



# Licensing Sub Committee

## Agenda

**Tuesday, 11 April 2023 at 12.00 p.m.  
Council Chamber - Town Hall, Whitechapel**

### Contact for further enquiries:

Farzana Chowdhury, Democratic Services Officer,

farzana.chowdhury@towerhamlets.gov.uk

020 7364 3037

Town Hall, 160 Whitechapel Road, London, E1 1BJ

<http://www.towerhamlets.gov.uk/committee>



## Public Information

### Viewing or Participating in Committee Meetings

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**Please note:** Whilst the meeting is open to the public, the public seating in the meeting room for observers may be limited due to health and safety measures. You are advised to contact the Democratic Services Officer to reserve a place.

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## **A Guide to Licensing Sub Committee**

The Licensing Sub Committee is made up of 3 Members of the Licensing Committee. In summary, the Sub Committee will determine applications to grant, vary or review a license submitted under the Licensing Act 2003 where representations have been made.

### **Public Engagement**

Meetings of the committee are open to the public to attend, and a timetable for meeting dates and deadlines can be found on the council's website.

# London Borough of Tower Hamlets

## Licensing Sub Committee

Tuesday, 11 April 2023

12.00 p.m.

### **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

### **1. DECLARATIONS OF INTEREST (PAGES 7 - 8)**

Members are reminded to consider the categories of interest, identified in the Code of Conduct for Members to determine: whether they have an interest in any agenda item and any action they should take. For further details, see the attached note from the Monitoring Officer.

Members are also reminded to declare the nature of the interest at the earliest opportunity and the agenda item it relates to. Please note that ultimately it is the Members' responsibility to identify any interests and also update their register of interest form as required by the Code.

If in doubt as to the nature of an interest, you are advised to seek advice prior the meeting by contacting the Monitoring Officer or Democratic Services.

### **2. RULES OF PROCEDURE (PAGES 9 - 18)**

To note the rules of procedure which are attached for information.

### **3. ITEMS FOR CONSIDERATION**

### **4. Application to Review the Premises Licence for The London Cocktail Club 9 Cabot Square Canary Wharf E14 4EB (PAGES 19 - 314)**

Licensing Objectives:

- Protection Of Children From Harm
- Prevention Of Crime And Disorder

Representations:

- Metropolitan Police

**Canary Wharf Ward**



## 5. **EXTENSION OF DECISION DEADLINE: LICENSING ACT 2003**

The Sub Committee may be requested to extend the decision deadline for applications to be considered at forthcoming meetings due to the volume of applications requiring a hearing. Where necessary, details will be provided at the meeting.

### **Next Meeting of the Licensing Sub Committee**

Tuesday, 25 April 2023 at 6.30 p.m. to be held in Council Chamber - Town Hall, Whitechapel



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# Agenda Item 1

## **DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER**

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

### **(i) Disclosable Pecuniary Interests (DPI)**

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

**DPI Dispensations and Sensitive Interests.** In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

### **(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)**

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

### **(iii) Declarations of Interests not included in the Register of Members' Interest.**

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

### **Guidance on Predetermination and Bias**

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

### **Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting**

In such circumstances the member may not vote on any reports and motions with respect to the matter.

**Further Advice** contact: Janet Fasan, Monitoring Officer, Tel: 0207 364 4800.

## **APPENDIX A: Definition of a Disclosable Pecuniary Interest**

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either—  (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or  (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

## TOWER HAMLETS



### LICENSING COMMITTEE

#### RULES OF PROCEDURE GOVERNING APPLICATIONS FOR PREMISES LICENCES AND OTHER PERMISSIONS UNDER THE LICENSING ACT 2003

<b>Date Last Reviewed:</b>	14 <sup>th</sup> June 2016
<b>Reviewed By:</b>	Senior Corporate and Governance Legal Officer
<b>Approved By:</b>	Licensing Committee
<b>Date Approved:</b>	14 <sup>th</sup> June 2016
<b>Version No.</b>	1
<b>Document Owner:</b>	Paul Greeno
<b>Post Holder:</b>	Senior Corporate and Governance Legal Officer
<b>Date of Next Scheduled Review:</b>	31 <sup>st</sup> March 2018



## **1. Interpretation**

- 1.1 These Procedures describe the way in which hearings will be conducted under the Licensing Act 2003, as set out in the Licensing Act 2003 (Hearings) Regulations 2005 (as amended) ('the Hearings Regulations'). The Procedures take into account the Licensing Act (Premises Licences and Club Premises Certificates) Regulations 2005.
- 1.2 Except where otherwise stated, references in this Code are to the Licensing Committee and its Sub-committees and the expression 'Licensing Committee' should be interpreted accordingly.
- 1.3 The Hearings Regulations provide (Regulation 21) that a Licensing Authority shall, subject to the provisions of those Regulations, determine for itself the procedure to be followed at a hearing.
- 1.4 These Procedures, therefore, set out the way in which Licensing Committee Meetings will be conducted under the Licensing Act 2003, following the requirements of the Hearings Regulations.
- 1.5 Proceedings will not be rendered void only as the result of failure to comply with any provision of the Hearings Regulations (Regulation 31) save that in any case of such an irregularity, the Licensing Committee shall, if it considers that any person may have been prejudiced as a result of the irregularity, take such steps as it thinks fit to cure the irregularity before reaching its determination (Regulation 32).

## **2. Composition of Sub-Committee**

- 2.1 The Sub-Committee will consist of three (3) members and no business shall be transacted unless three (3) members of the Licensing Committee are present and able to form a properly constituted Licensing Sub-Committee. In such cases the Chair shall have a second or casting vote.

## **3. Procedure**

- 3.1 The hearing shall take place in public save that the Licensing Committee may exclude the public from all or part of a hearing where it considers that, on balance, it is in the public interest to do so. The parties and any person representing them may be excluded in the same way as another member of the public. Any person so excluded may, before the end of the hearing, submit to the Licensing Committee in writing, any information which, they would have been entitled to give orally had they not been required to leave. Where there are a number of items on the agenda, the adjournment of that item for a short period, whilst another item is heard, may allow this process to be carried out effectively.

- 3.2 The Chair will begin by asking the parties to identify themselves and confirm whether or not they are represented.
- 3.3 The Licensing Committee should always satisfy itself that sufficient notice of the hearing has been given to all parties and if not satisfied, then the Licensing Committee should take such steps as it thinks fit to deal with that issue before reaching its determination and this could include adjourning that application to a later date.
- 3.4 The Licensing Committee will then consider any requests by a party for any other person to be heard at the hearing in accordance with the Regulations. Permission will not be unreasonably withheld provided proper notice has been given.
- 3.5 The Chair will then explain how the proceedings will be conducted, and indicate any time limits that may apply to the parties to the application. In setting time limits, the Licensing Committee will take into account the importance of ensuring that all parties receive a fair hearing, and the importance of ensuring that all applications are determined expeditiously and without undue delay. Further the Licensing Committee must have regard to the requirement to allow each party an equal amount of time.
- 3.6 If a party considers that any time limit is not sufficient then they should address the Licensing Committee and which will determine accordingly.
- 3.7 If any party has informed the Authority that they will not be attending or be represented at the hearing or any party does not give notice that they will not be attending but fails to attend and is not represented, the Licensing Committee may proceed in their absence or adjourn the hearing if it considers it to be necessary in the public interest. An adjournment will not be considered where due to the operation of the Hearing Regulations it would not be possible to adjourn.
- 3.8 If the Licensing Committee adjourns the hearing to a specified date it must specify the date, time and place to which the hearing has been adjourned and why it is considered necessary in the public interest.
- 3.9 If the Licensing Committee holds the hearing in the absence of a party, it will consider at the hearing the application, representation or notice given by that party.
- 3.10 The Chair will invite an Officer of the Licensing Section to present the report by briefly summarising the application and the number and type of the representations as set out in the papers circulated. The Officer will also advise of any discussions held with the parties; any amendments made to the application; any representations withdrawn; and any agreed conditions that the Licensing Committee is being asked to consider. The Officer shall not give

any opinion on the application or ask the Committee to make an inference based on such an opinion.

- 3.11 Members of the Licensing Committee can then ask questions of clarification of the Licensing Officer or seek legal advice from the Legal Adviser to the Licensing Committee if they require in respect of matters raised during the presentation by the Licensing Officer.
- 3.12 The Legal Adviser to the Licensing Committee will then give any relevant legal advice that the Licensing Committee need to take into consideration.
- 3.13 The Chair will then ask the applicant or their representative, if present, to present a summary of the nature and extent of the application. This should be brief, avoid repetition of material already available to the Licensing Committee in the Officer's report or otherwise, and include any reasons why an exception should be made to the Council's Licensing Policy, where appropriate, and respond to the written representations received. The submission may be followed by the evidence of any person who has been given permission by the Committee to give supporting evidence on behalf of the applicant or who has made a representation in favour of the application.
- 3.14 The application is to be presented within the time limit that has been set.
- 3.15 Where an applicant is unrepresented and having difficulty in presenting their application then the Legal Adviser to the Licensing Committee may ask questions of the applicant so that the relevant points are addressed and clarified for the Licensing Committee.
- 3.16 Members of the Licensing Committee may ask questions of the person presenting the case after their address as well as any other person who has spoken in support of the application. Members can also ask questions of the applicant as well as any other person present for the applicant who they consider can assist.
- 3.17 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.18 The Chair will then ask the persons who have made representations against the application to address the Licensing Committee within the time limit that has been set. They should not repeat what is already set out in their representations or notice or raise new matters. In their address they should provide clarification on any points previously requested by the Council. The submission may be followed by the evidence of any person who has been given permission by the Committee to give supporting evidence.
- 3.19 Members of the Licensing Committee may then ask questions of the persons making representations against the application and any other person who has

spoken in support of such representation. Members can also ask questions of any other person present who they consider can assist.

- 3.20 The Legal Adviser to the Licensing Committee may ask questions for the purpose of clarifying points for the Licensing Committee.
- 3.21 Petitions will be treated as representations provided they meet the requirements for relevant representations set out in the Licensing Act 2003. Members should proceed with caution when relying upon petitions used as evidence due to the structure and wording used.
- 3.22 The Licensing Committee will disregard any information given by a party, or any other person appearing at the hearing, which is not relevant to:
- a) their application, representation or notice; and
  - b) the promotion of the licensing objectives or the crime prevention objective where notice has been given by the police.
- 3.23 The Chair will intervene at any stage of the hearing to prevent repetitious or irrelevant points being raised.
- 3.24 Cross examination of any party or any other person allowed to appear will not be allowed unless specifically permitted by the Chair.
- 3.25 There is no right for any party to sum up but they may be permitted to do at the discretion of the Chair and within time limits prescribed by the Chair.
- 3.26 The Licensing Committee will consider its decision in private save that the Legal Adviser and Democratic Services Officer will remain with them.
- 3.27 The Licensing Committee will normally return to open session to announce its decision but in cases where the prescribed time limit allows for a later determination and it is appropriate to determine the matter within that time then the Chair will advise the parties present that the decision will not be announced then but that the determination will take place within the prescribed time limit and that written notification will be dispatched to all parties advising them of the determination.

#### **4. Exclusions**

- 4.1 In addition to any exclusion under paragraph 3.1 above, The Licensing Committee may require any person attending the hearing who in their opinion is behaving in a disruptive manner to leave the hearing and may refuse to permit the person to return; or allow them to return only on such conditions as Licensing Committee may specify.

- 4.2 Any person so excluded may, before the end of the hearing, submit to the Authority in writing, any information which, they would have been entitled to give orally had they not been required to leave.

## Guidance for Licensing Sub-Committee Meetings.

### (1) Attendance at Meetings.

All meetings of the Sub-Committee are open to the public and press to attend. On rare occasions, the Sub-Committee may retire to consider private business that will be clearly marked on the agenda as such. The press and public will be excluded for those confidential items only. We try to keep confidential reports to an absolute minimum. We request that you show courtesy to all present and please keep mobile phones on silent. Meetings can reach full capacity and seats are allocated on a first come first come served basis.

### (2) Licensing Sub-Committee Role and Membership.

In summary, the Sub-Committee will consider and determine applications to grant, vary or review a license submitted under the Licensing Act 2003 where representations have been made. The full terms of reference can be found on the Committee webpages (see below). The Licensing Sub-Committee will consist of 3 Members of the main Licensing Committee. Meetings are normally held in the Town Hall Council Chamber.

#### Licensing Sub-Committee Webpages

To view go to the Committee and Member Services web page: [www.towerhamlets.gov.uk/committee](http://www.towerhamlets.gov.uk/committee) - 'agenda, reports, decisions and minutes', then click on 'Licensing Sub-Committee'.

The pages include:

- Terms of Reference for the Licensing Sub-Committee.
- Meeting dates, agendas and minutes.
- Agenda timetable including agenda publication dates. (To view click 'browse meetings and agendas for this committee', then 'show agenda management timetable').

### (3) Access to Committee Papers.

The agenda for Sub-Committee meetings is published five clear (working) days before the Sub-Committee meeting on the Committee webpages (except for certain types of applications where special rules apply). All Committee papers (i.e. agendas, reports, minutes and decisions) are published on the website and also available on iPad and Android tablet apps downloadable for free from their respective app stores.

### (4) Who can speak at Licensing Sub-Committee meetings?

Only interested parties may address the Sub-Committee (those who have made a valid representation) and the applicant and their representatives. Although the Sub-Committee may allow other persons to present the interested parties evidence or to give supporting evidence. If you are planning to attend the hearing to address the committee, you are advised to contact the Committee officer - see the Committee

pages and agenda front page for contact details. Speakers are advised to arrive at the start of the meeting in case the order of business is changed. Speakers will be called to speak by the Chair at the appropriate time. If speakers are not present by the time their application is heard, the Committee may consider the item in their absence.

**(5) What can be circulated?**

Should you wish to submit any material, please contact the Committee/Licensing Officer as soon as possible. The Sub-Committee may accept information at the hearing, however this is only with the agreement of all parties present.

**(6) How will the applications be considered?**

The Sub-Committee will normally consider the items in agenda order subject to the Chair’s discretion. The hearing procedure is detailed at the end of this guidance.

**(7) How can I find out about a decision?**

You can contact Democratic Services the day after the meeting to find out the decisions.

**(8) Queries on reports.**

For any questions, please contact the Officer named on the front of the report.

Typical Seating Plan for Licensing Sub - Committee Meetings in the Town Hall Council Chamber.

Public Seating		Objectors Benches		Sub-Committee Members
Public Seating				Chair
Public Seating				Legal Officer
Public Seating		Applicants Benches		Committee Officer
Public Seating				Licensing Officer



## **LICENSING SUB COMMITTEE HEARING PROCEDURE**

All interested parties to the hearing must notify Democratic Services within prescribed timescales that they intend to attend and/or be represented at the hearing and whether any witnesses will be attending on their behalf. The meeting will be in the form of a discussion led by the Sub Committee, cross examination of either party will not be permitted.

The Chair will allocate an equal amount of speaking time to each party. Where there is more than one representation raising the same or similar grounds, those parties should consider nominating a single representative to address the Sub-Committee on their behalf at the hearing.

The hearing will proceed as follows (subject to the discretion of the Chair).

1. Chair will introduce him/herself and ask Members, officers, and all interested parties present at the meeting to introduce themselves.
2. Licensing Officer to present the report.
3. Committee Members to ask questions of officer (if any).
4. The Applicant to present their case in support of their application (including any witnesses they may have).
5. Committee Members to ask questions of applicants and their witnesses or ask for points of clarification.
6. The relevant Responsible Authorities in attendance will present their case and their reasons for representation (including any witnesses they may have).
7. The Objectors/Interested Parties in attendance will present their case and their reasons for objecting (including any witnesses they may have).
8. Committee Members to ask questions of Responsible Authorities, objectors and their witnesses or ask for points of clarification.
9. Applicant (with exception and with permission of the Chair) can ask questions of the other parties to the hearing and their witnesses.
10. Interested Parties to the hearing (with exception and with the permission of the Chair) can ask questions of the applicant/other parties to the hearing and their witnesses.
11. Chair's closing remarks
12. Sub-Committee retire from the meeting with the Committee Officer and Legal Officer and consider their decision.
13. The Sub-Committee will return to the meeting and Chair announces the decision together with the reasons for the decision and any right to appeal.
14. A Decision letter will be sent to all interested parties confirming the decision made.

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# Agenda Item 4

Committee: <b>Licensing Sub-Committee</b>	Date:	Classification: <b>UNRESTRICTED</b>	Report No.	Agenda Item No.
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Report of: <b>David Tolley</b> <b>Head of Environmental Health &amp; Trading Standards</b>  Originating Officer: <b>Lavine Miller-Johnson</b> <b>Licensing Officer</b>	Title: <b>Licensing Act 2003</b>  <b>Application to Review the Premises Licence for The London Cocktail Club 9 Cabot Square Canary Wharf E14 4EB</b>  Ward affected: <b>Canary Wharf</b>
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## 1.0 Summary

Name and Address of premises: **The London Cocktail Club  
9 Cabot Square  
Canary Wharf  
London  
E14 4EB**

Licence under review: **Licensing Act 2003**  
▪ **Sale by retail of alcohol**

Representations: **Police**

## 2.0 Recommendations

2.1 That the Licensing Committee considers the application for review and then adjudicates accordingly.

### LOCAL GOVERNMENT 2000 (Section 97) LIST OF "BACKGROUND PAPERS" USED IN THE DRAFTING OF THIS REPORT

Brief description of "background paper"	Tick if copy supplied for register	If not supplied, name and telephone number of holder
<ul style="list-style-type: none"><li>Guidance Issued under Section 182 of the Licensing Act 2003</li><li>Tower Hamlets Licensing Policy</li><li>File</li></ul>		Lavine Miller-Johnson 020 7364 2665

### 3.0 Review Application

- 3.1 This is an application for a review of the premises licence for The London Cocktail Club 9 Cabot Square London E14 4EB. The review was triggered by The Metropolitan Police.
- 3.2 A copy of the review application and supporting evidence MR/01 – MR/08 is attached in **Appendix 1**.

### 4.0 The Premises

- 4.1 The premises licence was issued on 21<sup>st</sup> March 2022. The premises licence holder is The London Cocktail Club Limited. Emma Heaney had been the DPS since the licence was granted in March 2022. A vary DPS was made 10<sup>th</sup> January 2023 to Simon Charles Kennington. A copy of the current licence is contained in **Appendix 2**.
- 4.2 Maps showing the premises, surrounding area and vicinity of local residents are included in **Appendix 3**.

### 5.0 Representations

- 5.1 This hearing is required by the Licensing Act 2003, because a review has been triggered by the Police.
- 5.2 Only representations that relate to the following licensing objectives are relevant:
- the prevention of crime and disorder
  - public safety
  - the prevention of public nuisance
  - the protection of children from harm
- 5.3 In the view of the interested party and the responsible authorities it is necessary to achieve the licensing objectives of the Protection of children from harm and prevention of crime & disorder.
- 5.4 Supporting representation received
- (Giuseppe Talio) **Appendix 4**
  - (Sophie Cann) **Appendix 5**

### 6.0 Review Explained

- 6.1 The Licensing Act 2003 was described by the Government at the time as “light touch” but as Baroness Blackstone stated in the Lords at the time of the second reading (26 Nov 2002) “Local residents and businesses as well as expert bodies, will have the power to request that the licensing authority review existing licences where problems arise. Such a review

could result in the modification of the licence, its suspension, or ultimately, revocation.”

- 6.2 The Home Office has issued guidance under Section 182 of the Licensing Act 2003 in relation to reviews and that is contained in **Appendix 6**. It is available on the Government’s website, [www.homeoffice.gov.uk](http://www.homeoffice.gov.uk). It was last revised in December 2022.
- 6.3 Members are particularly asked to note the comments in relation Crime and Disorder. In particular the home office advice is that “The role of the licensing authority when determining such a review is not therefore to establish the guilt or innocence of any individual but to ensure that the crime prevention objective is promoted.”
- 6.4 In relation to its advice on representations the home office has also advised that “there is no requirement for an interested party or responsible authority to produce a recorded history of problems at a premises to support their representations.” It has also issued revised guidance about Crime and Disorder. **See Appendix 7**.
- 6.5 Members should also note the Council’s Licensing Policy in relation to Crime and Disorder, the relevant parts of which are contained in **Appendix 8**.
- 6.6 Guidance Issued by the Home Office concerning Protection of children from Harm **Appendix 9**.
- 6.7 London Borough of Tower Hamlets Policy in relation to the Protection of Children from Harm **Appendix 10**.
- 6.8 The Home Office has advised that in relation to reviews “ Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation. ”
- 6.9 An interested party or a responsible authority can trigger a review at any time, but the grounds must be relevant to the licensing objectives. The form of the application, and the advertisement of the review are the subject of regulations (The Licensing Act 2003 (Premises Licences and Club Premises Certificate) Regulations 2005). In addition, the licensing authority has to satisfy itself of certain matters in relation to the Licensing Act 2003. The Licensing & Safety Team Leader is the delegated officer who deals with this on behalf of the Licensing Authority. All the matters

stated in 5.0 were considered before any representations were accepted for inclusion in this report.

6.10 The Licensing Act 2003 requires that the Licensing Authority satisfies itself that it should reject the grounds for a review because:

- The ground is not relevant to one or more of the licensing objectives
- In the case of an application by a local resident that the application is frivolous, vexatious or repetitious.

## 7.0 Review Advertisement

7.1 The review was advertised by a blue poster, next to the premises, by the Licensing Section. This was periodically monitored by the Section to ensure it was on continuous display, and replaced as necessary. It was also advertised at Mulberry Place, 5 Clove Crescent, London E14 2BG.

7.2 The party that triggers the review must notify the licence holder and responsible authorities. The review documents were sent to the licence holders.

7.3 The procedure for a review can be summarised as follows:

- A review is triggered by a responsible authority or interested party
- Consultation is conducted for 28 full days
- Other responsible authorities or interested parties may join in the review
- Members conduct a hearing
- Members make a determination
- All the parties to the review have the right of appeal to the magistrates court (i.e. the licence holder, the person who triggered the review and those who have made a representation).

## 8.0 Licensing Officer Comments

8.1 When licence holders or designated premises supervisors move, leave a premises or dispose of their premises they remain responsible in law until they have informed the licensing authority and surrendered the licence or arranged a transfer, which may involve notification to the Police as well. Any licensees or designated premises supervisors who are not sure what to do should contact the licensing authority. Please note that should the DPS cease to work/be employed by the premises the Licensing Authority will consider that there is no DPS for those premises.

This consideration shall apply regardless of whether that person is still named on the Premises Licence, or whether they have asked for their name to be removed from it. This consideration shall apply until such time that an application is received to nominate a new premises supervisor. In such cases, the Licensing Authority shall expect no sales of alcohol to take place until an application to vary the DPS has been submitted to the Licensing Authority. (27.1 Licensing Policy)

8.2 The Governments advice in relation to reviews is contained in **Appendix 6**. Members must consider all the evidence and then decide from the following alternatives:

- modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;
- exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption);
- remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;
- suspend the licence for a period not exceeding three months;
- revoke the licence.

8.3 The licence should only be suspended or revoked if Members believe that alterations to the existing licence, including imposing new conditions does not have a reasonable prospect of ensuring that the licensing objectives are met.

8.4 Members should bear in mind that conditions may not be imposed for any purpose other than to meet the licensing objectives.

8.5 In all cases the Members should make their decision on the civil burden of proof that is “the balance of probability.”

8.6 In all cases Members should consider whether or not primary legislation is the appropriate method of regulation and should only consider licence conditions when the circumstances in their view are not already adequately covered elsewhere.

## 9.0 Legal Comments

9.1 The Council’s legal officer will give advice at the hearing.

## 10.0 Finance Comments

10.1 There are no financial implications in this report.



## 11.0 Appendices

- |                    |   |
|--------------------|---|
| <b>Appendix 1</b>  | Copy of the review application & Evidence supporting review   |
| <b>Appendix 2</b>  | Current Premises Licence  |
| <b>Appendix 3</b>  | Maps of the premises and surrounding area   |
| <b>Appendix 4</b>  | Supporting representation (Giuseppe Talio)  |
| <b>Appendix 5</b>  | Supporting representation (Sophie Cann)   |
| <b>Appendix 6</b>  | Guidance issued under Section 182 by the Home Office for reviews  |
| <b>Appendix 7</b>  | Guidance Issued by the Home Office under Section 182 of the Licensing Act 2003 concerning Crime and Disorder                |
| <b>Appendix 8</b>  | London Borough of Tower Hamlets Licensing Policy in relation to the prevention of Crime and Disorder                        |
| <b>Appendix 9</b>  | Guidance Issued by the Home Office under Section 182 of the Licensing Act 2003 concerning Protection of children from Harm. |
| <b>Appendix 10</b> | London Borough of Tower Hamlets Policy in relation to the Protection of Children from Harm.                                 |

# Appendix 1

### Review of a premises licence or club premises certificate

To review a licence you must be one of the following:

- 'Responsible Authority' (i.e. Police, Environmental Protection, Trading Standards etc); and
- Other persons (i.e any individual, local resident, body or business)

The review must relate to a particular premises and can be triggered if there is evidence that one or more of the following licensing objectives are not being promoted:

- the prevention of crime and disorder
- the prevention of public nuisance
- public safety
- the protection of children from harm

As well as returning the completed review application to the Licensing Authority, you will need to notify the holder of the premises licence and each responsible authority of their request, by sending them a copy of the application for review together with any accompanying documents, on the same day as the application is given to the relevant licensing authority.

The addresses you will need are attached in the Appendix.

The licensing authority can reject any ground for a review if it considers it to be frivolous, vexatious or a repetition. If not rejected, the licensing authority must hold a hearing to consider the application. You will be notified of the date of the hearing.

If you would like a copy of the London Borough of Tower Hamlets' Licensing Policy, please contact the Licensing Section or go to the Councils web page: [www.towerhamlets.gov.uk/licensing](http://www.towerhamlets.gov.uk/licensing)

If you need any further help then please contact the licensing section, and we will be happy to help.

#### **The Licensing Authority**

Licensing Team  
Environmental Health & Trading Standards  
Mulberry Place  
5 Clove Crescent  
London E14 2BG

Tel: 020 7364 5008

Email: [licensing@towerhamlets.gov.uk](mailto:licensing@towerhamlets.gov.uk)

## Responsible Authorities (Appendix 2)

There are a number of "Responsible Authorities". These have been designated by the Government. All new (including time-limited) and variation applications have to be sent to the responsible authorities.

<p><b>The Licensing Authority</b> Licensing Team Environmental Health &amp; Trading Standards Mulberry Place 5 Clove Crescent London E14 2BG</p> <p>Tel: 020 7364 5008 Email: <a href="mailto:licensing@towerhamlets.gov.uk">licensing@towerhamlets.gov.uk</a></p>	<p><b>The Chief Officer of Police</b> Metropolitan Police Service (MPS) Central East Licensing Unit Licensing Office 2<sup>nd</sup> Floor Stoke Newington Police Station 33 Stoke Newington High Street London N16 8DS</p> <p>Tel: 07557 572 168 E: <a href="mailto:CEMailbox-TowerHamletsLicensing@met.police.uk">CEMailbox-TowerHamletsLicensing@met.police.uk</a></p>
<p><b>The Fire Authority</b> London Fire Brigade Fire Safety Regulation Helpdesk 169 Union Street London SE1 0LL</p> <p>Tel: 020 8555 1200 x 89170 Email: <a href="mailto:FSR-AdminSupport@london-fire.gov.uk">FSR-AdminSupport@london-fire.gov.uk</a></p>	<p><b>Health and Safety</b> Environment Health and Trading Standards Mulberry Place 5 Clove Crescent London E14 2BG</p> <p>Tel: 020 7364 5008 Email: <a href="mailto:Healthand.Safety@towerhamlets.gov.uk">Healthand.Safety@towerhamlets.gov.uk</a></p>
<p><u>Note:</u></p> <p><i>If you are not sure you will need to check which organisation is responsible for health and safety before you send off your forms.</i></p> <p><i>For Vessels, see the next page for further details</i></p>	<p style="text-align: center;"><u>(Only if applicable)</u></p> <p><b>Health and Safety Executive</b> Field Operations Division 4<sup>th</sup> Floor, North Wing Rose Court, 2 Southwark Bridge London SE1 9HS</p> <p>Tel: 020 7556 2100 Email: <a href="mailto:Formsadmin.London@hse.gov.uk">Formsadmin.London@hse.gov.uk</a></p>

<p><b>Local Weights and Measures Authority</b>  Trading Standards  Administration Section  Environment Health and Trading Standards  Mulberry Place  5 Clove Crescent  London E14 2BG</p> <p>Tel: 020 7364 5008  E: <a href="mailto:Trading.Standards@towerhamlets.gov.uk">Trading.Standards@towerhamlets.gov.uk</a></p>	<p><b>Planning Authority</b>  Planning Department  London Borough of Tower Hamlets  Mulberry Place  5 Clove Crescent  London  E14 2BG</p> <p>Tel: 020 7364 5009  E: <a href="mailto:Development.Control@towerhamlets.gov.uk">Development.Control@towerhamlets.gov.uk</a></p>
<p><b>Environmental Health Noise Team</b>  London Borough of Tower Hamlets  Administration Section  Mulberry Place  5 Clove Crescent  London E14 2BG</p> <p>Tel: 020 7364 5007  E: <a href="mailto:Environmental.Health@towerhamlets.gov.uk">Environmental.Health@towerhamlets.gov.uk</a></p>	<p><b>Child Protection - Licensing</b>  4<sup>th</sup> Floor  Mulberry Place  5 Clove Crescent  London  E14 2BG</p> <p>Tel: 020 7364 2135 / 020 7364 0677  <a href="mailto:Licensing-ChildProtection@towerhamlets.gov.uk">Licensing-ChildProtection@towerhamlets.gov.uk</a></p>
<p><b>Public Health</b>  Director of Public Health Tower Hamlets  4th floor  Mulberry Place  5 Clove Crescent  London E14 2BG</p> <p>Tel: 020 7364 7014  E: <a href="mailto:PublicHealthLicensing@towerhamlets.gov.uk">PublicHealthLicensing@towerhamlets.gov.uk</a></p>	<p><b>Home Office Immigration Enforcement</b>  Home Secretary  Alcohol Licensing Team  Lunar House  40 Wellesley Road  Croydon  CR9 2BY</p> <p>E: <a href="mailto:alcohol@homeoffice.gsi.gov.uk">alcohol@homeoffice.gsi.gov.uk</a></p>

**FOR VESSELS NOT PERMANENTLY MOORED**

<p><b>Tidal River Thames  Port of London Authority</b>  London River House  Royal Pier Road  Gravesend  Kent DA12 2BG</p> <p>Tel. 01474 562 200  Email: <a href="mailto:lic.app@pla.co.uk">lic.app@pla.co.uk</a></p>	<p><b>Navigation Authority  Canal &amp; River Trust</b>  First Floor North  Station House  500 Elder Gate  Milton Keynes  MK9 1BB</p> <p>Tel: 0303 040 4040  Email: <a href="mailto:customer.services@canalrivertrust.org.uk">customer.services@canalrivertrust.org.uk</a></p>
<p><b>The Maritime Coastguard Agency</b>  Marine Office  Central Court  1B Knoll Rise  Orpington  Kent BR6 0JA</p> <p>Tel: 01689 890 400  Email: <a href="mailto:helen.duncan@mcga.gov.uk">helen.duncan@mcga.gov.uk</a></p>	<p>If you are not sure where to send a copy of your application (s) to then please contact the Licensing Authority.</p> <p>For further information, visit  <a href="http://www.towerhamlets.gov.uk/licensing">www.towerhamlets.gov.uk/licensing</a></p>

## Licensing Act 2003

### **Requesting a review of a premises licence**

An interested party or responsible authority can, at any time, apply to the licensing authority for a review of a premises licence on a ground relating to one or more of the licensing objectives. An application for the review of a premises licence or club premises certificate must be given in writing and be in the prescribed form. Licensing authorities may make provision for applications for reviews to be made electronically, but this should be agreed in advance.

The person or body requesting the review must notify the holder of the premises licence and each responsible authority of their request, by sending them a copy of the application for review, together with any accompanying documents, on the same day as the application is given to the relevant licensing authority. The licensing authority must advertise the application for the review and invite representations from responsible authorities and interested parties. An interested party or a responsible authority has a period of 28 days in which to make representations to the relevant licensing authority.

The licensing authority can reject any grounds for a review if it considers it to be frivolous, vexatious or a repetition. If not rejected, the licensing authority must hold a hearing to consider the application.

### **How do I apply for a review of a premises licence?**

An application for the review of a premises licence or club premises certificate must be given in writing and be in the prescribed form. Licensing authorities may make provision for applications for reviews to be made electronically, but you should check with the relevant licensing authority first.

The person or body requesting the review must notify the holder of the premises licence and each responsible authority of their request, by sending them a copy of the application for review, together with any accompanying documents, on the same day as the application is given to the relevant licensing authority.

### **What happens next?**

The relevant licensing authority must advertise the application for the review by displaying a pale blue A4 (or larger) notice, printed legibly in black ink or typed in black, in a size equal to 16 font (or larger):

- Prominently at, on or near the premises to which the application relates, where it can be conveniently read from the exterior of the premises by the



public (where the premises covers an area of more than 50m squared, a further notice in the same form and subject to the same requirements every 50 metres along the external perimeter of the premises abutting any highway). The notice must be displayed for 28 consecutive days, starting on the day after the application is given to the relevant licensing authority

- At the offices, or the main offices of the licensing authority in a central and conspicuous place
- In a case where the relevant licensing authority maintains a website for the purpose of advertisement of applications given to it, by publication of a notice on that website

The notice must be displayed for 28 consecutive days, starting on the day after the application is given to the relevant licensing authority.

An interested party or a responsible authority has this period of 28 days in which to make representations to the relevant licensing authority.

The licensing authority can reject any ground for the review if it considers it to be frivolous, vexatious or repetitious. If not rejected, the licensing authority must hold a hearing to consider the application.

In the case of a review of a premises licence following a closure order by a magistrates court, an interested party or a responsible authority has a period of 7 days from when the licensing authority receives the order, in which to make representations about the review.

### **What information needs to be included in the advertisement for review?**

Notices advertising applications for reviews and reviews of a premises licence following a closure order, need to state:

- The address of the premises about which an application for a review has been made
- The dates between which interested parties and responsible authorities may make representations
- The grounds of the application for review
- That postal address and website address (if any) where the register of the relevant licensing authority is kept and where and when the grounds for the review may be inspected
- That it is an offence knowingly or recklessly to make a false statement in connection with an application and the maximum fine for which a person is liable on summary conviction for the offence

Do I have to pay a fee?

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The Licensing Act 2003 (Fees) Regulations 2005 does not prescribe a fee for making representations, or applying for the review of a premises licence or club premises certificate.

Can the licensing authority make representations on a licence application or ask for a review of a licence?

No (except where a premises is situated in more than one area and a different licensing authority is determining the application) the Act does not give the licensing authority considering the application the power to make representation in relation to the application for a premises licence or request a review of a premises licence.

The same provisions apply in relation to club premises certificates and provisional statements.

## **Q&A**

**What are the licensing objectives?**

**What are relevant representations?**

**What does frivolous, vexatious or repetitious mean?**

### **What are the licensing objectives?**

The Act provides four objectives. In carrying out its functions the licensing authorities must do so with a view to promoting the objectives. They are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

These **licensing objectives** have been formulated to ensure that the carrying on of licensable activities is done in the overall public interest. Any representations made in relation to an application for a provisional statement, a premises licence or club premises certificate (or a variation) or in respect of a review must be about the likely effect of granting the application on the promotion of one or more of the licensing objectives.

### **What are relevant representations?**

In brief "relevant representations" is the expression used in the Act for comments including objections on applications etc.

For a representation to be relevant it must:

- Relate to the effect of the grant of the licence on the promotion of the licensing objectives
- Be made by an interested party or responsible authority
- Not have been withdrawn
- Not be 'frivolous or vexatious' or, in the case of a review, 'repetitious' if made by an interested party
- If it concerns the premises supervisor be made by a chief officer of police and include a statement explaining the reasons for the objection

The Secretary of State has made [regulations under the Licensing Act 2003](#) in relation to the making of representations.

### **What does frivolous, vexatious or repetitious mean?**

Frivolous or vexatious will bear their ordinary meaning. The licensing authority must form a view as to whether a reasonable person would consider the observations frivolous or vexatious.

In the case of a review of the licence, the Act provides that for a ground to be a repetition it must be identical or substantially similar to a ground for review already made. For a representation to be a repetition it is identical or substantially similar to one already considered by the authority before it determined an application, or the representation would have been considered but for the fact that they were excluded representations following a provisional statement. Further, the Act provides that it will be a repetition if a reasonable interval has not elapsed since the earlier application or review.

For any further enquiries please contact:

### **London Borough of Tower Hamlets - Licensing Section**

Mulberry Place  
5 Clove Crescent  
London  
E14 2BG

**Tel:** 020 7364 5008  
**Fax:** 020 7364 0863  
**Email:** [licensing@towerhamlets.gov.uk](mailto:licensing@towerhamlets.gov.uk)

**Note:** You do not need to submit all the above guidance notes with this review application.



This form should be completed and forwarded to:

**London Borough of Tower Hamlets**  
Licensing Section, Mulberry Place, 5 Clove Crescent, London E14 2BG

**Application for the review of a premises licence or club premises certificate  
under the Licensing Act 2003**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form.  
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.  
You may wish to keep a copy of the completed form for your records.

**I PC Michael RICE (*Insert name of applicant*) apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)**

**Part 1 – Premises or club premises details**

<b>Postal address of premises or club premises, or if none, ordnance survey map reference or description</b>	
The Cocktail Club, 9 Cabot Square, Canary Wharf.	
<b>Post town</b>	<b>Post code (if known) E14 4EB</b>

**Name of premises licence holder or club holding club premises certificate (if known)**

**The London Cocktail Club Limited**

**Number of premises licence or club premises certificate (if known)**

**146190**

**Part 2 - Applicant details**

Please tick  yes

I am

- 1) an interested party (please complete (A) or (B) below) 
  - a) a person living in the vicinity of the premises
  - b) a body representing persons living in the vicinity of the premises
  - c) a person involved in business in the vicinity of the premises
  - d) a body representing persons involved in business in the vicinity of the premises
- 2) a responsible authority (please complete (C) below)
- 3) a member of the club to which this application relates (please complete (A) below)

**(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)**

Mr  Mrs  Miss  Ms  Other title   
(for example, Rev)

**Surname**

**First names**

**I am 18 years old or over**

Please tick  yes

**Current postal address if different from premises address**

**Post Town**

**Postcode**

**Daytime contact telephone number**

**E-mail address (optional)**

(B) DETAILS OF OTHER APPLICANT

Mr  Mrs  Miss  Ms  Other title   
(for example, Rev)

<b>Surname</b>	<b>First names</b>
<input type="text"/>	<input type="text"/>

I am 18 years old or over

Please tick  yes

<b>Current postal address if different from premises address</b>	<input type="text"/>
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<b>Post Town</b>	<input type="text"/>	<b>Postcode</b>	<input type="text"/>
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<b>Daytime contact telephone number</b>	<input type="text"/>
---	----------------------

<b>E-mail address (optional)</b>	<input type="text"/>
----------------------------------	----------------------

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

<b>Name and address</b>  Central East Police Licensing, Metropolitan Police, 1 <sup>st</sup> Floor, Stoke Newington Police Station, 33 Stoke Newington High Street, London, N16 8DS.
<b>Telephone number (if any)</b>
<b>E-mail (optional)</b>





**This application to review relates to the following licensing objective(s)**

Please tick one or more boxes

- |   |                                     |
|---|-------------------------------------|
| 1) the prevention of crime and disorder | <input checked="" type="checkbox"/> |
| 2) public safety                        | <input type="checkbox"/>            |
| 3) the prevention of public nuisance    | <input type="checkbox"/>            |
| 4) the protection of children from harm | <input checked="" type="checkbox"/> |

**Please state the ground(s) for review** (please read guidance note1)

Central East Police Licensing request the review of The Cocktail Club, 9 Cabot Square, Canary Wharf, E14 4EB for failing to uphold the Licensing Objectives of preventing crime and disorder and protection of children from harm. The Cocktail Club licence was granted on the 1<sup>st</sup> July 2022 however it opened to the public on the 14<sup>th</sup> October 2022.

**Summary of investigation findings.**

In the early hours of Saturday 3<sup>rd</sup> December 2022 Police were made aware of an incident at a bar in Shoreditch where a group of young women, some aged 16 had a drink spiked and collapsed. While investigating the incident we learnt that the two sixteen year old girls and the rest of their friends had been drinking at the Cocktail Club in Canary Wharf for around six hours just before going to Shoreditch, where they purchased alcohol and became intoxicated with one becoming so drunk she vomited inside the club.

