0. INTRODUCTION

The cultural climate of London’s nightlife is undergoing an extensive change. Tolerance towards aggression, harassment and assault are at an all-time low. This has come in part from the vocalisation of the needs of marginalised communities both in London and on a global scale. With this comes a desire to express the creative potential and interests of people outside of society's idea of convention.

The desire to house these marginalised communities and provide a space that embodies personal and community safety is at the core of Klub Verboten’s Ethos. It is our core objective to become London’s leading example in safeguarding a Fetish & BDSM venue. Our venue and events promote consensual forms of alternative human relationships. Our membership and guests are drawn from the broad fellowships of the Fetish & BDSM communities that embrace the full spectrum of human diversity and inclusivity.

OUR ETHOS: Respect, Wellbeing & Safety

Our Ethos is centered around three key concepts. The first is Respect for one another that goes above and beyond contemporary ideas of consent. This includes the acceptance and promotion of equality, diversity and inclusion within our communities. Second, Wellbeing as a right. For marginalised communities, nightlife culture in metropolitan areas does not provide ample safety to allow people to live their lives the way they want. We believe that wellbeing should not have to be earned, fought for or reclaimed. Third, Safety within our space and at all our events. Through education, cultural exchange and collectivism we hope to create a collective consensus on safety by giving people the hard and soft skills necessary to operate in our space, at our events and within our wider communities.

Klub Verboten aims to promote our on three distinct levels:

1. Company
2. Membership
3. Event

1. THE COMPANY LEVEL

The goal of the organisational, managerial and marketing team is to create a culture of mutual homogenous respect, a community for creative individuals and provide a space in which expression, compassion and exploration are championed. The communities that will use a space like this are concerned more with the prevention of incidence through education than remediation of incidents occurring through reckless decision making or carelessness.
This modus operandi has come not only from the alternative different communities within London, a more global requirement to provide safe spaces for people to inhabit and above all our tried and tested experience as promoters and organisers.

These goals are met through clear and easily accessible resources and rules. Through open and constant communication between staff, local law enforcement and independent and governmental groups aimed at providing help for the improvement of safety and wellbeing in nightlife. Our membership and vetting process allows us to manage and control the admittance of individuals and ensures new patrons subscribe to the culture of consent instilled at the Company level.

**KLUB RULES / CODE OF CONDUCT**

The Klub Verboten house rules/code of conduct can be found on our website, our members’ pages, our events pages and are posted at all our venues and events. They are also explained as part of our application process for membership. Every applicant is required to read and sign these during the application process.

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I. Klub Verboten is a Fetish & BDSM club and therefore requires a certain dress code: Latex, Rubber, PVC, Leather, Metal, Nylon, Lace, Drag, Chains, Studs & Naked Skin are all welcome. Suits, CosPlay, Fancy Dress, Cotton, Burning Man, Spandex, Circus Crew, and the like is strictly Verboten.

When travelling to and from any of our venues you are reminded that not everyone understands or appreciates the Kink community. For your own safety and in respect of others’ sensibilities be mindful of your public visibility. KV always provides a designated changing space.

II. “No” means “No” means “No!”. Consent is at the core of Respect, Wellbeing and Safety. We are all about consent in every possible way. Be respectful at all times. Do not touch without consent. Do not be a repetitive nuisance: Remember “No” means “No” means “No”.

If you have any concerns contact one of our Guardians or Management Team.

III. More about consent: Do not crash a scene. Wait to be invited. Whilst being voyeuristic is a legitimate kink, practising non-consensual self-love while watching is just wrong. That means solo-wanking is strictly Verboten!

IV. Respect: Aggressive, coercive, disrespectful or manipulative communication, verbal or non-verbal is strictly Verboten!

V. Please do not sit on any playroom equipment to have a rest. It is there to interact within a BDSM context. Unaccompanied or unattended toys or bags will be submitted to lost and found.

VI. Each event will have a pre-published and prominently
displayed “Event Play Rules” appropriate to the venue and the event. If in doubt ask one of our Guardians or Management Team for help and advice.

VII. We have a zero tolerance drugs policy. We reserve the right to refuse intoxicated people.

VIII. No photos. No videos. No sound recordings are permitted at any time.

IX. Event tickets are bound to memberships and can therefore not be resold or transferred outside the Dice platform. Non-members may only attend in the company of an approved member or through one of our public pre-ticketed events. Being a member, registered guest or ticket holder does not entitle you to enter our events. The Klub refuses the right to refuse entry for anyone that does not show respect or adhere to the rules on consent, dress code or privacy.

X. Phobic attitudes towards identity, race, gender, orientation or body types will not be tolerated. Ever.

XI. With the submission of the application form/ticket purchase, you agree to our club rules as well as terms & conditions.

XII. Remember, If in doubt ask one of our Guardians or Management Team for help and advice. Failure to complying with these rules could lead to ejection from the event & termination of membership.

Klub Verboten’s code of conduct & values have been developed in line with the guidance and training given by the Good Night Out Campaign & The Women’s Night Safety Charter. The Klub is committed to regular training on a managerial and interpersonal level to maintain these standards.

2. ON A MANAGEMENT LEVEL

The club reinforces the ideals and commitments of the club by employing aptly qualified staff, educating and informing members and continually instilling the Ethos that will allow a community hub of this nature to operate in a safe and secure way. It is the role of the staff to disseminate the rules of the club, proliferate the culture of consent and safety and to ensure that any deviations are dealt with through a timely and managed method. The management of the club work in direct contact with staff and
members to ensure they not only adhere to the rules but become ambassadors of the ethos.

A crucial mechanism of the Klub Verboten’s safeguarding programme is the vetting and membership process. Potential members must prove their capacity to operate in a safe and consensual manner, Adhering to the rules of the club before membership is granted. This is ensured by supplying information on their experiences in spaces of this nature and their capacity to adhere to the cultural ideals created on the company level. If doubt arises over a potential member’s capacity to operate in a space of this nature, an ongoing public meet and greet event has been created to meet potential members and discuss their suitability in person.

**Membership Database**
The membership database sits at the heart of Klub Verboten events and provides a history of information on applicants, the results of the vetting processes and any rule infringements or membership terminations. It creates a history and accountability and as such it represents the first layer of safeguarding. The growth of approved KV members in recent years has created a strong community sense and as such even events open to non-members see a majority of members attending. Through communal projects such as the Klub House funding a close identity has formed with the Klubs’ values and ethos, which is lived and represented by attending members looking out for each other.

**Membership ID Card**
Each new member receives a membership ID number and membership card. This is required to purchase tickets and is used to validate those on arrival with the door crew. The card can only be collected at KV events in person in prevention of identity theft.

**Vetting**
The vetting process for Klub Verboten acts as the Club’s firewall of safeguarding. Each individual application is considered by our dedicated team to ensure that prospective new members oppose no harm to the well being of the existing community and adherence and understanding of the rules and ethos.

The application process to the Klub entails the following data, relevant to the assessment of an applicant:

- A link to any of the applicant’s social media profiles
- Name of the applicant
- An email address
- Date of birth
Furthermore, the applicant is asked to read and sign the Klub’s rules as stated above before sending off the application for review. Each application is checked against current ban lists to ensure no unsavory people are permitted

Vetting is a crucial mechanism that takes place either through the online application process or in person at the Tears for Beers event.

**Vetting event: Tears for Beers**

If an application has been unsuccessful due to an applicant’s lack of a social media presence or if an applicant prefers to meet face to face before applying, one will be invited to the Club’s monthly social gathering at an external Pub. On this occasion, the vetting team is able to verify prospect members and guests are able to ask questions and find support in the lead up to the events or membership. However, each applicant has to send an online application before being given a membership.