At no point were any of the group asked to show any ID despite purchasing drinks at the bar a number of times. It is also very worrying that no member of the Cocktail Club staff spotted clearly underage girls who were drunk and vulnerable inside their venue let alone offered them support.

While investigating how this was able to happen at a licensed premises we have discovered that drunken fights and disorder have taken place at The Cocktail Club and the venue, with most seriously a number of sexual harassment allegations

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made by female customers. We also believe that other young people under 18 have been let into the venue and served alcohol.

#### **Evidence found during Investigation**

Central East Police Licensing Team visited the victim of the spiking after her discharge from hospital. She informed officers that her evening started at The Cocktail Club in Canary Wharf at around 6:30pm (Photograph MR/01 shows entry at 6:24pm). She and another 16 year old were due to meet friends for a night out. Both the 16 year old females were allowed entry into Cocktail Club, Canary Wharf without having their ID checked. A short while later, other members of the group have arrived at the venue, and again were allowed entry without having their ID checked. By this time one of the sixteen year old girls is stood at the bar ordering drinks picture (MR/02).

Police viewed CCTV from the Cocktail Club from reviewing the footage it becomes apparent that both sixteen year old girls are seen at the bar ordering drinks throughout the night. Staff are seen to serve them both cocktails and shots without challenge. The young teenage girls are served a significant amount of alcohol in a very short period of time, which as previously stated leads to one of the sixteen year old girls being sick onto the floor of the club where they are sat (please see picture MR/03).

After being sick the young girl and her friend run through the venue towards the toilet, with one clutching her mouth. This is directly next to a member of the security team who seems not to notice (picture MR/04). The 16 year old girl has been in the venue for less than 30 minutes.

Shortly after going to the toilet the same young female teenager is back at the bar ordering a drink (MR/05), she is stood alongside two friends using a Vape whilst waiting to be served. The young female and her young friends continue to be served



more alcohol, including shots throughout the night.

By 7:30pm about an hour after entering the venue, the group of young girls are clearly showing their age and the fact that they are intoxicated. Members of group run through the venue with no shoes on and one jumps onto the sofa at the booth they're sat at. By comparison other customers are sitting at their tables having drinks, no one else is seen running through the venue in an excitable, childish way.

At 9:15pm footage from the CCTV shows the majority of the group are at the bar. Some are ordering drinks with one of the sixteen year old girls buying at least two drinks from two separate members of bar staff. While at the bar one the girls becomes so drunk she needs to be helped to the toilets by a friend. Whilst on her way to the toilets she falls to the side and is helped by her friend who puts her arm around her shoulder to steady her so she does not fall to the floor. All this happens in the main area nearby to the bar, yet no action is taken by any staff to assist a vulnerable drunk teenager.

The group continue to purchase drinks and dance around the bar area. At around 11:30pm one of the sixteen year old girls is so intoxicated she is falling all over her friends and needs them to keep her from falling over. (MR/06) shows one of the girls trying to steady her but is almost pulled over by the drunk girl. She once again tries to go to toilet and again falls into a raised bar area. She is again helped by her friend to the toilet.

She comes back into the bar CCTV view at 11:36pm and is so drunk she is constantly having to be supported by her friend so she does not fall over. She attempts to dance but is so drunk she is unable to stand, instead having to hold onto the neck of her friend for support. Whenever she lets go she immediately stumbles into other people at the venue. Other members of the group seem to be doing an alcohol shot from a plastic syringe.

At 11:55pm, we believe the group is asked to leave or they do leave the venue.

From completing the review of CCTV, officers have also identified other customers, who we believe to be under 18 within the venue. From our review of the CCTV and other evidence none were asked for ID whilst at the bar or while entering the venue. Attached images MR/07 and MR/08 which show pictures of them. These individuals we believe to be under 18 can be observed both purchasing and drinking alcohol inside the Cocktail Club.

### **Police Visit to Cocktail Club Canary Wharf**

On Saturday 3<sup>rd</sup> December 2022 Central East Police Licensing visited the Cocktail Club due to the concerns raised by this incident. It was apparent to Police that the venue was not well run and staff had little concern or interest in the welfare of their customers. For example staff at the venue did not know how many customers they had inside.

We spoke at length to staff members about the importance of knowing how many people were inside their venue. Whilst there we conducted a walk-through of the premises, I particularly remember that the toilet facilities were in a poor state, the male toilet had a significant amount of urine on the floor as well as other mess. The disabled toilets were also in a similar state, with the door being wide open, allowing anyone the use of this. A disabled guest at this premises should not have to use facilities left in this condition.

We visited the venue during a busy period with people coming and going to the bar, during our visit we did not observe a single ID check taking place. Nor could we find any evidence of refusals for ID in any of the clubs documents. The Cocktail Club did not keep an alcohol refusal log behind the bar, so staff had no way of recording drunk people at the venue, and what happened to them. A consequence of which is

people being too drunk to be served alcohol, but allowed to remain in the venue, and going on to cause problems. Instances of this are shown in the venues own security book.

It was apparent that staff serving at the bar were reliant on security staff to conduct ID checks, they weren't undertaking any themselves. There is a culture and attitude among management and staff, that customer welfare is somebody else's responsibility.

#### **Harassment of female customers**

Whilst watching CCTV of the underage female group in the bar we saw very concerning images of sexual harassment directed at them. In the footage we see a male who seems to be making unwanted advances on a member of the girl's group. This includes grabbing a female around the neck, both sixteen year old girls seem to be concerned by this behaviour and make it clear that this person's behaviour is not wanted. This male then puts his arm around one of the sixteen year old girls and she almost immediately pulls away from him. After this the group continue to dance, but seem to deliberately try to exclude this male. No members of staff pick up on this behaviour and so no action is taken to deal with this male or protect the women.

We have also looked at the incident report book from the Cocktail Club which show an alarming number of female customers being harassed by men. The vast majority of these complaints are made by female customers to staff, yet the staff have failed to contact police.

**Harassment of female customers – as recorded in security log**

**26 November 2022 at 01:15am**

Sexual behaviour inside the venue. Final warning issued'

**3<sup>rd</sup> December 2022 - Time unknown**

Sexual harassment complain. Conflict management'

**3<sup>rd</sup> December 2022 - Time unknown**

Sexual harassment complain. Final warning'

**2<sup>nd</sup> December 2022 at 01:48am**

1 male guest being disorderly disturbing bar staff, - Final warning issued.

Later on harassing women, being intoxicated, eviction and banned from the venue.

**Undated – 01:19**

A female guest informed me that a male guest keeps harassing female guests inside the venue. After investigation, the male guest was intoxicated while disturbing women the whole time. I requested the guest to leave assisted by his friends. Guest cooperated'.

**Undated – 01:16**

2 female guests informed me that there is a male guest harassing women inside the venue. Investigation made. Male guest apologised and cooperated'.

**Incidents recorded within incident log (Other incidents):**

**26 November 2022 at 01:45am**

Male guest intoxicated struggling to come out the disabled toilets. Eviction'

**30<sup>th</sup> November 2022 time unknown**

Non co-operative male guest – evicted

**30<sup>th</sup> November 2022 time unknown**

Male guest using female toilet – evicted

**30<sup>th</sup> November 2022 time unknown**

Intoxicated male guest - evicted

**2<sup>nd</sup> December 2022 at 7:55pm**

3 female guests being disorderly, walking and running inside the venue without shoes while being intoxicated. Eviction made after several warning issued.'

**Undated – 00:20**

Bar staff informed me that two IC1 males were becoming aggressive to wards bar staff – Evicted

**Undated – 02:00**

'IC1 female intoxicated. Requested her friends to assist her and leave the premises'

**Undated – 00:55**

Female guest intoxicated vomiting in the smoking terrace area. Informed barback and requested the guest to leave. Assisted by her friends'

**Undated – 01:26**

Male guest intoxicated sleeping on the sofa in the smoking terrace area. Request to leave. Guest cooperated'

**Undated – 01:31**

IC1 male intox, request to leave. Guest cooperated'

**Undated – 02:00**

IC4 male harassing guest while being aggressive, canary wharf security called. IC4 male removed from the area.'

**Undated – 23:57**

Female guest intoxicated. I requested her to leave assisted by her friends'.

**Incident recorded in refusal log – After Police Licensing Visit**

12<sup>th</sup> December 2022 – 'Asked to leave venue as they were getting other customers to buy them drinks after being told they weren't being served for being too drunk'.

17<sup>th</sup> December 2022 – 'Customers struggled to maintain balance when ordering so we refused'.

18<sup>th</sup> December 2022 (7:30PM) – 'Customer struggled to form simple sentences'.

22<sup>nd</sup> December 2022 – 'Intoxicated signs, inability to balance, difficulty to put a sentence'.

28<sup>th</sup> December 2022 – 'Slurring speech, difficulty to balance, dropped a glass'.

**Conclusion**

At the time of this incident the Cocktail Club had been open for around six weeks, and they have allowed a group of young people including two sixteen year old girls to come into the venue to buy and drink alcohol. In less than 30 minutes after entering the premises one of the 16 year olds has consumed so much alcohol that she is sick inside the club, and nothing happens. The group are allowed to continue to buy and drink alcohol in the venue for over five hours, and again nothing happens, no intervention from staff or management.

Following our investigation we believe the venue has been allowing other underage people to drink alcohol inside. If the premises is failing in the most basic of requirements then we have no confidence they can or will abide by any conditions this committee sees fit to impose.

Our second concern is the amount of incidents which have taken place within a short period; from reviewing incident logs there seems to be very concerning pattern of sexual harassment taken place with very little action taken by staff at the venue. At no point were the Police contacted about these harassment complaints, meaning we have lost an opportunity to engage with the victims and tackle the actions of those committing these potential offenses.

Also linked to this sexual harassment is the amount of customers who are allowed to get drunk to the point of stupefaction, this is demonstrated within the venues own incident logs which shows individuals being unable to stand due to the sheer amount of alcohol consumed or even more concerning being unable to form simple sentences. No care appears to of been offered to these customers, no concern for their welfare.

All the above have happened despite the management and staff having completed WAVE training so the need to protect vulnerable customers should have been fresh in their minds.

Central East Police Licensing feel that revocation of the licence is the only course of action that is suitable given both the seriousness and number of failings. They have demonstrated that they cannot be trusted to uphold the licensing objectives. If a venue serves alcohol to 16 year old children, and does nothing about a clear pattern of harassment against women and girls then no amount of conditions are going to change the risk they pose. They have demonstrated that they are incapable of following such conditions, such is the culture of the venue. We therefore ask that the



... l. ... s revoked.



MR/02



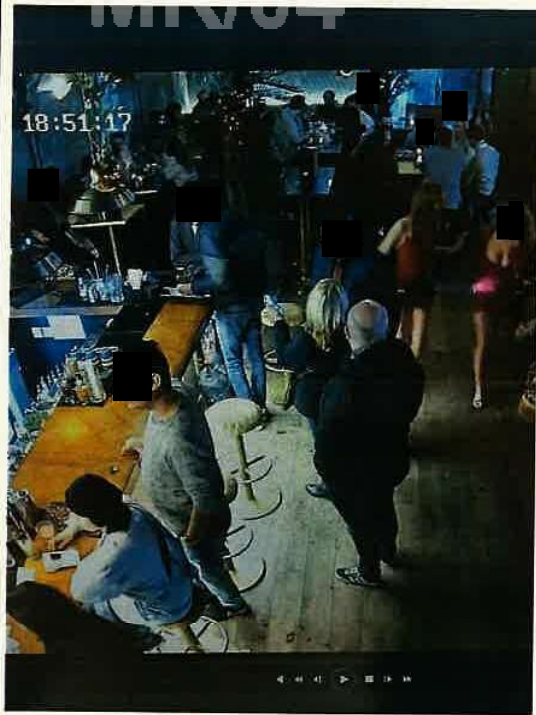


MR/03



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Licence The Cocktail Club Cabot Sq.doc

Page 22 of 29, amended on 01/07/21



MR/05







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Licence The Cocktail Club Cabot Sq.doc

Page 25 of 29, amended on 01/07/21



MR/08

**Please provide as much information as possible to support the application** (please read guidance note 2)

Included above

Have you made an application for review relating to this premises before

Please tick **?** yes

If yes please state the date of that application

Day	Month	Year

**If you have made representations before relating to this premises please state what they were and when you made them**

N/A

...res to the responsible authorities

Understand that if I do not comply with the above requirements my application will be

**IT IS AN OFFENCE, LIABLE ON CONVICTION TO A FINE UP TO LEVEL 5**

**Part 3 – Signatures** (please read guidance note 3)

Signature of the applicant



Capacity Police Licensing Officer

Contact name (where not previously given) and address for correspondence associated with this application (please read guidance note 5)	
Post town	Post code
Telephone number (if any)	
If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)	

**Notes for Guidance**

- 1 The ground(s) for review must be based on one of the licensing objectives.
- 2 Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
- 3 The application form must be signed.
- 4 An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
- 5 This is the address which we shall use to correspond with you about this application.



# Appendix 2



Lic No:  
146190

**London Cocktail Club  
9 Cabot Square  
London  
E14 4EB**

**Licensable Activities authorised by the licence**

The sale by retail of alcohol  
The provision of late-night refreshment  
The provision of regulated entertainment consisting of Live and Recorded Music & performance of dance (Indoors)

**See the attached licence for the licence conditions**

**Signed by**

**David Tolley**   
**Head of Trading Standards & Environmental Health**

**Date: 21<sup>st</sup> March 2022**

OFFICE USE	Receipt No: 463895	Paid: 1905.00	Date: 4/2/2022
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**Part A - Format of premises licence**

Premises licence number

146190

**Part 1 - Premises details**

**Postal address of premises, or if none, ordnance survey map reference or description**

9 Cabot Square

**Post town**

London

**Post code**

E14 4EB

**Telephone number**

**Where the licence is time limited the dates**

N/A

**Licensable activities authorised by the licence**

The sale by retail of alcohol

The provision of late-night refreshment

The provision of regulated entertainment consisting of Live and Recorded Music & performance of dance (Indoors)

**The times the licence authorises the carrying out of licensable activities**

**Regulated Entertainment Live and Recorded Music & performance of dance (Indoors)**

Monday to Sunday from 10:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD  
On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**Late Night Refreshment (Indoors and outdoors for external area and not for deliveries)**

Monday to Sunday from 23:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD

On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**Sale of Alcohol (on and off sales for external area use only not for deliveries)**

Monday to Sunday from 10:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD  
On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**The opening hours of the premises**

Monday to Sunday from 10:00 hours to 02:30 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD

On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**Where the licence authorises supplies of alcohol whether these are on and/ or off supplies**

On and off sales

**Part 2**

**Name, (registered) address, telephone number and email (where relevant) of holder of premises licence**

The London Cocktail Club Limited  
224a Shaftesbury Avenue  
London WC2H 8EB

**Registered number of holder, for example company number, charity number (where applicable)**

07438012

**Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol**

Simon Charles Kennington

**Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol**

Personal licence number: [REDACTED]  
Issuing authority: [REDACTED]

**Annex 1 - Mandatory conditions**

No supply of alcohol may be made under the premises licence-

- a) at a time where there is no designated premises supervisor in respect of the premises licence, or
- b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended

Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence

1.

- (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises
  - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises;
    - (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—
      - (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or
      - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
    - (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective
    - (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;
    - (d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;
    - (e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability)
2. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.

3.
  - (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
  - (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy
  - (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
    - (a) a holographic mark, or
    - (b) an ultraviolet feature.
  
4. The responsible person must ensure that—
  - (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—
    - (i) beer or cider: ½ pint
    - (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
    - (iii) still wine in a glass: 125 ml;
  - (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and
  - (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.
  
5.
  1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
  
  2. For the purposes of the condition set out in paragraph 1—
    - (a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;
    - (b) “permitted price” is the price found by applying the formula —
 
$$P = D + (D \times V)$$
 where —
      - (i) **P** is the permitted price
      - (ii) **D** is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

- (iii) **V** is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
  - (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence
    - (i) the holder of the premises licence
    - (ii) the designated premises supervisor (if any) in respect of such a licence, or
    - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence
  - (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and
  - (e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994
3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.
4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax
- (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day

***The following only applies to a premises which has a condition requiring door supervisors***

Where a premises licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, such individuals must be licensed with the Security Industry Authority.

This does not apply to premises within paragraph. 8(3)(a) of Schedule 2 to the Private Security Industry Act 2001, (premises with premises licences authorising plays or films), or

in respect of premises in relation to-

any occasion mentioned in paragraph 8(3)(b) or (c) of Schedule 2 (premises being used exclusively by club with club premises certificate, under a temporary event notice authorising plays or films or under a gaming licence), or  
 any occasion within paragraph 8(3)(d) of Schedule 2 (occasions prescribed by regulations under that Act) unless the Licence specifically states otherwise.



Security activity means an activity to which paragraph 2(1)(a) of Schedule 2 of the Private Security Industry Act 2001 of that schedule applies, and Paragraph 8(5) of Schedule 2 (interpreting of references to an occasion) applies as it applies in relation to paragraph 8 of Schedule 2 of the Private Security Industry Act 2001

## **Annex 2 - Conditions consistent with the operating Schedule**

1. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Tower Hamlets Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31 day period.
2. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.
3. An incident log shall be kept at the premises, and be available on request to the Police or an authorised officer. It must be completed within 24 hours of any incident and will record the following:
  - a) all crimes reported to the venue;
  - b) all ejections of patrons;
  - c) any complaints received concerning crime and disorder
  - d) any incidents of disorder;
  - e) all seizures of drugs or offensive weapons;
  - f) any faults in the CCTV system, searching equipment or scanning equipment;
  - g) any refusal of the sale of alcohol
  - h) any visit by a relevant authority or emergency service.
4. Food and non-alcoholic beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
5. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly

6. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of the locality and leave the area quietly.
7. No noise generated on the premises, or by its associated plant or equipment, shall emanate from the premises nor vibration be transmitted through the structure of the premises which gives rise to a nuisance.
8. The area immediately outside the premises shall be swept or washed and litter and sweepings collected and stored in accordance with the approved refuse storage arrangement.
9. There shall be no striptease or nudity and all persons shall be decently attired at all times.
10. There should be no designated dance floor.
11. Waiter/waitress service shall be available at all times
12. Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
13. A minimum of two SIA door staff shall be employed at the premises from 10:00 PM until closing on Fridays and Saturdays.
14. A minimum of one SIA door staff shall be employed at the premises from 10:00 PM until closing on Thursdays.
15. Off sales shall only be sold for consumption in the outside area shown on the proposed licencing plans which shall be monitored by staff at all times
16. The venue is to provide information on local taxi firms and transport links to patrons leaving the venue upon request.
17. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.
18. All windows and external doors shall be kept closed after 23:00 hours, or at any time when regulated entertainment takes place, except for the immediate access and egress of persons.

19. A register of security personnel employed on the premises shall be maintained in a legible format, am made available to police upon reasonable request. The register should be completed by the DPS/duty manager/nominated staff member at the commencement of work by each member of security staff, and details recorded should include full name, SIA badge number, contact details and time of commencement of duties. The security operative should then sign their name against these details.
20. The premises licence holder shall ensure that all door supervisors employed at the premises where a current identification badge. Issued by the security industry authority, in a conspicuous position to the front of their upper body.
21. All Staff responsible For selling alcohol shall receive regular training in the licencing act 2003 in terms of the licencing objectives, offences committed under the act and conditions of the premises licence. Written records of staff training in relation to the licencing act 2003 shall be retained and made available to police an authorised officers of the licencing authority on reasonable request.
22. The premises may remain open for the sale of alcohol regulated entertainment and the provision of late night refreshment from the terminal hour for those activities on New Year's Eve through to the commencement time for those activities on New Year's Day.
23. On the morning that Greenwich mean time changes to British summertime one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and all closing hour for the premises ends after 01:00 hours

### **Annex 3 - Conditions attached after a hearing by the licensing authority**

Not applicable

### **Annex 4 - Plans**

The plans are those submitted to the licensing authority on the following date:





**Part B - Premises licence summary**

**Premises licence number**

146190

**Premises details**

**Postal address of premises, or if none, ordnance survey map reference or description**

9 Cabot Square

**Post town**

London

**Post code**

E14 4EB

**Telephone number**

07525711530

Where the licence is time limited the dates

N/A

Licensable activities authorised by the licence

The sale by retail of alcohol  
The provision of late night refreshment  
The provision of regulated entertainment consisting of of Live and Recorded Music & performance of dance (Indoors)

The times the licence authorises the carrying out of licensable activities

**Regulated Entertainment Live and Recorded Music & performance of dance (Indoors)**

Monday to Sunday from 10:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD

On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**Late Night Refreshment (Indoors and outdoors for external area and not for deliveries)**

Monday to Sunday from 23:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD

On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

**Sale of Alcohol (on and off sales for external area use only not for deliveries)**

Monday to Sunday from 10:00 hours to 02:00 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD

On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

The opening hours of the premises

Monday to Sunday from 10:00 hours to 02:30 hours

**Non-Standard Timings**

NYE- from the end of permitted hours to the start of permitted hours on NYD  
On the morning that Greenwich Mean Time changes to British Summer Time one hour will be added to the terminal hour of any activities and to the closing time for the premises where the existing terminal hour for the activities and/or closing hour for the premises ends after 01.00

Name, (registered) address of holder of premises licence

The London Cocktail Club Limited  
224a Shaftesbury Avenue  
London WC2H 8EB

Where the licence authorises supplies of alcohol whether these are on and / or off supplies

On and off sales

Registered number of holder, for example company number, charity number (where applicable)

07438012

Name of designated premises supervisor where the premises licence authorises for the supply of alcohol

Simon Charles Kennington

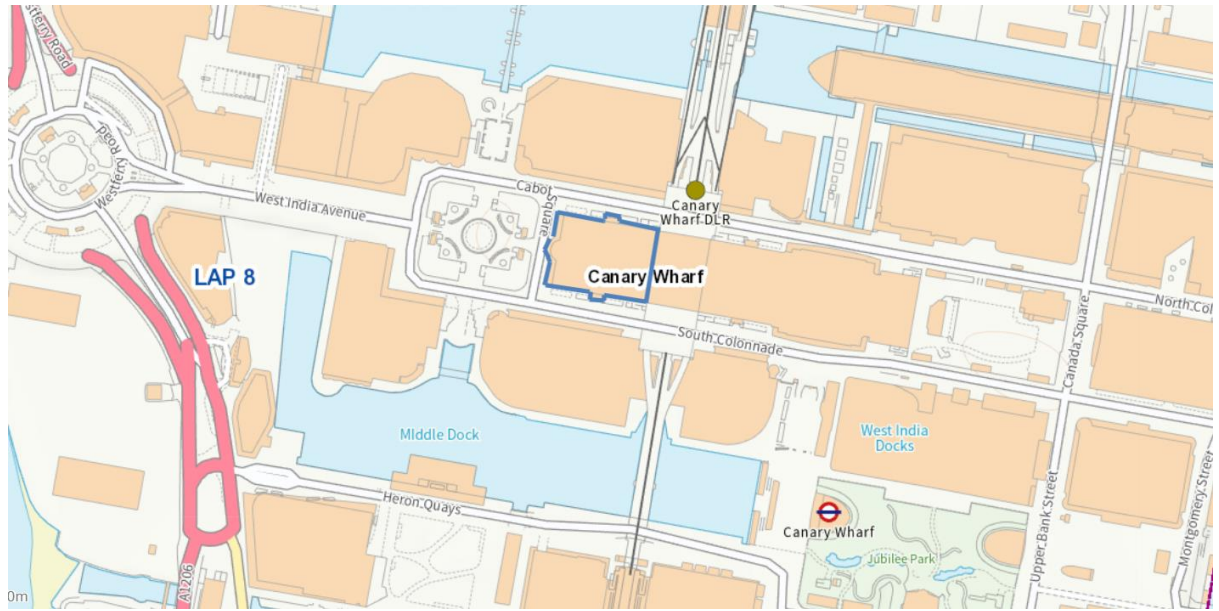
State whether access to the premises by children is restricted or prohibited

No restrictions

# Appendix 3



## 9 Cabot Square – Map of Surrounding Area



# Appendix 4

## Lavine Miller-Johnson

---

**From:** Licensing  
**Sent:** 27 February 2023 10:09  
**To:** Lavine Miller-Johnson  
**Subject:** FW: London Cocktail Club 9 Cabot Square london E14 4EB MA/156974

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Giuseppe Talio, Iberica [REDACTED]  
**Sent:** 25 February 2023 17:53  
**To:** Licensing <Licensing@towerhamlets.gov.uk>  
**Cc:** Gabriella Szalai, Iberica [REDACTED]  
**Subject:** London Cocktail Club 9 Cabot Square london E14 4EB MA/156974

To Whom it May Concern,

My name is Giuseppe Talio, General Manager for Iberica Restaurants, [REDACTED] neighbour of the upper mentioned Cocktail Club.

Since they opened, as a business we never had any issues with them.

Members of my staff are visiting them as guests regularly and they never reported anything wrong about the Club.

I've been working here for a month more or less but My assistant manager Gabriella Szalai, who has been working in the restaurant for 5 months also never experienced any problem regarding the Cocktail Club, they are always very helpful towards us.

Yours sincerely,

Giuseppe Talio  
General manager  
IBERICA RESTAURANTS

# Appendix 5

## Lavine Miller-Johnson

---

**From:** Licensing  
**Sent:** 23 February 2023 17:25  
**To:** Lavine Miller-Johnson  
**Subject:** FW: London Cocktail Club 9 Cabot Square London E14 4EB MA/ 156974

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Sophie Cann [REDACTED]  
**Sent:** 23 February 2023 15:55  
**To:** Licensing <Licensing@towerhamlets.gov.uk>  
**Subject:** London Cocktail Club 9 Cabot Square London E14 4EB MA/ 156974

To Whom It May Concern,

I am writing to provide a testimonial for London Cocktail Club Canary Wharf.

I am a Senior Account Manager at Venue Search London (Story Events) we have a long standing relationship with the venue group.

I have always had a safe, diligent, and professional experience when working with the London Cocktail Club Canary Wharf and their wider venue group.

If you require any further specific detail or information regarding my professional relationship with the venue, please don't hesitate to reach me.

Kind Regards,

Sophie Cann

Sophie Cann *she/her* | Senior Account Manager



[REDACTED]

W: <http://www.venuesearchlondon.com>

A [REDACTED]



This message is intended for the named recipient only. It may contain privileged and/or confidential information. If you are not the intended recipient, you must not copy, distribute or take any action in respect of it. If you have received this message in error, please telephone the sender. All material © Venue Search London Ltd 2023. Registered in England and Wales as Venue Search London Ltd. under company number 13972065 at Middle End Barn, Leckhampstead, Buckinghamshire, MK18 5NS.

# Appendix 6

# 11. Reviews

## The review process

- 11.1 The proceedings set out in the 2003 Act for reviewing premises licences and club premises certificates represent a key protection for the community where problems associated with the licensing objectives occur after the grant or variation of a premises licence or club premises certificate.
- 11.2 At any stage, following the grant of a premises licence or club premises certificate, a responsible authority, or any other person, may ask the licensing authority to review the licence or certificate because of a matter arising at the premises in connection with any of the four licensing objectives.
- 11.3 An application for review may be made electronically, provided that the licensing authority agrees and the applicant submits a subsequent hard copy of the application, if the licensing authority requires one. The licensing authority may also agree in advance that the application need not be given in hard copy. However, these applications are outside the formal electronic application process and may not be submitted via GOV.UK or the licensing authority's electronic facility. The applicant must give notice of the review application to the responsible authorities and holder of the licence or certificate. The licensing authority is required to advertise the review application.
- 11.4 In addition, the licensing authority must review a licence if the premises to which it relates was made the subject of a closure order by the police based on nuisance or disorder and the magistrates' court has sent the authority the relevant notice of its determination, or if the police have made an application for summary review on the basis that premises are associated with serious crime and/or disorder.
- 11.5 Any responsible authority under the 2003 Act may apply for a review of a premises licence or club premises certificate. Therefore, the relevant licensing authority may apply for a review if it is concerned about licensed activities at premises and wants to intervene early without waiting for representations from other persons. However, it is not expected that licensing authorities should normally act as responsible authorities in applying for reviews on behalf of other persons, such as local residents or community groups. These individuals or groups are entitled to apply for a review for a licence or certificate in their own right if they have grounds to do so. It is also reasonable for licensing authorities to expect other responsible authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children. Likewise, where there are concerns about noise nuisance, it is reasonable to expect the local authority exercising environmental health functions for the area in which the premises are situated to make the application for review.
- 11.6 Where the relevant licensing authority does act as a responsible authority and applies for a review, it is important that a separation of responsibilities is still achieved in this process to ensure procedural fairness and eliminate conflicts of interest. As outlined previously in Chapter 9 of this Guidance, the distinct functions of acting as licensing authority and responsible authority should be exercised by different officials to ensure a separation of responsibilities. Further information on how licensing authorities should

achieve this separation of responsibilities can be found in Chapter 9, paragraphs 9.13 to 9.19 of this Guidance.



- 11.7 In every case, any application for a review must relate to particular premises in respect of which there is a premises licence or club premises certificate and must be relevant to the promotion of one or more of the licensing objectives. Following the grant or variation of a licence or certificate, a complaint regarding a general issue in the local area relating to the licensing objectives, such as a general (crime and disorder) situation in a town centre, should generally not be regarded as relevant unless it can be positively tied or linked by a causal connection to particular premises, which would allow for a proper review of the licence or certificate. For instance, a geographic cluster of complaints, including along transport routes related to an individual public house and its closing time, could give grounds for a review of an existing licence as well as direct incidents of crime and disorder around a particular public house.
- 11.8 Where a licensing authority receives a geographic cluster of complaints, consideration may be given as whether these issues are the result of the cumulative impact of licensed premises within the area concerned. In such circumstances, the licensing authority may be asked to consider whether it would be appropriate to publish cumulative impact assessment. Further guidance on cumulative impact assessments can be found in Chapter 14 of this Guidance.
- 11.9 Responsible authorities and other persons may make representations in respect of an application to review a premises licence or club premises certificate. They must be relevant (i.e., relate to one or more of the licensing objectives) and, in the case of other persons, must not be frivolous or vexatious. Representations must be made in writing and may be amplified at the subsequent hearing or may stand in their own right. Additional representations which do not amount to an amplification of the original representation may not be made at the hearing. Representations may be made electronically, provided the licensing authority agrees and the applicant submits a subsequent hard copy, unless the licensing authority waives this requirement.
- 11.10 Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation.
- 11.11 If the application for a review has been made by a person other than a responsible authority (for example, a local resident, residents' association, local business or trade association), before taking action the licensing authority must first consider whether the complaint being made is relevant, frivolous, vexatious or repetitious. Further guidance on determining whether a representation is frivolous or vexatious can be found in Chapter 9 of this Guidance (paragraphs 9.4 to 9.10).

## **Repetitious grounds of review**

- 11.12 A repetitious ground is one that is identical or substantially similar to:
- a ground for review specified in an earlier application for review made in relation to the same premises licence or certificate which has already been determined; or
  - representations considered by the licensing authority when the premises licence or

certificate was granted; or

- representations which would have been made when the application for the premises

licence was first made and which were excluded then by reason of the prior issue of a provisional statement; and, in addition to the above grounds, a reasonable interval has not elapsed since that earlier review or grant.

- 11.13 Licensing authorities are expected to be aware of the need to prevent attempts to review licences merely as a further means of challenging the grant of the licence following the failure of representations to persuade the licensing authority on an earlier occasion. It is for licensing authorities themselves to judge what should be regarded as a reasonable interval in these circumstances. However, it is recommended that more than one review originating from a person other than a responsible authority in relation to a particular premises should not be permitted within a 12 month period on similar grounds save in compelling circumstances or where it arises following a closure order or illegal working compliance order.
- 11.14 The exclusion of a complaint on the grounds that it is repetitious does not apply to responsible authorities which may make more than one application for a review of a licence or certificate within a 12 month period.
- 11.15 When a licensing authority receives an application for a review from a responsible authority or any other person, or in accordance with the closure procedures described in Part 8 of the 2003 Act (for example, closure orders), it must arrange a hearing. The arrangements for the hearing must follow the provisions set out in regulations. These regulations are published on the Government's legislation website ([www.legislation.gov.uk](http://www.legislation.gov.uk)). It is particularly important that the premises licence holder is made fully aware of any representations made in respect of the premises, any evidence supporting the representations and that the holder or the holder's legal representative has therefore been able to prepare a response.

## **Powers of a licensing authority on the determination of a review**

- 11.16 The 2003 Act provides a range of powers for the licensing authority which it may exercise on determining a review where it considers them appropriate for the promotion of the licensing objectives.
- 11.17 The licensing authority may decide that the review does not require it to take any further steps appropriate to promoting the licensing objectives. In addition, there is nothing to prevent a licensing authority issuing an informal warning to the licence holder and/or to recommend improvement within a particular period of time. It is expected that licensing authorities will regard such informal warnings as an important mechanism for ensuring that the licensing objectives are effectively promoted and that warnings should be issued in writing to the licence holder.
- 11.18 However, where responsible authorities such as the police or environmental health officers have already issued warnings requiring improvement – either orally or in writing – that have failed as part of their own stepped approach to address concerns, licensing authorities should not merely repeat that approach and should take this into account when considering what further action is appropriate. Similarly, licensing authorities may take into account any civil immigration penalties which a licence holder has been required to pay for employing an illegal worker.
- 11.19 Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:

- modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;
  - exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption)<sup>10</sup>;
  - remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;
  - suspend the licence for a period not exceeding three months;
  - revoke the licence.
- 11.20 In deciding which of these powers to invoke, it is expected that licensing authorities should so far as possible seek to establish the cause or causes of the concerns that the representations identify. The remedial action taken should generally be directed at these causes and should always be no more than an appropriate and proportionate response to address the causes of concern that instigated the review.
- 11.21 For example, licensing authorities should be alive to the possibility that the removal and replacement of the designated premises supervisor may be sufficient to remedy a problem where the cause of the identified problem directly relates to poor management decisions made by that individual.
- 11.22 Equally, it may emerge that poor management is a direct reflection of poor company practice or policy and the mere removal of the designated premises supervisor may be an inadequate response to the problems presented. Indeed, where subsequent review hearings are generated it should be rare merely to remove a succession of designated premises supervisors as this would be a clear indication of deeper problems that impact upon the licensing objectives.
- 11.23 Licensing authorities should also note that modifications of conditions and exclusions of licensable activities may be imposed either permanently or for a temporary period of up to three months. Temporary changes or suspension of the licence for up to three months could impact on the business holding the licence financially and would only be expected to be pursued as an appropriate means of promoting the licensing objectives or preventing illegal working. So, for instance, a licence could be suspended for a weekend as a means of deterring the holder from allowing the problems that gave rise to the review to happen again. However, it will always be important that any detrimental financial impact that may result from a licensing authority's decision is appropriate and proportionate to the promotion of the licensing objectives and for the prevention of illegal working in licensed premises. But where premises are found to be trading irresponsibly, the licensing authority should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises and, where other measures are deemed insufficient, to revoke the licence.

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<sup>10</sup> See chapter 16 in relation to the licensing of live and recorded music

## Reviews arising in connection with crime

- 11.24 A number of reviews may arise in connection with crime that is not directly connected with licensable activities. For example, reviews may arise because of drugs problems at the premises, money laundering by criminal gangs, the sale of contraband or stolen goods, the sale of firearms, or the sexual exploitation of children. Licensing authorities do not have the power to judge the criminality or otherwise of any issue. This is a matter for the courts. The licensing authority's role when determining such a review is not therefore to establish the guilt or innocence of any individual but to ensure the promotion of the crime prevention objective.
- 11.25 Reviews are part of the regulatory process introduced by the 2003 Act and they are not part of criminal law and procedure. There is, therefore, no reason why representations giving rise to a review of a premises licence need be delayed pending the outcome of any criminal proceedings. Some reviews will arise after the conviction in the criminal courts of certain individuals, but not all. In any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives. Where a review follows a conviction, it would also not be for the licensing authority to attempt to go beyond any finding by the courts, which should be treated as a matter of undisputed evidence before them.
- 11.26 Where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, its role is solely to determine what steps should be taken in connection with the premises licence, for the promotion of the crime prevention objective. It is important to recognise that certain criminal activity or associated problems may be taking place or have taken place despite the best efforts of the licence holder and the staff working at the premises and despite full compliance with the conditions attached to the licence. In such circumstances, the licensing authority is still empowered to take any appropriate steps to remedy the problems. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.
- 11.27 There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of the licensed premises:
- for the sale and distribution of drugs controlled under the Misuse of Drugs Act 1971 and the laundering of the proceeds of drugs crime;
  - for the sale and distribution of illegal firearms;
  - for the evasion of copyright in respect of pirated or unlicensed films and music, which does considerable damage to the industries affected;
  - for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people;
  - for prostitution or the sale of unlawful pornography;
  - by organised groups of paedophiles to groom children;
  - as the base for the organisation of criminal activity, particularly by gangs;

- for the organisation of racist activity or the promotion of racist attacks;
- for employing a person who is disqualified from that work by reason of their immigration status in the UK;
- for unlawful gambling; and
- for the sale or storage of smuggled tobacco and alcohol.

11.28 It is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.

### **Review of a premises licence following closure order or illegal working compliance order**

11.29 Licensing authorities are subject to certain timescales, set out in the legislation, for the review of a premises licence following a closure order under section 80 of the Anti-social Behaviour, Crime and Policing Act 2014 or an illegal working compliance order under section 38 of and Schedule 6 to the Immigration Act 2016. The relevant time periods run concurrently and are as follows:

- when the licensing authority receives notice that a magistrates' court has made a closure order it has 28 days to determine the licence review – the determination must be made before the expiry of the 28th day after the day on which the notice is received;
- the hearing must be held within ten working days, the first of which is the day after the day the notice from the magistrates' court is received;
- notice of the hearing must be given no later than five working days before the first hearing day (there must be five clear working days between the giving of the notice and the start of the hearing).

### **Review of a premises licence following persistent sales of alcohol to children**

11.29 The Government recognises that the majority of licensed premises operate responsibly and undertake due diligence checks on those who appear to be under the age of 18 at the point of sale (or 21 and 25 where they operate a Challenge 21 or 25 scheme). Where these systems are in place, licensing authorities may wish to take a proportionate approach in cases where there have been two sales of alcohol within very quick succession of one another (e.g., where a new cashier has not followed policy and conformed with a store's age verification procedures). However, where persistent sales of alcohol to children have occurred at premises, and it is apparent that those managing the premises do not operate a responsible policy or have not exercised appropriate due diligence, responsible authorities should consider taking steps to ensure that a review of the licence is the norm in these circumstances. This is particularly the case where there has been a prosecution for the offence under section 147A or a closure notice has been given under section 169A of the 2003 Act. In determining the review, the licensing authority should consider revoking the licence if it considers this appropriate.

# Appendix 7

# Guidance Issued by the Home Office under Section 182 of the Licensing Act 2003

Updated December 2022

## Crime and disorder

- 2.1 Licensing authorities should look to the police as the main source of advice on crime and disorder. They should also seek to involve the local Community Safety Partnership (CSP).
- 2.2 In the exercise of their functions, licensing authorities should seek to co-operate with the Security Industry Authority (“SIA”) as far as possible and consider adding relevant conditions to licences where appropriate. The SIA also plays an important role in preventing crime and disorder by ensuring that door supervisors are properly licensed and, in partnership with police and other agencies, that security companies are not being used as fronts for serious and organised criminal activity. This may include making specific enquiries or visiting premises through intelligence led operations in conjunction with the police, local authorities and other partner agencies. Similarly, the provision of requirements for door supervision may be appropriate to ensure that people who are drunk, drug dealers or people carrying firearms do not enter the premises and ensuring that the police are kept informed.
- 2.3 Conditions should be targeted on deterrence and preventing crime and disorder including the prevention of illegal working in licensed premises (see paragraph 10.10). For example, where there is good reason to suppose that disorder may take place, the presence of closed-circuit television (CCTV) cameras both inside and immediately outside the premises can actively deter disorder, nuisance, anti-social behaviour and crime generally. Some licence holders may wish to have cameras on their premises for the prevention of crime directed against the business itself, its staff, or its customers. But any condition may require a broader approach, and it may be appropriate to ensure that the precise location of cameras is set out on plans to ensure that certain areas are properly covered and there is no subsequent dispute over the terms of the condition.
- 2.4 The inclusion of radio links and ring-round phone systems should be considered an appropriate condition for public houses, bars and nightclubs operating in city and town centre leisure areas with a high density of licensed premises. These systems allow managers of licensed premises to communicate instantly with the police and facilitate a rapid response to any disorder which may be endangering the customers and staff on the premises.