**Membership validation through Dice**

Klub Verboten has a partnership agreement in place with the London based ticket system provider Dice. For all members-only events, users are required to provide their Verboten membership ID before checking out. 100% of KV’s events are pre-ticketed, guests are not able to purchase tickets at the door and as such not just random walks-ups can be prevented but also the data of every single guest is recorded. The Dice platform automatically rejects banned ID numbers.

**Entry to events (Ticketing)**

Entry to the venue is only permitted to approved members and their partners (one per approved member) for Klub Verboten events. The venue however also organises events in conjunction with external partners (e.g. Recon). On such occasions it is also not possible to purchase tickets at the door. All events are pre-ticketed and 50% of all ticket sales for external promoters have to go through the venue’s partner platform: Dice.

By using a regular ticketing partner, we ensure that the membership system is adhered to properly and inhibit members of the general public entering without going through the safeguarding procedures. It also supports the enforcement of existing banlists before guests arrive at the premises.

**Ban list/watch list**

In the years that KV has been running events and in London a very small number of people have shown themselves to be a nuisance or of potential threat to members of our community.

KV’s closely knitted members have grown to be very proactive in reporting back warnings of potential dangerous individuals from external happenings and encounters, which allowed KV to produce very detailed ban & watch lists for the reason of the prevention of boundary crossing at the events.
In order to reduce the possibility of persons of this nature entering our venue we have been documenting the names, faces and aliases of these people and regularly check membership applications against these lists. Names and photos of people listed are also made available to our door selectors, door staff and our in house guardian team.

The main objective is to prevent potential dangerous individuals from even arriving at the premises.

Vulnerable Persons
(See operational handbook.)
3. On an interpersonal level

At this level, the club's guidance rules and ethos are enacted through the educated and informed staff's interpersonal handling of situations to ensure members enjoy a safe event. At the time of an event, the Klub has already gone to great lengths to systematically safeguard the well being of its members. To further instil these measures we adhere to a number of pre-existing safeguarding standards to ensure staff and members can ensure the rules are being properly considered.

For our guests, the website, handouts, the member’s newsletter, as well as signage and regularly, planned workshops on consent & safe BDSM type play offer a wide range of educational materials, which further help to enforce safety & wellbeing on customer level.

One of the materials most regularly sent to guests in conjunction with event details is a video on Consent, published via the Thames Valley Police: https://www.youtube.com/watch?v=pZwvrxVavnQ

Our venue has 3 types of staff at each event: SIA door staff, The Guardians and the bar/floor staff and managers.

SIA
(Please see Operational Handbook for further reference.)

Door selection
The operators are committed not to let anyone below the age of 18 onto the premises and therefore operated the doors on the basis of the Challenge 25 campaign. Staff will further indulge in a quick chat with arriving guests whilst checking their outfits to check for intoxication and general wellbeing before guests are permitted entry to the venue. On leaving the venue staff will ensure that guests are suitably dressed.

Membership status check
For membership based events, it is required to further validate one’s active membership status on arrival using KV’s membership ID card. Cards are cross referenced with the membership database.

The venue’s outside visibility
The venue will not feature any outside advertising, in order to further ensure that no random build-up of party-goers will occur at the doors and the integrity of the community is preserved.
**Radio System**
A radio system will be in use on the premises, connecting the Management, DPS, Head of security, Head Guardian & First Aider during events.

**Phone line**
Klub Verboten operates a helpline during events. Guests can call or text this number to anonymously report any suspicious behaviour or request help/assistance. The first responder is a designated member of the management team who will upon receiving the call/text message deploy further actions in conjunction with the SIA team & Guardians in line with the safeguarding policies. Signage informing about the phone line will be displayed in the bar and toilet areas as well as corridors.

**Ask for Angela / Speak with Sam**
Beyond using the provided telephone helpline, guests who may be in fear of drawing too much attention can also report anything that should feel uncomfortable to any members of staff, such as the bar team with using the safeword: ANGELA or SAM. Signs will be displayed in the bar and toilet areas to make guests aware of such.