- 2.5 Conditions relating to the management competency of designated premises supervisors should not normally be attached to premises licences. It will normally be the responsibility of the premises licence holder as an employer, and not the licensing authority, to ensure that the managers appointed at the premises are competent and appropriately trained. The designated premises supervisor is the key person who will usually be responsible for the day to day management of the premises by the premises licence holder, including the prevention of disorder. A condition of this kind may only be justified as appropriate in rare circumstances where it can be demonstrated that, in the circumstances associated with particular premises, poor management competency could give rise to issues of crime and disorder and public safety.
- 2.6 The prevention of crime includes the prevention of immigration crime including the prevention of illegal working in licensed premises. Licensing authorities should work with Home Office Immigration Enforcement, as well as the police, in respect of these matters. Licence conditions that are considered appropriate for the prevention of illegal working in licensed premises might include requiring a premises licence holder to undertake right to work checks on all staff employed at the licensed premises or requiring that evidence of a right to work check, either physical or digital (e.g. a copy of any document checked as part of a right to work check or a clear copy of the online right to work check) are retained at the licensed premises.

# Appendix 8

## Crime and Disorder

- 7.1 Licensed premises, especially those offering late night / early morning entertainment, alcohol and refreshment for large numbers of people, can be a source of crime and disorder problems and to store prescribed information.
- 7.2 When addressing crime and disorder the applicant should initially identify any particular issues (having regard to their particular type of premises and / or activities) which are likely to adversely affect the promotion of the crime and disorder licensing objective. Such steps as are required to deal with these identified issues should be included within the applications operating schedule. Where the Metropolitan Police, acting as a responsible authority, makes recommendations in respect of an application relating to the licensing objectives the Licensing Authority would expect the applicant to incorporate these into their operating schedule.
- 7.3 Applicants are recommended to seek advice from Council Officers and the Police as well as taking into account, as appropriate, local planning and transport policies, with tourism, cultural and crime prevention strategies, when preparing their plans and Schedules.
- 7.4 In addition to the requirements for the Licensing Authority to promote the licensing objectives, it also has duties under Section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough and to share prescribed information.
- 7.5 The Licensing Authority, if its discretion is engaged, will consider attaching Conditions to licences and permissions to deter and prevent crime and disorder both inside and immediately outside the premises and these may include Conditions drawn from the Model Pool of Conditions relating to Crime and Disorder given in the Secretary of State's Guidance.
- 7.6 **CCTV** - The Licensing Authority, if its discretion is engaged, will attach conditions to licences, as appropriate where the conditions reflect local crime prevention strategies, for example the provision of closed circuit television cameras.

7.7 **Touting** – This is soliciting for custom. There has been a historic problem with Touting in the borough, mainly in relation to restaurants, and as such in 2006 the Council introduced a byelaw under Section 235 of the Local Government Act 1972 for the good rule and government of the London Borough of Tower Hamlets and for the prevention and suppression of nuisances.

As a result, in relation to premises where there is intelligence that touting is, or has been carried out, the Licensing Authority, where its discretion is engaged will insert a standard condition that prohibits 'touting' as follows:-

- 1) No person shall be employed to solicit for custom or be permitted to solicit for custom for business for the premises in any public place within a 500 meters radius of the premises as shown edged red on the attached plan.( marked as Appendix -)
- 2) Clear Signage to be placed in the restaurant windows stating that the premises supports the Council's 'No Touting' policy.

7.8 **Responsible Drinking** - The Licensing Authority expects alcohol to be promoted in a responsible way in the Borough. This should incorporate relevant industry standards, such as the Portman Group Code of Practice. Where appropriate and proportionate, if its discretion is engaged, the Licensing Authority will apply conditions to ensure responsible drinking. The Licensing Authority also recognises the positive contribution to best practice that "Pubwatch" and other similar schemes can make in promoting the licensing objectives and is committed to working with them.

Model Pool Conditions can be found in the Secretary of State's Guidance.

7.9 **Criminal Activity** - There is certain criminal activity that may arise in connection with licensed premises which the Licensing Authority will treat particularly seriously. These are the use of the licensed premises:

- for the sale and distribution of drugs controlled under the Misuse of Drugs Act 1971 and the laundering of the proceeds of drugs crime;
- for the sale and distribution of illegal firearms;
- for the evasion of copyright in respect of pirated or unlicensed films and music, which does considerable damage to the industries affected;
- for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people;
- for prostitution or the sale of unlawful pornography;
- by organised groups of paedophiles to groom children;

- as the base for the organisation of criminal activity, particularly by gangs;
- for the organisation of racist activity or the promotion of racist attacks;
- for employing a person who is disqualified from that work by reason of their immigration status in the UK;
- for unlawful gambling; and
- for the sale or storage of smuggled tobacco and alcohol.

The Secretary State's Guidance states that it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and this Licensing Authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence, even in the first instance, should be seriously considered.

7.10 In particular the Licensing Authority is mindful of the Secretary of State's Guidance "Reviews arising in connection with crime".

7.11 From 1 April 2017, businesses which sell alcohol (for example, retailers of alcohol and trade buyers) will need to ensure that the UK wholesalers that they buy alcohol from have been approved by HMRC under the Alcohol Wholesaler Registration Scheme (AWRS). They will need to check their wholesalers Unique Registration Number (URN) against the HMRC online database which will be available from April 2017. This is an ongoing obligation and if a business is found to have bought alcohol from an unapproved wholesaler, they may be liable to a penalty or could even face criminal prosecution and their alcohol stock may be seized. Any trader who buys alcohol from a wholesaler for onward sale to the general public (known as a 'trade buyer') does not need to register unless they sell alcohol to other businesses. Examples of trade buyers would be pubs, clubs, restaurants, cafes, retailers and hotels. However, they will need to check that the wholesaler they purchase alcohol from is registered with HMRC. Further information may be found at: <https://www.gov.uk/guidance/the-alcohol-wholesaler-registration-scheme-awrs>.

## **Smuggled goods**

7.12 The Licensing Authority will exercise its discretion to add a standard condition as follows:-

- 1) The premises licence holder and any other persons responsible for the purchase of stock shall not purchase any goods from door-to-door sellers other than from established traders who provide full receipts at the time of delivery to provide traceability.
- 2) The premises licence holder shall ensure that all receipts for goods bought include the following details:
  - i. Seller's name and address
  - ii. Seller's company details, if applicable
  - iii. Seller's VAT details, if applicable
  - iv. Vehicle registration detail, if applicable
- 3) Legible copies of the documents referred to in 2) shall be retained on the premises and made available to officers on request.
- 4) The trader shall obtain and use a UV detection device to verify that duty stamps are valid.
- 5) Where the trader becomes aware that any alcohol may be not duty paid they shall inform the Police of this immediately.

## **Olympic Park – Football Ground**

7.13 Premises where Police intelligence shows that football supporters congregate within the borough should consider in their application form the following conditions:

- 1) On Match Days for premises licensed for the supply of alcohol for consumption on the premises:
  - a) Drinks shall only be supplied in polypropylene or similar plastic and all bottled drinks shall be poured into such drinking vessels before being handed to the customer. These should be made of recyclable materials.
  - b) Registered door staff shall be employed to control the entry and exits to the premises and to manage any licensed outside area(s).

# Appendix 9

# Guidance Issued by the Home Office under Section 182 of the Licensing Act 2003

Updated December 2022

## Protection of children from harm

- 2.22 The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 2.23 The Government believes that it is completely unacceptable to sell alcohol to children. Conditions relating to the access of children where alcohol is sold and which are appropriate to protect them from harm should be carefully considered. Moreover, conditions restricting the access of children to premises should be strongly considered in circumstances where:
- adult entertainment is provided;
  - a member or members of the current management have been convicted for serving alcohol to minors or with a reputation for allowing underage drinking (other than in the context of the exemption in the 2003 Act relating to 16 and 17 year olds consuming beer, wine and cider when accompanied by an adult during a table meal);
  - it is known that unaccompanied children have been allowed access;
  - there is a known association with drug taking or dealing; or
  - in some cases, the premises are used exclusively or primarily for the sale of alcohol for consumption on the premises.
- 2.24 It is also possible that activities, such as adult entertainment, may take place at certain times on premises but not at other times. For example, premises may operate as a café bar during the day providing meals for families but also provide entertainment with a sexual content after 8.00pm. It is not possible to give an exhaustive list of what amounts to entertainment or services of an adult or sexual nature. Applicants, responsible authorities and licensing authorities will need to consider this point carefully. This would broadly include topless bar staff, striptease, lap-, table- or pole-dancing, performances involving feigned violence or horrific incidents, feigned or actual sexual acts or fetishism, or entertainment involving strong and offensive language.



- 2.25 Applicants must be clear in their operating schedules about the activities and times at which the events would take place to help determine when it is not appropriate for children to enter the premises. Consideration should also be given to the proximity of premises to schools and youth clubs so that applicants take appropriate steps to ensure that advertising relating to their premises, or relating to events at their premises, is not displayed at a time when children are likely to be near the premises.
- 2.26 Licensing authorities and responsible authorities should expect applicants, when preparing an operating schedule or club operating schedule, to set out the steps to be taken to protect children from harm when on the premises.
- 2.27 Conditions, where they are appropriate, should reflect the licensable activities taking place on the premises. In addition to the mandatory condition regarding age verification, other conditions relating to the protection of children from harm can include:
- restrictions on the hours when children may be present;
  - restrictions or exclusions on the presence of children under certain ages when particular specified activities are taking place;
  - restrictions on the parts of the premises to which children may have access;
  - age restrictions (below 18);
  - restrictions or exclusions when certain activities are taking place;
  - requirements for an accompanying adult (including for example, a combination of requirements which provide that children under a particular age must be accompanied by an adult); and full exclusion of people under 18 from the premises when any licensable activities are taking place.
- 2.28 Please see also Chapter 10 for details about the Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010.

- 2.29 Licensing authorities should give considerable weight to representations about child protection matters. In addition to the responsible authority whose functions relate directly to child protection, the Director of Public Health may also have access to relevant evidence to inform such representations. These representations may include, amongst other things, the use of health data about the harms that alcohol can cause to underage drinkers. Where a responsible authority, or other person, presents evidence to the licensing authority linking specific premises with harms to children (such as ambulance data or emergency department attendances by persons under 18 years old with alcohol-related illnesses or injuries) this evidence should be considered, and the licensing authority should also consider what action is appropriate to ensure this licensing objective is effectively enforced. In relation to applications for the grant of a licence in areas where evidence is presented on high levels of alcohol-related harms in persons aged under 18, it is recommended that the licensing authority considers what conditions may be appropriate to ensure that this objective is promoted effectively.
- 2.30 The 2003 Act provides that, where a premises licence or club premises certificate authorises the exhibition of a film, it must include a condition requiring the admission of children to films to be restricted in accordance with recommendations given either by a body designated under section 4 of the Video Recordings Act 1984 specified in the licence (the British Board of Film Classification is currently the only body which has been so designated) or by the licensing authority itself. Further details are given in Chapter 10.
- 2.31 Theatres may present a range of diverse activities and entertainment including, for example, variety shows incorporating adult entertainment. It is appropriate in these cases for a licensing authority to consider restricting the admission of children in such circumstances. Entertainments may also be presented at theatres specifically for children. It will be appropriate to consider whether a condition should be attached to a premises licence or club premises certificate which requires the presence of a sufficient number of adult staff on the premises to ensure the wellbeing of the children during any emergency.

## Offences relating to the sale and supply of alcohol to children

2.32 Licensing authorities are expected to maintain close contact with the police, young offenders' teams and trading standards officers (who can carry out test purchases under section 154 of the 2003 Act) about the extent of unlawful sales and consumption of alcohol by minors and to be involved in the development of any strategies to control or prevent these unlawful activities and to pursue prosecutions. Licensing authorities, alongside the police, are prosecuting authorities for the purposes of these offences, except for the offences under section 147A (persistently selling alcohol to children). Where, as a matter of policy, warnings are given to retailers prior to any decision to prosecute in respect of an offence, it is important that each of the enforcement arms should be aware of the warnings each of them has given.

<b>Table of relevant offences under the 2003 Act Section</b>	<b>Offence</b>	<b>Prosecuting Authority</b>
Section 145	Unaccompanied children prohibited from certain premises	Police and/or Licensing Authority
Section 146	Sale of alcohol to children	Police, Licensing Authority and/or Local Weights and Measures Authority
Section 147	Allowing the sale of alcohol to children	Police, Licensing Authority and/or Local Weights and Measures Authority
Section 147A	Persistently selling alcohol to children	Police and/or Local Weights and Measures Authority
Section 148	Sale of liqueur confectionery to children under 16. (This offence will be repealed by the Deregulation Act 2015 on 26 May 2015).	Police and/or Licensing Authority
Section 149	Purchase of alcohol by or on behalf of children	Police and/or Licensing Authority
Section 150	Consumption of alcohol by children	Police and/or Licensing Authority
Section 151	Delivering alcohol to children	Police and/or Licensing Authority
Section 152	Sending a child to obtain alcohol	Police and/or Licensing Authority
Section 153	Prohibition of unsupervised sales by children	Police and/or Licensing Authority

# Appendix 10

## Protection of children from harm

- 10.1 The wide range of premises that require licensing means that children can be expected to visit many of these, often on their own, for food and/or entertainment. The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Home Office Guidance also expects Licensing authorities to consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 10.2 Tackling Child Sexual Exploitation (CSE) is a key target both locally and nationally as such the Licensing Authority expects Licence Holders to:
- Understand that there are criminal offences in relation to sexual exploitation of a child,
  - Ensure that they and their employees have a basic awareness of the signs of CSE and how to report it;
  - Report any concerns to the appropriate authorities or to the Licensing Authority can advise them of the appropriate authority to report concerns to.
- 10.3 Applicants are to consult with the Responsible Authority designated for Child Protection listed in appendix 1 - List of Responsible Authorities of this who this Licensing Authority recognises to be competent body to advise on the protection of children from harm.
- 10.4 The Act does not prohibit children from having access to any licensed premises; the Council recognises that limitations may have to be considered where it appears necessary to protect children from harm.
- 10.5 The Licensing Authority will judge the merits of each separate application before deciding whether to impose conditions limiting the access of children to individual premises. The following are examples of premises that will raise concern:-
- Where there have been convictions, Fixed Penalty Notices (FPNs) or formal cautions for serving alcohol to minors or with a reputation for underage drinking

- With a known association with drug taking or dealing
  - Where there is a strong element of gambling on the premises
  - Where entertainment of an adult or sexual nature is provided
  - Where irresponsible drinking is encouraged or permitted.
- 10.6 Where its discretion is engaged, the Licensing Authority will consider any of the following options when dealing with a licence application where limiting the access of children is considered necessary to prevent harm to children:
- Limitations on the hours when children may be present,
  - Limitations on ages below 18,
  - Limitations or exclusion when certain activities are taking place,
  - Requirements for an accompanying adult,
  - Full exclusion of people under 18 from the premises when any licensable activities are taking place.
- 10.7 No conditions will be imposed requiring that children must be admitted to any premises and, where no limitation is imposed, this will be left to the discretion of the individual licensee.
- 10.8 The Act details a number of offences designed to protect children in licensed premises and the Licensing Authority will work closely with the police to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.
- 10.9 All licence holders will be expected to comply the Portman Group Code of Practice, and in particular the Retailer Alert Bulletin by which the Portman Group informs licensed retailers, which products have been found to be in breach of the code, and should be removed from sale.
- 10.10 The Licensing Authority expects all licensed suppliers of alcohol to have robust measures, effectively managed and monitored, in place to ensure that minors are fully protected from harm. This will require operating plans to specify these measures and management controls taking into account paragraph 10.1 and 10.2 above. Where appropriate a written childcare policy should be available and be incorporated in the induction of staff.

- 10.11 The Licensing Authority will take appropriate and proportionate action where there are serious concerns in relation to the safe guarding of children in connection with a licensed premises, which may include consideration of applying for a review of the licence where there significant evidence of undermining the licensing objective of the protection of children from harm.
- 10.12 The sale of alcohol to a minor is a criminal offence and Trading Standards will conduct appropriate covert test purchasing exercises and will take account of any complaints and intelligence received. The Act permits the use of children under the age of 18 to undertake test purchases.
- 10.13 Where there are age restrictions imposed by the Act on the licensable activities in respect of children below a certain age, then the licensee will be required to demonstrate that they have age verification systems in place. This Licensing Authority believes that that Licensed Premises should have age verification policies to require individuals who appear to the person serving alcohol to be under the age of 25 years of age to produce on request appropriate identification. This is commonly referred to as the “Challenge 25 Scheme”. The rationale for this is because it can often be difficult to judge how old teenagers are and “Challenge 25 age verification system” would provide licensed premises with margin of error to prevent underage sales. Thus Challenge 25 can help to empower staff to challenge customers where there is doubt about their age. In turn this is likely to reduce the risk of the owner, or the seller of the alcohol, committing an offence.
- 10.14 Training in age verification systems should be given to all persons who might be in a position to serve or refuse the sale of alcohol to children. The training should include a basic understanding of the law, seeking proof of age, verifying the authenticity of proof of age cards and handling and recording refusals.
- 10.15 Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose the following standard conditions in relation to age verification systems:
- 1) All tills shall automatically prompt staff to ask for age verification identification when presented with an alcohol sale.
  - 2) A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
  - 3) A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record

shall be available for inspection at the premises by the police or an authorised officer at all times whilst the premises is open.

- 4) All staff whose duties include the serving of alcohol must be trained in the requirements of this scheme including the importance of recording any refusals.

## **11 Access to Cinemas**

- 11.1 Films cover a vast range of subjects, some of which deal with adult themes and / or contain, for example, scenes of horror or violence that may be considered unsuitable for children within certain age groups.
- 11.2 In order to prevent children from seeing such films, the Licensing Authority will impose conditions requiring licensees to restrict children from viewing age restricted films classified according to the recommendations of the BBFC, or the Council itself. The Licensing Authority will not consider reclassifying any films already classified by the BBFC. The Council will charge for classifying films, on a full cost recovery basis.
- 11.3 The Licensing Authority will classify films itself where it is satisfied that no BBFC classification exists. It will inform relevant licensee and require such classifications to be clearly contained in any advertising or informative material relating to such films.

## **12 Children and Public Entertainment**

- 12.1 Many children go to see and / or take part in an entertainment arranged substantially for them. Consequently additional arrangements are required to safeguard them at such times.
- 12.2 Where 10.1 applies, and its discretion is engaged, the Licensing Authority will require the following arrangements in order to control their access and egress and to assure their safety:-
  - An adult member of staff to be stationed in the vicinity of each of the exits from any level, subject to there being a minimum of one member of staff per 50 children or part thereof,
  - No child unless accompanied by an adult to be permitted in the front row of any balcony,
  - No standing to be permitted in any part of the auditorium during the Performance.
- 12.3 Where children are taking part in any regulated entertainment, and its



discretion is engaged, the Licensing Authority will require the operating schedule to clearly state the steps taken to assure their safety.

- 12.4 Where its authority is engaged, the Licensing Authority will consider attaching conditions to licences and permissions to prevent harm to children, and these may include conditions drawn from the Model Pool of. Conditions that can be found in the Secretary of State's Guidance.

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Index- on behalf of licence holder

1. Witness statement Dawn Donohoe and attachments DD1-DD4
2. Operations Manual
3. Report Michael Watson
4. Audit- 26.2.23
5. Audit 25.3.23
6. Action Plans (x3)
7. Serve Legal Reports
8. Photos
9. KD Security Policies

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**In the London Borough of Tower Hamlets Licensing Sub Committee**  
**In the matter of The Cocktail Club, Cabot Square London**  
**Application for Review**

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**WITNESS STATEMENT OF DAWN DONOHOE**

---

I **DAWN DONOHOE** of [REDACTED] say as follows:

1. I am the managing director of The London Cocktail Club Limited, the premises licence holder of The Cocktail Club, 9 Cabot Square London, E14 4EB (the 'Premises')
2. I make this statement in response to the application for review made by the Metropolitan Police Service. I will also be present at the licensing sub committee hearing on 11 April 2023.
3. The facts and matters addressed in this witness statement are within my own knowledge.

**Introduction**

4. The Cocktail Club operates as a cocktail bar. The premises in Cabot Square is one of 16 premises operated by The London Cocktail Club Limited across the country. The Cocktail Club is a well established cocktail lounge brand and the Group is recognised in publications as an industry leader for drinks innovation.
5. The Cocktail Club operates from the afternoon into the evening, and is popular with after work drinks. The venues are female friendly given the cocktails on the menu and availability of seating and relaxed atmosphere, and around 75% of their patrons come via pre-arranged table bookings. There is waiter/waitress service throughout the premises.
6. The premises is open for a number of regular cocktail tasting and Cocktail Master Class events as well as private bookings. The team gives Master Classes weekly between their sites.
7. We initially entered into an agreement for lease to acquire the Cabot Square premises in March 2022. The agreement was conditional on obtaining a premises licence and planning permission.
8. The premises licence application was initially made in February 2022 and was granted under delegated authority in March 2022 (not July 2022 as stated in the review application) as there were no objections from any responsible authorities or other persons. The premises then opened, after the fit out, on 14 October 2022.

9. The lease for the premises is for 15 years. The current rent paid is £165,000, and the business rateable value is currently £135,000 per year. There is therefore a long term investment in the premises by the company/premises licence holder.

### The Incident

10. We were made aware of the incident the subject of the review by the Police on 5 December 2022. I was shocked and disappointed at hearing of the incident. I have 2 daughters myself and am mortified the incident occurred in one of our premises. This incident is the first incident of this nature in our 17 venues. I am fully aware of and recognise the seriousness of this incident and do not want this to ever happen again.
11. The application for review, whilst setting out the incident, which occurred nearly 2 months before the review was lodged, does not make reference to any of the actions we took as a business following us being notified of the incident and of which the Police were aware, and in the interests of fairness I set out the position below to assist Members.
12. Firstly, I have extensive licensing experience and am well aware of the licensing objectives, including the protection of children from harm. Therefore, the fact that this incident occurred at all is unacceptable and it meant I needed to look at our policies and procedures, and matters stemming from this such as training of staff and the actions of management to ensure there would be no repeat of this. It was a primary concern of mine to ensure that whatever needed to change changed and an incident of this nature would never happen again.
13. Secondly I confirm we met with the Police on 9 December 2022 to discuss the incident and we spoke about the action taken by the venue and the seriousness of the incident itself. We took this meeting very seriously.
14. We provided a written action plan to the Police on 12 December 2022 along with all of the additional information they requested. Attached at DD1 is a copy of an email sent to the Police on 12 December.
15. The action plan sent to the Police included the following:

All member of staff was re-trained, after the visit, on licensing objective and how to enforce the challenge 21, all records reflect this on Flow training platform
---

Citizen ID card are no longer being accepted
--

There will be a topic that will include security (logs/compliances/records/checks/due diligence book) on weekly basis between GM and Area Manager, any red flags will be reported to the Operations Director immediately
--

Review all the security compliances within operational management on a 4-weekly basis, earlier if any recurrent issue that needs actioned sooner
Ordered an ID scanner to be installed and used with immediate action. This has been ordered and install to be complete w/c 12/12/22
Security must scan all ID before granting entrance to any guests with no exceptions to bookings, private parties, or venue hires
Downloaded all footage of the night from 6pm to midnight and handed over to police officer Michael Rice.
Security member was replaced immediately, and extra member of security added since. Security rotas reflect a doorman on from open every day
All members of staff has been informed and signed an additional training assessment to reiterate the importance of them following the rules and extra measures (also mentioned in this document) that we will take to prevent serving underaged
All Management team to attend the Pub Watch meetings and ALL members of staff to attend the WAVE training provided by Canary Wharf Management
Better communication will be ensured during any shift and if member of staff is in any doubt, they must ask for identification regardless if security has already check them
Review this document on monthly basis
Till records to be monitored weekly and any refusal of serve to be logged, this also will be documented with detail on within the logbook and duty of care provided thereafter
Test purchasing company "Serve Legal" to be instated to spot check at least twice weekly
Welfare officer to be allocated for the site on daily shifts
Staff training Risk Assessment upweighted and all staff have been signed of and documentation filed on record
Only senior doorman to be provided at Canary Wharf site, and head of Premium Security Company Jack Neil to work alongside the security team on peak trading to ensure they are adhered to their responsibilities and process
All incidents to continue to be logged on Riskproof and end of night reports to continue to reflect any incidents/issues at the end of every shift
Numbers log to be recorded every 30 minutes, this to be checked by management every half an hour to ensure process is being adhered to and records complete

16. This was the initial action plan based on what we understood of the incident and we have reviewed the action plan on a monthly basis in January, February and March as previous

action has been undertaken and completed. From the March action plan date we are reviewing the action plan weekly as all action points are in place now.

17. Given the seriousness of the incident I made the following decisions:

- a) To change the entire management team at the premises. This included the DPS/ general manager and assistant general manager and duty managers. The Police had indicated they had little confidence in the management after the incident and a clean sweep of staff was important to me as well to ensure policies and procedures were able to be robustly adhered to
- b) On 6 January 2023 I instructed our licensing solicitor to vary the DPS of the premises to Mr Simon Kennington- well before the review was submitted by the Police. This was lodged on 9 January 2023. This change took a little longer to implement as Simon, a new employee, was hired especially for this site as he had extensive experience in the industry and needed to work out a notice period over the Christmas break, however the change was implemented as soon as possible. Simon has over 20 years of hospitality experience including 9 years as a Senior General Manager operator. He has a mature management style and has a wealth of experience in running high volume sites in which are all late-night operations predominantly with trading hours till 3am. The venues that he has previously managed have ranged from a minimum of 300 - 800 capacities across various London Boroughs, he has always had great relationships with the local authorities, and participated in local schemes and community initiatives and this will continue in this Borough. Simon has great knowledge of licencing requirements and operating a safe environment is at the forefront of what he does within any venue that he operates. Below is a couple of examples of sites that he has previous operated.
  - o Roadhouse – 600 Capacity – Westminster
  - o Apt Bar – 300 Capacity – City Of London
  - o Abacus – 800 Capacity – City Of London
  - o Mabel's – 400 Capacity – Westminster
  - o Most Recently – Bar Elba – Lambeth
- c) I understand that our licensing solicitor notified the Police Licensing Team of this change in DPS and the background of Simon and offered to meet the Licensing Police to further review the operations. The Licensing Police did not respond to this request to meet us. Attached at DD2 is a copy email sent to the Police Licensing Team dated 5.1.23.
- d) Within the week of the Police meeting on 9 December 2022 my operations team had arranged for an ID Scanner to be installed at the premises. This was put into use. No other venues of London Cocktail Club Limited has an ID scanner as we are not a brand that has high crime and disorder at all. The ID Scanner remains on site now, working and in use. Any defects / faults are to be logged in good time. Security and



management endeavour that all guests are asked for ID at entry stage to the venue, this will mean a physical check as well as utilising the scanner. For any guests who are assessed to be over 25, this is verified prior to service by two members of our team, ideally a manager AND an SIA Operative. We work to this principal as our main customer base has an age of around 28.9 (average age of male is 30.1 and female is 27.8). Attached at DD3 is age data from the ID Scan to verify this..

- e) Following the incident I summonsed the security firm we were using (Premium Security) to a meeting with me and requested a complete change of security staff from within the company, along with the retraining of security staff on age checks and our policies. As a fresh team working inside the venue there was no familiarity with staff or customers and we were able to train from scratch the SIA team in place. This was undertaken and we were given a security team that was consistent and regular. I did not immediately change the security firm itself as in my view there is not a large selection of firms in London and no one firm stands out head and shoulders above the rest. This was communicated to the Police.
- f) On 1 February 2023, I did change security firms for the premises. I felt that after a period of time a clean sweep of security would only enhance the other changes we had made to the premises following the incident.
- g) The security firm we use now is KD Security. KD Security Group is a London based security service with over 30 years experience and is a provider of security guards, protection and manpower. We spent some time handpicking the team for a few weeks after they started working at the Premises to ensure they had engaged our preferred operatives. KD Security have a policy that they will not sub contract out and the direct employment of their staff without the use of subcontractors, unlike other companies, ensures they have full control of the security guards. Copies of the policies of KD Security are included within the papers for the licence holder, although the security we use are also trained in our own policies and licence conditions.
- h) I implement regular SIA refresher training/briefing sessions for the security. I, along with my team, have been watching the SIA contracted at the premises very carefully and have been impressed by their work ethic and commitment to comply with the licensing objectives and ensure our patrons are looked after well.
- i) We have between 2 and 4 SIA at the premises depending on the day of the week and the venue's risk assessment. At the moment we have 2 SIA on Mondays, Tuesdays, Wednesdays and Sundays, 3 on Thursdays and 4 on Fridays and Saturdays. The security starts at different times on each of these days, but usually 4pm starting time for the first security on each of these days.

- j) In line with our desire to ensure there would be no repeat of the December incident I instructed independent audits of the premises operation to be carried out by Better Compliance. These were carried out on 26 February 2023 and 25 March 2023 and copies of the reports have been attached to the licence holders supporting material, and the feedback has been positive,
- k) I instructed a full review of internal policies to be carried out to ensure they were up to date and robust. A copy of the internal policies have been attached to the premises supporting material. The review of these policies was completed on 28 February 2023.
- l) All staff and security have been trained in our updated policies and procedures. There is a specific section on young people and I confirm that under our Challenge 25 policy (and licence condition) if a guest cannot provide satisfactory proof of age, entry will be denied and they will be reminded to bring proof of age in future.
- m) The full training for new starters include the following modules:
- WELCOME TO TCC/INDUCTION
  - FOOD ALLERGENS
  - FOOD SAFETY LEVEL 1
  - FIRST AID
  - BAR SET UP
  - POURING
  - BAR STOCK CONTROL
  - TCC MENU SPECS
  - DIVERSITY, INCLUSION AND EQUALITY
  - WELL-BEING
  - LICENSING ENGLAND AND WALES (see below)
  - WORKPLACE SEXUAL HARRASSMENT
  - MAKE SPIKING HISTORY
  - UPSELLING TECHNIQUES
  - BAR EQUIPMENT
  - GARNISHES
  - HEALTH & SAFETY LEVEL 2
  - FOOD SAFETY FOR MANAGERS (managers only)

EMPLOYMENT LAW (managers only)

THE FIRE MARSHALL (managers only)

**LICENSING ENGLAND AND WALES – course breakdown**

**SECTION 1 – KNOWING THE RULES**

-4 Licensing objectives

-Weights and measures

-Accepting the correct ID

-Scenario quiz on when to ask for ID and who to serve and who to not.

**SECTION 2 – WHAT HAPPENS WHEN A LICENSING OFFICER CALLS**

-Information video on Challenge 25, what it is, signage requirements.

-Other enforcement officer information

-Promoting low risk drinking

**SECTION 3 - PRESSURES OF A BUSY NIGHT**

-How to spot potential conflict in the venue

-Dealing with aggressive customers and conflict

-Scenario quiz on who to serve alcohol and who not to in assessing drunk behaviour.

**SECTION 4 – ASSESSMENT**

Scenario based multiple choice questions covering all of the above information.

Pass mark 80%

- n) There is also weekly staff training to review key aspects of the licensing laws and this is supported by training records available for inspection by the authorities.
  
- o) We became a member of Serve Legal in January 2023. Serve Legal is the market leading provider of ID and compliance testing services in the UK & Ireland, and conducts age verification test purchasing, which provides assurance of compliance with the Challenge 25 licence conditions. Serve Legal's engaged auditor community of over two thousand 16 to 19 year olds means they are able to carry out age verification audits all across the UK & Republic of Ireland. Each Area Manager within the Operations team selects suitable work for each auditor to carry out, within a specified timeframe, building rapport with their network of auditors to allow the business to adapt quickly to short-notice requests from clients. If the auditor is required to provide official ID to complete the transaction, the site PASSES. If the auditor purchases the items without showing ID, the site FAILS. This is a positive as it demonstrates to the authorities and customers that we take underage sales

seriously and are being proactive. It also increases management focus on legislation and internal compliance policies, which improves staff performance.

- p) We have had a number of audits and have passed them all, which shows the premises, along with all of the other changes, can operate successfully and promote all 4 licensing objectives.
- q) There are welfare officers at these premises, and indeed also at some other sites, and these are easily identifiable. The purpose of these welfare officers is to monitor patrons in a non confrontational way and to ensure safety of our guests.
- r) We review all the security compliances within operational management on a 4-weekly basis, earlier if any recurrent issue that needs actioned sooner
- s) There is now also a new unique sign off created to inform staff of all ongoing challenges, anomalies, additional processes and new operational Management key points. Any unique / unusual licensing conditions or building / area specific challenges are attached to this
- t) All Management team are to attend the Pub Watch meetings and ALL members of staff to attend the WAVE training provided by Canary Wharf Management
- u) Till records are monitored weekly and any refusal of serve to be logged, this also will be documented with detail on within the logbook and duty of care provided thereafter
- v) A review that includes security/logs/compliances/records/checks/due diligence book shall be discussed and undertaken between GM and Operations Manage on a weekly basis, where any red flags will be reported to the Operations Director immediately so they can be actioned and remedied
- w) Toilet checks are carried out every 30 minutes by staff to ensure customer welfare is being promoted and a toilet check list is completed. Attached at DD4 is a copy of the toilet check list.
- x) A dedicated operations manager has been allocated to this premises. His name is Kieran Manning and he has 20 years experience in Food and Beverage & Late Night Hospitality sectors. Over the years Kieran managed for a number market-leading companies in prestigious venues around Central London. The bulk of his career was at Erbium / Novus Leisure Ltd and then in the Stonegate Group. Since 2021 Kieran has worked as an Operations Manager role for the Nightcap PLC group. Kieran has worked closely with both police and council licensing departments as well as EHO bodies, and has a huge amount of experience in the areas of licensing and general compliance. In addition to his venues' legal requirements he has always been keen to go further in making the venues he has worked with be a positive part of the

community and the sector broadly, particularly around his work on Welfare & Vulnerability Engagement.

18. On NYE the Police Licensing Team visited the premises to carry out an inspection. I understand that no issues were identified to the premises on that occasion.
19. Other than the visit on NYE there have been no further visits to the premises by the Police Licensing Team since the incident.

### **Ongoing Compliance**

20. The actions we have taken since December 2022 have resulted in significant improvements to the operation of the Premises.
21. The ongoing training of staff and security, along with the termination of the security contract has ensured that there is not any culture of expectation by customers. The covert visits conducted has shown the consistent improvements made at the Premises.
22. With the actions taken I am now confident the entire team are committed to ensuring compliance with our premises licence and the licensing objectives and protecting vulnerable persons. There is no way we want to have any repeat of the incident but we have shown over the last 3 months that the premises are capable of, and have been run successfully with full focus on the licensing objectives.
23. We will continue to work to ensure no future lapses. I am also keen to work in partnership with the Police, to continually review and update our procedures so that the Premises operates to the highest possible standards of compliance. I appreciate the Police may not have felt it desirable to engage with the premises after their review application, which is unfortunate, but I am hopeful our working relationship can flourish after this hearing.
24. I believe the Premises is now a fully compliant working environment for every customer, as well as the staff.
25. I confirm that moving forward I am my staff will:
  - a) continue with regular training sessions for staff and security including from external suppliers/trainers. This will all be documented.
  - b) continue monitoring covert visits, at least once a quarter to ensure procedures and practices are being upheld
  - c) continue to ensure practices are kept up to date with changes in law and time.

d) continue to work and liaise, and have open dialogue, with the authorities and especially the Police Licensing Team

I believe the facts stated in this witness statement are true.

Signed *Dawn Donohoe*

*Dated 29.3.23*

**DD1**

**From:** [Emma Heaney](#)  
**To:** [mark.j.harry@met.police.uk](#); [Michael.Rice@met.police.uk](#)  
**Cc:** [Dawn Donohue](#); [Lana Tricker](#)  
**Subject:** The Cocktail Club Canary wharf  
**Date:** 12 December 2022 17:25:02  
**Attachments:** [image002.png](#)  
[Riskproof incident report 09.12.22.pdf](#)  
[Riskproof incident report 04.12.22.pdf](#)  
[Riskproof incident report 29.10.22.pdf](#)  
[Riskproof incident report 22.10.22.pdf](#)  
[Transaction report.xlsx](#)  
[The Cocktail Club incidents - Canary Wharf Team.pdf](#)  
[JD Scan contract documents - signed.pdf](#)  
[Age range Data.csv](#)  
[CW Action Plan.doc](#)  
[CANARY Licensing report\(PDF\) - Flow.pdf](#)

Hi Mark & Michael,

Hope you are both well,

Please find attached Canary Wharf pack with following attachments

- Detailed action Plan, this is already in play

Canary Wharf Incidents have been sent to myself from Canary Wharf security team reported to yourself please note the reported spiking was never reported to us the rest we have logs for and the rest match theirs across our online platform and incident log book.

- Riskproof Online logs

22/10/22  
 29/10/22  
 04/12/22  
 09/12/22

- Incident log book

18/11/22  
 19/11/12

- Transaction report showing any licensing via till
- ID scan contract signed for and arranged for quick turnaround in which Scannet were contacted by myself after meeting on Friday for install this week scheduled for install and training for team on Wednesday
- Flow records that all staff have been retrained again and completed the module
- Age range data, both WIFI and Booking data, 2 tabs collated on the same sheet
- Upweighted security below to ensure one on from open daily

FULL NAME AS PER SIA LICENSE ONLY			Mon		Tues		Wed		Thurs		Fri		Sat		Sun	
FIRST NAME	LAST NAME	BADGE NO.	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
HD	W/C 12th Dec 22		16:00	cl	16:00	cl	16:00	cl	15:00	cl	16:00	cl	18:00	cl		
DOORMAN 2			19:00	cl	19:00	cl	19:00	cl	16:00	cl	17:00	cl	15:00	cl	16:00	cl
DOORMAN 3									19:00	cl	20:00	cl	20:00	cl	19:00	cl
DOORMAN 4																

We continue to monitor all of the above and will ensure that all is adhered too, please let me know if there is anything further that I may have missed on my direct contact details below

Kindest Regards

Emma Heaney  
 Operations Director  
 The Cocktail Club





**DD2**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: : Cocktail Club, Cabot Square  
**Date:** 09 January 2023 15:33:00  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Hi Mark  
Thanks for this

- Roadhouse – 600 Capacity – Westminster - **June 2008 – June 2011**
- Apt Bar – 300 Capacity – City Of London - **June 2011 – Sept 2012**
- Abacus – 800 Capacity – City Of London - **May 2013 – June 2015**
- Mabel’s – 400 Capacity – Westminster - **May 2016 to June 2019**
- Most Recently – Bar Elba – Lambeth - **Nov 2021 to January 2023**

Kind regards  
Lana

Lana Tricker  
Principal, LT Law



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---

**From:** MARK.J.Perry@met.police.uk [REDACTED]  
**Sent:** 09 January 2023 11:03  
**To:** Lana Tricker [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** : Cocktail Club, Cabot Square

Hi Lana,

Christmas and New Year’s was good thanks, very busy with lots of illegal raves to close down.

Thanks for this information, we will consider this and it will form part of our deliberations, can you tell us when Mr Kennington was at these venues please?

Kind Regards

Mark



PC Mark Perry  
Central East Licensing Unit  
Metropolitan Police Service (MPS)  
[REDACTED]  
Email [REDACTED]  
A: Licensing Office, 1<sup>st</sup> Floor Stoke Newington Police Station





**From:** Lana Tricker [REDACTED]

**Sent:** 05 January 2023 13:50

**To:** Perry Mark J - CE-CU [REDACTED]

**Subject:** Cocktail Club, Cabot Square

Dear Mark

I hope you had a great Christmas and a non-problematic New Years!

I wanted to update you on the changes to management of the Cabot Square venue we spoke about at the end of last year. The client has removed the existing management which you were concerned with and a new general manager, Simon Kennington has been appointed. Simon has over 20 years of hospitality experience including 9 years as a Senior General Manager operator. He has a mature management style and has a wealth of experience in running high volume sites in which are all late-night operations predominantly with trading hours till 3am. The venues that he has previously managed have ranged from a minimum of 300 - 800 capacities across various London Boroughs, he has always had great relationships with the local authorities, and participated in local schemes and community initiatives and this will continue in your Borough. Simon has great knowledge of licencing requirements and operating a safe environment is at the forefront of what he does within any venue that he operates. Below is a couple of examples of sites that he has previous operated.

- Roadhouse – 600 Capacity – Westminster
- Apt Bar – 300 Capacity – City Of London
- Abacus – 800 Capacity – City Of London
- Mabel's – 400 Capacity – Westminster
- Most Recently – Bar Elba – Lambeth

I intend to replace Emma as DPS with Simon and I am just awaiting the signed dps consent form. Emma was in operations and Simon will be based at the venue to ensure full compliance with conditions and practices.

We would be happy to meet with you to fully introduce Simon to you and reiterate the changes to operational practices as highlighted in the action plan of the venue previously sent. I believe you attended on NYE and saw the ID Scan in operation. If you are willing to meet pls let me know some available times and we can tee that up.

Thanks

Kind regards

Lana

Lana Tricker  
Principal, LT Law

[REDACTED]

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**DD3**

- **Total scans overall - 19999**
- **Male - 48%**
- **Female - 52%**
- **Average overall age - 28.9**
- **Average Male - 30.1**
- **Average Female - 27.8**

DD4



## Toilet Inspection Checksheet

<b>Week Commencing</b>							
	<b>M</b>	<b>T</b>	<b>W</b>	<b>T</b>	<b>F</b>	<b>S</b>	<b>S</b>
	Checked Initial	Checked Initial	Checked Initial	Checked Initial	Checked Initial	Checked Initial	Checked Initial
12:00							
12:30							
13:00							
13:30							
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23:00							
23:30							
00:00							
00:30							
01:00							
01:30							
02:00							
02:30							
03:00							
Closed							

Sign to confirm that the site toilets have been checked during trading at 30 minute intervals.

Management Signature

Management Name

Date

This page is intentionally left blank





9 Cabot Square  
London E14 4EB

# Operational Manual

LICENSING POLICIES & PROCEDURES

[28.02.2023]

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## 1. Introduction

The aim and purpose of this manual is to promote the Four Licensing Objectives: -

- The Prevention of Crime & Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

The manual sets out The Cocktail Club's minimum operating standards and the policies and procedures to be followed by all staff.

The manual will be reviewed regularly to ensure any changes at The Cocktail Club or to licensing laws are addressed.

The policies and procedures contained within the manual will be incorporated into staff induction and training sessions.

## 2. Management Structure



### 3. Terms of Entry

**The aim of this policy is to prevent problems inside The Cocktail Club by ensuring that the highest standards are in place when vetting guests prior to them entering.**

It is very important that there is a consistent standard and approach to whom is allowed on the premises.

The following controls on entry will be implemented by managers, door hosts and security at the entrance.

The following persons will be refused entry: -

1. Any persons deemed by management or security to be under the influence of alcohol or illegal substances
2. Any persons carrying or thought to be carrying any form of offensive weapon
3. Any person who refuses to be searched when asked
4. Any person who refuses to provide ID when asked
5. Any persons not in keeping with the dress code, set out below
6. Any persons, who are known to have been involved in any criminal activities either within or in the areas surrounding The Cocktail Club
7. Any ex-employees of the business, whose employment was terminated by the company
8. Large single sex groups

**The Cocktail Club retains the right to search customers as a condition of entry to ensure the safety of both customers and staff.**

#### Guest Dress Code

Smart casual dress.

If customers are wearing caps, these are to be removed on entry.

Management reserves the right of entry. Being on a guest list, or having a table reservation, does not guarantee entry.

#### **Venue Specific Conditions**

The Cocktail Club is also subject to specific age-related premises licence conditions in **Annex 2**.

*Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.*

## 4. Young People

**The aim of this policy is to protect children from harm, prevent breaches of premises licence conditions and to prevent underage entry to The Cocktail Club.**

All serving staff will receive regular training (a minimum of twice a year) on age identification and verification. It is imperative that staff understand the restrictions under the Licensing Act 2003 and ways to identify underage persons and prevent sales of alcohol to them.

### **Provisions of the Licensing Act 2003**

Children under 16; cannot be allowed on licensed premises that are solely or primarily for the sale of alcohol unless accompanied by someone over 18 years old (premises offering entertainment or food would not necessarily be considered in this category).

It is unlawful under the Act to allow unaccompanied children aged less than 16 years into the premises between midnight and 5 a.m. where alcohol is supplied for consumption on the premises

16 and 17 years olds; can have beer, wine or cider with a table meal as long as someone over 18 years old accompanies them & purchases the drink for them

### **Under 18 year olds**

- Cannot purchase alcohol
- Cannot knowingly consume alcohol (unaccompanied – see above)

### **Under 18 year olds**

- Cannot sell alcohol unsupervised

### **Over 18 year olds**

- Cannot send an under 18 to purchase alcohol
- Cannot purchase alcohol for an under 18 unless they are 16 or 17 and eating a meal at a table
- Cannot allow the unsupervised sale of alcohol by someone under 18

### **Offences under the Licensing Act 2003**

There are numerous offences involving the sale of alcohol to children:

A person commits an offence under section 146 if he sells alcohol to a child under 18. A club commits an offence under section 146(2) if alcohol is supplied by it or on its behalf to, or to the order of, a member of the club who is under 18.

A person charged with an offence by reason of his own conduct has the same defence as is available in respect of a section 145 charge, that the person charged had no reason to suspect that the individual was under 16; and a person charged because of the act or default of another has a due diligence defence available.

Under section 147 it is also an offence to knowingly allow the sale of alcohol, on relevant premises, to a child under 18. Here, the offence would not be committed if the child unwittingly consumed a spiked drink.

A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 5 (£5,000) on the standard scale.

### **Mandatory Conditions**

Every Premises Licence that authorises sales of alcohol is subject to a mandatory condition requiring an age verification policy.

*(1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.*

*(2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.*

*(3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either (a) a holographic mark, or (b) an ultraviolet feature.*

### **Venue Specific Conditions**

The Cocktail Club is also subject to specific age-related premises licence conditions in **Annex 2**.

*Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.*

**The following procedures will be implemented by managers, door hosts and security at the entrance and by serving staff at the point of sale.**

1. The premises operate a strict 'Challenge 25' policy where any guest appearing under 25 will be required to provide proof of age.
2. The Cocktail Club does not allow under 18-year olds on the premises.
3. This policy is enforced at the entrance by security and managers.
4. Only international passports, UK driving licences or any PASS approved proof of age card will be accepted as proof of age.
5. When checking ID staff will:-
  - Check the 3D effect hologram is not stuck on
  - Check photo to ensure it is the correct person
  - Check date of birth
  - Check ID for any tampering
  - If unsure of the persons age refuse service / entry
6. **IF A GUEST CANNOT PROVIDE SATISFACTORY PROOF OF AGE, ENTRY WILL BE DENIED AND THEY WILL BE REMINDED TO BRING PROOF OF AGE IN FUTURE**

7. There will be clear and prominent signage displayed at the entrance advising guests of the age policy and that “if you look under 25 you will be asked to prove you are 18”.
8. The age policy will be displayed on the premises’ website and any promotional material.
9. The premises will keep a written record each night of guests who are refused entry or service at the bar.
10. Staff serving alcohol must also question a customer’s age, regardless of if there is security vetting entry to the premises, if they feel that they may not be 18 years of age using the ‘challenge 25’ policy.



## 5. Search and Seizure

**The aim of this policy is to prevent prohibited items being brought into The Cocktail Club. For the purposes of this policy, prohibited items are considered to be the following:**

- Weapons
- Non-prescription drugs
- Alcohol

**The following procedures will be implemented by managers and security at the entrance.**

1. All persons entering may be subject to a search at any time.
2. Signage will be prominently placed at the entrance and queuing area stating:  
*The premises operates a search policy. All persons entering The Cocktail Club may be subject to a search of outer clothing and personal belongings. This is a condition of entry. Those unwilling to be searched will be refused admittance. Any illegal drugs or weapons will be seized, and the police notified. By order of the management.*
3. Searching will consist of a physical pat down search and guests may be asked to empty their pockets.
4. Bags may be opened and searched.
5. All searches of customers will take place in a well-lit area clearly covered by CCTV.
6. Searches will take place prior to any entrance fee payment.
7. All searches will be same sex, i.e., male security to search male guests and female security to search female guests.
8. Guests may be searched on entry and re-entry.

**In addition, please be aware that all Managers are instructed to call the Police in any case where a weapon or drug dealing is involved or suspected.**

**In the event of seizure of a weapon or drugs:**

- Ensure the process is witnessed.
- Confiscate the item found.
- Record and log details of drugs found in the drugs / weapons register.
- Place drugs in a sealed bag (provided by police) or sealed envelope signed across the seal.
- Place knives or sharp objects in a weapons tube or safe container
- Call police on the non-emergency number (101) and inform them of seizure.
- In the event of a large quantity of drugs or a weapon being found, call the police immediately on 999. Where possible the suspect should be detained (subject to the safety of staff).

### **Drug Seizures**

An entry will be made in the drugs register for every seizure. The process will be witnessed. The register will contain the following information.

1. Date / time item found
2. Where found
3. Details of person finding and any witnesses
4. Description of item
5. Seal number of property bag or unique reference number
6. Any action taken (e.g. person detained, police called)
7. Signature of person seizing
8. Signature of manager
9. Details of person searched (if available)

## 6. Preventing & Dealing with Intoxication

**The aim of this policy is to prevent guests becoming intoxicated and, if so identified, dealing with them in an effective and appropriate manner.**

**All serving staff will receive regular training (a minimum of twice a year) on preventing, identifying and dealing with intoxication and their responsibilities under the Licensing Act 2003.**

It is an offence under the Licensing Act 2003 to knowingly sell to (or obtain alcohol for) a drunk person. It is also an offence for a drunk and disorderly person to fail to leave a licensed premises when asked by a police officer or the person in charge of the premises.

### Procedures

1. Security and management to regularly patrol venue, monitoring customer behaviour
2. Any member of staff who believes a customer is intoxicated will inform a member of management
3. Anyone appearing intoxicated must be escorted outside to get air
4. The person will be informed clearly why they have been approached
5. Bottled water will be provided to any person believed to be intoxicated
6. A manager must be present at all walkouts
7. The guest will be walked out through the main entrance unless there is a good reason to do otherwise; e.g. aggression with another group
8. Security and management on the door must be informed to ensure the person does not regain entry to the venue without the consent of the manager
9. Any person wanting to gain re-entry must see the manager who will make a decision whether the person is fit to re-enter the venue
10. If yes, this will be communicated to all security and managers that the person is now back in the venue
11. If the person is escorted out The Cocktail Club a second time, they will not be allowed to re-enter
12. All walk outs will be recorded in the ejections log
13. The guest's welfare will be considered at all times and the Guest Welfare Policy followed
14. Advice on local transport options will be given
15. If required, taxis should be arranged to ensure the person arrives home safely
16. Where necessary, the expense of the taxi will be met by premises
17. Staff will understand that some illnesses can have symptoms which may make a person appear intoxicated.

## **Staff Training**

### **Identification**

Servers are not expected to know a customer's blood alcohol content (BAC) but they are expected to recognise the signs of visible intoxication. Staff will be taught to identify four main areas using a system known as SAAB.

1. Speech
2. Appearance
3. Attitude
4. Behaviour

There are more than 50 indicators within these four areas. If a person shows one or two of these signs that does not necessarily mean the person is intoxicated. But a combination of some of these and a sudden change in behaviour could be a strong indication that a person is intoxicated.

If a member of staff is not sure they should not serve the person and consult a manager.

### **Intervention and Refusing Service**

Staff have the right to refuse alcohol service to anyone as long as they don't violate anti-discrimination laws. Management commitment is essential to create a supportive environment that encourages responsible employee practices.

Owners and managers have an obligation to support their servers' efforts to obey the law. The best way to do that is to establish policies that promote responsible alcohol service.

At some point all serving staff will be faced with a decision about refusing to serve alcohol to a patron. Whether this decision is based on legal or safety requirements, it is important we deliver a consistent message that all patrons understand.

Intervention is the plan of action for a server that:

- Prevents a customer from drinking to intoxication
- Prevents minors from drinking

It is the servers' plan for bringing together legal and professional duties. Staff will show a professional attitude and approach when refusing service and will be instructed to:

#### **Intervene early – don't let a problem develop**

If possible, obtain agreement from a supervisor and notify security, if available, before speaking to the patron.

**Be courteous & concerned** - People are cooperative when being treated respectfully

**Be tactful** – Try not to accuse a guest of being intoxicated. Simply say you cannot serve them alcohol at this time

**Be firm** – remain calm & don't back down. Don't allow the customer to talk you out of your decision. If necessary ask for assistance from a manager or another employee

**Be confident** - This convinces people you know what you are doing

**Be discreet** - Try not embarrass the customer in front of others.

All serving staff will:

- Smile, make eye contact, and take your time checking ID
- Chat with customers to determine their status.
- Watch for signs of visible intoxication (speech, attitude, appearance, behaviour)
- Wait until a customer finishes a drink before offering another.
- Check with co-workers if they have served the customer.
- Slow service to a customer who is drinking rapidly.
- Encourage customers to order food.
- Offer water, coffee, or other non-alcoholic spacers between drinks.
- When you are refusing service, inform their manager and co-workers.
- Take a manager or security with you when you have to refuse service or pull a drink.
- Use peer pressure when appropriate by asking for support from the customer's friends.
- Replace a pulled drink with something else: coffee, water, food.
- Make a record of refusal of service, especially those involving threats or aggression.

**Staff will also be taught to use 'intervention Scripts'**

Avoiding "you" statements - Using "I" statements

Not to: bargain; debate; get defensive; or give lengthy explanations.

**To focus on the law and the consequences you face**

"I'm not able to bring you another drink tonight. I could get into trouble with the authorities and we could lose our Licence if I serve you more alcohol. How about I bring you a cup of coffee and get you something to eat."

"Our company policy doesn't allow me to serve you any more alcohol. We could get into trouble with licensing and lose our premises license. I'll bring you some water and how about a basket of French fries or a plate of Buffalo wings to go with it?"

"Listen, I could get fired if I serve you another drink. The police could fine the business and me, and I could lose my job. I'll bring you a water or a cup of coffee instead."

**To focus on the customer's well-being**

"Look, I'm concerned about your safety. I want to be sure you get home okay tonight. Why don't I bring you a glass of water while you look at our appetizer menu and choose something to eat?"

"Legally, I'm not allowed to serve you another drink. This glass of water will help you avoid getting a hangover tomorrow, and in the meantime, I'll bring you a snack."

**Don'ts of service refusal**

- Don't call your patron a 'drunk' - warn them politely that their behaviour is unacceptable.
- Don't be persuaded to give them 'one last drink' after you have stated that they have had enough.
- Don't agree to let the person finish their drinks (it is an offence under the Liquor Act to allow a minor or unduly intoxicated or disorderly person to consume liquor on licensed premises).
- Don't raise your voice. If they raise theirs, lower yours.
- Don't put off refusal hoping that the patron will leave after the next drink - act while the patron can still be reasoned with.

- Don't judge other people.
- Don't think the matter is over because you have verbally addressed it.
- Don't tell them what to do or how to behave.

**In addition, as part of your premises' due diligence regime, a record will be kept of all persons:**

- a) refused entry to the premises
- b) any person refused service of alcohol
- c) any person assessed for intoxication
- d) any person asked to leave because of intoxication

## 7. Drugs

**The aim of this policy is to prevent the use and/or supply of controlled (illegal) drugs.**

**The use of controlled drugs represents a health and safety risk to our guests and staff. We are committed to providing a drug free environment for the benefit of all our customers and employees.**

**This policy sets out how we intend to meet this commitment through the following three main aims:**

- **Prevention of drug use on the premises;**
- **Prevention of drug dealing on the premises;**
- **Safeguarding those that have taken drugs.**

### **Policy Awareness**

#### **Staff**

All new members of staff are required to read and sign this policy as part of their induction. A copy of this policy, endorsed with a manager's signature, is kept on each staff member's file.

Staff members have a responsibility to seek clarification on any points of this policy they do not understand.

Staff can expect to receive drug awareness training on a regular basis.

All staff will be made aware of any changes to this policy.

#### **Management**

In addition we will endeavour to ensure that all members of management attend formal drug awareness training, such as the BII Drug Awareness course.

Managers/supervisors have a role to ensure that all staff under their control are familiar with this policy and attend refresher training as appropriate.

#### **Guests**

Customers and other visitors to our premises shall be made aware of our expectations in regard to this policy in a number of ways:

- Appropriately sited zero tolerance notices.
- Implementation of a search policy on occasions where a drug related risk is identified (see separate search policy document).
- Staff adopting a zero tolerance to use of controlled drugs on the premises.

### **Policy Implementation**

#### **Staff**

The possession, supply, and distribution of controlled drugs is absolutely prohibited on this premises. This includes inside the building and surrounding land such as outside seating areas and smoking areas.

Staff will receive training on the following:

1. The relevant laws controlling the use and supply of drugs. Please refer to Appendix 1.
2. The types and effects of the common controlled drugs, including signs of misuse. Please refer to Appendix 2.

3. The measures taken to prevent the use and dealing of the common controlled drugs.

If a staff member suspects that controlled drugs are being taken or distributed by employees or customers, they must inform a manager immediately. Any information given will be treated in the strictest confidence.

In connection with the supply or consumption of controlled drugs, staff must:

- Remain vigilant at all times during the performance of their duties. This includes being mindful of individuals showing signs of drug use, evidence of drug paraphernalia, knowledge of high risk areas such as toilets, corridors and secluded areas, overheard conversations involving drug references and suspicious behaviour.
- Notify a manager if they suspect that any person is using, dealing or attempting to deal in drugs on the premises (whether such person is a customer or an employee of the company).
- Fully support the company in its drugs policy.
- Report to a manager any drugs or suspected drugs which the employee may find in the premises at any time. Ideally suspected drugs should only be handled with appropriate personal protective equipment. For example, puncture resistance gloves should be worn to handle needles to avoid needle stick injury and appropriate gloves worn to prevent any skin to drug contact.
- Any suspected drugs found on the premises should not be left unattended if at all possible.
- Staff shall not attempt to purchase any illegal substances as a means of trying to trap someone who they suspect is dealing – this is illegal

All staff are expected to fully cooperate with the authorities in any investigations arising from the use, or suspected use, of controlled drugs associated with this premises.

**Please note that anyone in breach of the above points will be disciplined as per guidelines in the employee policy.**

#### **Managers**

If you are concerned in the management of the premises and are made aware of the use or attempted use of controlled drugs, whether for personal consumption or supply to others, then you have a legal obligation to take action. If you do not take action to prevent the activity it is likely that you are committing an offence.

In the event of discovering the personal use of controlled drugs:

- The person(s) concerned should be informed that the premises operates a zero tolerance to the use of controlled drugs.
- If practical any controlled drugs should be seized.
- The person(s) concerned should either be warned or instructed to leave the premises depending on the circumstances.



- A written record made of the incident, including a description of the drugs involved and steps taken to prevent the drug use.

Managers are instructed to involve the Police in any case where drug dealing is involved or suspected.

In the event of seizure of drugs:

- Ensure the process is witnessed, ideally by security or another member of staff.
- Confiscate any drugs found, if safe to do so.
- Record and log details of drugs found in the drug register
- Place drugs in sealed bags (provided by police) or a sealed envelope (signed and dated across the seal).
- Call police on the non-emergency number (101) and inform them of seizure in accordance with local police procedure. Make sure a CAD number is taken and added to the entry in the drugs register
- In the event of a large quantity of drugs being found, call the police (999) immediately.
- If drug seizure captured on CCTV, secure backup of relevant footage.

In this context, only a police officer on duty is lawfully allowed to be in possession of controlled/illegal drugs. Staff and door supervisors are not authorised to possess controlled drugs.

**Therefore never:**

- ✗ Put drugs into your pockets
- ✗ Remove controlled substances from the premises
- ✗ Ignore drug taking
- ✗ Allow known or suspected dealers in your venue
- ✗ Act on your own, always have a witness
- ✗ Flush drugs down the toilet

Managers should ensure they are fully trained on the use of CCTV equipment (separate CCTV policy in place to ensure correct operation). They are required to familiarise themselves with locations of cameras, and any potential “dark” spots.

Managers should be familiar with local police protocols on the seizure and holding of controlled drugs.

In certain instances it may be necessary to implement the crime scene preservation policy, for example, if there is a suspected overdose or a large quantity of controlled drug is discovered.

**Spotting the Signs of Dealing in Your Venue**

- A person or group being very popular
- People taking regular trips to the toilets
- Customers staying for a short while and not buying drinks
- Secretive or sly conduct
- Known users/dealers using the venue

- Money changing hands
- Individuals with unusually large amounts of cash

#### **Drug-Related Litter to be Vigilant for**

- Syringes, pipes, tubes, scorched tinfoil, burnt spoons.
- Small paper wraps, self-seal bags, small bottles, or vials
- Razor blades or plastic cards used for chopping
- Cardboard filters on hand-rolled cigarettes
- Ripped cigarette packets
- Powder on surfaces

#### **Door Supervisors**

Well trained, professional, SIA (Security Industry Authority) registered door supervisors are employed at the venue. Their duties include monitoring those entering and using the premises, checking toilets, and monitoring those leaving who showing signs of drug misuse. Registered door supervisors must undergo drug awareness training as part of the registration process.

A door supervisor log is maintained and endorsed by management to ensure all security staff are appropriately registered.

#### **Toilet Attendants**

On occasions where toilet attendants are employed their duties include:

- Reporting instances of suspected drug use or dealing to a duty manager. This may include those who spend unusually long periods in a cubicle, overheard conversations and evidence of drugs paraphernalia such as needles, wraps, powder, etc.
- Being vigilant about those that may have taken drugs, particularly those that may be in distress, and report to management.

In addition managers and security are required to carry out regular toilet checks.

#### **Safe guarding those that have taken drugs**

We ensure that we have sufficient first aiders on duty who have been trained to recognise and respond to common drug induced problems.

Anyone suspected of suffering ill effects of drugs will be encouraged to stay on the premises where they can be closely monitored. The attending first aider will make an assessment whether to call an ambulance. In cases where no further medical intervention is considered necessary, management will ensure appropriate steps are taken to ensure the person is delivered to a safe environment.

Staff are made aware of the potential risk of drink spiking. In recent years there has been an increase in reports of “Drug Facilitated Sexual Assault” (DFSA). Typically, the victim has a drug, such as Rohypnol or GHB surreptitiously placed in their drink. Once the drug has taken effect the victim is often powerless to prevent assault. Staff should be vigilant about:

- Unattended drinks. Any unattended drinks should be kept behind the bar for safe keeping.
- Customers displaying signs of “accelerated” intoxication.

- Suspicious behaviour, associated with a DFSA scenario.

Staff should report any instances of suspected drink spiking to a manager. Staff should also consider crime scene preservation for any drink/object connected to an allegation of spiking.

### The Misuse of Drugs Act 1971

This is the main piece of legislation covering drugs and their categorisation.

Drugs are split into three classes (in accordance with their toxic effect), which determines the penalties for offences under the Act.

**The following table sets out a summary of the potential penalties for possession and dealing controlled drugs: This may change over time as drugs get reclassified from time to time.**

Class of Drug		Possession	Dealing
<b>Class A</b>	Ecstasy, LSD, heroin, cocaine, crack, magic mushrooms, amphetamines (if prepared for injection), Opium	Up to seven years in prison or an unlimited fine or both.	Up to life in prison or an unlimited fine or both.
<b>Class B</b>	Amphetamines, Cannabis, Methylphenidate (Ritalin), Pholcodine.	Up to five years in prison or an unlimited fine or both.	Up to 14 years in prison or an unlimited fine or both.
<b>Class C</b>	Tranquilisers, some painkillers, Gamma hydroxybutyrate (GHB), Ketamine, Rohypnol (Date rape drug)	Up to two years in prison or an unlimited fine or both.	Up to 14 years in prison or an unlimited

### Offences under the Misuse of Drugs Act 1971

Unlawful possession of a controlled drug

Unlawful possession with intent to supply

Supplying or offering to supply a controlled drug

Producing or being concerned in the production

Cultivating cannabis

Being the occupier or concerned in the management of premises who knowingly permits or suffers certain activities to take place on those premises

### Psychoactive Substances Act 2016

The Psychoactive Substances Act came into force on 26 May 2016. This act makes it illegal to produce, supply, import or export any psychoactive substance (such as nitrous oxide 'laughing gas') that is likely to be used to get high.

### Legal high

The term 'legal high' is commonly used to describe new psychoactive substances (NPS) but it is misleading. Many 'legal highs' (e.g. types of synthetic cannabinoids) are already controlled

under the Misuse of Drugs Act, which now specifies particular drugs and groups of drugs (e.g. synthetic cannabinoids that impact on specific receptors in the brain). Many products sold as 'legal highs' contain multiple NPS and many contain illegal or banned substances.

**Preventing drug use within a venue will use a combination of the following:**

<b>Staff</b>	<b>Environment</b>
Trained staff	Customer signage
Use of SIA registered door supervisors	Visible monitoring of areas
Body and bag searches	Use of CCTV
Toilet attendants	Policies including search and seizure
	Design and layout considerations

**If you knowingly allow drug offences to take place in a licensed premises, you are breaking the law.**

**Drugs Signage**

**WARNING**

**The Cocktail Club  
Operates a Zero  
Tolerance Drugs  
Policy**

**Any Person Found in  
Possession of Drugs  
Will be Detained and  
the Police Called  
Immediately**

**By Order of the Management**

## 8. Prevention & Intervention

**The aim of this policy is to prevent or intervene in relation to serious incidents.**

*'Early Intervention is better than a cure'*

Police regularly scrutinise events leading up to a serious incident. If a venue has not got the appropriate procedures and measures in place and this was a direct (or even indirect) cause of the incident (or escalation of an incident) then it is likely the police will take some form of remedial action. This could range from requiring appropriate measure to be implemented, or conditions being added to the Licence, for less serious incidents to more robust action that can include Review of the Premises Licence and even closure of the venue.

Prevention and intervention measures fall into three groups – policies and procedures, human resources and physical measures.

### **Comprehensive & Effective Policies & Procedures**

The Operational Manual details the premises policies and procedures, including:

- Terms of Entry
- Search and Seizure
- Age Verification
- Responsible Alcohol Sales
- Drugs
- Ejections
- Security Positions – Specific Job Requirements
- Violence & Aggression
- Management of Outside / Dispersal
- Smoking
- Incident Reporting
- Major Incidents
- Crime Scene Preservation
- Bottle Service
- Events
- Smoking
- CCTV, Body Worn Cameras and ID scanners

### **Human Resources**

- Staff Training
- Proactive Managers and Staff
- Staff Awareness and Vigilance
- Door Supervisors

### **Physical Measures**

- Design of Premises – lines of sight etc.
- Access Controls
- Search Equipment
- CCTV and body worn cameras
- Identity Scanners
- Good Premises Maintenance
- Chelsea clips
- Signage

## 9. Guest Welfare

**The aim of this policy is to explain the importance of guest welfare and to present ways to provide for the welfare of our guests.**

**It is very important that the various risks that can affect the welfare of our guests is understood. You will also know the measures available to keep your guests safe. All staff will undergo WAVE (Welfare and Vulnerability Engagement) training.**

There is a clear responsibility for operators to have a duty of care for their customers. Aside from this, the vast majority of businesses want their guests to have a good time in a safe environment.

There are various policies and procedures – both from a licensing and a health & safety perspective that address the welfare of guests inside the premises, e.g., risk assessments, first aiders, a responsible alcohol sales policy, door supervisors etc.

It is also important to consider the welfare of guests as they leave your premises. Ask the following questions:-

- Are they intoxicated?
- Are they vulnerable or at risk of harm?

Vulnerable people, particularly through intoxication, are far more likely to become the victim of crime:-

- They are less aware of their property, and can become the victim of theft
- They are less aware of their surroundings and can become victims of assault, e.g. knocking into people, sitting at the wrong table, spilling drinks and prompting an aggressive response from other people.
- They are less aware of their surroundings and can become a victim of sexual assault

Vulnerable people, particularly through intoxication, are also far more likely to become the victim of an accident:-

- From slips, trips or a fall
- Road traffic accidents

**Our guests' safety and welfare is of paramount importance and should be considered at all times and the appropriate action taken.**

**All staff will receive Welfare and Vulnerability Engagement (WAVE) training to: -**

- Provide a safer environment for the guests
- Reduced crime on the premises
- Reduce the chance of a sexual assault taking place
- Decrease the chances of a guest coming to harm either on or off the premises
- Increased guest satisfaction
- Improved working partnerships with statutory authorities
- Enhanced staff training
- Lower instances of ASB (Anti-Social Behaviour).
- Prevent/reduce sexual offences

- Reduce preventable injury linked to alcohol and drug use in the licensed economy
- Reduce opportunities for criminal activity and anti-social behaviour in licensed premises
- Promote partnerships and engagement with communities and key stakeholders in the licensed economy

**WAVE initiatives help to identify people before they become potentially vulnerable, as well as:**

- Victims of crime
- Victims of anti-social behaviour
- Those who have come to harm in any other way
- Those involved in crime/antisocial behaviour/harm

It also aims to ensure vulnerable people are properly supported with positive interventions. Ultimately, WAVE is a prevention and harm reduction initiative.

**But what is Vulnerability?**

There are several ways of defining vulnerability but for the purpose of this book, we will use the following broad definition taken from the Oxford English Dictionary:

Anyone exposed to the possibility of being attacked or harmed, either physically or emotionally

**Factors Making a Person Vulnerable**

**Age**

Younger people tend to be more vulnerable to risk of harm. But age not overriding factor. Is the individual vulnerable due to their age, young or old?

**Alone**

When separated from friends, appearing lost or isolated guest can be easily targeted.

- Where possible, attempts should be made to contact friends who may be able to assist.
- CCTV, ID scanners, etc. may well assist in identifying friends.
- Is there an opportunity to make contact with family?
- When refusing entry, make sure someone stays with the vulnerable person.

**Overconsumption of Drugs & Alcohol**

This will reduce inhibitions and decrease ability to make informed decisions. It changes perceptions of a person's own abilities and limitations but the signs vary from being overly gregarious or passive, through to aggressive or a lack of spatial awareness. Sometimes guests appear unwell and usually experience a loss of motor neuron skills.

If persons are ejected without their belongings, they may have no means to contact anyone, no money and/or appropriate clothing, which may render the person vulnerable.

**Considerations:**

- How can you assist the person in getting home safely? Do you need to arrange a taxi?



- Is the individual/group so intoxicated that it is not reasonable to expect them to be able to take care of themselves?
- You have a responsibility to those refused entry, particularly if underage – do you have a child in front of you?
- Are they accompanied by others who may also be seeking entry - are they capable of taking responsibility for the individuals concerned?
- Seek assistance from a colleague where possible and obtain full details from emergency services, such as the call reference number.
- Ensure staff are aware of the location of the medical kit and ensure it is in date and the staff are trained to use it.

### **State of mind**

The emotional or mental state that the guest is in can be influenced by a range of factors – friends will usually notice a difference in behaviours first.

- Staff must be aware of guests showing excessive emotions.
- Enlist a guest's friend to calm the person and help them get home safely.

### **Wearing Expensive Jewellery**

A spate of watch thefts that occurred in London's West end and beyond has highlighted this issue. Many of the crimes occur after the guest has been followed home, thus making it difficult for the various local police forces to take effective action.

- Warn guests thieves operate in the area and to hide their valuables.
- Where possible, escort them to their taxis.
- Ensure staff outside are vigilant.

### **Presence of an Offender**

Ultimately, the one thing that puts guests at risk from harm is usually the presence of an offender. Risk of potential harm increases substantially when the above factors are combined with the presence of a criminal offender.

- It's important to remember that anyone from any background can commit an offence. Offenders can be predatory or opportunistic in nature. There is no one specific demographic relating to offenders.
- Offenders may be looking to target vulnerable people to commit crime or may be looking to take advantage of a situation for their own benefit.
- Almost 80% of sexual assaults are carried out by someone known to the victim.

**How to recognise vulnerability**

As always, early identification is key. Trust your instinct - if you have concerns then make an intervention.

Use the SAAB (speech, attitude, appearance, and behaviour) methodology which we covered in the section on preventing intoxication to assess the guest. As a reminder, here are some highlights:

Recognising Vulnerability	
Unsteady on their feet	Drowsy
Incoherent	Upset
Irrational	Being controlled by somebody
Glazed eyes	Injury
Dishevelled appearance	Quiet
Lost	Excitable
Alone	Missing clothing
Being plied with alcohol/drugs	Vommiting

**Where can we intervene to reduce vulnerability?**

- In the street
- In the premises
- Refusal of entry to premises
- Ejection from premises

**Ask for Angela**

Ask For Angela provides a useful additional tool for dealing with vulnerability.

- ‘Ask for Angela’ initiative aims to reduce sexual violence and vulnerability by providing customers with a non-descript phrase they can use to gain assistance from staff members in order to be separated from the company of someone with whom they feel unsafe due to that person’s actions, words or behaviour.
- By “asking for Angela”, an individual should be treated as a vulnerable person and the interventions you have in place should be applied.



### Safeguarding Departing Guests

1. Any information regarding thieves, or suspicious activity, in the vicinity of the premises will be reported to the police
2. Any information or intelligence received from police will be included in pre-opening briefings with security and staff.
3. Staff will receive Welfare and Vulnerability Engagement (WAVE) training.
4. There will always be a suitably trained member of staff acting as a Guest Welfare Officer whose primary role will be the welfare of guests and who will deal with any person considered vulnerable.
5. Security and staff at the entrance will proactively monitor guests leaving. Any person who is considered to be at risk or vulnerable will be spoken to by a manager.
6. Any person considered vulnerable will engage the Guest Welfare Policy.

7. A taxi will be offered to any person who is considered to be at risk or vulnerable. If the person concerned has a car nearby security will escort them to their vehicle. A note of the vehicle description and registration number will be recorded and retained.
8. Any intervention, or proactive action, will be recorded including refused assistance.
9. Security will monitor the street and report any suspicious activity to the manager in charge.
10. Security equipped with Body Worn Cameras (BWC) will attempt to video any persons loitering or acting suspiciously in the immediate vicinity.
11. Any relevant information will be shared with neighbouring premises.

## 10. Ejections

**The aim of this policy is to ensure safe ejections / walk outs of guests who are required to leave The Cocktail Club.**

**It is very important that the various risks that can affect the welfare of our guests is understood. You will also know the measures available to keep your guests safe.**

There are occasions when you will have to ask a guest to leave your premises. This normally falls into three categories:

- For violent conduct (fighting or aggressive behaviour)
- For non-violent conduct (being intoxicated)
- Someone suspected of a crime that you will detain for the police.

Staff will be trained to identify when someone is intoxicated, causing trouble, or acting inappropriately. They always need to be vigilant and be confident about taking action by calling a manager or security. For additional support, keep radios behind bars, in cloakrooms, and toilets as these can all be flashpoints where staff are often working alone.

Staff will be trained on how to use the radios, when to inform door supervisors and management of any concerns they have, and what to do if they have witnessed an incident. If they are approached by a guest in distress or if they need assistance, they must react immediately and call for help.

As far as possible, security should deal with any potentially violent situation, NOT bar staff. In all instances, the situation must be dealt with calmly and professionally. Staff should follow a strict procedure which is set out to ensure safe ejection for both the customer, door supervisors, and employees whilst causing minimum disruption to other guests.

For minor misdemeanours (for example, refusing to move away from a designated fire exit or standing on a chair), consider issuing a first warning. If there is a further instance of misbehaviour, the persons should be ejected using a hands-off policy. At any time, a Customer Code of Conduct may be quoted.

### **Process of Ejection**

The following is a summary of the process that should apply if an ejection is required. Please note that you need to consider the peculiarities of your venue and staffing situation and develop your own process that is most effective:

#### **Ensure you understand the situation and assess it first**

Always take account of the whole situation, for example, those involved may be with a large group of friends who may react violently.

#### **Ensure you have support**

Before taking any form of action, call a manager and security for assistance.

#### **Explain the reasons why a person is being ejected**

It is often better to inform their friends first of what is about to happen so they don't react badly. Remember, if you embarrass someone or cause them to lose face, the situation may quickly escalate.

The reasons for being asked to leave need to be clear; you may find it is easier to ask someone to get some fresh air for 10 minutes.

### **All guests should voluntarily walk out**

This is often called a 'hands off ejection'. Wherever possible, persons being ejected should not be touched, although in law, reasonable force may be used. You always need to be careful when using any force if you think it is 'reasonable'.

### **Use the front entrance where possible and use your radio to inform the door**

If there is a confrontation between guests that you fear could escalate or there is a situation that disrupts the business, both parties should be ejected. In this situation, use more than one exit or delay one party leaving to avoid further confrontation outside.

The senior manager on duty or the Designated Premises Supervisor will have the final say on who is ejected following any confrontation in the premises.

In all cases, a record should be kept of all ejections. Where any force has been used, a full incident report should be written. If the authorities require further statements and/or your attendance is required at a police station, this should be done immediately or at the police's request.

Always remember you are trying to de-escalate a situation; be discreet and try to avoid embarrassment. Be confident in your delivery but don't raise your voice. Clearly explain the reason for why they are being asked to leave or get some fresh air.

Below are some suggested scripts that can be used but each situation will be different so use your experience and best judgement:

If speaking to their friends first: *"Look, I can see you are all having a good time. Unfortunately, your friend there is acting inappropriately or is intoxicated, and we need to take them outside for some fresh air and water. We want you all to continue enjoying your night, but we need one of you to come with your friend to help look after them."*

Or to the person directly: *"We want you to have good time, but we need you to come outside for some fresh air and water for a few minutes – please can you come with us. One of your friends is going to come with you."*

Should the customer not understand the reason after two explanations or they refuse to cooperate, disengage and hand responsibility to security who will advise the customer that they will be shown the route off-site. The manager should always observe their removal.

Should a physical ejection be necessary, only reasonable force will be used. There is more detail on this subject further on, but any force should be a last resort.

- Offer to find the friends if they are not already with them and collect any coat or personal belongings they have left in the venue. **Always remember GUEST WELFARE.** The customer will remain with the manager and the member of security while these happen.
- Give advice on how to get home safely.
- Get their friends to look after them or, if appropriate, pay for a taxi home.
- If a customer is being collected and it is safe to allow them to wait to be picked up, an appropriate area will be available for them with security presence.
- The customer should be offered a bottle of water in the meantime.
- Take the details and description of any customer being ejected from the venue and make a written record.

### **The Use of Reasonable Force**

Remember that you will always have to be able to explain and justify your actions, perhaps even in legal proceedings, so think before acting and remember your conflict management training.

These questions are not a definitive list but will give you a sense of what you need to assess a physical ejection.

- Is it absolutely NECESSARY to use force?
- What amount of force is REASONABLE to eject the person?
- Consider the size and build of the person to be ejected
- Are any weapons used or a threat from the person to be ejected?
- When is force no longer required?

For further clarity, let's look at the words NECESSARY and REASONABLE in more detail.

#### **NECESSARY**

The law is quite clear on the term 'necessary' with regards to the use of force. Necessary force is not what is deemed necessary by someone considering the facts from a safe and comfortable place well after the events, but what the person carrying out the acts in question considered necessary at the time. Only you can say why you thought it necessary to use the force at the time, whereas a court may have to ultimately decide whether the amount of force used was reasonable or not.

#### **REASONABLE**

The term 'reasonable' is more difficult to define and not always easy. It will depend on the circumstances and careful thought will need to be given when you assess the seriousness of the threat.

#### **Ask yourself the question!**

Would it be reasonable to punch or use physical force on someone who is verbally abusing you? The answer is no.

Physical force should only be considered when there is a real possibility of physical harm to you or someone else and even then, the amount of force used should be appropriate and reasonable to the situation.

A door supervisor or manager claiming self-defence as an excuse for the use of force must be able to show that:

- They did not want to fight
- Responded with no more force than was reasonable to repel the attack

If you can demonstrate those two things, force is not unlawful and no criminal offence is committed.

If, however, the force continues outside (having used reasonable force inside) to 'teach him a lesson' or to 'stop him coming back again', then that extra and unnecessary use of force would not be seen as 'reasonable' and would make you or the door supervisor liable to criminal proceedings for assault.

#### **Remember**

The test whether force is reasonable in any given circumstance is a subjective one and is assessed on the facts as the person concerned believed them to be at the time. As such, a full incident report should be written whenever force is used to eject a customer.

## 11. Security Roles & Responsibilities

This is an example of security positions and roles when The Cocktail Club is operating on peak nights or at capacity. Variations of this plan will be used on less busy nights after assessment by the DPS. All security will sign in the door supervisor log at the beginning of their shift. These positions will be allocated at the security briefing at the beginning of the shift.

### Security #1 - Head of Security and Security #2 Entrance

- Vet entry in line with entry policies
- Bring anything untoward to Managers attention
- Refusing entry will be conducted in a professional manner. Management always have the final say
- Control of clickers ensuring that we are never over capacity at any time. Smokers must be included in the clicker count
- Complete the clicker count sheet at 30-minute intervals.
- Vet guests and check identification and for intoxication
- Search guests in line with search policy.
- Check IDs and scan IDs through the identity scanner.
- Monitor and supervise outside seating area and smokers.
- Stop guests leaving with alcohol (if not going to seating area).

### Security #3 & #4 Roaming

- Monitor for unattended property
- Monitor floor and bar
- Monitor any customers who may be intoxicated
- Control congestion
- Monitor interaction between staff and customers
- Watch for pushing / aggressive behaviour
- Regularly check toilets

### Venue Specific Licence Conditions

The Cocktail Club is also subject to the following conditions in **Annex 2**.