**Signage**
The following signs will be displayed throughout the venue:
- Fire exits
- Fire extinguisher location
- CCTV Policy
- Challenge 25
- Ask for Angela
- Telephone Helpline
- Klub Rules

**Guardians**
Our team of guardians are there to ensure everyone has a safe and enjoyable time once they enter the venue. Our BDSM and wellbeing consultant Master Peter trains and educates all staff on the procedures and requirements to ensure safety. Guardians actively monitor all of the event-specific activities that occur in the venue. This includes ensuring the ethos of mutual respect is being adhered to, checking that play is being done safely and helping guests navigate their way through the play aspects of the events. Their role also ensures that the space is kept hygienic and free from obstruction. The Guardians are clearly visible at each event and wear high vis to ensure they are easily recognisable.

Master Peter acts as the events Guardian manager and oversees training, acts as head-guardian for large events and joins meetings with the management level to ensure there is a clear path of communication between hands-on safety and the organisation of the venue. Peter’s role also includes training new guardians, running refresher courses and documenting the history of guardian training.
Key Duties
- Monitoring of all play-related activities
- Assuring all play and interactions are Safe, Sane and Consensual
- Welcome, engage and educate guests on safe BDSM practices
- Be open, non-judgemental & approachable to any concern or question guest might have
- Be highly visible to guests at all times
- Represent the event and the community as an ambassador and exemplar
- Maintaining the Klub’s ethos and standards as laid out by the Operational Handbook & Safeguarding manual

These Are Achieved By
- Active observation & listening
- Continuously moving around the event space
- Communication with other Guardians
- Enacting and enforcing play policy and klub rules
- Proactively helping and assisting guests
- Intervening when necessary
- Stopping scenes when necessary
- Excluding people from play space when necessary

Personality Attributes
- Observant and focused
- Friendly and diplomatic
- Assertive and calm
- Great understanding of consent
- Sober at all times
- Responsible and conscientious
- Empathic and compassionate
- Lacking bias
- Competent and knowledgeable in several areas of BDSM

Required Training Sessions
- Master Peter Play-Safe training
- Good Night Out Campaign: Safer Events Guidance
- KV Safeguarding training
- KV Operational Handbook training
- Fire & Evacuation training

Pre-Doors Procedure

Head Guardian
- Inspect play area and furniture arrangement, ensuring:
  - Suitable space around play equipment, considering arcs of swing (impact), crowd footfall and flow through space;
  - Adequate lighting and visibility;
  - Absence of trip hazards, obstacles, unsafe structural features;
  - Hygiene stations with anti-bac wipes/spray, tissue, gloves
  - Sufficient bins are provided
Event Monitoring Procedures

- Be visible but not overbearing.
- Do not overly socialise or appear distracted/unobservant during shift.
- Be friendly and welcoming to people in space.
- When addressing issues, do so calmly, politely and firmly, away from other people.
- Don’t leave play space without notifying other monitors
- When off duty, remain as an example of good etiquette and the brand

What to watch out for

- Clear violations of play and Klub rules of any kind
- Unsafe play of any kind
- Misuse of equipment
- Play inappropriate to space
- Absence of negotiations prior to play
- Absence of aftercare after play
- Any signs of being too intoxicated
- Any signs of someone in distress (crying, fear, excessive pain responses)
- Any signs of someone in endorphin shock
- Any signs of a medical/mental health issue
- Someone in rope bondage unattended
- Aggressive or unfriendly behaviour
- Harassment or persistent targeting of people not enthusiastically responding to attention
- Interrupting of scenes
- Lack of awareness to space, especially around impact play
- Damage to equipment or space related risks
- Unavailability of hygiene resources
- Monopolisation of space or equipment

What to listen out for:

- Universal safewords and exclamations that are likely safewords
- Crying, shouting, screaming, sounds of someone in distress
- Coercive language (“Oh go on”, “come on, it’ll be fun”) and peer pressure language
- Angry outbursts, sounds of aggression
- Sounds of material breaking

Safe Play
Negotiations
- Be prepared to observe negotiations if requested
- Negotiations as a minimum should involve:
  - Activities agreed
  - Parts of body in/out of scope
  - Leaving of marks
  - Safewords/signals to stop
  - Amount of nudity / any adjustment to clothing
  - People involved