*A minimum of two SIA door staff shall be employed at the premises from 10:00 PM until closing on Fridays and Saturdays.*

*A minimum of one SIA door staff shall be employed at the premises from 10:00 PM until closing on Thursdays.*

*A register of security personnel employed on the premises shall be maintained in a legible format and made available to police upon reasonable request. The register should be completed by the DPS/duty manager/nominated staff member at the commencement of work by each member of security staff, and details recorded should include full name, SIA badge number, contact details and time of commencement of duties. The security operative should then sign their name against these details.*

*The premises licence holder shall ensure that all door supervisors employed at the premises wear a current identification badge. Issued by the security industry authority, in a conspicuous position to the front of their upper body.*



## 12. Security Code of Conduct

The following code of conduct will apply to all door supervisors at all times when employed at The Cocktail Club.

### Personal Appearance

Door supervisors should at all times:

1. Wear his/her Security Industry Authority licence on the outside of their clothing whilst on duty, displaying the photograph side.
2. Wear clothing which is smart, presentable, easily identifies the individual as a security operative, and is in accordance with The Cocktail Club's security uniform.

### Professional Attitude

Door supervisors should:

3. Greet visitors to The Cocktail Club in a friendly and courteous manner.
4. Act fairly and not discriminate on the grounds of gender, sexual orientation, marital status, race, nationality, ethnicity, religion or beliefs, disability, or any other difference in individuals which is not relevant to the security operatives' responsibility.
5. Not harass, victimise or bully others through actions, language or behaviour.
6. Carry out his/her duties in a professional and courteous manner with due regard and consideration to others.
7. Behave with personal integrity and understanding.
8. Use moderate language, which is not defamatory or abusive, when dealing with members of the public and colleagues.
9. Be fit for work and remain alert at all times.

### General Conduct

In carrying out his/her duty, a Door Supervisor should:

10. Never solicit or accept any bribe or other consideration from any person.
11. Never valet park or accept client's car keys for safe keeping.
12. Never abuse his/her position of authority.
13. Never carry any item which is or could be considered to be threatening.
14. Report all incidents to the management.
15. Co-operate fully with members of the police and partners, local authority, SIA, and other statutory agencies with an interest in the premises or the way they are run.

16. Not be alone in the company of a customer except in an area open to the public within the club.
17. Never participate in indecent or inappropriate contact with customers.
18. Never engage in any unlawful activity.
19. Never consume any alcohol whilst on duty.
20. Never consume, possess or be under the influence of any unlawful drug or substance, unless it is personally prescribed medication by a registered doctor.
21. Not invite or knowingly permit their spouses, girlfriends / boyfriends, or friends and acquaintances to enter the club without the express consent of the Designated Premises Supervisor (DPS). If a door supervisor should become aware that a spouse, girlfriend / boyfriend, or friend is in the venue they must notify the manager in charge immediately.
22. Report any person engaged in unlawful activities immediately to a manager.
23. Not encourage, incite or participate in antisocial behaviour.
24. Not encourage drunkenness in customers.
25. Promote the four licensing objectives in the course of their work - The Prevention of Crime & Disorder, Public Safety, The Prevention of Public Nuisance and The Protection of Children from Harm.
26. Be familiar with the Premises Licence and all of the conditions the Licence is subject to and ensure compliance at all times.
27. Attend the nightly pre-shift security briefing where positions, roles and responsibilities will be allocated. Any absence must be approved by the Designated Premises Supervisor (DPS).

#### **The Cocktail Club's Values and Standards**

Door supervisors should:

28. Adhere to The Cocktail Club's company standards, policies and procedures.
29. Be perceptive of The Cocktail Club's values.
30. Contribute to the goals and objectives of The Cocktail Club.

**Any door supervisors found to be in breach of any of the above rules will be subject to disciplinary procedure.**

The premises will review the code of conduct periodically and any amendments may be incorporated into this document.

## 13. Dealing with Serious Incidents

**The aim of this policy is to ensure serious incidents are dealt with effectively and that staff understand the various measures to take following a serious incident and why they are necessary.**

For the purposes of this policy a serious incident is normally defined (by police) as the following:

- An injury has occurred due to some form of weapon, e.g., knife, bottle, pole etc.
- A broken skin injury has occurred.
- An incident has occurred which has resulted in death or serious injury. (i.e., heart failure, accident, serious assault, etc.).
- Any other crime committed where police may need to search and investigate for any evidence.

**In the event of a major incident the manager in charge will:**

1. Inform the police immediately or confirm that the police have been informed (and any other appropriate emergency service) The senior manager will always meet and brief the first Police Officer on scene to ensure clear communication and appropriate actions are carried out upon Police instructions.
2. Ensure that adequate victim welfare and any medical assistance required is provided
3. If safe to do so locate and detain offender(s). Suspects will be held by security pending arrival of police
4. Identify and secure crime scene(s). Evacuate area where incident occurred and preserve the scene – do not move any objects, furniture, bottles, glasses etc
5. Identify any witnesses and keep them on premises for police or, if this is not possible, obtain contact details
6. Burn relevant CCTV to media (e.g., USB stick) and supply all images required to police
7. Keep customers at premises if at all possible
8. Keep all till receipts and details of credit cards
9. Ensure all staff write comprehensive incident reports and give statements to police
10. Inform the duty manager and all security of the incident
11. All staff will remain at scene until no longer required by police.

**REMEMBER: PRESERVE CRIME SCENE** - All staff will be instructed in the Crime Scene Preservation Policy:-

- Do not attempt to clean or clear crime scene area
- Do not allow people to walk through crime scene area or move anything

### **Investigate - Who? What? When? Where?**

As the manager of the premises, you need to quickly ascertain the nature of the incident. Do NOT make assumptions, find out the facts – speak to witnesses (customers and staff) especially any person WHO may have an injury.

- Look around you. WHAT do you see? – broken glass, wet floor, blood?
- WHERE do you see it? – in which areas of the venue?
- WHEN did it happen? – treat and speak to injured person(s),
- WHO was involved? – trace the offender (if there is one), view CCTV

### **Incident Report**

A full incident report must be written following any serious incident. This may take the form of a composite report that includes various accounts from your staff. This may then need to be updated in the following days as you receive further information or there are events related to the incident (e.g., police collecting CCTV, a witness coming forward, etc.). You may also want to add additional content to the report such as remedial action taken (e.g., staff training, action plans etc.).

## 14. Sexual Assaults

**The aim of this policy is to prevent sexual assaults, ensure staff are informed and aware of the risks and to ensure that should anyone be sexually assaulted that adequate procedures are in place to provide for the welfare of the victim and detention of any suspects.**

### 1. Offences - Definitions

#### Rape

Under the *Sexual Offences Act 2003*, it is an offence for any male to penetrate with his penis the vagina, anus or mouth of a female or male without their consent. A person found guilty of this offence could be sent to prison for life.

#### Assault by penetration

The Act makes it an offence for any male or female to penetrate the vagina or anus of another person without their consent. The offence is committed where the penetration is by a part of the body (for example, a finger) or anything else (for example, a bottle) for sexual intent.

#### Sexual Assault

Section 3 of the Act makes it an offence for any male or female to intentionally touch another person sexually without his or her consent. A person found guilty of this offence could be sent to prison for a maximum of ten years.

#### Causing sexual activity without consent

It is an offence to cause or encourage another person to engage in sexual activity without his or her consent. If penetration is involved then a person found guilty of this offence could be sent to prison for life. If no penetration is involved then a person found guilty of this offence could be sent to prison for up to ten years.

#### What does 'consent' mean?

The definition of a sexual offence often revolves around consent. In simple terms, it's all about permission (or agreement). This is something that must be clearly established between two people before any kind of sexual act or behaviour. If an individual is accused of a sex offence, they must show that they reasonably believed consent had been given by the other person.

### 2. Drink Spiking

Drink spiking is when mind-altering substances, such as drugs or alcohol, are added to your drink without you knowing. Mind-altering means that it may affect your actions, or how you behave with other people.

There are many reasons why someone might spike a drink, and it is not only females who could be targeted. The most common reasons are:

- for amusement,
- to be malicious (deliberately nasty),
- to carry out a sexual assault, or rape, (Drug Facilitated Sexual Assault (DFSA)),
- to carry out a physical assault, or
- to carry out a theft.

The symptoms of drink spiking will depend on whether alcohol, or another drug, has been used, how much of the substance was used, and how much alcohol has already drunk. A person will need to have your blood or urine tested by the police to confirm that a drink has been spiked with drugs.

Drink spiking is illegal, even if an attack or assault has not been carried out. It can result in a maximum punishment of 10 years in prison for anyone who is found guilty of doing it. If an assault, rape, or robbery is also carried out, the sentence will be even higher.

If a person's drink has been spiked, the symptoms will depend on what drug has been used. The effect of any drug will depend on body shape and size, age, how much of the spiked drink has been consumed, and how much alcohol (if any) has already been drunk.

Any drug could be slipped into a person's drink without their knowledge. Drugs can come in powder, or liquid, form, and may not have a taste, or smell, that you can identify as unusual.

### **Date Rape Drugs**

The most common drugs that are used in drink spiking are often referred to as date rape drugs. This is because they make it harder for a person to resist an assault. The most common date rape drugs are:

- alcohol,
- gamma-hydroxybutyrate (GHB) and gamma-butyrolactone (GBL),
- tranquilizers, most often benzodiazepines, including valium and rohypnol, and
- ketamine.

These drugs are depressants which work by slowing down your nervous system, and dulling your responses and your instincts. In moderation, alcohol can help to relax you, and some date rape drugs are legally prescribed for anxiety and insomnia. However, when taken without knowing, these substances leave you vulnerable to danger.

Date rape drugs will affect your behaviour and the messages that you give out to other people. You will not be fully in control of yourself and someone could take advantage of you.

Date rape drugs can start to take effect within five minutes of being taken, or up to an hour after being taken. The symptoms for the above drugs, including alcohol, are quite similar, and will include some of the following:

- drowsiness or light headedness,
- difficulty concentrating,
- feeling confused or disorientated, particularly after waking up (if you have been asleep),
- difficulty speaking, or slurring your words,
- loss of balance and finding it hard to move,
- lowered inhibitions,
- paranoia (a feeling of fear or distrust of others),
- amnesia (memory loss) or a 'black-out' of events (when you cannot remember large sections of your evening),
- temporary loss of body sensation (feeling like you are floating above your body, or having an 'out of body' experience),
- visual problems, particularly blurred vision,
- hallucinations (seeing, hearing, or touching things that are not really there),
- nausea and vomiting, and
- unconsciousness.

All date rape drugs are particularly dangerous when they are mixed with alcohol because they combine to have a very powerful anaesthetic effect. This causes unconsciousness and, in more extreme cases, it can cause coma or even death.

How long the effects of the drugs last will depend on how much has been taken and how much alcohol, if any, has been drunk. The symptoms could last between 3-7 hours, but if a person passes out it will be hard to know the full effect. It is possible to still feel some of the symptoms of a date rape drug after a night's sleep, particularly confusion, amnesia or nausea.

The most common date rape drugs are described in more detail below.

### **Alcohol**

Alcohol is the most common date rape drug. It can be added to a soft (non-alcoholic) drink without a person's knowledge, or double measures can be used instead of singles. If a person has had a drink already, they may find it harder to tell how much alcohol they are consuming. The effects of alcohol will depend on how much they drink, and if they had been drinking already.

### **Gamma-hydroxybutyrate and gamma-butyrolactone**

Gamma-hydroxybutyrate (GHB) usually comes in the form of a slightly oily, colourless, liquid, and less often as a powder.

Gamma-butyrolactone (GBL) is a more basic form of GHB and another possible date rape drug. It comes in liquid form and is found in some household products. After entering the body, GBL changes into GHB.

Only a very small amount of GHB is needed in order to have an effect, and it can be dissolved easily into other liquids. GHB has an unpleasant taste, and a weak odour but, in very small doses, or if is mixed with a strong flavoured drink, a person is unlikely to notice it.

### **Tranquilizers**

Tranquilizers come in hundreds of different forms, but the most common are called benzodiazepines. You may hear of these as valium, rohypnol, roofies, or benzos. They are sometimes legally prescribed to treat anxiety or insomnia. Tranquilizers work by slowing down a person's body, relieving tension, and making them feel very relaxed. They normally come as a tablet.

### **Ketamine**

Ketamine, sometimes just called K, is a powerful anaesthetic that is used for both animals and humans. In its legal form it is a liquid, but illegally, it is normally a grainy white powder or a tablet. Ketamine can cause hallucinations or it can create a feeling of your mind being separate from your body.

### **Preventing Drink Spiking**

- Clear away unattended drinks
- Advise customers not to leave drinks unattended
- Be aware of what customers are ordering
- Try to observe who drinks are for

- Watch out for suspicious behaviour

### 3. Customer Behaviour

All staff must be aware of any behaviour that could become a potential problem.

- Over amorous couples
- Males in female toilets
- Males giving females too much attention or unwanted attention
- Females that are displaying signs of intoxication and are vulnerable
- Upset females

### 4. Patrolling Premises

The premises needs to be patrolled effectively. This responsibility will lie with the GM / duty manager to ensure this happens. Certain areas, such as toilets, will require a record of checks.

Each premises should have a security plan (see below). The positions (and responsibilities) will be allocated in the security briefing before shift begins.

Every member of staff has a responsibility to report any suspicious behaviour in any part of the premises.

### 5. Vulnerable Areas

Vulnerable areas will vary from site to site, but areas that should be paid particular attention are listed below. Your security plan, pre-shift briefing and regular checks must take in account the following, as well as any venue specific areas.

- Toilets
- Dark areas with low lighting
- Private rooms / booths
- Back of house / cupboards
- Fire exits

You must carefully assess your site to identify any vulnerable areas and take the appropriate measures, e.g. allocate security, include in checklists, raise lighting etc.

As a minimum, vulnerable areas should be checked every 30 minutes.

### 6. Security

There is a security plan which includes job descriptions for all security. This sets out all static security positions and a job description for each member of the security team. The job description sets out their roles and responsibilities. This includes areas to patrol and will, in particular, specify vulnerable areas (see above) that require regular checks.

The plan numbers each position, e.g. "Security #1 – Head doorman" with a full description of his role and responsibilities.

At least one female door supervisor is employed where possible.

Security must immediately notify management of any potential issues relating to sexual offences.



## 7. CCTV

CCTV, as far as possible, covers all vulnerable areas. Where this is not possible additional appropriate measures are taken, e.g. patrolling the premises or positioning of security.

## 8. Training

All staff receive training on how to identify potential situations. Training will include:

- Danger signs
- Communication to other staff
- Victim care
- Crime scene preservation
- Report / statement writing

Training sessions will be held quarterly. All staff must have a signed record of attending the training.

## Reactive Measures

### 1. Victim Care

The victim of a sexual assault is to be considered an extremely vulnerable person and, as such, the appropriate level of care and consideration must be given.

A same sex member of staff should remain with the victim until police arrive.

The victim / witnesses to the incident are to be asked to remain inside the club and if possible, they are to be seated in an area away from other customers, free non-alcoholic refreshments (such as coffee, mineral water) should be offered to them to assist in their comfort.

Do not try and interview the victim (other than basic questions to ascertain if the suspect is on the premises).

Bear in mind that the victim is, in fact, a crime scene.

You must keep any suspect away from the victim.

### 2. Crime Scene Preservation

The scene of the assault must be preserved pending arrival of police as per the Crime Scene Preservation Policy. The suspect must not be allowed to destroy evidence, e.g. washing hands / body etc. and should not be left alone whilst waiting for police to arrive.

### 3. Suspects

If a suspect has been identified, they should be detained pending the arrival of the police in the same way you would deal with any other serious assault.

Bear in mind that the suspect could also be a crime scene.

You must keep any suspect away from the victim.

### 4. Police

If a sexual assault has been alleged, or even suspected, the police will be called immediately.

The victim of sexual assault will quite often not want to call police or even make an allegation. It is quite common for an allegation to be made at a later date.

Following an assault the victim will often just want to go home or get away from the scene of the crime. It is not for you or security to investigate the assault. The police are the only people that can ascertain if a crime has taken place. It is for that reason that police should always be called.

## **5. CCTV**

Any relevant CCTV images will be burnt to DVD or CD as soon as possible following any serious incident. Four copies will be retained – one for police, one for the business' licensing solicitor, one for the directors and one placed in the safe at the premises.

Relevant images will include the area the assault took place, but also where the victim and suspect had been in the premises. It will also include the victim and suspect arriving and leaving the premises.

## **6. Incident Reporting / Statements**

A full incident report will be written by the GM as per the premises' Incident Reporting Policy. Statements will be provided by any staff who witnessed the incident.

## **7. Press**

The directors will prepare a brief press statement if appropriate.

All staff must be instructed not to speak with any press whatsoever. They should be warned that there may be calls or visits from press pretending to be concerned guests, relatives etc.

Any press enquiries received at the premises must be referred to the directors.

## 15. Crime Scene Preservation

**The aim of this policy is to ensure a crime scene is preserved, when necessary, and that staff understand the various measures to take following a serious incident and why they are necessary.**

### 1. What constitutes a serious incident which may require a crime scene to be preserved?

- An injury has occurred due to some form of weapon, e.g.; knife, bottle, pole etc.
- A broken skin injury has occurred.
- An incident has occurred which has resulted in death or serious injury. (i.e.; heart failure, accident, serious assault, etc.).
- Any other crime committed where police may need to search and investigate for any evidence.

### 2. Crime Scene Preservation

**A crime scene is to be preserved when there has been a serious incident where police may need to search and investigate for any evidence.**

#### Terminology

**Crime Scene:** Any physical location in which a crime has occurred or is suspected of having occurred.

**Primary Scene:** The original Location

**Secondary Scene:** An alternate location where additional evidence may be found

**Physical Evidence:** Any material items present at crime scene, on victims or found in suspects possession

**Suspect:** Person thought to have committed a crime

**Accomplice:** Person associated with suspect

**Testimonial Evidence:** Oral or written statements given to police or in court

#### Procedures

The authority to preserve a potential crime scene remains with the senior manager on duty.

Full responsibility for all events following an incident will be taken by the senior manager on duty. This includes incident reporting, removing tapes and liaison with Police on the night. Any co-operative witnesses are to be taken to a holding area and the senior manager is to inform the first attending officer.

Once an area has been declared as a crime scene by the senior manager on duty, then all access to the area must cease immediately.

There is to be no access to the preserved area which is to be marked off by barriers, ropes and security. Any evidence must be left where it falls (broken glass, bottle etc.) unless it is dangerous to leave it where it is. If it has to be moved – a manager must pick it up using gloves (avoiding finger prints) and place it inside a police evidence bag. It is to be signed and sealed and placed in the safe to hand over to police on their request.

**Individuals may be considered crime scenes and all precaution must be taken to prevent the transfer of evidence. E.g. A door supervisor who has restrained a suspect for assault should not then have contact with a victim. A suspect and victim should also be kept apart.**

A manager on duty must remain at the crime scene until the police arrive.

The senior manager on the door will then make first contact with the police and relay the information as to whether the crime scene remains preserved or is cleared.

***It is imperative that a preserved crime scene takes precedent over the financial needs of the business. Whenever possible, if a crime scene can be preserved without disruption to the general public, then The Cocktail Club should run as normal. If the crime scene disrupts the use of one of the fire exits, then the front door should be closed to the public immediately and a view will be taken as to whether trading will continue. If the crime scene will either greatly disrupt the public or jeopardise public safety, then the senior manager on duty will be responsible for the decision to close.***

Witnesses to the incident are to be asked to remain inside the premises and if possible they are to be seated in an area away from other customers, free non-alcoholic refreshments (such as coffee, mineral water) should be offered to them to assist in their comfort.

**Victim care must be considered when dealing with vulnerable people – see the Guest Welfare Policy.**

**Remember:**

- **Protect the crime scene to preserve its physical aspects.**
- **Steps need to be taken as soon possible after incident even while victims are being attended to.**
- **Cordon off if possible or station staff in relevant positions – Reroute traffic**
- **Prevent unneeded walking around and intrusions**
- **Prevent unneeded movement or touching of physical evidence**
- **Do not allow any items to be removed from scene without permission from authorities.**
- **Do not discuss the crime with witnesses and bystanders.**
- **Be alert to secondary scenes – e.g. weapon discarded in toilets or exit**
- **Follow the same procedures as primary scene**

**Remember people can also be crime scenes and avoid transfer of evidence**

## 16. Theft Prevention

**The aim of this policy is to prevent property theft in (and around) The Cocktail Club.**

Thefts can be prevented using four broad approaches:-

1. **Staff awareness**
2. **Customer awareness**
3. **Property control**
4. **Security**

The following measures are in place to prevent thefts at The Cocktail Club.

### **Staff awareness**

- Daily briefings (cascade information from incident reports / crime mapping etc.)
- Allocate responsibilities
- Training

### **Customer awareness**

- Signage (at entrance and in toilets)
- Verbal advice to look after property and use Chelsea clips

### **Property control**

- As the weather deteriorates there will be more coats that may attract thieves and in particular pickpockets, all staff should be briefed to be alert
- Chelsea clips
- Security & managers to be vigilant
- Log all found property
- Log and incident report any reported lost stolen property

### **Security**

- Include in staff briefings & training
- Entry controls – vetting at entrance
- Searching
- Patrol premises for unattended property
- Door Supervisor positions
- Crime mapping – allocate resources where appropriate
- CCTV – monitor from office / use to detect suspects following the report of lost property
- ID scan
- Lighting levels

### **PIN Theft**

- Known as 'shoulder surfing'
- Train staff on 'protect your PIN'
- Label credit card machines
- Instruct guests to cover their PIN
- Look for people watching machines
- Effective signage asking guests to cover their PIN

### **Unattended Items**

- Unattended items to be secured by staff

- All items to be recorded in the office as soon as they are found
- All items not claimed throughout the evening must be recorded

### **Unclaimed Items**

- All phones, wallets, bags, passports and items of value **MUST** be left in the appropriate secure place in the office and recorded on the internal spreadsheet
- Each item must be tagged with a sticker indicating the date left
- All phones must be called to retrieve the owner. You must call 'home', 'last caller', 'mum' etc.
- Items with some form of identification must be contacted by the reservationist the following morning. All records of attempt should be updated on the internal spreadsheet

## 17. Staff Behaviour

**The following code of conduct will apply to all staff employed at The Cocktail Club.**

1. Members of staff are not to be in the company of a customer except in an area open to the public within the club.
2. There shall be no indecent or inappropriate contact between members of staff and customers.
3. Members of staff must not engage in any unlawful activity inside the club.
4. Members will not discriminate against any individual or group.
5. Members of staff will not harass, victimise or bully others through actions, language or behaviour.
6. Members of staff will not consume any alcohol whilst on duty.
7. Members of staff may never consume, possess or be under the influence of any unlawful drug or substance, unless it is personally prescribed medication by a registered doctor.
8. Members of staff are not to invite or knowingly permit their spouses, girlfriends / boyfriends, or anyone else with whom they are romantically involved with to enter the club without the express consent of the Designated Premises Supervisor (DPS).
9. Members of staff will report any person engaged in unlawful activities immediately to a manager.
10. Members of staff will not encourage, incite or participate in antisocial behaviour.
11. Members of staff will not serve intoxicated guests and will not encourage drunkenness in customers.
12. All members of staff have a duty to comply with the Licensing Act 2003 and to promote the four licensing objectives in the course of their work - The Prevention of Crime & Disorder, Public Safety, The Prevention of Public Nuisance and The Protection of Children from Harm
13. All members of staff must become familiar with the Premises Licence and all of the conditions the Licence is subject to and ensure compliance at all times.
14. Any member of staff found to be in breach of any of the above rules will be subject to disciplinary procedure.
15. The premises will review the code of conduct periodically and any amendments may be incorporated into this document.

## 18. Private Events

**The aim of this policy is to reduce the risk of serious violent crime at events held at The Cocktail Club.**

**All private events held at The Cocktail Club will be subject to rigorous vetting. Any booking will not be confirmed without the approval of the Designated Premises Supervisor.**

Anyone wishing to hold a private event will be required to attend The Cocktail Club in person to meet with management (unless they are already known to management). No bookings will be taken solely over the telephone or by e-mail.

Persons wishing to book a private event will be required to provide the following information:

1. The nature of the event.
2. The style of music to be played
3. The name, date of birth, home address, e-mail address and a telephone number of the organiser (photographic ID will be supplied)
4. The name, date of birth, home address and a telephone number of any DJ's playing at the event.
5. Whether tickets are being sold
6. A copy of the invitation prior to the event

If the event is promoted in some form by an outside promoter, further details may also be required in order to complete a risk assessment, including full personal details of any performers including DJs.

Each event will be risk assessed individually and the appropriate numbers of registered door supervisors employed.

Persons holding the event will be informed that:

- The event will be held subject to a risk assessment
- An invitation does not guarantee entry. All persons will be subject to an ID scan on the door
- All guests will be subject to a search
- The premises operates a strict policy on drugs and weapons. Any person found in possession of either will be detained and reported to the police immediately

**The event will be monitored throughout and could, should the management feel appropriate, be stopped at any time.**

A risk assessment will be available to police licensing upon request. The assessment will include a start/end time, a description of the event, expected number of guests attending and number of security employed for the event.



## 19. Management of Outside Area & Dispersal

**The aim of the procedures laid out in this document is to ensure there is an absolute minimum of noise and to prevent any nuisance being caused to our neighbours and the general public.**

**All staff will be trained in the procedures and will receive regular refresher training.  
This document will be reviewed on an annual basis to ensure its effectiveness and relevance is not compromised.**

### 1. Roles and Responsibilities

- 1.1. The manager in charge will be responsible for ensuring the plan is fully implemented.
- 1.2. There will be a briefing each trading night where staff are assigned specific roles and responsibilities.
- 1.3. The briefing will be documented and will address any issues or complaints from the previous trading night.
- 1.4. Each briefing will consider any aspects of trading that could cause a nuisance to neighbours and put appropriate measures in place accordingly.
- 1.5. The briefing will also ensure that each member of staff has an effective means of communicating with the manager and other members of staff.

### 2. Entry Controls

- 2.1. Whenever there is a queue, it will be supervised at all times by at least one door supervisor to ensure guests do not congregate outside.
- 2.2. Guests in the queue will be advised on likely waiting times.
- 2.3. Guests will be advised that entry may be subject to a search.
- 2.4. If waiting times for entry are excessive customers will be asked to leave.
- 2.5. Any guests causing noise or disturbance or who appeared to be impaired / intoxicated through alcohol or drugs will be REFUSED ENTRY and asked to leave.
- 2.6. A manager will check the outside area regularly throughout the night.
- 2.7. A manager will be on duty at the entrance on busy nights.
- 2.8. The entrance must not be obstructed.

### 3. During Trading

- 3.1. Door supervisors will monitor activity in the vicinity of The Cocktail Club throughout each night to prevent crime and disorder, noise or disturbance arising from customers.
- 3.2. Door supervisors will ensure customers do not congregate outside. Any guests outside will either be directed to the smoking area or back inside The Cocktail Club.

#### **4. Guests Smoking**

- 4.1. Guests will only be permitted outside to smoke in line with Smoking Policy.
- 4.2. The smoking area for The Cocktail Club is in the area to the left hand side of the entrance (as you look at it).
- 4.3. Door supervisors will monitor guests smoking.

#### **5. Exit Controls**

- 5.1. Door supervisors will endeavour to control a slow stream of customers and guests leaving The Cocktail Club.
- 5.2. Door supervisors will be proactive about dispersal of groups of people outside The Cocktail Club.
- 5.3. Guests will be encouraged to leave the area quickly and quietly.
- 5.4. Door supervisors will patrol the terrace outside The Cocktail Club to ensure customers and guests leave the area quietly. Any customers and guests causing noise or disturbance will be asked to be quiet. Those that do not will be refused entry in the future.
- 5.5. A manager will be on duty and stationed at the exit to oversee dispersal. For this period at least two door supervisors will also be on duty to assist with the safe dispersal of guests.
- 5.6. The SIA supervisors shall monitor the area outside the premises to ensure that customers leave the premises safely and to prevent serious crime and disorder from occurring.
- 5.7. As customers leave and The Cocktail Club empties, door supervisors from inside The Cocktail Club will be posted outside to assist with dispersal.
- 5.8. Guests will not be allowed to take drinks with them as they leave.

#### **6. Other Measures**

- 6.1. The tempo of music will be slowed down and the volume will be lowered gradually at the end of the night to encourage guests exit in a calm manner.
- 6.2. The house lights will be raised gradually at the terminal hour for licensable activities.
- 6.3. Guests will be supplied with information on transport options available late at night.
- 6.4. Notices will be prominently displayed at exits requesting the guests to respect the needs of local residents and to leave The Cocktail Club and the area quietly in a considerate manner.
- 6.5. The Licensee will ensure that staff will conduct a litter and cleaning patrol of area immediately outside The Cocktail Club.

- 6.6. The Licensee will contact the police as necessary if people who have left are causing a public nuisance, threatening property or people or otherwise engaged in anti-social behaviour.
- 6.7. Management and security will utilize the radio to communicate with Canary Wharf as and when necessary.

## **7. Complaints procedure and contacts**

- 7.1. A telephone number will be available to local residents for them to call should they have an issue. The telephone number will be published on the website.
- 7.2. Any complaint will be dealt with promptly by the senior member of staff on duty. The complaint will also be reviewed and followed up by the DPS on the next working day.
- 7.3. A detailed record will be kept of any complaint received. This will include the nature of the complaint and action taken together with the details of the complainant.

## **8. Venue specific licence conditions**

The Cocktail Club is also subject to the following conditions in **Annex 2**.

*Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.*

*Notices shall be prominently displayed at all exits requesting patrons to respect the needs of the locality and leave the area quietly.*

*The area immediately outside the premises shall be swept or washed and litter and sweepings collected and stored in accordance with the approved refuse storage arrangement.*

*The venue is to provide information on local taxi firms and transport links to patrons leaving the venue upon request.*

*A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.*

*All windows and external doors shall be kept closed after 23:00 hours, or at any time when regulated entertainment takes place, except for the immediate access and egress of persons.*

## 20. Smoking

**The Cocktail Club operates a zero tolerance policy to smoking in the venue in line with the Smoke Free regulations and Health Act 2006.**

1. "No Smoking" signage will be displayed at The Cocktail Club that clearly states it is against the law to smoke anywhere inside the premises.
2. Staff will take immediate action if any customer attempts to smoke inside The Cocktail Club. Any customer who still attempts to smoke inside the premises will be asked to leave.
3. Staff will not smoke anywhere inside The Cocktail Club, including back of house areas.
4. All staff will receive training on dealing with smoking in smoke free premises including the penalties involved:-
  - Smoking in smoke free premises: a fixed penalty notice of £50 (reduced to £30 if paid in 15 days) imposed on the person smoking. Or a maximum fine of £200 if prosecuted and convicted by a court.
  - Failure to display no-smoking signs: a fixed penalty notice of £200 (reduced to £150 if paid in 15 days) imposed on whoever manages or occupies the smoke free premises. Or a maximum fine of £1000 if prosecuted and convicted by a court.
  - Failing to prevent smoking in a smoke free place: a maximum fine of £2500 imposed on whoever manages or controls the smoke free premises if prosecuted and convicted by a court. There is no fixed penalty notice for this offence.

**The Cocktail Club operates two smoking areas; one on Worship Street and another on the rooftop terrace. The following policy will be in operation:**

5. The smoking area for The Cocktail Club is in the area to the left-hand side of the entrance (as you look at it).
6. The smoking area will be monitored by staff and door supervisors.
7. The smoking areas will be cleaned of litter at regular intervals.
8. Customers will be reminded to keep the noise down and to respect the residents in the area. This will be supported by clear and prominent signage.
9. Any person causing a nuisance or disturbance in the smoking area will be asked to leave The Cocktail Club immediately.

### **Venue specific licence conditions**

The Cocktail Club is also subject to the following conditions in **Annex 2**.

*Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.*

*The area immediately outside the premises shall be swept or washed and litter and sweepings collected and stored in accordance with the approved refuse storage arrangement.*

## 21. Incident Reporting & Due Diligence Records

**The aim of this policy is to detail the records that will be kept to provide evidence of due diligence and the responsible operation of the premises in line with the Four Licensing Objectives.**

### 1. Incident Reports

It is important accurate details of any incident is recorded at the time should there be a requirement for investigation at a later date and to show that incidents were dealt with correctly.

The following incidents will be fully reported:

1. All crime reported to the premises that has occurred within it or which relates to a patron attending the premises or waiting to be admitted to the premises
2. All ejections of patrons where force was used
3. Any complaints received relating to the promotion of the licensing objectives
4. Any incidents of disorder occurring within the premises or outside the premises and where they relate to matters outside the premises they involve patrons of the premises or persons waiting to be admitted to the premises
5. All seizures of drugs or weapons
6. any faults in the CCTV system, body worn cameras or ID scanner
7. any visit by a relevant authority or emergency service
8. any emergency situation such a fire, flood, loss of power, or bomb threat
9. any accident or injury to employee, contactor or customer

**A separate record will also be kept of refusals (of entry and service) and ejections (where no force was used)**

**Each incident report will contain the following:**

- The full name and position of person reporting
- Their SIA registration if security
- Date, time and location of incident
- Whether the incident was captured by CCTV – which camera – have the images been burnt onto DVD?
- Was a crime scene preserved
- Full details of the incident
- Whether the police were called (and who called them)
- Police CAD number (if police were called)
- Whether police attended (if so provide shoulder numbers)
- Whether anyone was injured (give full details, including any medical assistance given and whether an ambulance attended)
- Describe all persons involved in the incident

- Give details of all witnesses to the incident

**STAFF WILL BE INSTRUCTED NOT TO:**

- Use slang
- Use acronyms, abbreviations or terminology that may not be understood
- Make assumptions or speculate – be factual

## **2. Due Diligence Records**

The following daily records will be completed:

- Pre-opening safety checks – to show that emergency exits, lighting, signage and fire safety equipment is all maintained, working and in place.
- Clicker counts / accommodation numbers – to show that a safe capacity is managed and never exceeded.
- Refusals of entry – to show customers are vetted before allowed entry
- Refusal of service – to show that we do not serve intoxicated or underage persons
- Ejections – to show that unsuitable guests (e.g. through intoxication, behaviour etc.) are asked to leave The Cocktail Club.
- Door supervisor log – to show that properly SIA registered staff are employed at The Cocktail Club.
- Toilet checks – to show that toilets are regularly checked for criminal activity / antisocial behaviour.
- CCTV checks – to show our CCTV is working correctly and holds footage for the minimum required 31 days.

### **Venue specific licence condition**

The Cocktail Club is also subject to the following condition in **Annex 2**.

*An incident log shall be kept at the premises, and be available on request to the Police or an authorised officer. It must be completed within 24 hours of any incident and will record the following:*

- a) all crimes reported to the venue;*
- b) all ejections of patrons;*
- c) any complaints received concerning crime and disorder*
- d) any incidents of disorder;*
- e) all seizures of drugs or offensive weapons;*
- f) any faults in the CCTV system, searching equipment or scanning equipment;*
- g) any visit by a relevant authority or emergency service.*

## 22. CCTV & Body Worn Cameras (BWC)

**The aim of this policy is to ensure CCTV and BWC are operated effectively and that records are retained for due diligence purposes.**

The Cocktail Club operates a CCTV system that conforms to the Data Protection Act 2018. The Data Controller is The London Cocktail Club Ltd.

It is very important to be able to demonstrate that the system is working, has been operational historically, and that any issues are resolved as soon as possible.

CCTV is operated for the purposes the prevention and detection of crime, public safety and employee security. The following procedures are in place:

1. One camera will show a close-up of the entrance to the premises, to capture a clear, full length image of anyone entering. The system will provide full coverage of the interior of the premises and any exterior part of the premises accessible to the public.
2. The system will record in real time and recordings will be date and timestamped.
3. Recordings shall be kept for a minimum of 31 days and shall be made available upon request by an authorised officer of the licensing authority or by a police officer within 24 hours.
4. The CCTV system shall continually record whilst The Cocktail Club is open for licensable activities and during all times when customers remain on the premises.
5. The CCTV system will capture a clear head and shoulders image of “identification standard” of every person entering the premises. Persons entering The Cocktail Club should be asked to remove any headwear which obscures the persons’ face unless it is worn as part of religious observance.
6. The CCTV system will be kept secure at all times. Access will be limited to the DPS and managers.
7. A dedicated CCTV system log will be kept at The Cocktail Club. All usage, checks, faults and requests for images will be recorded in the log. Any person taking a copy of the CCTV such as the police, fire authority or local authority officer MUST sign in the relevant section of the log acknowledging receipt of the data. The signing officer must also enter their place of work and a contact telephone number.
8. A full incident report will be made of any faults with the system.
9. When reporting any faults with the CCTV system, anticipated times scales for repairs and who the issue has been escalated to if these time scales are not met will be included.
10. The DPS and all managers will all be trained in the use of the CCTV system. The training will include interrogation of the system and transfer of images to separate media (flash drive, USB stick external hard drive etc.)
11. There will be at least one person who is suitably trained and conversant with the CCTV system on The Cocktail Club at all times it is open to the public.

12. The DPS will ensure as far as possible that the system is maintained and working correctly at all times. At minimum, a weekly, documented test will be carried out to ensure the system is working correctly. A record of these checks, showing the date and name of the person checking, will be kept and made available to the police or other authorised officer on request.
13. Relevant CCTV images will be burnt to playable media as soon as possible following any serious incident. Two copies will be retained – one for police and a backup placed in the safe at the premises.
14. All searches of customers will take place in an area clearly covered by CCTV.
15. Signage will be placed prominently at the entrance to The Cocktail Club advising all persons entering that CCTV is in operation in accordance with the Data Protection Act 1998 and GDPR.

### **BODY WORN CAMERAS (BWC)**

In the event The Cocktail Club opted to use BWC, the following measures will be place. The use of BWC would be to promote the four licensing objectives; to protect staff, customers, members of the public and their property, and prevent and detect crime.

The use of BWC should be:

- Incident specific
- Proportionate
- Legitimate
- Necessary
- Justifiable

BWC are capable of capturing primary evidence in such a way that it is able to bring a compelling and an indisputable account of the circumstances at that time. This will not replace the needs to capture other types of evidence but will go a considerable way in reducing any ambiguities and should be considered as an additional security aid.

1. The premises shall ensure that the use of such BWC is dealt with within any training it provides to the security personnel team.
2. Door Supervisors based at The Cocktail Club will 'book out' their BWC from a pool of devices shared amongst a number of staff members.
3. Door Supervisors are required to ensure the device is charged, all previously captured images and audio is automatically removed prior to deployment. The device will then be fixed to the Door Supervisors outer clothing where the field of view is clear and not obscured.
4. BWC video footage will be held in compliance with the Data Protection Act requirements. Footage will be held for 31 days unless there is a need for it to be held longer – i.e., as evidence of a crime etc.
5. BWC footage will be provided to police upon request with the absolute minimum of delay.



6. Door supervisors with BWC will record, where possible, any physical ejections and any incidents of crime and/or disorder.

### **Venue specific licence condition**

The Cocktail Club is also subject to the following condition in **Annex 2**.

*The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Tower Hamlets Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31 day period.*

*A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.*

## 23. Identity Scanner

The Cocktail Club operates an identity scanning system that conforms to the Data Protection Act 2018. It is operated for the purposes the prevention of crime, public and employee security and safety. The Data Controller is The London Cocktail Club Ltd.

The Cocktail Club follows the Information Commissioner's Office Good Practice advice.

### 1. Signage

Signs are prominently displayed at the entrance of premises which explain why the ID system is in operation. The notice will also explain to customers that providing satisfactory identification to be electronically scanned and recorded is a condition of entry.

### 2. Sharing Information

A manager will decide whether information should be shared on the system in the interests of preventing crime or public safety.

Personal information will not be used or shared for marketing or commercial activity.

Personal information will be shared with police, or other enforcement agencies, investigating crimes upon request.

Only relevant information will be scanned for the purposes of confirming and recording the identity of customers.

### 3. Access to Personal Information

Access to scanning system records is restricted to those whose duties require it. Only managers will be able to access to all record fields, including addresses, on the ID scanning machine. The data is stored and encrypted locally on the HDD of a computer. This is kept securely and only managers are able to access the data. The data on the computer is password protected and staff with authority have individual usernames and passwords. There is a record of any person accessing personal data.

The ID scanning equipment has a transactional logging and audit capability to allow regular security reviews to counter any possible system abuse.

### 4. Data Retention

The Cocktail Club will only keep records for as long as there is a reasonable requirement to do so. Any details relating to a customer who has not visited The Cocktail Club in over a year will be deleted unless there is a serious reason to not do so.

Data is retained for a minimum of 6 months and this is reviewed annually when senior management will conduct a purge of data.

### 5. Subject Access

Individuals may request copies of the personal information held on the identity scanning machine using The Cocktail Club's subject access procedures. Any request to delete personal data will be considered and decided by The Cocktail Club management.

### 6. Maintenance and Faults

The identity scanning system will be kept in good working order and any faults or operating issues will be fully incident reported. If for any reason the scanner fails during trading, the manager in charge will ensure that photographic images are taken of IDs and the guest presenting the ID, prior

to the person entering the premises. All data will be handled in line with the requirements of the Data Protection Act.

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**The Cocktail Club**  
**9 Cabot Square London E14 4EB**

**Introduction**

1. I, Michael Watson, of Better Compliance, make this statement to provide additional relevant information regarding a Review of the Premises Licence under section 51 Licensing Act 2003, for The Cocktail Club.
2. I have been a licensing consultant since 2004. My licensing consultancy has a respected reputation amongst the Police, local authorities, and our private clients.
3. Previously, I was:
  - a. a civilian licensing officer with the Metropolitan Police Clubs and Vice Unit (CO14) from 1994 to 2001; and
  - b. a licensing officer at the London Borough of Islington from February 2001 to June 2004.
4. I have attained the Certificate of Higher Education in Licensing Law from Birmingham University and I am a member of the Institute of Licensing (MIoL). I am also an Associate of the Chartered Institute of Environmental Health (ACIEH). My role as a consultant is to work in partnership with the statutory authorities. I have given evidence at Licensing Committees, planning appeals and licensing appeals before Magistrates and the Crown Court.
5. I have been an independent licensing consultant for over seventeen years. I have worked with a wide variety of premises including night clubs, bars, restaurants, and hotels. My retainer clients include The

London Park Lane Hilton (Westminster), the Truman Brewery complex (Tower Hamlets), The Outernet – HERE and The Lower Third (Camden), The Piano Works (Islington and Westminster), The Windmill Theatre Soho (Westminster), Tape London (Westminster), The Box Soho (Westminster) , Cirque Le Soir (Westminster), Reign (Westminster), Raffles (Royal Borough of Kensington and Chelsea), Tabu (Westminster), and Swingers Golf (City of London and Westminster).

6. I am the co-author of a book, *“Staying Open – An Essential Guide for Managers of Licensed Premises”*.
7. I have worked with many venues, in many different environments, to design successful management procedures to ensure the promotion of the Four Licensing Objectives.

#### **Instructions and Scope of Work**

8. I have been instructed by Mr Jim Robertson, Managing Director (London Estate) of Night Cap (the operator) regarding an application for a Review under s.51 Licensing Act 2003 of a premises licence for The Cocktail Club, 9 Cabot Square London E14 4EB.
9. I have been provided with a copy of the Review application.
10. My instructions were to devise a plan for The Cocktail Club that would ensure compliance with licensing regulations and premises licence conditions, promotion of the Four Licensing Objectives and strive for current best practice in operational policies and procedures.
11. I met with Jim Robertson, the Managing Director, Kieran Manning, Operations Manager, and the new General Manager, Simon Kennington, who is also now the new DPS of the premises, on the 10<sup>th</sup> February 2023 to discuss in detail a compliance plan for the future operation of the premises.
12. Jim Robertson, Kieran Manning and Simon Kennington were very helpful and enthusiastic about the compliance plan. They understood,

and accepted, the compliance plan would involve significant commitment and work.

13. I confirm that, notwithstanding that I have been engaged as a consultant by The London Cocktail Club Ltd, I have prepared this Witness Statement together with all opinions expressed herein, as an independent professional licensing consultant.

### **Licensing Compliance Plan**

14. The proposal is in four parts; (1) review and set up best practice policies and procedures, (2) provide staff training, (3) conduct regular licensing audits to measure performance and provide due diligence evidence, and (4) to provide ongoing advice, support and to review any incidents / issues that arise.

### **Policies and Procedures**

15. I have undertaken a full review of the operation of the premises and produced a comprehensive licensing Operational Manual which would contain licensing policies and procedures. The manual would demonstrate best practice in all areas. It would also form part of induction for new members of staff and the ongoing training of existing staff.

16. The Operational Manual sets out the premises' minimum operating standards and the policies and procedures to be followed by all staff.

17. The Operational Manual is a 'living' document and will be reviewed regularly to ensure current best practice and that any changes at the premises or to licensing laws are addressed.

18. The Operational Manual would include, but not be limited to, the following policies and procedures.

- Customer Vetting and Terms of Entry
- Young People
- Searching and Seizure of Prohibited Items

- Preventing and Dealing with Intoxication
- Drugs
- Crime Prevention and Intervention
- Guest Welfare and Welfare and Vulnerability Engagement (WAVE)
- Ejections
- Security Roles, Responsibilities and Code of Conduct
- Security Code of Conduct
- Dealing with Serious Incidents
- Sexual Assaults
- Crime Scene Preservation
- Theft Prevention
- Staff Behaviour and Code of Conduct
- Events & Private Hire
- Management of Outside & Dispersal
- Smoking
- Incident Reporting & Due Diligence Records
- CCTV, Body Worn Cameras and Identity Scanning Systems

### **Staff Training**

19. All serving staff will attend the RASPFLO (Responsible Alcohol Sales and Promoting the Four Licensing Objectives – [www.raspflo.co.uk](http://www.raspflo.co.uk)). This is specifically aimed at serving staff, with a focus on the practicalities of their work role and responsibilities under the Licensing Act 2003.

20. A written record will be kept of all staff training and be available for inspection by the statutory authorities.

21. The RASPFLO course covers the following areas.

An Introduction to the Licensing Act 2003

- Understanding the importance of compliance and protecting your Licence.
- The requirements for having a Licence



- The difference between a personal and a premises Licence
- Mandatory and venue specific conditions
- The penalties for breaching conditions

#### The Four Licensing Objectives

- The importance of promoting the objectives at all times
- The meaning and significance of each objective
- Learning methods to promote the objectives.

#### Intoxication

- The dangers intoxication poses, the requirements of the law and the tools to deal with the issue effectively.
- The effects of alcohol on the body
- How to identify and deal with intoxicated guests
- The best methods to prevent intoxication.

#### Age

- The law in relation to children
- How to check IDs
- Recognising valid forms of ID
- Identifying invalid IDs

#### Crime Scene Preservation

- When a crime scene should be preserved
- Actions to take following a serious incident
- How to ensure the preservation of a crime scene.

#### Factors that Affect Drinking Behaviour

- The factors that affect irresponsible alcohol consumption
- How to promote a safe and responsible environment
- How to positively influence a responsible and safe drinking culture

22. All staff will also undergo comprehensive guest welfare training that includes the Metropolitan Police Service's WAVE (Welfare and Vulnerability Engagement) course content.

23. All managers, and staff involved in a supervisory role, will undergo RASPFLO managers training, an advanced version of the course.

24. The managers' version of RASPFLO includes the six units in the staff course and also covers the following areas.

#### Closure Powers

- The most common forms of closure powers
- The process of when there is a Review of a Premises Licence
- The potential consequences of a Review or other remedial action

#### Preventing Drug Use / Dealing

- Ways to identify, prevent and understand the effects of drug use and dealing
- The components of a comprehensive drugs policy

#### Crime Prevention and Intervention

- Policies and procedures
- Human resources
- Physical measures

#### Guest Welfare

- Identifying vulnerable people
- Intervention and ways to provide for the welfare of your guests

#### Ejections

- The various risks when carrying out an ejection
- Ejecting a person safely in a professional manner

#### Conflict Management

- Ways to reduce aggression and prevent confrontations escalating

- Measures you can take to deal with aggressive and violent customers

#### Dealing with Serious Incidents

- The definition of a serious incident
- Procedures to follow in the event of a serious incident

#### Incident Reporting

- Types of incident that should be reported
- The details an incident report should contain

#### Daily Due Diligence Records

- The types of records that should be maintained on a daily basis
- Why keeping records is good due diligence evidence

25. Staff will receive the training on Monday 6<sup>th</sup> March 2023. The training will be delivered by Deon van Niekerk, an accredited trainer.

26. There will also be ongoing bespoke training for staff and managers on the Operational Manual. This training will use the incident of 2<sup>nd</sup> December 2022 as an example of the dangers that can arise as well as the lessons learnt, and procedures implemented to prevent any further issues following that incident.

#### **Licensing Audits**

27. Comprehensive licensing audits of the premises would be conducted by a qualified consultant to ensure compliance with the Licensing Act 2003, the promotion of the Four Licensing Objectives and any specific conditions attached to the Premises Licence.

28. The audits would, of course, measure the success and effectiveness of operational procedures and aim to build a body of positive due diligence evidence for the premises. They also serve as a management tool; giving confidence that the premises is compliant and acts as an early warning system if issues are identified.

29. The audits cover the following areas:

- Promotion of the Four Licensing Objectives
- Licences and Signage
- Compliance with Premises Licence conditions and Licensing Regulations
- Door Supervisors
- Outside Management
- Fire Safety
- Record Keeping
- Internal Management
- Toilets
- CCTV & Body Worn Cameras

30. The audits would be conducted once a month for the first 3 months after the hearing.

31. The audits would be unannounced and be carried out whilst the venue was trading at peak times.

32. One such audit was conducted on 26<sup>th</sup> February 2023 (Friday trading night). I attach a copy of the audit report. The inspection did not identify any issues save for the requirement of signage for CCTV and body worn cameras. There was also no signage to notify guests that there is a search policy in place, and it is good practice to do so. I understand that all this signage is now in place.

33. When I audited the premises on 26<sup>th</sup> February 2023, I also conducted an observation of the premises until it was closed, and all guests had left. I did not witness anything that could have an adverse impact on any of the four licensing objectives. Dispersal was quick and effective. Staff and security were alert and proactive.

### **Ongoing Support**

34. I would regularly re-evaluate the compliance regime at the premises, taking into account shifting circumstances, changes in legislation, best practice and current guidance from the authorities.

35. I would review all incident reports and provide an assessment of the incident, giving recommendations, advice and support as applicable. This may include reviewing CCTV, writing additional policies / action plans and providing additional staff training plans.

### **Conclusions**

36. The measures detailed in this statement have proven highly effective and successful at many busy late licensed clubs and bars across London.

37. The compliance plan requires a clear commitment from the leadership of the business. I have been assured that the business is fully committed to implementing and following the compliance plan. From all my interactions with the senior management team I am in no doubt that they are highly responsible and professional operators who will do whatever is required to learn from the lessons of recent events to minimise the risk of repetition.

This statement is to the best of my belief and understanding true and accurate.

Signed:  .....

Dated: 28<sup>th</sup> February 2023

Michael Watson

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## Licensing Compliance Audit

Improve compliance | Safeguard your business | Enjoy peace of mind

# London Cocktail Club

26 Feb 2023

Complete

Score	99.08%	Flagged items	3	Actions	0
<b>Conducted on</b>	26 Feb 2023 1:08 AM GMT				
<b>Name of auditor</b>	Michael Watson				
<b>Client / Site</b>	The London Cocktail Club Limited				
<b>Name of premises</b>	London Cocktail Club				
<b>Location</b>	9 Cabot Square London E14 4EB				



## Disclaimer

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### Confidentiality Statement

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**Flagged items**

3 flagged

Licences &amp; Signage

**CCTV warning signs displayed**

No

If you operate a CCTV system then you must inform visitors to your premises. The notices must contain contact details for the registered data controller.

Licences &amp; Signage

**ID scanning equipment warning signs displayed**

No

You must display signs and prominently explaining simply and clearly to guests why the ID system is in operation.

Licences &amp; Signage

**Search policy notice displayed**

No

It is good practice to explain to guest that they may be searched and that this is a condition of entry.

**General****Current Premises Licence number**

146190

**Name of Designated Premises Supervisor (DPS)**

Simon Kennington

Awaits licence to be issued with Simon specified as DPS

**Number of customers inside premises**

92

**Number of customers queuing**

None

**Number of customers drinking/smoking outside**

8

**Name of person in charge**

Simon Kennington

**Number of door supervisors employed at premises****3**  
From 0 to 50**What is the premises search policy**

Random searches

**Number of IDs scanned**

91

**Number of persons refused entry**

17

**Number of persons ejected / refused re-entry / refused service**

1 ejection (intox)

**Licences & Signage**

3 flagged, 61.11%

**Premises Licence summary, Part B, correctly displayed**

Yes

<b>Section 57, custody of Licence notice, correctly displayed</b>	Yes
<b>CCTV warning signs displayed</b>	No
If you operate a CCTV system then you must inform visitors to your premises. The notices must contain contact details for the registered data controller.	
<b>Details</b>	Not displayed
<b>ID scanning equipment warning signs displayed</b>	No
You must display signs and prominently explaining simply and clearly to guests why the ID system is in operation.	
<b>Details</b>	Not displayed
<b>Search policy notice displayed</b>	No
It is good practice to explain to guest that they may be searched and that this is a condition of entry.	
<b>Details</b>	Not displayed
<b>Anti-drug signage displayed</b>	Yes
<b>Age verification policy displayed</b>	Yes
<b>Please leave quietly, or similar, notices displayed</b>	Yes
<b>Licence Compliance</b>	100%
<b>Licensable activities being provided</b>	Sale by retail of alcohol Late night refreshment Regulated entertainment
<b>Premises compliant with Licence conditions</b>	Yes
<b>Premises Licensee / delegated person on the premises</b>	Yes
<b>Current Premises Licence available</b>	Yes
<b>Personal Licence Holder able to produce their original Licence</b>	Yes



Photo 1

<b>Staff authorised to make alcohol sales by Personal Licence Holder</b>	Yes
<b>Premises does not have any irresponsible drinks promotions</b>	Yes
<b>Tap water available on request</b>	Yes
<b>Mandatory minimum prescribed measures available and advertised to customers</b>	Yes
<b>At least one Personal Licence Holder on duty</b>	Yes
<b>Door Supervisors</b>	100%
<b>Adequate number of door supervisors employed at the entrance</b>	Yes
<b>Door supervisors clearly identifiable</b>	Yes
<b>All door supervisors' SIA registration badges correctly displayed</b>	Yes
<b>Door supervisor log completed and correct</b>	Yes
<b>All door supervisor SIA registrations current</b>	Yes
<b>Adequate security provision within the premises</b>	Yes
<b>Door supervisors alert and vigilant</b>	Yes
<b>Door supervisor roles and responsibilities clearly defined</b>	Yes
<b>Outside Management</b>	100%
<b>Outside areas clearly defined (queues, smoking area etc.)</b>	Yes
<b>Queue management sufficient</b>	Yes
<b>Queue adequately supervised</b>	N/A
<b>Smokers adequately supervised</b>	Yes
<b>Outside area clear of bottles and glasses</b>	Yes
<b>Outside area clear of cigarette butts and litter</b>	Yes
<b>Entrance adequately managed</b>	Yes
<b>Customers properly vetted prior to entry</b>	Yes

<b>Customers searched in line with premises' policy</b>	Yes
<b>Fire Safety</b>	100%
<b>Escape routes clearly signed</b>	Yes
<b>Escape routes adequately lit</b>	Yes
<b>Escape routes unobstructed</b>	Yes
<b>Escape doors available and open freely</b>	Yes
<b>Fire extinguishers / safety equipment properly positioned</b>	Yes
<b>Fire extinguishers / safety equipment within test date</b>	Yes
<b>All fire doors closed or fitted with automatic closers</b>	Yes
<b>Fire alarm panel free of faults</b>	Yes
<b>Fire marshal on duty</b>	Yes
<b>Fire action notices displayed</b>	Yes
<b>Emergency lighting working</b>	Yes
<b>Walls/floors/ceilings in good state of repair</b>	Yes
<b>Record Keeping</b>	100%
<b>Written record of daily safety checks</b>	Yes
<b>Written record of occupancy numbers</b>	Yes
<b>Written record of split capacity occupancy numbers</b>	N/A
<b>Reportable incidents recorded</b>	Yes
<b>Refusals of entry recorded</b>	Yes
<b>Customer ejections recorded</b>	Yes
<b>Record of staff on duty</b>	Yes
<b>Internal Management</b>	100%
<b>Premises is not overcrowded</b>	Yes
<b>Cloakroom available for customer use</b>	Yes

<b>Premises clear of unattended property</b>	Yes
<b>Store cupboards locked and secure</b>	Yes
<b>Adequate lighting in customer areas</b>	Yes
<b>Empty drinking vessels and bottles being collected</b>	Yes
<b>Floor dry and any spillages being cleared</b>	Yes
<b>Floor clear of trip hazards</b>	Yes
<b>Intoxication levels adequately managed</b>	Yes
<b>No underage customers on premises</b>	Yes
<b>Sufficient number of first aiders on duty</b>	Yes
<b>Sufficient first aid facilities available</b>	Yes
<b>Polycarbonate / plastic bottles and drink vessels used</b>	N/A
<b>Food available</b>	Yes
<b>Toilets</b>	100%
<b>Attendant employed in the toilets</b>	N/A
<b>Toilets clean and floor dry</b>	Yes
<b>Toilets free of any evidence of suspected drug use</b>	Yes
<b>Toilets checked regularly by staff</b>	Yes
<b>Written record of toilet checks</b>	Yes
<b>Store cupboards within toilets locked and/or secure</b>	Yes
<b>Toilets and wash basins available for use</b>	Yes
<b>Toilets free of uncollected drinking vessels and bottles</b>	Yes
<b>CCTV &amp; ID Scanning Equipment</b>	100%
<b>CCTV installed in the premises</b>	Yes
<b>CCTV system working correctly</b>	Yes
<b>CCTV date and time correct</b>	Yes

<b>Minimum of 31 days CCTV footage available</b>	Yes
<b>Adequate CCTV coverage of premises</b>	Yes
<b>Sufficient stock of CCTV recording media</b>	Yes
<b>At least one member of staff on duty able to fully operate CCTV system</b>	Yes
<b>Written record of routine CCTV checks</b>	Yes
<b>ID scanning equipment working correctly</b>	Yes
<b>Appropriate staff issued with operational radios</b>	Yes
<b>How many staff issued with Body Worn Cameras</b>	<b>0</b> From 0 to 20
<b>Are Body Worn Camera recordings retained for 31 days</b>	N/A

## Appendix



Photo 1





## Licensing Compliance Audit

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# London Cocktail Club

25 Mar 2023

Complete

Score	100%	Flagged items	0	Actions	0
<b>Conducted on</b>	25 Mar 2023 10:36 PM GMT				
<b>Name of auditor</b>	Michael Watson				
<b>Client / Site</b>	The London Cocktail Club Limited				
<b>Name of premises</b>	London Cocktail Club				
<b>Location</b>	9 Cabot Square London E14 4EB				

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### Confidentiality Statement

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General	
Current Premises Licence number	146190
Name of Designated Premises Supervisor (DPS)	Simon Kennington
Number of customers inside premises	127
Number of customers queuing	None
Number of customers drinking/smoking outside	2
Name of person in charge	Simon Kennington
Number of door supervisors employed at premises	<b>4</b> From 0 to 50
What is the premises search policy	Discretionary searching
Number of IDs scanned	316
Number of persons refused entry	28
Number of persons ejected / refused re-entry / refused service	1
Licences & Signage	100%
Premises Licence summary, Part B, correctly displayed	Yes
Section 57, custody of Licence notice, correctly displayed	Yes
CCTV warning signs displayed	Yes
ID scanning equipment warning signs displayed	Yes
Search policy notice displayed	Yes
Anti-drug signage displayed	Yes
Age verification policy displayed	Yes
Please leave quietly, or similar, notices displayed	Yes
Licence Compliance	100%
Licensable activities being provided	Sale by retail of alcohol Late night refreshment Regulated entertainment

<b>Premises compliant with Licence conditions</b>	Yes
<b>Premises Licensee / delegated person on the premises</b>	Yes
<b>Current Premises Licence available</b>	Yes
<b>Personal Licence Holder able to produce their original Licence</b>	Yes
	
Photo 1	
<b>Staff authorised to make alcohol sales by Personal Licence Holder</b>	Yes
<b>Premises does not have any irresponsible drinks promotions</b>	Yes
<b>Tap water available on request</b>	Yes
<b>Mandatory minimum prescribed measures available and advertised to customers</b>	Yes
<b>At least one Personal Licence Holder on duty</b>	Yes
<b>Door Supervisors</b>	100%
<b>Adequate number of door supervisors employed at the entrance</b>	Yes
<b>Door supervisors clearly identifiable</b>	Yes
<b>All door supervisors' SIA registration badges correctly displayed</b>	Yes
<b>Door supervisor log completed and correct</b>	Yes
<b>All door supervisor SIA registrations current</b>	Yes
<b>Adequate security provision within the premises</b>	Yes
<b>Door supervisors alert and vigilant</b>	Yes
<b>Door supervisor roles and responsibilities clearly defined</b>	Yes
<b>Outside Management</b>	100%
<b>Outside areas clearly defined (queues, smoking area etc.)</b>	Yes

Queue management sufficient	Yes
Queue adequately supervised	N/A
Smokers adequately supervised	Yes
Outside area clear of bottles and glasses	Yes
Outside area clear of cigarette butts and litter	Yes
Entrance adequately managed	Yes
Customers properly vetted prior to entry	Yes
Customers searched in line with premises' policy	Yes
<b>Fire Safety</b>	100%
Escape routes clearly signed	Yes
Escape routes adequately lit	Yes
Escape routes unobstructed	Yes
Escape doors available and open freely	Yes
Fire extinguishers / safety equipment properly positioned	Yes
Fire extinguishers / safety equipment within test date	Yes
All fire doors closed or fitted with automatic closers	Yes
Fire alarm panel free of faults	Yes
Fire marshal on duty	Yes
Fire action notices displayed	Yes
Emergency lighting working	Yes
Walls/floors/ceilings in good state of repair	Yes
<b>Record Keeping</b>	100%
Written record of daily safety checks	Yes
Written record of occupancy numbers	Yes
Written record of split capacity occupancy numbers	N/A

<b>Reportable incidents recorded</b>	Yes
<b>Refusals of entry recorded</b>	Yes
<b>Customer ejections recorded</b>	Yes
<b>Record of staff on duty</b>	Yes
<b>Internal Management</b>	100%
<b>Premises is not overcrowded</b>	Yes
<b>Cloakroom available for customer use</b>	N/A
<b>Premises clear of unattended property</b>	Yes
<b>Store cupboards locked and secure</b>	Yes
<b>Adequate lighting in customer areas</b>	Yes
<b>Empty drinking vessels and bottles being collected</b>	Yes
<b>Floor dry and any spillages being cleared</b>	Yes
<b>Floor clear of trip hazards</b>	Yes
<b>Intoxication levels adequately managed</b>	Yes
<b>No underage customers on premises</b>	Yes
<b>Sufficient number of first aiders on duty</b>	Yes
<b>Sufficient first aid facilities available</b>	Yes
<b>Polycarbonate / plastic bottles and drink vessels used</b>	N/A
<b>Food available</b>	Yes
<b>Toilets</b>	100%
<b>Attendant employed in the toilets</b>	N/A
<b>Toilets clean and floor dry</b>	Yes
<b>Toilets free of any evidence of suspected drug use</b>	Yes
<b>Toilets checked regularly by staff</b>	Yes
<b>Written record of toilet checks</b>	Yes

Store cupboards within toilets locked and/or secure	Yes
Toilets and wash basins available for use	Yes
Toilets free of uncollected drinking vessels and bottles	Yes
<b>CCTV &amp; ID Scanning Equipment</b>	100%
CCTV installed in the premises	Yes
CCTV system working correctly	Yes
CCTV date and time correct	Yes
Minimum of 31 days CCTV footage available	Yes
Adequate CCTV coverage of premises	Yes
Sufficient stock of CCTV recording media	Yes
At least one member of staff on duty able to fully operate CCTV system	Yes
Written record of routine CCTV checks	Yes
ID scanning equipment working correctly	Yes
Appropriate staff issued with operational radios	Yes
How many staff issued with Body Worn Cameras	<b>1</b> From 0 to 20
Are Body Worn Camera recordings retained for 31 days	Yes



## Media summary



Photo 1

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# Actions from Police visits

The Cocktail Club – Canary Wharf			Reference Number:
Persons Involved: <b>The cocktail club staff</b>	Describe Activity: <b>Service of alcohol to underage</b>	Describe Actions: <b>Measures to prevent service of alcohol to underaged</b>	Date: <b>09/12/2022</b>

Assessment	Action taken	Date	
<b>Serve of alcohol to underage</b>	All member of staff was re-trained, after the visit, on licensing objective and how to enforce the challenge 21, all records reflect this on Flow training platform		
	Citizen ID card are no longer being accepted		
	There will be a topic that will include security (logs/compliances/records/checks/due diligence book) on weekly basis between GM and Area Manager, any red flags will be reported to the Operations Director immediately		
	Review all the security compliances within operational management on a 4-weekly basis, earlier if any recurrent issue that needs actioned sooner		
	Ordered an ID scanner to be installed and used with immediate action. This has been ordered and install to be complete w/c 12/12/22		
	Security must scan all ID before granting entrance to any guests with no exceptions to bookings, private parties, or venue hires		
	Downloaded all footage of the night from 6pm to midnight and handed over to police officer Michael Rice.		
	Security member was replaced immediately, and extra member of security added since. Security rotas reflect a doorman on from open every day		
	All members of staff has been informed and signed an additional training assessment to reiterate the importance of them following the rules and extra measures (also mentioned in this document) that we will take to prevent serving underaged		
	All Management team to attend the Pub Watch meetings and ALL members of staff to attend the WAVE training provided by Canary Wharf Management		
Better communication will be ensured during any shift and if member of staff is in any doubt, they must ask for identification regardless if security has already check them			

Assessment	Action taken	Date	
<b>Serve of alcohol to underage</b>	Review this document on monthly basis		
	Till records to be monitored weekly and any refusal of serve to be logged, this also will be documented with detail on within the logbook and duty of care provided thereafter		
	Test purchasing company "Serve Legal" to be instated to spot check at least twice weekly		
	Welfare officer to be allocated for the site on daily shifts		
	Staff training Risk Assessment upweighted and all staff have been signed of and documentation filed on record		
	Only senior doorman to be provided at Canary Wharf site, and head of Premium Security Company Jack Neil to work alongside the security team on peak trading to ensure they are adhered to their responsibilities and process		
	All incidents to continue to be logged on Riskproof and end of night reports to continue to reflect any incidents/issues at the end of every shift		
	Numbers log to be recorded every 30 minutes, this to be checked by management every half an hour to ensure process is being adhered to and records complete		

Assessment Carried Out By:		Print and Sign:	
Venue Name: <b>The Cocktail Club – Canary Wharf</b>	Date of Assessment: <b>09/12/2022</b>	Intended Review Date: <b>09/01/2023</b>	Actual Review Date:

# Actions from Police visits

The Cocktail Club – Canary Wharf			Reference Number:
Persons Involved: <b>The cocktail club staff</b>	Describe Activity: <b>Service of alcohol to underage</b>	Describe Actions: <b>Measures to prevent service of alcohol to underaged</b>	Date: <b>09/12/2022</b>

Assessment	Action taken	Date	Signed
<b>Serve of alcohol to underage</b>	All member of staff was re-trained, after the visit, on licensing objective and how to enforce the challenge 21, all records reflect this on Flow training platform	Monthly	KM
	Citizen ID card are no longer being accepted	Ongoing	KM
	There will be a topic that will include security (logs/compliances/records/checks/due diligence book) on weekly basis between GM and Area Manager, any red flags will be reported to the Operations Director immediately	Ongoing	KM
	Review all the security compliances within operational management on a 4-weekly basis, earlier if any recurrent issue that needs actioned sooner	Ongoing	KM
	Ordered an ID scanner to be installed and used with immediate action. This has been ordered and install to be complete w/c 12/12/22	Ongoing, use monitored	KM
	Security must scan all ID before granting entrance to any guests with no exceptions to bookings, private parties, or venue hires	Ongoing	KM
	Downloaded all footage of the night from 6pm to midnight and handed over to police officer Michael Rice.	Completed	KM
	Security member was replaced immediately, and extra member of security added since. Security rotas reflect a doorman on from open every day	Ongoing	KM
	All members of staff <b>have</b> been informed and signed an additional training assessment to reiterate the importance of them following the rules and extra measures (also mentioned in this document) that we will take to prevent serving underaged	<b>Completed, refresh required by next review</b>	KM

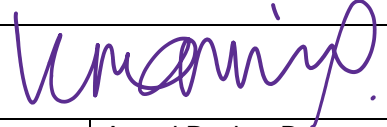
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	All Management team to attend the Pub Watch meetings and ALL members of staff to attend the WAVE training provided by Canary Wharf Management	Employing external company for training	KM
	Better communication will be ensured during any shift and if member of staff is in any doubt, they must ask for identification regardless of if security has already check them	Ongoing	KM

Assessment	Action taken	Date	
<b>Serve of alcohol to underage</b>	Review this document on monthly basis	06/02/23	KM
	Till records to be monitored weekly and any refusal of serve to be logged, this also will be documented with detail on within the logbook and duty of care provided thereafter	Ongoing	KM
	Test purchasing company "Serve Legal" to be instated to spot check at least twice weekly	Ongoing	KM
	Welfare officer to be allocated for the site on daily shifts	Ongoing	KM
	Staff training Risk Assessment upweighted and all staff have been signed of and documentation filed on record	Completed	KM
	Upon further review of security personnel, new security company to be engaged.	Week Commencing 30.01.23	KM
	All incidents to continue to be logged on Riskproof and end of night reports to continue to reflect any incidents/issues at the end of every shift	Ongoing	KM
	Numbers log to be recorded every 30 minutes, this to be checked by management every half an hour to ensure process is being adhered to and records complete	Ongoing	KM

	Action taken	Date	
	Engage licensing consultants so as to have impartial auditing, advice, process & documentation suitability review as well as assistance on evaluation of current CW Action Plan	05/02/23 and ongoing	KM
	NEW version of this document to be created (subsequent to above item's completion)	Complete by end of March	KM

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Assessment Carried Out By:	Print and Sign: KIERAN MANNING 		
Venue Name: <b>The Cocktail Club – Canary Wharf</b>	Date of Assessment: <b>09/12/2022</b>	Intended Review Date: <b>09/01/2023 &amp; monthly thereafter</b>	Actual Review Date: <b>06/02/23</b>



# Ongoing Action Plan


<b>The Cocktail Club – Canary Wharf</b>			Reference Number: N/A
<b>Persons Involved:</b> The cocktail club staff, Managers and Contractors (namely Security Operatives)	<b>Describe Activity:</b> Service of alcohol to underage	<b>Describe Actions:</b> Measures to prevent service of alcohol to underaged	<b>Date:</b> 13.03.23

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Assessment	Action taken	Date	Signed
<b>Serving Alcohol to Underage Guests, Excessive Intoxication and Vulnerability</b>	Regular staff training both via in-person training and digital (Flow Platform) training to take place	Ongoing	KM
	Citizen ID card are no longer being accepted. ID to be accepted as proof of age are a current UK or European photo-card driving licence. UK full or provisional photo-card driving licence and ID cards from the National Proof of Age Standards Scheme (with PASS hologram).	Ongoing	KM
	There will be a topic that will include security (logs/compliances/records/checks/due diligence book) on weekly basis between GM and Operations Manager, any red flags will be reported to the Operations Director immediately	Ongoing, part of weekly review of this document	KM
	Review all the security compliances within operational management on a 4-weekly basis, earlier if any recurrent issue that needs actioned sooner	Ongoing	KM
	ID Scanner to be on site, working and in use. Any defects / faults to be logged in good time.	Ongoing	KM
	Security / management to endeavour that all guests are asked for ID at entry stage to the venue, this will mean a physical check as well at utilising the abovementioned scanner	Ongoing	KM
	Challenge 25 - Any guests who looks under 25 years old must present valid, accepted photographic ID at entry.	Ongoing	KM
	“Two Sets of Eyes” – For any guests who are assessed to be over 25, this should be verified prior to service by <b>two</b> members of our team, ideally a manager AND an SIA Operative	Ongoing	KM

	Action Taken	Date	Signed
	New unique sign off created to inform staff of all ongoing challenges, anomalies, additional processes and new operational Management key points. It should also have attached to it any unique / unusual licensing conditions or building / area specific challenges	By 14.03.23	
	All Management team to attend the Pub Watch meetings and ALL members of staff to attend the WAVE training provided by Canary Wharf Management	10/03/23	KM
	Staff member should satisfy their own queries as to whether guests are of legal age and operate Challenge 25 at the bar should they ever be unaware as to whether that guest has already been challenged prior.	Ongoing	KM
	Renew and review 'Ask for Angela' and Drinks Tampering training	By W/E 20/03/23	
	Till records to be monitored weekly and any refusal of serve to be logged, this also will be documented with detail on within the logbook and duty of care provided thereafter	Ongoing	KM
	Welfare officer to be allocated for the site on daily shifts	Ongoing	KM
	All incidents to continue to be logged on Riskproof and end of night reports to continue to reflect any incidents/issues at the end of every shift	Ongoing	KM
	Engage licensing consultants so as to have impartial auditing, advice, process & documentation suitability review as well as assistance on evaluation of current CW Action Plan	05/02/23 and ongoing	KM
	Trial introduction of Body Worn Video Cameras	By 15/03/23 and ongoing	
	Numbers log to be recorded every 30 minutes	Ongoing	KM
	Based on weekly meetings and visits; Prioritise one side of seated area during off-peak months, increases visibility, reducing chance of poor behaviour from passers-by etc	Ongoing as of 20/02/2023	KM
	Improve outside signage asking guests to be quiet and respectful as leaving	02/03/23	KM

	Guests identified as being under 18 in the ID process should be treated as vulnerable, and managers and security should endeavour to assist them as we would with a <i>guest</i> who was identified as vulnerable or needed assistance.	Ongoing	KM
	This plan to be reviewed weekly going forward	By 21/03/23 and ongoing	

<b>Assessment Carried Out By:</b> Kieran Manning, Ops Manager		<b>Print and Sign: KIERAN MANNING</b> 	
<b>Venue Name:</b> The Cocktail Club – Canary Wharf	<b>Date of Assessment:</b> 13.03.23	<b>Intended Review Date:</b> 13 <sup>th</sup> April, weekly thereafter	<b>Actual Review Date:</b>

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Hi,

The visit to The Cocktail Club, Canary Wharf at 20:38 on 28/01/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	28/01/2023
Actual Time of Visit	20:38
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Spirit & Mixer
Please give details of the alcohol that you tried to purchase:	Rum and pineapple
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Female
What was the approximate age of the team member who served you?	25
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	female, black hair, 20s, 5ft5

Question	Response
What was the name of the person who served you?	n/a
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	No
What did you think of the venue's atmosphere in terms of music and lighting?	loud, packed to an extent but died down
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 19:00 on 03/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	03/02/2023
Actual Time of Visit	19:00
Visit Result	PASS - CHALLENGE AT BAR



# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Other
Please give details of the alcohol that you tried to purchase:	Old Fashioned cocktail
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Round
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	20s
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Short black hair and stubble, roughly 5 foot 8

Question	Response
What was the name of the person who served you?	Kevin
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	Trendy, fun and adult
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 17:55 on 17/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	17/02/2023
Actual Time of Visit	17:55
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Other
Please give details of the alcohol that you tried to purchase:	2 espresso martini cocktails
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Round
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	20s
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Short light brown hair and stubble, roughly 5 foot 11

Question	Response
What was the name of the person who served you?	David
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	Fun, energetic and classy
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 18:17 on 09/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	09/02/2023
Actual Time of Visit	18:17
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Other
Please give details of the alcohol that you tried to purchase:	2x truffle martini cocktails
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Round
Did the person who served you ask your age?	Yes
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	25
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Male wearing all black, black hair around 5'8

Question	Response
What was the name of the person who served you?	N/a till was behind bar
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	No
What did you think of the venue's atmosphere in terms of music and lighting?	It was nice
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	Did not ask for receipt as audit details stated not to but to take Descreet photo of bar





Hi,

The visit to The Cocktail Club, Canary Wharf at 20:07 on 21/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	21/02/2023
Actual Time of Visit	20:07
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Alcopop
Please give details of the alcohol that you tried to purchase:	Baby doll
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Female
What was the approximate age of the team member who served you?	20
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Female, black hair, 20s

Question	Response
What was the name of the person who served you?	Emily
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	No
What did you think of the venue's atmosphere in terms of music and lighting?	Very nice
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 17:13 on 16/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	16/02/2023
Actual Time of Visit	17:13
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Alcopop
Please give details of the alcohol that you tried to purchase:	Solero Sundae Cocktail
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Round
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Female
What was the approximate age of the team member who served you?	20
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	She had black hair that was in a pony tail

Question	Response
What was the name of the person who served you?	She had no name tag
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	It was amazing, really classy and had a great vibe
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 18:53 on 18/03/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	18/03/2023
Actual Time of Visit	18:53
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Spirit & Mixer
Please give details of the alcohol that you tried to purchase:	Aperol Spritz and a normal wine glass
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	25
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Medium height, short black hair and glasses with tattoos



Question	Response
What was the name of the person who served you?	Bishal
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	It was really cool
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 19:18 on 09/03/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	09/03/2023
Actual Time of Visit	19:18
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Other
Please give details of the alcohol that you tried to purchase:	Espresso Martini cocktail
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	N/A
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	20s
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Short black hair and facial hair, clear frame glasses

Question	Response
What was the name of the person who served you?	Kevin
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	Fun, upbeat and classy
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 17:13 on 20/02/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	20/02/2023
Actual Time of Visit	17:13
Visit Result	PASS - CHALLENGE AT BAR

# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Lager
Please give details of the alcohol that you tried to purchase:	Bottle of corona
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	Yes
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Male
What was the approximate age of the team member who served you?	25
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Male, black hair (curly on top), glasses, grey shirt

Question	Response
What was the name of the person who served you?	Na
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	Very good, fits the classy clientele of Canary Wharf
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



Hi,

The visit to The Cocktail Club, Canary Wharf at 17:20 on 16/03/2023 was a PASS - CHALLENGE AT BAR.

## Site Review

### Premises Details

Premises Name	The Cocktail Club, Canary Wharf
Address 1	9, Cabot Square
Address 2	Canary Wharf
Premises City	London
Post Code	E14 4EB

### Site Details

Store Code	E14 4EB
Organisation Levels	company

### Visit Details

Actual Date of Visit	16/03/2023
Actual Time of Visit	17:20
Visit Result	PASS - CHALLENGE AT BAR



# Report

Question	Response
Were you able to successfully conduct this audit?	Yes
Were door staff present when you entered the premises?	Yes
Did the door staff ask your age?	No
Did the door staff ask you for ID?	Yes
Did door staff scan your ID upon entry?	Yes
Did the door staff refuse entry?	No
Were the door staff wearing official "Security" badges	Yes
Were the door staff polite and welcoming?	Yes
What type of alcohol did you try to purchase?	Cider
Please give details of the alcohol that you tried to purchase:	A Rekordilig strawberry and lime
If you ordered a bottle of beer, were you offered a glass and was the label facing forward on the bottle?	No
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the staff member who served you ask for ID?	Yes
In your opinion, did the person who served you make an assessment of your age?	Yes
Were the bar staff friendly?	Yes
What was the gender of the staff member who served you?	Female
What was the approximate age of the team member who served you?	20
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	she had dark short hair that had highlights

Question	Response
What was the name of the person who served you?	No name tag
Was the bar area clean with no spillages and clear of empty glasses, straws, napkins etc.?	Yes
What did you think of the venue's atmosphere in terms of music and lighting?	It was very classy
Please use this space to explain anything unusual about your visit or to clarify any detail of your report:	



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# KD Security Welcome Pack



# About us

KD Security Group is a London based security service with over 30 years experience and as a provider of quality security guards, protection, manpower either discreetly or highly visible to various prominent clients for many years. We are totally committed to providing our clients with security solutions tailor made to their requirements.

Matching the right guards to our clients and their environment is a craft we have mastered over many years. Our policy is that we will not sub contract out our valuable clients work. Also the direct employment of staff without the use of subcontractors, unlike other companies, we have full control.

KD Security Group can guarantee an allocation of a reliable security guard or team who are able to display discretion, professionalism and within the timeframe required. All our clients enjoy full support by KD Security Service, as we will focus on the growth and improvement of their business interests.

We will implement the required system and professional standard that deliver an outcome on any platform. We know how diverse security can be, but despite this, KD Security Group have experienced practices in place to meet our client's needs.

We offer a personalised security service to all clients regardless of their budget.