Impact Play
- Space management - flight of floggers, canes, whips etc. unimpeded and not a risk to other scenes or guests
- Tools and toys are not damaged/unsafe
- Floggers or whips are not in contact with floor / unsanitized surfaces
- Tools and toys used are properly cleaned after use
- Impact on existing bruises
- Broken skin

Bondage
- Collars are not too tight (two finger rule), or leashed from a high point
- Ropes are not over joints/nerve points
- Ropes are not around neck
- Extremities are not going blue, or showing signs of no circulation
- Nobody bound left unattended
- Breasts are not ballooning
- No free standing whilst ankles or legs bound together

Intervention and People Management
Many activities of a minor but flagged or concerning nature may involve monitoring closely without further action, but if an intervention or a scene stop is required, it is always better to act sooner rather than later.

Intervening / Stopping a Scene
1. Approach in a mild, polite manner with a “Can I have a quick word?”
2. Try to speak without anyone else in direct earshot.
3. Keep your voice and attitude calm, even, non-confrontational.
4. Explain what you observed then why that’s problematic then what the action is.
5. Where appropriate, offer to briefly coach correct play or suggest alternatives.

First aider/nurse
A first aider will be on-site for immediate response to minor injuries.

Management
One management member will be always on-site initiating or conducting all site-specific procedures before opening and ensuring all staff are sufficiently trained and maintain
the venue’s operational & safety standards as laid out in the company’s operational Handbook and safeguarding manual.

**Challenge 25 - Bar**
The venue's bar operates on the basis of *Challenge 25*. With door and bar staff being updated and educated on all of it’s procedures and guidelines

### 3. REPORTING AND RECORDING

As a final measure, Klub Verboten systematically ensures the Ethos of the community is being upheld from management level all the way through to the events as they take place. For this to work efficiently, we document and record the happenings, discretions and infringements during events. The guardians, phone lines and bar staff will document and record each time a member comes to them with an issue. This documentation is reviewed and responded to at regular intervals to tune the rules and guidance for maximum well being.

**Incident Handling**

**Intoxication:** All members of staff keep a keen eye for people’s intoxication levels. Since consent cannot be clearly given while intoxicated, it is important that everyone engaging in fetish or BDSM activities has clarity. Intoxication can result in ejection from the venue and repeat offenders will have the membership suspended.

**Boundary Crossing:** infringements on well being or mutual respect will be dealt with on a case by case matter. It will be at the guardian’s discretion to judge the severity of such actions. In the event of a boundary being crossed Guardians will take note of such infringements and log it.

**House rule violation:** The rules have been set out in a clear and concise way, membership is granted on the basis of understanding the rules and are regularly reminded through signage, emails and the website. If the venue. If a rule is broken that pertains to the safety or well being of another member membership termination will be strongly recommended.

Not only do these allow us to monitor the events, but also creates a feedback loop of information to the top of the organisation hierarchy. For us, it is important that we are sophisticated in adapting to the new problems that may arise and can be responsive in ensuring the ethos of the venue is maintained.
Response Matrix.

The following tables clearly show how the Klub responds to issues and problems that may arise at events. The severity of rule infringements have been broken down into a traffic light system for clarity. This table will act as guidance for our qualified and aptly trained staff to help them navigate the best practice for dealing with issues. This system helps ensure that a problem that happens on the night is recorded correctly and the appropriate steps have been taken. To ensure that the venue can continue operating in a safe and effective manner.

Our Guardians and Door staff will all be briefed and kept up to date on the happenings of a specific venue. The severity and route of action will be at the guardians discretion.