## INTRODUCTION:

- ESTABLISHED IN 2011
- OWNER/FOUNDER IS SOLE SHAREHOLDER
- CURRENT TURNOVER OF £4.5m
- 80 ACTIVE CONTRACTS

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ZOMRA  
SECURITY LTD  
FORMED

KD SECURITY  
IS FORMED  
TO FOCUS ON  
NIGHT-TIME  
ECONOMY

23<sup>rd</sup> MARCH 2020 COVID CRISIS  
EFFECTIVELY MOTHBALLING THE ENTIRE  
HOSPITALITY INDUSTRY

KD SECURITY (LONDON) LIMITED  
CELEBRATES 10th ANNIVERSARY RE-  
LAUNCH POST COVID

KD SECURITY (LONDON) LIMITED  
AWARDED INFERNOS CLAPHAM

KD SECURITY (LONDON) LIMITED  
TENDERS FOR KOKO LONDON

KD SECURITY  
(LONDON)  
LIMITED  
AWARDED  
KOKO LONDON  
CONTRACT

APRIL  
2011

NOVEMBER  
2014

MARCH  
2020

APRIL  
2021

JULY  
2021

MARCH  
2022

APRIL  
2022

# Our Clients

- Barrios – Angel, Brixton, Covent Garden, Shoreditch, Soho, Watford
- City Pub Group - Aragon House, Belle Vue, Bow Street Tavern, Daly's Wine Bar Kings House, The Phene, Three Crowns
- Columbo Group - Blues Kitchens (Camden, Brixton, Shoreditch), Jazz Cafe, Metropolis, , Old Queens Head, Phonox
- Livelyhood Venues Pub Group – Perky Nel, Rosey Hue, The Regent
- London Cocktail Club – Canary wharf, Clapham
- Mercato Metropolitano – Elephant & Castle, Mayfair, Wood Wharf
- Mint Group - Infernos, Koko, House of Koko (Members Club), Mommi
- Novus Leisure – Piccadilly Institute
- East London Pub Company - The Saxon, The Gun, Ten Bells, Sun Tavern
- Rocket Leisure – Northcote, Venn St, Old Street, Eastcheap Records & Louche-Soho
- SBG (Shoreditch Bar Group) – Casa Blue, Floripa, Hoxton 7, Love Company, Matchbox, The Redchurch Bar, The Shoreditch, Wenlock & Essex
- Soho Bars – Soho Residence & Freedom
- Urban Pubs & Bars Ltd – Bar Kick
- Wesley Hotels – Camden & Euston
- 25 Paul Street
- 64th & Social
- Aquum
- Broadway Bar & Grill
- Cafe Sol
- Caribbean Collection Ltd
- Gerry's Club
- Hayatt Greenwich
- Heads & Tails Cocktail Bar
- La Rueda
- Osteria Mbare
- Planet Wax
- Reggae Kitchen Bar & Restuarant
- St Mortiz (Restaurant)
- Sugar Cane (Battersea)
- The Mall Tavern
- Yatay (Japanese Restaurant & Bar)

# MEET THE TEAM





## David Hasani – Managing Director

David is the Managing Director for KD Security and he has been within the security industry for over 30 years.

David started of as a security officer and saw an opportunity to start his own business and help establish KD Security as one of the leading competitors in London.

David is ultimately responsible for the operational & financial probity of the company.



## Damien Zannetou – Business Development Manager

Damien has worked as a Business Development Manager for 20 years in various different sectors, Damien also specialises in high level recruitment and he is ensuring that KD Security keeps the calibre of staff high throughout all of their venues.





## Martin Kiri - Operations Manager

Martin has been with KD Security for over 15 years and he played a key role in helping grow of KD Security as a brand.

Martin has helped with the site mobilisation for companies such a The Columbo Group, Rocket Leisure, Barrio's, London Cocktail Clubs, City Pub Group.





## Armando Bajrami - Operations Manager

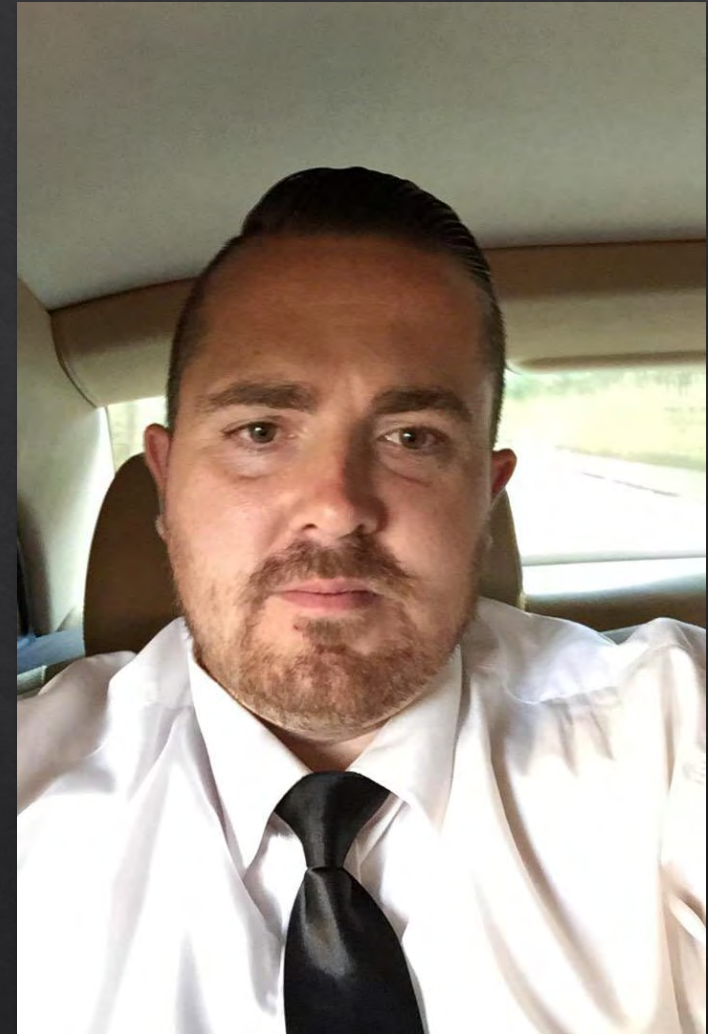
Armando has over 16 years experience working in the security industry, Armando has played a key role in growth of KD Security and helped with the site mobilisation for companies such as The Columbo Group, Rocket Leisure, Barrio's, London Cocktail Clubs, City Pub Group and also Mint Group.



# Steven Rose - Operations Manager

Steve has over 15 years in the security industry, Steve has had the pleasure of managing security for large scaled events such as the Liberal Democrats Conferences to Royal Events at Kensington Palace & Hampton Court.

Steve has been working with KD Security for nearly 10 years and he played a key role in helping grow of KD Security as a brand.





# Paul Clarke – Operations Manager

Paul has over 30 years experience in the security industry in many different venues both corporate/entertainment around London, he also has 15 years experience as a close protection officer.

Paul is a qualified SIA trainer and although he is the newest member of the KD family, Paul has established himself well within the company .

Paul has the pleasure of looking after The Mint Group contract, Koko/Infernos & Mommi and works along side Armando.



## Abbas Maqsood – Operations Manager

Abbas Maqsood is Operations Manager with the company and has a security background spanning over 10 years. Abbas has extensive experience in both public and private security including close protection. Abbas is responsible for managing the day to day operation at KD Security



# Our Objective





# MISSION STATEMENT & CORE VALUES

- 1. To re-invest in the business for sustainable growth, attracting & retain proven industry experts**
- 2. To invest in staff, including their training, salary & benefits so they in turn invest in us**
- 3. To motivate our workforce by engaging inspirational leaders**
- 4. To ensure CSR is at the core of our business model, taking time to recharge, reflect and refocus**
- 5. Retain existing customers, providing a level of service they could not find anywhere else. Maintaining relationships based on honesty, integrity, credibility and loyalty.**

# MOBILISATION STRATEGY

Financial & Commercial Documentation

Operations/Administrative Tasks Completed

Human Resources (talent search)

Training Regime

Performance Monitoring & Improvement

- Financial & Commercial elements
- Service Agreement
- Site Survey
- Uniform Requirements
- Technical Solutions
- Deployment Plan
- Assignment Instructions
- Risk Assessment
- Interviews
- Recruitment & Screening
- Induction Training
- Training Programme Matrix agreed
- E-learning commences
- Client Specific Training Delivered
- Toolbox Training (on-going assessment)
- Reporting specifics to be agreed
- Frequency of Gold, Silver, Bronze oversight
- Strategic Security Assessment (Martyns Law)
- [Protect Duty Consultation Document](#)
- KPI Monitoring

# RECRUITMENT STRATEGY

BS7858:2019

IDENTITY CHECKS COMPLETED

FINANCIAL CHECKS COMPLETED

EMPLOYMENT & CHARACTER REFERENCES

CRIMINAL RECORD (BASIC DBS)

- All of our HR processes are vigorous and robust, our references checks are done to **BS7858:2019**, which is the British standard for screening of individuals employed in a security environment

## Identity Checks

- ID confirmation, Five years address history, Right to Work check, SIA Licence check, Global Watchlist, Electoral Roll &....

## Financial Checks

- Bankruptcy / Insolvency / IVA, CCJ (Up to £10,000) &.....

## Employment & Character Reference Checks

- 5 years employment history &....

## Criminal Records

- Basic Disclosure



# TRAINING OPPORTUNITIES AND ADDED VALUES

## **“Assignment Specific” Introduction**

- **Local Concerns, Hot Spots**
- **Geographic Familiarisation**
- **Roles & Responsibilities**
- **Induction Training (In-depth)**
- **Standard Operating Procedures**

## **Other Courses**

- **Emergency Response(s)**
- **Counter-Terrorism**
- **Situation Awareness**
- **Behavioural Awareness**
- **Ask For Angela, WAVE etc**

## **Specific Concerns**

- **Vulnerability**
- **Drink Spiking**
- **Drug usage, dealing and aftermath**
- **Reporting crime**

## **Company Induction Training**

- **Induction to company**
- **Customer Service Model**
- **Policies & Procedures**
- **Models of Professional Behaviour**
- **Code of Conduct**

## **Personal Development**

- **Supervisory Course(s)**
- **Leading & Mentoring**
- **ACT Training (access to URIM)**
- **ScAN Training**

## **Contractual Administration & Added Value**

- **Report Writing**
- **Statement Taking**
- **Lost & Found Property**
- **Identifying Vulnerability**
- **Alarm Monitoring & Response**
- **Incident Management & Reports**
- **First Responders (incident management)**
- **Body Camera Evidence Gathering**

## **Security Industry Training**

- **Physical Intervention**
- **Conflict Management**
- **Crisis Management**
- **Fire Marshall**
- **First Aid**

## **Department & Conduct**

- **Personal Presentation**
- **Customer Service Delivery**
- **Uniform**
- **Equipment**

# WHY CHOOSE US?

EXTENSIVE KNOWLEDGE OF INDUSTRY

UNRIVALLED EXPERIENCE & EXPERTISE

100+ YEARS OF MANAGEMENT EXPERIENCE

HONEST, RELIABLE, TRANSPARENT & LOYAL

EXCELLENT REPUTATION WITHIN INDUSTRY



# QUALITY ASSURANCE

We guarantee that 100% of our workforce will be directly employed. We do not sub-contract, use self-employed individuals or engage labour pool providers.

An Operations Manager will visit several times a week. The Client and workforce benefit by having immediate access to a senior manager and any issues or matters arising can be dealt with without delay.

A Director level visit will be made at least once per month.

# ANY QUESTIONS?

Please contact [steve@kdsecurity.co.uk](mailto:steve@kdsecurity.co.uk) if you require any further information from us.





## CONFLICT MANAGEMENT MASTERCLASS

### *Abstract:*

This Conflict Management Masterclass will provide you with an understanding of how frustration, anger and aggression can lead to violence. Furthermore, the course will explain the environmental and human factors that can contribute to it and influence whether the situation escalates or de-escalates.

Malcolm Nicol FBii.TP

### COURSE OBJECTIVES:

The aim of this course is to recognise different aspects of conflict that you may encounter and to understand and be aware of different methods of resolving those situations. At the end of the course you will be able to:

1. Describe common causes of conflict.
2. Identify common flashpoints.
3. Identify triggers or “hot buttons”
4. Give examples of impact factors.
5. Describe methods of dealing with conflict situations.
6. Conduct a dynamic risk assessment.
7. Understand the use of space & distance with dealing with conflict.
8. Understand the importance of using non-confrontational body language.



### COURSE CONTENT:

#### Conflict Management Masterclass

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Introduction, registration and preamble</li> <li>• Overview of content and timings</li> <li>• Identifying Conflict Situations</li> <li>• Effective Communication</li> <li>• Cultural Awareness</li> <li>• Breakdown in Communication</li> <li>• Communication Models</li> <li>• Betaris Box (attitude and behaviour cycle)</li> <li>• Patterns of Behaviour</li> <li>• Showtime ‘Setting the tone’</li> <li>• Dynamic Risk Assessment</li> <li>• SAFER</li> </ul> | <ul style="list-style-type: none"> <li>• Triggers</li> <li>• Signs of Escalation</li> <li>• Warning &amp; Danger Signs</li> <li>• Fight or Flight Response</li> <li>• De-Escalation Techniques</li> <li>• Impact Factors</li> <li>• Personal Space/Maintaining Distance</li> <li>• Non-Confrontational Body Language</li> <li>• Signalling Non-Aggression</li> <li>• LEAPS (acronym for effective communication)</li> <li>• Active Listening Techniques</li> <li>• POPS technique (practical demonstration)</li> </ul> |
|--|--|

**CAUSES OF CONFLICT:**

What are the common causes of conflict in your workplace?

Think of any examples (maximum 5) and write them in the boxes underneath.

- 1.
- 2.
- 3.
- 4.
- 5.

**What does conflict mean to you?**

**Questions to consider:**

How did you feel during a conflict situation?

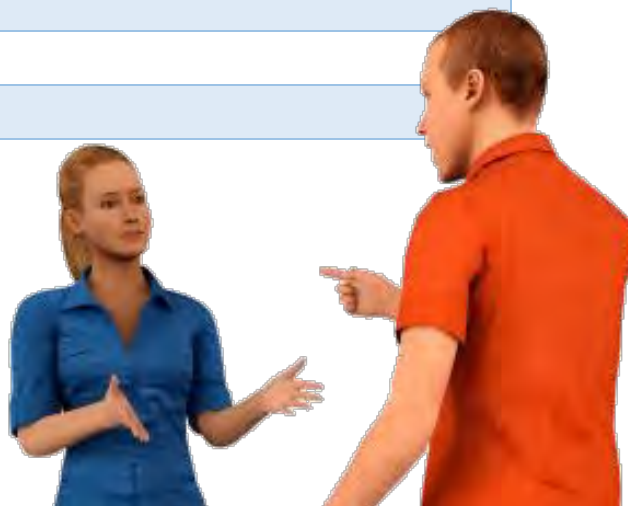
What impression did it make on you; anyone else who may have witnessed or been affected by it?

Were you prepared for what happened?

**DEALING WITH CONFLICT:**

What techniques do you already know and use that de-escalate conflict or confrontational situations?  
Use the box below to list some methods you already use to de-escalate situations.

- 1.
- 2.
- 3.
- 4.
- 5.





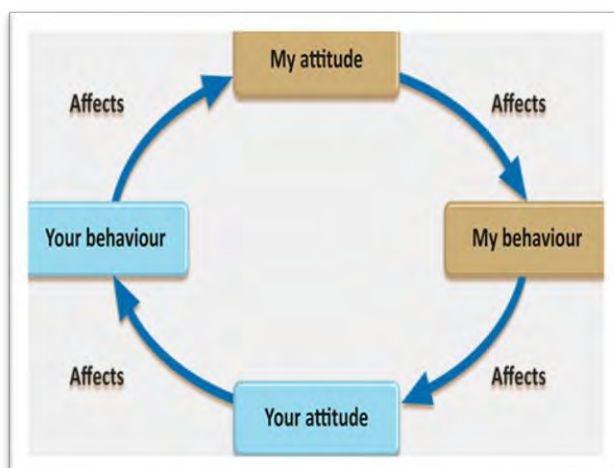
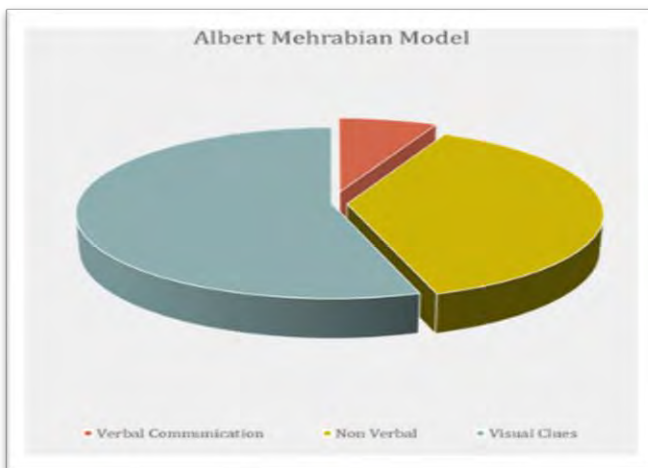
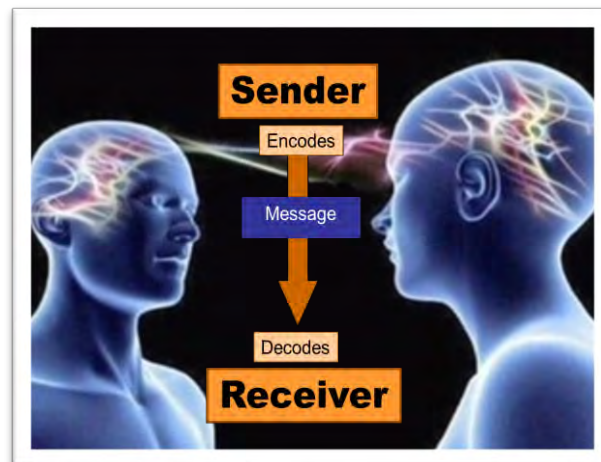
**BASIC ELEMENTS OF COMMUNICATION:**

Conversation relies on the message you are sending being “de-coded” properly by the receiver.

It uses 3 channels to convey your message.

Write the percentage of “meaning” for each channel of communication below.

Words	7%
Tone	38%
Non-Verbal Communication	55%



**HOW DO WE COMMUNICATE:**

Examples of Non-Verbal Communication we use sub-consciously.

- (1) Body Language is a type of nonverbal communication in which physical behaviour, as opposed to words, are used to express or convey information. Such behaviour includes facial expressions, body posture, gestures, eye movement, touch and the use of space.
- (2) Congruency – (match body language with verbal content, tone, pitch and intonation) Collectively called prosody.
- (3) Limbic Responses - When you think of the limbic brain imagine the autonomic response that happens when we are startled by a loud bang (shoulders raise, head lowers, adrenaline flows)
- (4) ‘Rule of Four. Congruency, Context, Baselining and Intuition



## COMMUNICATION MODELS

### PEACE

<b>P</b>	<b>PREPARATION AND PLANNING</b> Have a script of 'typical' responses, you appear and sound confident, capable and professional. Plan for complaint handling and conflict resolution (it will happen)
<b>E</b>	<b>ENGAGE AND EXPLAIN</b> Introduce yourself, remove the anonymity, (always give your name if asked) it causes considerable frustration when it is refused. Keep your tone neutral & language simple.
<b>A</b>	<b>ACCOUNT</b> Allow the complainant to speak without interruption, ask open questions, active listening, and non-confrontational body language
<b>C</b>	<b>CONCLUSION/CLOSURE</b> Review what has been said, paraphrase, show empathy, clarify any points, seek more information, inform what will happen next and follow up
<b>E</b>	<b>EVALUATION</b> What do you need to do now? How did you handle it? Could you have done anything differently?

## COMMUNICATION MODELS

### 5 STEP APPEAL

<b>1</b>	<b>ETHICAL APPEAL</b> Ask the person to comply; please stop doing that, please leave... make it clear what it is you want from them to do or importantly, not do. Some people respond immediately with no perception of resistance.
<b>2</b>	<b>REASONED APPEAL</b> Reinforce the rules, explain why you have made the request and link it to the conduct or behaviour you are challenging. Example "you cannot do that because.. "
<b>3</b>	<b>PERSONAL APPEAL</b> Consider what options are available, offer and present to the person. Explain at this point what is likely to happen if they do not comply. (they'll have to leave, police will be called etc)
<b>4</b>	<b>PRACTICAL APPEAL</b> This is the final appeal. Explain what is going to happen (consequence) if they do not respond to your request. "is there anything I can reasonably do that will make you stop that behaviour or leave the premises, co-operate.."
<b>5</b>	<b>ACTION</b> This is situationally dependent on the threat as you perceive it. First priority is your personal safety, conduct a dynamic risk assessment and ACT. It may be words of advice, maintain distance and observe

## COMMUNICATION MODELS

### CUDSA

<b>C</b>	<b>CONFRONT THE CONFLICT – CHALLENGE THE BEHAVIOUR</b> Requires an assertive approach. Address the behaviour and attempt to enlist cooperation to solve the problem.
<b>U</b>	<b>UNDERSTAND THE PROBLEM &amp; EACH OTHERS POSITION</b> Confirm what is actually causing the conflict. Take time to allow the other person to outline their perspective of the conflict. Demonstrate respect and show you are willing to try and understand and resolve the situation.
<b>D</b>	<b>DEFINE THE PROBLEM</b> Definition of the root cause of the cause will solve the source of the problem and not just the surface issues. This is particularly important when identifying frustration and anger before escalation to violence.
<b>S</b>	<b>SEARCH FOR SOLUTIONS</b> Collectively search for possible solutions to the problem. What outcome would they like? Is it feasible? Can you arrange it? If you agree, can you actually deliver it?
<b>A</b>	<b>AGREE UPON AND IMPLEMENT THE BEST COURSE OF ACTION</b> The final stage should be an agreement of a course of action to move forward and deescalate. It may not always be possible to organise a win/win solution.

## COMMUNICATION MODELS

### LEAPS

<b>L</b>	<b>LISTEN</b> For feelings as well as facts. Interpret non verbal communication such as gestures and body language. Listen to the whole message. Listen and hear, keep an open mind and display active listening techniques.
<b>E</b>	<b>EMPATHISE</b> ‘em’ from the Latin “to see through”. ‘pathy’ from the Greek meaning “the eye of the other”. The ability to understand and share feelings of another. Not to be confused with sympathy, the feeling of pity of sorrow for someone’s misfortune.  “I can see how frustrated you are” “I would be frustrated too” “I can understand why that would annoy you” “it would annoy me too” “I would be unhappy if that happened to me too”
<b>A</b>	<b>ASK</b> Seek clarification for any points you do not fully understand. Establish facts, seek opinion and check understanding.
<b>P</b>	<b>PARAPHRASE</b> Restating what someone has said shows interest, identifies any inaccuracies and confirms you are actually listening. Helps to establish control, if you are talking and they are listening you can steer the conversation.
<b>S</b>	<b>SUMMARISE</b> Condense everything that’s been said into a simple statement. Be brief, concise and agreed next steps.

PATTERNS OF BEHAVIOUR

**SERIOUS OR AGGRAVATED RESISTANCE**

- The person attempts to or actually causes serious injury and may use weapons

**AGGRESSIVE RESISTANCE**

- The person reacts with verbal aggression or physically attacks

**ACTIVE RESISTANCE**

- Physical refusal to comply. The person pulls or pushes away but makes no attempt to strike

**PASSIVE RESISTANCE**

- The person will either sit or stand and will refuse to move. Ignoring the request.

**VERBAL RESISTANCE**

- The person refuses to comply either verbally or with their body language.

**COMPLIANCE**

- The person offers no resistance and complies with your request.

**Profiling Body Language: (Identifying clusters of behaviours)**

The **Dominant Cluster** includes the behavioural cues of someone who is preparing a “fight” response. The Dominant Cluster is how we use our body to show authority, intimidate, posture before a fight or to ensure that we are perceived as being in control of the situation.

<p><b>Lower Body/Torso</b></p> <p>Standing – legs shoulder width apart (taking up more space)</p> <p>Seated – Leaning back with hands clasped behind head (hooding) (taking up more space)</p> <p>Standing – Hands on hips – authoritative (taking up more space)</p> <p>Standing – leaning forwards – aggressive, making themselves look bigger. Stretching torso and making oneself look taller by standing upright and erect</p>	<p><b>Hands and Arms:</b></p> <p>Arms Spread out on an object (table, counter, etc.) – (taking up more space)</p> <p>Hands clasped behind back – (judging or evaluating)</p> <p>“Wrist Down” when shaking hands/greeting</p> <p>While talking – lecturing (pointing with hands)</p> <p>Steeple gesture with hands (perceived as intellectual and confident)</p>
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SIGNS OF ESCALATION/WARNING AND DANGER SIGNS

WARNING SIGNS	DANGER SIGNS
Direct and prolonged eye contact	Fists clench and unclench
Facial colour may darken, redden or flush	Facial colour may become paler
Head tilted back	Lips tighten over teeth
Subject stands tall to maximise height	Head drops to protect the throat
Subject expands chest	Eyebrows drop to protect the eyes
Subject splays arms to appear physically imposing	Hands rise above the waist
Subject kicks ground (stamps feet)	Shoulders tense
Large exaggerated movements to close space	Stance moves from square on to sideways
Breathing rate increases	Staring intently at intended target
Hindering movement (closing down space)	Eyes narrow or squint to focus on target
Behaviour may stop/start abruptly	Lowering body to launch forward

Signalling Non-Confrontational Body Language & SAFER approach

Write PALMS & SAFER in the spaces below

P \_\_\_\_\_

S \_\_\_\_\_

A \_\_\_\_\_

A \_\_\_\_\_

L \_\_\_\_\_

F \_\_\_\_\_

M \_\_\_\_\_

E \_\_\_\_\_

S \_\_\_\_\_

R \_\_\_\_\_



## DYNAMIC RISK ASSESSMENT TEMPLATE

### Identify the risk?

- Are you alone?
- Has the interaction escalated towards conflict?
- Has the customer exhibited any signs of escalation?
- Do other staff know where you are and what you are dealing with?

### Assess the risk?

- Do you have any concerns about your personal safety?
- Has the customer become physically threatening?
- Consider the impact factors and control measures

### Remove or Reduce Risk

- What is it that concerns you?
- Has the customer become aggressive?
- Fear of being assaulted, attacked verbally abused?
- Even verbal threats of violence will not be tolerated under any circumstances.

## PERSONAL SAFETY STRATEGY

### Anticipate and Recognise a Risk

- Focus on action to prevent conflict escalating towards violence
- Use effective communication techniques
- Active listening skills
- Non-confrontational body language

### Take action to remove or avoid it

- Early intervention using aggressive hospitality
- Address the cause of the conflict
- Summon support
- Remove yourself to a place of relative safety

# CONFLICT RESOLUTION



**ALL DOOR-SUPERVISORS HAVE ALREADY RECEIVED MANDATORY CONFLICT MANAGEMENT AND PHYSICAL INTERVENTION TRAINING AS PART OF THEIR SIA LICENCE QUALIFICATION**



**REMEMBER - BUG(E)**

**B - BACK OFF**

**U - UTILISE COVER**

**G - GIVE SPACE**

**E - ENTER NEGOTIATIONS**



**REMAIN CALM EVEN IF THE CUSTOMER BECOMES ANGRY.  
DO NOT MEET AGGRESSION WITH AGGRESSION  
COMPOSE YOURSELF AND RESPOND USING PROFESSIONAL LANGUAGE**



**NO PHYSICAL CONTACT - NEVER PLACE YOUR HANDS ON AN AGGRESSIVE INDIVIDUAL OR MAKE PHYSICAL CONTACT UNLESS THE USE OF FORCE IS ABSOLUTELY NECESSARY**



**BE AWARE OF PERSONAL SPACE AND MAINTAIN THE 'REACTIONARY GAP' THE DISTANCE A PERSON CAN MOVE BEFORE YOU'RE ABLE TO REACT**



**MOVE OUT OF POTENTIALLY DANGEROUS AREAS. FOR EXAMPLE, AREAS WITH POOR VISIBILITY, NO CCTV COVERAGE, OR CONTAINING DANGEROUS ITEMS SUCH AS SCISSORS, KNIVES OR OBJECTS THAT COULD BE THROWN**



**USE A BARRIER BETWEEN YOU AND THE AGGRESSIVE CUSTOMER, BUT DON'T BLOCK YOUR OWN EXIT. KEEP AN EYE ON POTENTIAL ESCAPE ROUTES**



**IF THE DIALOGUE WITH A CUSTOMER ISN'T PROGRESSING, TRY SWAPPING WITH ANOTHER MEMBER OF THE SECURITY TEAM SO THE FOCUS OF AGGRESSION IS NOT ON YOU PERSONALLY**



**MALE/FEMALE DYNAMICS CAN HAVE AN IMPACT SO IF PROGRESS ISN'T BEING MADE TRY SWAPPING IN WITH A COLLEAGUE OF A DIFFERENT GENDER**



**USE OBSCURE WORDS OR PHRASES AS CODE TO COVERTLY CALL COLLEAGUES FOR ASSISTANCE, THE PHRASE "IS THERE ANYTHING ELSE I CAN DO OR SAY HELP RESOLVE THIS SITUATION" IS PARTICULARLY USEFUL**



**USE OVERT INSTRUCTIONS TO COLLEAGUES "CALL THE POLICE" IF THE SITUATION IS RAPIDLY DETEIORATING TOWARDS VIOLENCE**



**ENSURE ALL RADIO COMMUNICATIONS ARE WORKING AND STAFF ARE TRAINED IN HOW TO USE PTT HANDHELD EQUIPMENT. TRAINING REQUIRED IN RADIO PROTOCOL**



**DEBRIEF YOUR STAFF AFTER INCIDENTS TO ENSURE THEIR WELFARE IS CONSIDERED, TAKE SOME TIME AWAY TO COMPOSE YOURSELF. WRITE UP A DETAILED INCIDENT REPORT**



When a customer is in breach of any licensing laws or for some other substantial reason; they must be removed from the premises or refused entry in a Polite, Positive and Professional manner, using non-confrontational techniques. Force should only ever be considered when it is absolutely necessary and the individual Door Supervisor being able to justify your actions at a later date. A dynamic risk assessment by the individual involved will dictate whether force was justified, proportionate, absolutely necessary and reasonable in the circumstances.

The overarching priority is to ensure the safety and security of yourselves and others. It is stressed from the outset that where there are any concerns about your own safety or in the protection of others you are to summon assistance from colleagues or withdraw and Police should be called immediately. If you are concerned about the welfare of a customer, bring your concerns to the attention of the Head-Door Supervisor or Venue Manager so they can oversee the situation.

Excessive or disproportionate force is never condoned and cannot be defended in any circumstances. It is highly likely that if this identified; the individual will be personally liable to prosecution and potentially lose their SIA licence; directly affecting their livelihood and future employability. Any force used must be reasonable in the circumstances, necessary and proportionate to the threat perceived from the customer.

The conflict resolution model has been included to remind you of your responsibility as an individual to defend your actions and should be referred to in any subsequent statement following an incident.

In very specific circumstances, a pre-emptive strike may be used to protect yourself or others from an imminent assault. To re-enforce this point; retaliation is not a defence when considering using a pre-emptive strike.

**TO REFUSE ENTRY OR EJECT A CUSTOMER IS THE LAST RESORT.** The decision to eject a customer should only be reached when you have exhausted all other resources to diffuse a situation or de-escalate potential conflict.

#### **COMMON RISK TECHNIQUES THAT ARE PROHIBITED:**

- Full Nelson, Strangle Holds & Head Chancery are strictly prohibited.
- Certain Arm Locks & Wrist Locks can lead to breaks and strains.
- We do not support the use of any hold or restraint that restricts breathing/airway and /or circulation which can lead to collapse, paralysis and ultimately death.
- Vagus nerve stimulation (affects heart rate & blood pressure.)
- Spinal damage - C3 to C5 also controls breathing
- Always be aware of the dangers of "Positional Asphyxiation"

#### **THE VENUE MANAGEMENT TEAM HAVE THE OVERALL AUTHORITY FOR THE DECISION TO REFUSE CUSTOMERS ENTRY AND EJECTING FOR DISORDER, INTOXICATION OR CONDUCT.**

Prior to any ejection you must evaluate the situation and the outcome that will be achieved by an ejection. For example; if you eject a group of patrons for fighting; will the violence continue outside the premises and could serious injury occur? If a patron has had enough to drink will ejection make them vulnerable to attack or injury?

#### **BEFORE ACTING THINK OF THE CONSEQUENCE!**

- Is the person or persons a risk to themselves, customers, you or other staff?
- Do you need to summon a response team to assist in the ejection or is the customer compliant?

Once the decision is made to eject, advise the Venue Manager and the Head Door-supervisor must also be informed. A body worn camera user should also attend every ejection. For a simple escorted ejection always use the front door (better camera coverage, including witness and customer evaluation).

#### **ALL EJECTIONS MUST BE WITNESSED, PREFERABLY BY THE VENUE MANAGER AND CAPTURED BY A BODY WORN CAMERA. THIS IS FOR YOUR OWN PROTECTION!**

Try to think of reasonable actions as opposed to reasonable force, as 'force' immediately initiates the 'laying on of hands'. A professional Door Supervisor's demeanor and attitude can sometimes be enough to make a person leave or adjust their behaviour. Reasonable force when it has to be used; is only ever applied to ensure a person complies with a reasonable request or in self-defence.

If the person agrees to leave willingly you can escort them one step behind with an arm to their rear (no contact is necessary) in-case they change their mind about leaving. Remember, once bodily contact is made it can be deemed as assault. (This is dependent on the level of force used and the circumstances) If the customer is disorientated, drunk or confused, a simple cradle on the elbow can be used to guide them.

Under no circumstances are head-locks, chokes or any variation of hold which restricts the airway to be used.

# ALCOHOL AWARENESS

## TRAINING RECORD

1. I can only be authorised to sell alcohol for the hours stated on our premises licence and once authorised will not do so outside of those hours
2. Alcohol sales are only for consumption on the premises and I must be aware of customers actions at all times and not allow consumption off the premises unless the alcohol is in a secure/sealed container
3. I confirm that I will not sell alcohol to anybody under the age of 18
4. I confirm that I will challenge anybody attempting to purchase alcohol who appears to be under the age of 25 to prove that they are over 18 by producing acceptable proof of age – Challenge 25
5. I will only accept a Passport, a Photo Driving Licence or a PASS accredited card as proof of age such as the Validate card or the Citizen Card
6. I will not sell alcohol to anybody who I believe is purchasing to supply alcohol to somebody under the age of 18
7. I will not sell alcohol to anybody who I believe is, or appears to be drunk
8. I will not sell alcohol to anybody who I believe is purchasing for somebody who is, or appears to be drunk
9. If I am in any doubt at all on the above I will refuse the sale
10. I will record all incidents of refusals in the refusals book noting the date and time, plus a description of and name of the person if known, together with a note of the product refused and I will advise my supervisor of the refusal as soon as possible and certainly no later than at the end of my shift

I acknowledge that I am not authorised to sell alcohol unless I comply with all of the above at all times.

I confirm that I have received training and understand my legal responsibilities regarding the responsible sale of alcohol as outlined above and received specific training relating to the "Age Verification Policy" and ASK FOR ANGELA how to implement it.

Further to this training, in accordance with the Licensing Act 2003; I have been authorised by a Personal Licence Holder to sell/supply alcohol by way of a retail sale in this premises.

EMPLOYEE NAMES	SIGNATURE:	DATE:
TRAINERS NAMES	SIGNATURE:	DATE:



# ALCOHOL AWARENESS

## #ASK FOR ANGELA

66 HI I'M ANGELA,

ARE YOU ON A DATE THAT ISN'T WORKING OUT? DO YOU FEEL LIKE YOU'RE NOT IN A SAFE SITUATION?

IS YOUR TINDER OR POF DATE NOT WHO THEY SAID THEY WERE ON THEIR PROFILE? DOES IT ALL FEEL A BIT WEIRD?

IF YOU GO TO THE BAR AND ASK THE 'ANGELA' THE BAR STAFF WILL KNOW YOU NEED YOUR HELP GETTING OUT OF YOUR SITUATION AND WILL CALL YOU A TAXI OR HELP YOU GET HOME SAFELY - WITHOUT THE ANGEL DIAL

[www.waterfordcity.ie/askforangela](http://www.waterfordcity.ie/askforangela)

CALL 999 FOR EMERGENCY POLICE ASSISTANCE TO REPORT AN OFFENCE OR GET HELP

IF YOU'RE DRUNK OR TUCKERED OUT, WE CAN HELP YOU GET HOME SAFELY - CALL 999 OR 112

CALL 999 IF IT'S AN EMERGENCY OR A CRIME IN PROGRESS

## ASK FOR ANGELA!

GET HOME SAFE!

ARE YOU ON A DATE THAT ISN'T WORKING OUT? DO YOU FEEL LIKE YOU'RE NOT IN A SAFE SITUATION?

DOES IT ALL FEEL A BIT WEIRD? DINNER OR TINDER DATE NOT WHO THEY SAID THEY WERE?

APPROACH A MEMBER OF STAFF AND ASK FOR ANGELA. STAFF WILL IMMEDIATELY KNOW YOU NEED HELP AND WILL BE ABLE TO GET YOU OUT OF THE SITUATION SAFELY AND DISCREETLY

**ASK FOR ANGELA**

TACKLING SEXUAL OFFENCES IN WATERFORD CITY VISIT [WWW.WATERFORDCITY.IE/PEOPLE/AS FOR MORE INFO](http://WWW.WATERFORDCITY.IE/PEOPLE/AS FOR MORE INFO)





## Welfare and Vulnerability Engagement (WAVE)

The WAVE initiative helps to identify people before they become potentially vulnerable, and:

- victims of crime
- victims of anti-social behaviour
- come to harm in any other way

Some of the factors that may cause a person to be potentially vulnerable include:

- Age (very young or old)
- Alone
- Drugs & alcohol
- State of mind
- Presence of an offender

**i** It is important not to leave the vulnerable person on their own.

**Vulnerable person in premises, response checklist:**

- Is the individual/group so intoxicated that it is not reasonable to expect them to be able take care of themselves?
- What responsibility do you have to those refused entry?
- Do others who may also be seeking entry accompany the person? Are they capable of taking responsibility of the individuals concerned?
- Is there an opportunity to make contact with the person's family?
- If they need medical attention or an ambulance, treat this as a priority and arrange immediately.
- Ensure staff are aware of the medical kit location, ensure it is in date and staff are trained to use it.
- Does the premises have an internal safe space? A safe space could be a room or area where a vulnerable person can be taken and feel safe whilst arranging assistance.
- Does the premises have a Welfare Officer? Are they clearly identifiable to all?

**Serious sexual assault in premise, response checklist:**

- Call 999 - Uniform officers will attend and conduct the initial investigation. They will contact the relevant specialist unit.
- Statements will be taken from witnesses, so it is important to obtain any details of witnesses if possible.
- The crime scene will be forensically examined and photographed.
- Identify where the offence happened and if possible, seal that area off.
- Do not remove anything from that area unless necessary for the health and safety of others.
- Do not clean up the scene.
- If anyone has to enter that area, record who it was, when they went into the area and why.

**✓** Do not pressure the victim, contact police 999 as soon as possible, explain to them the reasons why and ensure that area

**✗** Do not: blame the victim/witness, judge the situation, or punish the victim, search the area where the assault occurred.

# ALCOHOL AWARENESS

## REFUSING THE SALE OF ALCOHOL

Failing to leave licensed premises in a criminal offence under section 143 of the Licensing Act 2003.

"a person who is drunk or disorderly commits an offence if without reasonable excuse – he fails to leave relevant premises when requested to do so by a constable or person to whom sub-section 2 applies \* or he enters or attempts to enter relevant premises if requested by \* not to do so. \* any person working at the premises in a capacity whether paid or unpaid which authorises him to make such a request (DPS or PLH or Responsible Person)

'Disorderly Behaviour' is defined as 'threatening, abusive or insulting words or behaviour (drunkenness and violence).

'Drunkenness' is defined as "The state of an individual whose mind is affected by the consumption of alcohol" (Blacks Law Dictionary).

Drunkenness is a consequence of drinking intoxicating liquors to such an extent as to alter the normal condition of an individual and significantly reduce his capacity for rational action and conduct. Consumption of alcohol does not in itself indicate a customer is "drunk" you need to assess their manner, deportment, conduct, behaviour before forming an opinion and either refusing further service or asking them to leave the premises.

Once a decision is made to refuse service, you should be cautious not to escalate the situation as it is likely to cause conflict which has potential to lead to violence. Convey the message professionally, using professional language removes you personally from the situation. Refer to specific behaviours which concern you.

The primary reason to refuse service is a concern for the welfare of the customer, it is generally difficult for a customer to argue with you if the reason you have made the decision is a genuine concern for their wellbeing or vulnerability.

## ASK FOR ANGELA, WAVE AND GOOD NIGHT OUT

"Ask For Angela" is a nationwide scheme to reduce vulnerability in the night-time economy and provide reassurance to customers who are concerned for their wellbeing or welfare or experiencing harassment. They may approach a member of staff and simply "ASK FOR ANGELA"

If you are approached, the customer requires you to immediately and discretely remove them from the situation they find themselves in and take them to a place of relative safety. Notify the venue management and Security Manager of the situation.

Take every allegation of sexual harassment incredibly seriously. Never dismiss the customer and ignore what you are being told. Sexual predatory behaviour in the night-time economy is a very serious problem that must be handled with discretion, empathy and an understanding of how difficult it may be for a victim to approach you and ask for help.

Do not allow the victim and alleged assailant to talk or otherwise interact. They must be kept completely apart. Both the victim and perpetrator are essentially crime scenes and evidence may be transferred or contaminate what (if any) evidence is already present. In the instance of an allegation of sexual harassment or sexual assault, reassure the victim that you are going to help and follow the guidelines below.

- If you are in receipt of this type of complaint, notify your supervisor to contact the most senior manager on duty. A radio call of "code pink" has been assigned in the venue to make the incident clear on the radio.
- The most senior manager on duty will meet the victim in the security office. Once a description of the accused has been received, then a radio call will be circulated to the relevant staff and security to try and identify the individual.
- If the victim wishes to have the police called, then the management will do so immediately and the suspect detained. On occasions where the victim does not want police involvement, the management will explain that due to the nature of the allegation, we have a responsibility as licensees' to notify the police in any case.



# ALCOHOL AWARENESS

## IDENTIFYING DRUNKENNESS:

### CO-ORDINATION

Fine motor skills affected. Often illustrated by dropping change & spilling drinks

### ALCOHOL SMELL

The smell of an intoxicant is an indication of the consumption of alcohol not necessarily drunkenness.

### UNSTEADY

Beware making an assumption based solely of one indicator, look for a combination of 2/3 clusters of behaviour.

### SLURRED SPEECH

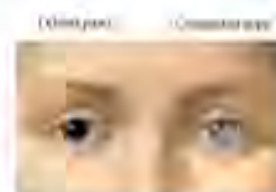
May potentially be attributed to a disability or illness not immediately obvious to the server.

### EYES GLAZED

(or) Bloodshot.

Dilated or Constricted pupils may be an indicator of prescription or recreational substance abuse.

Look for clusters of behaviours or physical characteristics to determine whether a customer is intoxicated to a degree where you must refuse service.



## LICENSABLE ACTIVITIES AND LICENSING OBJECTIVES:

The Licensable activities (Retail Sale of Alcohol, Regulated Entertainment and Late Night Refreshment) are authorised by the Licensing Authority issuing the Premises Licence. The permitted hours are when those activities can legally take place, the Terminal Hour, is when all the licensable activities must cease. A breach of licensing will occur if any licensable activity takes place outside the permitted hours or after the terminal hour.

The closing times are when all members of the public must leave the premises. This is often referred to as "dispersal" all customers must leave the premises in an orderly and quiet manner so no local residents or other businesses are disrupted by your customers. The Designated Premises Supervisor and/or Premises Licence Holder can receive an unlimited fine and up to 6 months custodial sentence if prosecuted and convicted of an offence under the licensing act 2003.

The licensing Objectives are: The Prevention of Crime and Disorder, Public Safety, The Prevention of Public Nuisance and The Protection of Children from Harm. It is your responsibility to support and promote these 4 fundamental principles of licensing. You have a personal responsibility to prevent illegal sales by remaining observant and vigilant while on duty to identify drunkenness, prevent disorderly conduct and prevent under-age drinking. You can be prosecuted and receive a £90 Fixed Penalty Notice for offences committed under the Licensing Act 2003

## WEIGHTS & MEASURES:

**GIN, RUM, WHISKY & VODKA** must be sold in measures of 25ml or multiples thereof. Other spirits and liqueurs can be sold in other measurements but must be multiples of 25ml. A customer can request and should receive a small measure (25ml) even if your standard drink is usually prepared and served at 50ml.

Still wine must be available in measures of 125ml, your standard glass size may be 175ml or 250ml, but should a customer request a small glass, this must be available and dispensed accordingly.

Free-Pouring is only allowed when constructing a cocktail. The legal definition is a drink with a minimum of 3 liquid ingredients. All other drinks must be measured and poured using "jiggers, thimbles or optic measures"

# ALCOHOL AWARENESS

The person named below has received training relating to the Licensing Act 2003 and regarding the responsible sale of alcohol and has successfully completed the Alcohol Awareness and Responsible Retail Sale of Alcohol training programme delivered on Friday 26<sup>th</sup> November 2021 by Malcolm Nicol, BIIAB FTP.

The training covered the topics listed below.

- Age Verification Policy
- Responsible Retailing of Alcohol
- Identifying Drunkenness
- Identification & Proof of Age
- Licensable Activities & Licensing Objectives
- Refusing the sale of alcohol
- Preventing illegal sales
- Ask for Angela, WAVE & Good Night Out
- Weights & Measures
- Dealing with Conflict.

## AGE VERIFICATION POLICY:

In this premises we operate a "Challenge 25" policy. This means that if you are not satisfied that someone looks over 25 years of age then you must ask them for identification to prove they are over 18.

Acceptable forms of identification are:

- 1) Identity card bearing the PASS hologram
- 2) Photo-Card Driving Licence
- 3) Passport or National Identity Card



If an individual is unable to provide an acceptable form of identification then you must refuse service. All refusals must be recorded in the refusals register.

- **LOOK** Look carefully at every person attempting to buy alcohol
- **ASSESS** Assess their likely age, are they obviously over 18?
- **DECIDE** Decide whether or not to challenge and ask for proof of age documentation
- **SURE** Make sure they are over 18 before selling alcohol

Is the documentation acceptable? **IF IN ANY DOUBT, REFUSE SERVICE.**

## RESPONSIBLE RETAILING OF ALCOHOL:

### YOU MUST NOT:

- 1: Sell alcohol to someone under the age of 18.
- 2: Knowingly allow the sale of alcohol to someone under the age of 18
- 3: Allow someone under the age of 18 to sell alcohol without the specific approval of someone over 18
- 4: Knowingly allow consumption of alcohol on licensed premises by someone under the age of 18. The only exemption to this relates to 16/17 year olds being able to consume beer, wine or cider during a substantial table meal. They must be accompanied by a person over 18, be able to provide photographic proof of age and the alcohol must be purchased by the adult.
- 5: Sell or Supply alcohol to anyone you believe to be drunk (exhibiting signs or symptoms of drunkenness)





## CODE OF CONDUCT/QUALITY MANAGEMENT

- IT IS THE RESPONSIBILITY OF EVERY DOOR SUPERVISOR TO BE FAMILIAR WITH VENUE CAPACITIES AND FIRE PROCEDURES PRIOR TO THE START OF THEIR INITIAL SHIFT, INCLUDING THE CODE WORDS AND EVACUATION PROCEDURES. FIRE EXITS/EXTINGUISHERS AND ALARM CODES
- YOU SHOULD CONTROL THE NUMBER OF PERSONS ENTERING THE PREMISES SO AS TO PREVENT OVERCROWDING, IN LINE WITH THE CAPACITY LAID DOWN BY THE LICENSEE AND LOCAL AUTHORITY
- ALL SECURITY SHALL WEAR THE APPROPRIATE UNIFORM ACCORDING TO THEIR ASSIGNED VENUE (THIS IS NOT OPEN TO INTERPRETATION) E.G BLACK SUIT, WHITE SHIRT AND BLACK TIE.
- ALWAYS BE AVAILABLE TO LEND ASSISTANCE TO ANY PERSON ON THE PREMISES WHO IS INJURED OR DISTRESSED
- AT ALL TIMES, MAINTAIN THE AGREED STANDARDS OF PERSONAL APPEARANCE AND DEPORTMENT APPROPRIATE TO THE EVENT OR ESTABLISHMENT AND DO NOT ACT IN A MANNER THAT IS LIKELY TO BRING DISCREDIT TO KD SECURITY OR TO THE CLIENT.
- **EXCESSIVE FORCE WILL NOT BE TOLERATED. ONLY HOME OFFICE APPROVED RESTRAINING TECHNIQUES MUST BE USED WHEN EJECTING PATRONS.** NEVER TRY TO RESOLVE CONFLICT WITH FORCE. USE MODERATE LANGUAGE AT ALL TIMES WHEN DEALING WITH MEMBERS OF THE PUBLIC AND STAFF MEMBERS EMPLOYED AT THE OUTLET. ACT FAIRLY AND NOT UNLAWFULLY, DO NOT DISCRIMINATE AGAINST ANY PERSON ON THE GROUNDS OF COLOUR-RACE-RELIGION-SEX OR DISABILITY (AND BE PREPARED TO JUSTIFY YOUR ACTIONS).
- NEVER SOLICIT OR ACCEPT BRIBES OR OTHER CONSIDERATIONS FROM ANY PERSON, NOR FAIL TO ACCOUNT FOR ANY MONEY OR PROPERTY RECEIVED DURING THE COURSE OF AN ASSIGNMENT.
- DO NOT FRATERNISE WITH PATRONS, FRIENDS OR FAMILY WHILST ON AN ASSIGNMENT.
- NEVER ABUSE YOUR POSITION OF AUTHORITY, AND IMMEDIATELY REPORT ANY INCIDENTS OR INVOLVEMENT WITH THE LOCAL AUTHORITY THAT MAY AFFECT YOUR ABILITY TO WORK ON AN ASSIGNMENT AS A DOOR SUPERVISOR.
- ALWAYS GIVE DUE CONSIDERATION CONCERNING THE ADMISSION OF PERSONS SUSPECTED OF BEING UNDER THE AGE OR UNDER THE INFLUENCE OF EXCESSIVE DRINK OR DRUGS. THE FINAL DECISION WILL ALWAYS LIE WITH THE LICENSEE OR HIS/HER DEPUTY.
- NEVER CARRY AN OFFENSIVE WEAPON.
- ALWAYS SIGN IN UPON COMMENCEMENT AND AT THE END OF YOUR DUTIES.
- MOBILE PHONES ARE TO BE TURNED OFF DURING WORKING HOURS.
- CIGARETTE BREAKS ARE PERMITTED ON THE CONDITION THAT THEY ARE OUT OF PUBLIC VIEW, SUBJECT TO MANAGER'S CONSENT.
- MEAL BREAKS ARE PERMITTED ON THE CONDITION THAT THEY ARE OUT OF PUBLIC VIEW, SUBJECT TO MANAGER'S CONSENT.
- SOFT DRINKS ARE ALLOWED TO BE CONSUMED, BUT NOT LEFT AT THE ENTRANCE OF THE PREMISES.
- SECURITY MUST REPORT 15 MINUTES BEFORE DUTY.
- CONSUMPTION OF ALCOHOL OR ANY ILLEGAL SUBSTANCES WHILST ON DUTY WILL RESULT IN IMMEDIATE DISMISSAL ON THE GROUNDS OF "GROSS MISCONDUCT".
- ALL SECURITY MUST HAVE THEIR "DOOR SUPERVISOR" BADGE VISIBLE AT ALL TIMES AS REQUIRED BY THE COUNCIL.
- ALL RADIO COMMUNICATION MUST BE STANDARD KD SECURITY CALL SIGNS.
- SECURITY ARE NOT PERMITTED TO DEAL WITH SITUATIONS ON THE STREET. YOUR JURISDICTION STOPS WITH THE BOUNDARIES OF THE PREMISES.
- GREET ALL PATRONS TO THE OUTLET IN A FRIENDLY & COURTEOUS MANNER.
- SECURITY MEMBERS ARE NOT ALLOWED IN VENUES RUN BY KD SECURITY (LONDON) LTD WHEN THEY ARE OFF DUTY, IF EXCEPTIONS ARE MADE, THEY MUST BE ARRANGED THROUGH VENUE MANAGERS AND KD Security (London) Ltd HEAD OFFICE MUST BE NOTIFIED.

### ORDER SECTION 174 OF THE LIQUOR LICENSING ACT 1964

"The holder of a Justices' License shall neither penult drunkenness on licensed Premises, nor serve intoxicating liquor to a person who is drunk Licensees have the power to refuse admission or to exclude any person who is DRUNK, VIOLENT, QUARRELSOME or DISORDERLY or whose presence would subject (hem to a penalty under the law. Any person who is asked to leave under these circumstances by either the Licensee or his/her agent/sent ant (YOU) and fails to do so, commits an offence (TRESPASS)."

THE CRIMINAL LAW ACT 1967 SECTION 3.1 states.

"A person my use such force as is reasonable in the circumstances in the prevention of crime, or in effecting or assisting in the lawful arrest of offenders or suspected offenders or of parsons unlawfully at large "

'Reasonable Force' can be used in **Self Defense, Defense of Others, Defense of Property and Lawful Arrest** Force under these circumstances is '**Justifiable Assault**' and therefore legal, as long as the force used was '**Reasonable in the Circumstances**'.



## **SEARCH, SEIZURE & ARREST POLICY**

KD Security (London) LTD operates in accordance with Government guidelines in respect of search, and seizure. It is our policy to ensure that current legislation is upheld at all times by all Security Operatives in order to establish safe working practice and avoid possible exposure to allegations of misconduct at any time.

With this goal in mind, we aim to establish preventative measures, holding Security Operatives accountable for their actions and applied procedures, and by providing support and assistance to all parties involved in any incident. Committing an unlawful act has the potential to endanger other persons, and bring disrepute along with legal consequences.

Door Supervisors working at licensed premises have no legal or statutory powers to search any person. Under no circumstances can they forcibly search anyone. The Manager/Licensee of the premises can, however, make it a 'condition of entry' that people wishing to enter the premises consent to being searched by the Door Team prior to being allowed in.

Preventing items that are not allowed onto the premises reduces the chances of serious harm to customers and staff, and reduces the likelihood of the licensee or staff being prosecuted. If the patron refuses to be searched, then entry may be refused. It is good practice to display a sign outside the premises explaining this to potential customers.

### **Guidelines on Search:**

- The Door Supervisor must obtain permission from the customer to conduct the search.
- Pat down searches must always be carried out by same-sex Door Supervisors.
- You must explain what you are searching for, and give the customer the opportunity to refuse or accept the search. If the customer refuses, you must remind him/her of the policy in this respect, and consider refusing entry. Should this occur, you must ensure that you log this occurrence on the Incident Log Book accordingly.
- If you have strong reasonable grounds to believe that the person is in possession of either illegal drugs or an offensive weapon, note the persons description and which direction they take off in, and report this matter to the police.
- If you conduct a search without the person's permission, you are committing an assault. You can be legally prosecuted for this and you can be subject to criminal proceedings or civil action.
- Searches must be carried out swiftly and in a friendly and polite manner. You must act efficiently and remember to thank the customer for their assistance afterwards.
- You must not ever remove items from a pocket, bag or vessel of any kind. You must ask the customer to empty their pocket/bag onto a table in full view of both yourself and them, after which you may then conduct a brisk but thorough 'pat down', it is advisable to have a witness present during searches.

### **Guidelines on Seizure:**

- You have the power to seize illegal drugs or offensive weapons in order to stop an offence being committed.
- Any illegal items you do seize as a result of a search or otherwise must be handed to the person in charge of your duties as soon as is practicable possible, and an appropriate entry should be made in the Incident Log Book.
- The item(s) must be secured somewhere safe until they can be collected by the police as evidence or for the purposes of destruction.



## **THE PRIVATE SECURITY INDUSTRY ACT 2001**

We are committed to a Pro-Active approach in all aspects and on all levels of our system implementation. We recognize the need for on-going training, assessment and vetting of staff at all levels, and as such we have an integrated software package which has been specifically designed to ensure compliance of practice.

In addition to our vetting procedures, each applicant is personally interviewed by 1 of our Operations Managers with a follow-up procedure of performance review for every security operative at regular intervals.

During the application process each person is asked to provide proof of any security related training they have undergone. No applicant will be considered for a security position without receiving appropriate training. In addition to this, each applicant is given a KD Security Training Manual, and their comprehension of the information contained therein is confirmed by way of a briefing.

Furthermore, we operate an ongoing training programme which is available to all Door Supervisors. Various courses are offered at either reduced rates or no charge. Aspects include:

- Conflict Management
- Risk Assessment
- Executive Protection
- Health & Safety/Fire Safety
- Door Supervisors Upgrade Skills
- Site Basic Job Training (Retail/Static/Patrol Guarding)

At this present time, we are running a continuous rolling programme of courses in order to approach the forthcoming SIA License requirements fully prepared. All security operatives currently registered with KD Security (London) Ltd are included in the programme, and we therefore anticipate that, when the SIA become legislatively compulsory in London between Jan-April 2005, we will have a fully complimented team of security operatives at the forefront of security service provision.

Additionally, all security operatives are in possession of a current and valid Local Authority Door Supervisor Badge. This badge is inspected by a member of our managerial staff prior to registration, and subsequently also checked for verification with the relevant Local Authority from which the badge originates.



## **OPERATIONAL GUIDELINES**

Door Supervisors are expected to comply with the KD Security (London) Ltd Code of Conduct, as well as Local Authority and Government guidelines on dealing with incidents of any nature and severity. All KD Security Operatives are fully trained in the correct procedures for dealing with any level of criminal activity. Door Supervisors are also instructed to liaise with the venue Management as to any specific procedures that may be in place. Comprehensive incident recording and reporting methods are in place, and these logs are kept on sight at all times.

Our ethos is one of friendliness and approachability whenever and wherever possible. Our security representatives are trained to be firm but fair, vigilant but non-obtrusive, communicative but non-intrusive. The aspect of exposure to violence within the Licensed Premises security industry is one that, whilst it cannot be totally eradicated, can be safely contained within correct operating procedures. Health & Safety guidelines are included in the training of all KD Security Door Supervisors, and staff are reminded to familiarize themselves with the venue, clientele and Management prior to shift commencement, as well as observe "safe practice" when dealing with potentially volatile situations.

We actively encourage contact from our staff, our clients and your patrons alike. We are committed to an objective process for the handling of complaints from any source, and we undertake to report back to you within 10 working days on any issue raised. We are pleased to invite you to visit us in our offices in order to introduce you to our systems and procedures on ground level.

KD Security (London) Ltd (if any) is represented nationwide through a network of affiliations. All affiliated members are vetted in accordance with our due diligence guide lines. Regular reviews take place with all suppliers, in order to ensure that the high standards of excellence to which we are committed is upheld throughout our chain of supply.





## **OUR COMMITMENT TO OUR QUALITY ASSURANCE POLICY**

We operate an ongoing monitoring system to ensure that we deliver a quality service at all times. All venues are invited to complete a monthly assessment of their security services as a whole, as well as an individual appraisal sheet of every Door Supervisor on their team. The information arising from this process is then discussed with the client, in order to agree any further action that may be required. Additionally, this information is also monitored by KD Security Head Office, in order to evaluate and respond to client feed-back in a positive and constructive manner. Clients are invited to offer feedback to KD Security on all levels, including Managerial and Directorial team members who are available to be contacted at any time.

We would suggest that in the rare event of a complaint, you should firstly direct this to your assigned KD Security Operations Manager. However, should you feel that for whatever reason you need to proceed higher up the ranks, you are welcome to contact Head Office at any time to discuss your concerns.

Furthermore, there is a KD Security Log Book and File in place at each venue. The Log Book includes 3 key sections:

1. Daily signing in/out sheet including name, time in/out, badge number/expiry
2. Radio log sheet detailing each radio number assigned each day
3. Incident report sheets including:
4. 1-line reporting system for minor incidents (incl. Managers Signature)
5. Full page reporting system for any other incident.

The File includes all documents pertaining to information about KD Security, including the following:

1. Employer's/Public Liability Insurance Certificate
2. Contact details for all key Managerial/Directorial staff members
3. Managerial Profile
4. Company Profile
5. All KD Policies
6. Various References



## **OUR COMMITMENT TO EXCELLENCE**

Our aim is to ensure the safety and satisfaction of our customers at all times. All security operatives are bound by our Codes of Conduct whilst acting as our representative. This is a comprehensive document which deals with all aspects of events that may be encountered whilst on duty. In addition to this they are instructed to be fully familiar with the venue/location where they are deployed, including all aspects of Fire Safety/Health & Safety. They are required to be familiar with the following:

- Layout of the venue
- Emergency Evacuation Procedures
- Fire Codes & Assembly Points
- Flash Points
- Identifiable High-Risk Areas
- Any procedures individual to the venue, i.e., till movements, uniforms, etc.

In order to maintain our commitment to the highest of standards, all Door Supervisors are briefed on the importance of their role as an ambassador to the venue. They are instructed to remember at all times that they are the first and last point of contact for the venue patrons. It is their responsibility to ensure that they present themselves as friendly, polite and helpful in order to create an atmosphere which is conducive to a feeling of safety and enjoyment for all those around them.

We will assign an Operations Manager to oversee your requirements at all times. This person will be available on a 24-hour basis, and it will be his responsibility to ensure that high standards are maintained at all times. He will be responsible for your security operation as a whole, but he will also ensure that any specific requirements on branch level are met. Our package of services and caliber of staff is widely inclusive of all aspects within our industry, and we are therefore able to offer any bespoke security system that you may require. Any individual venue requirements should be discussed with your designated KD Security Operations Manager, who will also be able to advise on any local priorities that may influence your requirements. He will then communicate with our Head Office in order to ensure delivery of services as required.

We aim to ensure that consistency of Door Supervisors at each venue is maintained wherever possible, as we consider it to be an essential element of a pro-active, fully informed and professionally functional team. However, various aspects need to be taken into account in this respect, including illness, holidays, or unforeseen events that may lead to the need for replacement of an individual team member. Additionally, replacement team members need to be in receipt of the correct Local Authority badge for the area required which can lead to difficulties on occasion.



## **QUALITY POLICY**

KD Security (London) Ltd will maintain a Quality Management System.

- We will continuously strive to improve the level of our customer satisfaction.
- We shall develop and promote a culture of continuous improvement.
- We shall actively seek and encourage comments and suggestions from all our clients.
- We shall ensure that all Security Operatives are aware of our QMS, and that where appropriate they will hold responsibility for its implementation.
- We shall ensure that all Door Supervisors understand our Codes of Conduct and maintain a signed copy on file, as well as provide them with a copy for their retention.

## **TRAINING POLICY**

KD Security (London) Ltd will undertake to provide continuing and on-going training opportunities for all its operatives. We will endeavor to ensure that ongoing training is made available through our Trade Associations for all security operatives, including training up-grades and refresher courses.

- We will continuously strive to enable access to on-going training.
- We will have training course dates/times/descriptions available in our office at all times.
- We shall ensure that our training courses are available equally to all security operatives and clients alike.
- We are committed to continuous improvement and we recognize that training is an integral part of our on-going development strategy.
- We shall maintain adequate records on training of all security operatives, including refresher courses and up-grades.
- We shall ensure that all training courses are delivered by approved and qualified trainers.



## **HEALTH & SAFETY POLICY**

KD Security (London) Ltd aim to provide a safe working environment for all Security Operatives supplying services to its clients. We recognize our legal and moral duty to uphold certain standards of health, safety and welfare at all times. We also aim to ensure that the activities of our Security Operatives do not endanger members of the public visiting client's premises.

As Door Supervisors, it is your duty to be familiar with the emergency procedures in place at the location of your assignment. This includes:

- Fire evacuation procedures.
- Emergency procedures.
- Contingency plans in place.
- Possible flash points.
- Possible high-risk areas.
- Hazardous areas.
- Appointed First Aider.

It is the duty of the Licensee/Manager to have in place a Risk Assessment for the venue. You should familiarize yourself with this, so that you are able to respond to any emergency with due diligence.

You should act within the Code of Conduct guidelines of KD Security (London) Ltd at all times. YOU should not place either yourself or any member of the public at risk through your actions. You should apply the knowledge of your training to all situations you encounter, thus enabling you to act cordially, efficiently and professionally at all times.

You are required to be familiar with the procedures of KD Security (London) Ltd in dealing with complaints and commendation. You are invited to communicate any concerns, queries or comments to our Head Office whenever the need should arise.

**A COPY OF THIS POLICY IS AVAILABLE ON REQUEST**



## **ANTI-TERRORIST/BOMB THREAT GUIDELINES**

Any premises open to the public can be the target of a terrorist attack or threat. Some terrorist groups work on an international basis, whereas others fight for domestic issues. Certain terrorist organizations target just one particular company for a specific reason, while others may be more indiscriminate in their targeting.

The nature of threats changes frequently, so regular risk assessment is important. As well as the better-known terrorist organizations with Irish or Middle-Eastern connections, we now also have several other areas of targeted terrorism who pose real threats to trading premises.

As pubs and clubs try to attract members of the public to use their premises as places of entertainment there is a need to ensure their safety by having effective security operatives and security plans to help minimize the threat of terrorist attack. All licensed premises now need to take counter-terrorist precautions on an individual basis.

In order to reduce the chances of any type of bomb being smuggled into and planted on the premises, the door team must:

- Challenge anyone found in areas where they should not be.
- Carry out efficient searches at the points of entry.
- Be vigilant for suspicious persons or behavior, both inside and outside the premises and in the local vicinity.
- Search the premises at the end of the evening for any abandoned articles, and remain watchful of any articles being abandoned during trading hours.
- Report anything suspicious to the Management of the venue, so that a joint decision can be taken on the possible need to alert the Authorities.

You must exercise your powers of observation and be alert for:

- Anything that cannot be accounted for.
- Anything that should not be there.
- Anything that looks out of place.

### **On finding a suspect device:**

- Do not open it, touch it or otherwise try to examine it.
- Do not move it.
- Do not put water into it or otherwise try to diffuse it.
- Do not put anything on top of it.
- Do not attempt to cut or disconnect any wires.
- **DO NOT USE A RADIO WITHIN 25 METERS OF THE DEVICE.**
- Inform the Management of the premises.
- Clear the area of people (on Management instruction).
- Call the police (on Management instruction).
- Evacuate the premises (on Management instruction).
- Leave the lights on in the room where the device is.
- Leave doors and windows open.
- Remain available to inform the police of what, where and how you found the device.



**A COPY OF THIS DOCUMENT IS AVAILABLE ON REQUEST**

## **ANTI-DRUGS POLICY**

KD Security (London) Ltd operates a ZERO-TOLERANCE policy on the use or distribution of illegal substances of any kind. It is the purpose of KD Security (London) Ltd to help provide a safe and drug-free environment for our patrons and employees alike. With this goal in mind and because of the serious drug abuse problems that are potentially present in today's workplace environment, we are establishing the following policy for existing and future employees and patrons/clients of KD Security (London) Ltd.

KD Security (London) Ltd explicitly prohibits:

- The use, possession, solicitation for, or sale of narcotics or other illegal drugs, or prescription medicine without a prescription on KD Security (London) Ltd or client's premises.
- Being impaired or under the influence of illegal drugs whilst on KD Security (London) Ltd or clients' premises.
- The presence of any detectable number of prohibited substances in the system of any staff member, security operative or anyone representing the KD Security (London) Ltd, or any patron or client of KD Security (London) Ltd at any time whilst on the premises of KD Security (London) Ltd or any of its clients KD Security will undertake the following action upon violation/suspected, breach of this.
- Any person found to be in possession of any illegal substance whilst on the premises of KD Security (London) Ltd or clients' premises will be detained under Citizen's Arrest Legislation and handed over to the appropriate Authority as quickly as possible.
- Any person acting as if under the influence of an illegal substance will be asked to leave the premises of KD Security (London) Ltd or the client's premises immediately. This action is subject to an examination by a trained and appointed First Aider establishing that there is no immediate Health & Safety risk to the person concerned.

KD Security (London) Ltd may undertake random searches:

KD Security (London) Ltd reserves the right to conduct random searches of its Patrons and employees in order to uphold this policy. This is subject to the following reserves:

- Searches will be conducted in accordance with Government guidelines
- Same-sex searches will be carried out on female patrons
- Everyone has the right to refuse a search, however, entry may be refused on this basis
- If a search is refused whilst the person is already on the premises, the person may be asked to leave.

**A COPY OF THIS POLICY IS AVAILABLE ON REQUEST**

## **VIOLENCE-FREE WORKPLACE POLICY**

KD Security (London) Ltd operates a ZERO-TOLERANCE policy on violence of any kind. It is the intent of KD Security (London) Ltd help provide a safe and violence-free environment for our patrons and employees alike.

With this goal in mind we aim to establish preventative measures, holding perpetrators of violence accountable and by providing support and assistance to victims of violence. Committing violent acts has the potential to endanger other persons, and is an illegal act. It is intended that all useful Conflict Management tools be employed in order to reduce the level of threat in any confrontational situation, as well as to be pro-actively engaged in avoiding the onset of conflict. This is aimed at accomplishing the dual purpose of reducing the effects of violence on victims and providing consequences to those who perpetrate violence.

### **Definitions:**

- Intimidation (engaging in actions that includes but is not limited to threats, behavior intended to frighten, coerce or induce stress)
- Threat (an expression of an intent to cause physical or mental harm, whether this threat is contingent, conditional or future)
- Physical Attack (unwanted or hostile physical contact such as hitting, fighting, pushing, shoving or throwing objects)

KD Security will undertake the following action upon violation/suspected breach of this policy:

- Any person found to be engaging in violent behavior which has resulted in the injury of another party whilst on the premises will be detained under the legislation of Citizen's Arrest and handed over to the appropriate Authority as quickly as possible.
- Any person acting in a violent manner which has not resulted in injury to another party will be asked to leave immediately
- Any person behaving in a violent way outside the premises will be categorically refused entry
- Any employee or representative of the KD Security found to be acting in a violent manner will be subject to our internal disciplinary procedure as well as any further possible legal action from Local Authorities.

**A COPY OF THIS POLICY IS AVAILABLE ON REQUEST**





- The Door Supervisor must NEVER keep such items in his/her possession for any longer than is absolutely necessary, and must NEVER leave the premises with the items in his/her possession.
- The client Manager will have a procedure in place for the logging of such items. Details included in your incident report should be:
  1. Date & time the article was found/seized
  2. How and where the article was found/seized
  3. If article was found during a search, full description of person and any witnesses
  4. Full description of item
  5. What action was taken and where item has been placed
  6. Names of people informed
  7. Signature of Door Supervisor and client Manager

### **Arrestable Offences:**

You have the same powers of arrest as any other members of the public. For any individual to deprive another of his/her liberty is one of the most serious responsibilities a person can accept, and for this reason you must ensure that you act correctly when apprehending someone for an offence. You must have reasonable grounds to suspect that the intended has committed an offence or is in the act of committing an offence. Reasons for Citizen's Arrest are;

1. Breach of the Peace (any disorder or disruption to the peace in public or in private that results in violence, threat of violence or provokes violence from another)
2. Murder
3. Rape
4. Assault (ABH, GBH)
5. Indecent assault
6. Firearms/Drugs offences
7. Possession of offensive weapons
8. robbery/Theft/Burglary
9. Deception
10. 10. Criminal Damage Once you have taken the decision to make the arrest, you must tell the person the following:
  - Who you are
  - That he/she is under arrest
  - What he/she is being arrested for
  - The grounds for the arrest
  - That the police will be called

You must only use reasonable and justifiable force to detain the person. This is defined as:

- Such force which is reasonable in the circumstances in the prevention of crime or in effecting the lawfully arrest of offenders or suspected offenders, or of persons unlawfully at large.

You must remain with the person until the police arrive. Be watchful at all times that the person may try to get rid of any evidence on their person, or equally may attempt to harm either themselves or you. You are legally responsible for the person until the police arrive. You must explain to the police, in front of the arrested person, the reason for the arrest.



# INCIDENT REPORTING

All reports should be prepared in the same way; it is only the content that changes. You will realise through completing reports regularly that the same type of incident will require a certain report style, for example; when you respond to an allegation of assault. You should already be thinking of the possible questions that must be answered in order for you to complete a full report and have a chance of investigating the alleged crime.

## THE 5 W'S:

<b>WHEN-</b>	What is the date and time the incident occurred.
<b>WHERE-</b>	Where exactly did the incident occur.
<b>WHO-</b>	Who is involved?, ie: who committed the offence, who had the accident, who lost property, who else is involved etc Provide a full physical description of any suspects, whether they sustained any injuries, whether first aid was required and who administered. Provide contact details if the injured party/loser/witnesses
<b>WHAT-</b>	What has actually happened, this forms the body of the report, a detailed description in your own words of what occurred, what action has been taken subsequently. Photographs add a great level of detail to a report, if you can photograph a suspect, injuries, damage etc then add the images to the report.
<b>WHY-</b>	If you can find out why an incident occurred it may help to prevent a similar incident happening again in the future. Why also may include any background to the incident to help form the complete picture for anyone reading the report in the future.



You may find TED questions help with extracting information from victims and witnesses.

**TELL ME, EXPLAIN TO ME, DESCRIBE TO ME.**

## WHAT TYPES OF INCIDENT REQUIRE A STATEMENT/REPORT?

Any occurrence that is out of the normal routine or requires some action on your part to rectify a situation will mean a report is generated. I have listed below a selection of occurrences that would warrant a written report. The purpose of a report is primarily for evidence of your involvement in an incident and secondly to inform other interested parties of what has occurred and how it was dealt with.

- Theft,
- Injury, assault
- Accident
- Death
- Drug use, (possession or selling)
- Violence, fighting, weapons etc

## ADVOKATE: PRINCIPLES OF IDENTIFICATION

**R v Turnbull 1977** Where a case depends wholly or substantially on the correctness and accuracy of identification of a suspect, use **ADVOKATE** to reference the following points.

- **A** – amount of time under observation
- **D** – distance from suspect
- **V** – visibility, (day, night, lighting)
- **O** – obstructions to the view of the witness
- **K** – known or seen before (where and when)
- **A** – any special reason for remembering the suspect?
- **T** – time lapse, how long has elapsed since incident
- **E** – error or material discrepancy given in any subsequent accounts?

# INCIDENT REPORTING

## CHECKLIST GUIDANCE FOR COMPLETING A REPORT FOLLOWING AN ASSAULT: TICK WHEN CONSIDERED OR ADDED TO YOUR REPORT.

- Set the scene-is there any background between the victim and the suspect?
- How does the victim know the suspect?
- If so, briefly describe the relationship.
- Write the date, time and accurate location where the incident happened
- Where was the victim, who were they with and what was the victim doing immediately prior to the assault?
- Were other people present who witnessed the assault.
- Identify them by name, ask the victim to describe them.
- Use the ten-point description model to describe the assailant
- Was there any conversation or argument between the victim and suspect?
- (If yes) use direct speech quotes, write exactly what they tell you.
- What did the offender/suspect do immediately prior to the assault?
- Did the offender/suspect issue any threats?
- (Use direct speech to describe what was said)
- How was the victim assaulted?
- Were they grabbed, punched, slapped, kicked, how much force was used?
- What injuries were sustained?
- Does the victim require medical attention, was this offered and refused? If they did require medical attention record the ambulance crew number, time it arrived and what hospital is the victim being conveyed to.

10 Point Description Model	
1	SKIN COLOUR/ETHNICITY
2	GENDER
3	APPROXIMATE AGE
4	APPROXIMATE HEIGHT
5	BUILD – SLIM, LARGE, PROPORTIONATE TO A HEIGHT
6	HAIR COLOUR & STYLE
7	COMPLEXION
8	DISTINGUISHING FEATURES
9	CLOTHING (TOP TO BOTTOM)
10	CARRYING ANYTHING?

## ESSENTIAL ELEMENTS TO INCLUDE IN EVERY REPORT:

TIME, DATE AND EXACT LOCATION	NO PERMISSION TO ASSAULT INJURED PARTY
VICTIM DETAILS (FULL NAME & CONTACT DETAILS)	CCTV FOOTAGE
SEQUENCE OF EVENTS	DETAILS OF ATTENDING POLICE, AMBULANCE
DESCRIPTION OF OFFENDERS	CAD REFERENCE NUMBER
DETAILS OF INJURIES/PAIN ETC	TIME EMERGENCY SERVICES CONTACTED
HOW INJURIES CAUSED	TIME EMERGENCY SERVICES ATTENDED
OPEN PALM STRIKE, CLOSED FIST, WEAPONS ETC	AFTERMATH (ARRESTS, MEDICAL ATTENTION, ETC)

## WRITTEN COMMUNICATION AN OVERVIEW:

In essence your report must be **Clear, Concise, Accurate** and written in plain English. Follow the guidelines and with experience you will improve your report writing skills. An incident report must accompany any entries reporting situations or circumstances that may require further investigation or are not regular usual occurrences.

DO	DON'T
<ul style="list-style-type: none"> <li>✓ Complete the report as soon as possible following the completion of the incident to ensure details are fresh in your mind</li> <li>✓ Ensure you detail events in chronological order (the order that they happened)</li> <li>✓ Ensure you complete the report in neat, clear handwriting. Print if necessary</li> <li>✓ Ensure you complete the report in ink, not pencil.</li> <li>✓ Ensure you sign the report and include your name</li> <li>✓ Remember the simple rule regarding whether to complete an incident report or not, <b>'IF IN DOUBT, MAKE ONE OUT'</b>.</li> <li>✓ Always carry a notebook and pen to allow you to note down details during any incident.</li> </ul>	<ul style="list-style-type: none"> <li>✗ Use pencil to complete the report. It can be erased and altered.</li> <li>✗ Delay in completing the report. Vital detail may be forgotten and omitted.</li> <li>✗ Complete it in a hurry. Plan the report first.</li> <li>✗ Include your opinion. Stick to the facts.</li> <li>✗ Try and complete the report simply from your memory.</li> <li>✗ Use your notes to refresh your memory beforehand.</li> <li>✗ Be afraid to ask for advice before completing the report.</li> <li>✗ Forget to supply the venue management with a copy.</li> </ul>

This policy contains information relevant to all Door Supervisors in situations where there is a necessity to interact with customers because of **DRUNKENNESS, POTENTIAL INTOXICATION or SOME OTHER SUBSTANTIAL REASON (SOSR)**

**Drunkenness is a consequence of drinking intoxicating liquors to such an extent as to alter the normal condition of an individual and significantly reduce his capacity for rational action and conduct. Consumption of alcohol does not in itself indicate a customer is "drunk" you need to assess their manner, deportment, conduct, behaviour before forming an opinion and either refusing further service or asking them to leave the premises.**

**Once a decision is made to refuse service, you should be cautious not to escalate the situation as it is likely to cause conflict which has potential to lead to violence. Convey the message professionally, using professional language removes you personally from the situation. Refer to specific behaviours which concern you. The primary reason to refuse service is a concern for the welfare of the customer, it is generally difficult for a customer to argue with you if the reason you have made the decision is a genuine concern for their wellbeing or vulnerability.**

Risks to welfare, particularly with vulnerable customers (for example, lone females) have been identified and it is important that all Door Supervisors are trained in their responsibility and to the best of their ability ensure the welfare of vulnerable customers. The overriding priority is always to ensure the safety and security of yourselves and others.

The decision to refuse entry due to intoxication will only be made after careful consideration and evaluation of the potential customer exhibiting clusters of behaviour attributed to the physical characteristics of drunkenness. Single indicators presented in isolation should be disregarded. Before you make that final decision to refuse; summon the Security Manager or Venue Manager to confirm they agree that the individual is unsuitable and the perspective customer can be informed of the result of the consultation.

**EXAMPLE:** Pre-loading (drinking in the queue) or attempting to enter the venue already exhibiting signs the customer has consumed an excessive amount of alcohol.

## **CO-ORDINATION**

Fine motor skills affected. Often illustrated by dropping change & spilling drinks

## **ALCOHOL SMELL**

The smell of an intoxicant is an indication of the consumption of alcohol not necessarily drunkenness

## **UNSTEADY GAIT**

Beware making an assumption based solely of one indicator, look for a combination of 2/3 clusters of behaviour.

## **SLURRED SPEECH**

May potentially be attributed to a disability or illness not immediately obvious to the server.

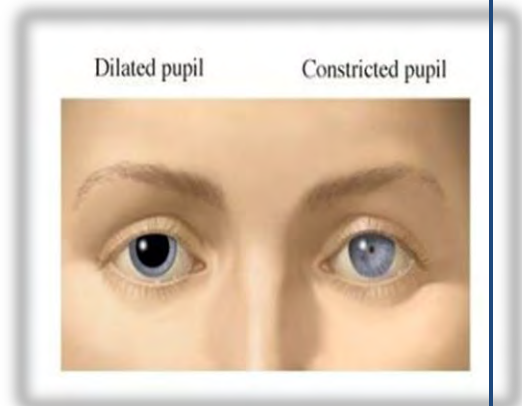
## **EYES GLAZED**

(or) Bloodshot. Dilated or Constricted pupils may be an indicator of prescription or recreational substance abuse.

## **BEHAVIOUR(s)**

- Tiredness, drowsiness or falling asleep inside the venue
- Responsiveness to simple questions (how old, date of birth etc)
- Vomiting

The medical room has been designated a "chill out" zone for a 2-stage ejection of drunk but not disorderly customers. The "chill out" zone can be used in the cases where a customer is particularly vulnerable or for example lone females. Water and Welfare checks will be provided by the medic.



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