<table>
<thead>
<tr>
<th>REASON</th>
<th>IMMEDIATE LONG TERM BAN</th>
<th>TIME OUT / MEMBERSHIP PAUSE</th>
<th>RECORDED WARNING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sexual assault</td>
<td>Low level verbal abuse to staff or guests</td>
<td>Low level unsafe play</td>
<td></td>
</tr>
<tr>
<td>Safeword inaction</td>
<td>Low level consent (non-sexual/intimate)</td>
<td>Incapable through drinks/drugs</td>
<td></td>
</tr>
<tr>
<td>Serious verbal abuse to staff or guests</td>
<td>Aggressive cruising</td>
<td>Strong dress code violation</td>
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<tr>
<td>Serious consent violation (sexual/intimate or unsafe)</td>
<td>Play with someone visibly intoxicated</td>
<td></td>
<td></td>
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<tr>
<td>Racism, homophobia, transphobia,misogynyn</td>
<td>Coercion / pressure to play</td>
<td></td>
<td></td>
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<tr>
<td>Major infraction of Play limits</td>
<td>Serious unsafe play</td>
<td></td>
<td></td>
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<tr>
<td>Harassment / abuse</td>
<td>Photography / Videography with consent</td>
<td></td>
<td></td>
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<tr>
<td>Photography / Videography without consent</td>
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<tr>
<td>IMMEDIATE ACTION BY GUARDIANS</td>
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<tr>
<td>Drug dealing/ drug taking</td>
<td>False Identity claim</td>
<td>Stalking</td>
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<tr>
<td>Ticket scam attempt</td>
<td>Assessment</td>
<td>Assessment</td>
<td></td>
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<tr>
<td><strong>Assessment</strong></td>
<td>Hear all parties involved</td>
<td>Hear all parties involved</td>
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<tr>
<td>Engage with the alleged wrong-doer(s) aware how the line was crossed</td>
<td>Engage with the alleged wrong-doer(s) aware how the line was crossed</td>
<td>Engage with the alleged wrong-doer(s) aware how the line was crossed</td>
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<tr>
<td>Create safe space for potential victim</td>
<td>Create safe space for potential victim</td>
<td>Create safe space for potential victim</td>
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<tr>
<td>Recording</td>
<td>Recording</td>
<td>Recording</td>
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<tr>
<td>Scan ID Card / record personal details</td>
<td>Confiscate Membership Card</td>
<td>Record details / membership ID number</td>
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<tr>
<td>Confiscate Membership Card</td>
<td>If not a member - Identify the member responsible</td>
<td>Ejection in line with vulnerability policy</td>
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<tr>
<td>If not a member - Identify the member responsible</td>
<td>Take the details of the person</td>
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<tr>
<td>Take a photo of the person</td>
<td><strong>Notification</strong></td>
<td><strong>Notification</strong></td>
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<tr>
<td>Notify management / SIA staff immediately</td>
<td>Notify management / SIA staff immediately</td>
<td>Notify management / SIA staff immediately</td>
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<tr>
<td>Create incident report</td>
<td>Create incident report</td>
<td>Create incident report</td>
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<tr>
<td>Management: Call the Police for immediate response</td>
<td>Management: Notify the Police if law is broken</td>
<td>Management: Keep record for the Police</td>
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<tr>
<td><strong>MANAGEMENT FOLLOW UP</strong></td>
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<tr>
<td>Add person to ban list incl. personal details &amp; description of incident</td>
<td>Create record of incident with the membership accounts of all parties involved</td>
<td>Create record of incident with the membership accounts of all parties involved</td>
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<tr>
<td>Ban membership number of Dice ticket platform</td>
<td>Temp. block of Dice ticket platform</td>
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<tr>
<td>Ban membership number from Mailchimp</td>
<td>Temp. block membership number from Mailchimp</td>
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<tr>
<td>Ban account from FL social Channels</td>
<td>Notify wrong-doer via email about the temp. ban</td>
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<td></td>
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<tr>
<td>Ban account from FB group</td>
<td>Notify possible victim about actions taken</td>
<td></td>
<td></td>
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<tr>
<td>Ban account from FB page</td>
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<tr>
<td>Ban account from Instagram</td>
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<tr>
<td>Notify wrong-doer via email about the ban</td>
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