Licensing Sub Committee meeting on Tuesday 19th July 2022 at 6.30pm to consider the application for Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

INDEX TO BUNDLE

1.	Statement of Tobias Jackson
2.	List of Conditions both agreed and not agreed
3.	Landlord's packs providing information in relation to Adventure, Blame Gloria including photographs, drinks lists etc.
4.	Disperal Policy.
5.	Entrance Policy.
6.	Incident reporting procedure.
7.	WAVE/Welfare Policy and Guidance.
8.	Statement of Frank Fender

Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 1

FAO: Tower Hamlets Licensing Committee



Monday 11th July 2022

Dear Committee Members,

I am one of the Founders of the Adventure Bar Group. We formed our business in 2005 (at the age of 23) to create great cocktail bars that are safe, fun and give great service.

History

Over the past 17+ years, we have opened bars in locations such as Clapham, Balham, East Dulwich, Covent Garden, Shoreditch, Waterloo, Soho, Leicester Square, Birmingham, Cardiff and Bristol with Liverpool due to open in a couple of months. Our bars range in size from 180 capacity cocktail bars, to 2,500 capacity outdoor and events space in Digbeth, Birmingham.

Whilst Independent for a majority of our history, the pandemic took its toll on us and we decided to sell the business to Nightcap plc (whilst staying at Adventure Bar Group for the foreseeable future). This has allowed us to meet and collaborate with other experienced operators; the MD of The Cocktail Club and the CEO of Nightcap, Sarah Willingham (former Dragon on Dragon's Den, founder of the Bombay Bicycle Club and Chair of Craft Gin Club).

We are currently expanding around the UK, predominantly opening more Tonight Josephines and Blame Glorias. Both these brands were created in the past five years and have been very warmly received.

Blame Gloria

Blame Gloria was introduced in 2018 on the site of our old Adventure Bar on Bedford Street in Covent Garden. We are open from 4pm till 11.30pm during the week and until midnight Friday and Saturday. We are within the Covent Garden and Soho stress area, otherwise we'd like to open later as we often close with a full venue.

We also have a Blame Gloria in Clapham Junction which is open until 2am Thursday to Saturday, also on a former Adventure Bar site. We also have recently opened our third Blame Gloria in Bristol which has a 3am license.

Blame Gloria is a cocktail bar aimed at a mixed crowd of affluent guests. Our average age is 26-30 and our general mix is 60% female and 40% male. We have always enjoyed serving this demographic and have never experienced a major incident in any of our venues in 17 years.

Members of the Committee will see from the Bundle provided that we operate an extremely bright, colourful and somewhat quirky décor and atmosphere; this is particularly



attractive to our larger group (women) but also encourages a unique and enjoyable experience for our guests.

In Blame Gloria we take at least 50% bookings usually, this means that customer via our website prepay for a booth or a small area and at that stage their details are recorded and retained. We have a large following of both regular customers and on social media.

A number of our premises licences allow us to trade until 3.00am but these are in practice rarely used.

We have amended our hours in relation to this application such that the terminal hour for licensable activities will be midnight on Sunday to Wednesday inclusively, 1.00am on Thursday and 2.00am on Friday and Saturday with 30 minutes "drinking up time".

Licensing Objectives

We have enjoyed a good relationship with local authorities across all London Boroughs and City councils. We have never had a review, nor been threatened with a review. We have worked with local authorities in the past to satisfy concerns and 100% of the time been able to find compromise to give all parties what they need to be comfortable.

We train above and beyond legal requirements within the sites for personal licenses, challenge 25, alcohol awareness, first aid, fire marshall training and dealing with aggression. We have policies that cover entry policy, service and dispersal which are applied to all sites, whether or not they are required by local authorities (and some of these are attached in the Bundle).

Wellness

Within the business, we pay for all of our staff to access Hospitality Action, an Employee Assistance Program which offers counselling services, financial assistance and help with gambling, drugs, alcohol and other addictions. We believe that if you look after your teams, they will look after your guests.

In the sites, we record every incident and even near miss for full transparency. These are recorded on a top of the range system call Risk Proof which also provides legal advice for all cases. We have at least one trained first aider on every shift and have safety of our guests and staff as our biggest operational concern at all times.

We are happy to agree to the Police condition in relation to welfare policy which is something that we take extremely seriously as outlined above.

However, a dedicated welfare officer, even limited to Thursday, Friday and Saturdays, we do not believe is necessary.



We would prefer and think it better to have all of our staff trained who are customer facing to look out for any concerns and this I believe will be sufficient and effective.

If there were a person who was readily identified as a welfare officer and who was not able to perform any other function, then I believe that our clientele who would not be used to seeing this will regard this as somewhat odd and may indeed indicate that this is a venue where there are problems.

It is important to note that many of our guests will have visited us either on social media, talk to other customers or attended our other sites in central London where they will almost certainly have had a very good time without the two restrictions which the Police have requested.

Underage Concerns

We operate a non-mandatory Challenge 25 policy in all our sites, even though some do not require it on the license. We find that this policy is extremely effective, keeping everyone safe and delivering the best service possible.

We have used an ID scanner at a venue we used to operate in Leicester Square. We took the venue which had been to Review previously and had an ID Scan on the license. The Police didn't want it removed until we could prove that we did not attract the same crowd as the previous occupant had. They asked for six months of proof, but after further consultation allowed us to put in a minor variation after three months as they saw we are a responsible operator with a good demographic, even in a challenging area.

During the time we operated with an ID scan, we had many issues on the door with people within our normal demographic who didn't carry ID as they look over 25. There was an occasion where we had to refuse Kelly Brook, the famous Heart FM DJ who worked above the venue, because of this onerous condition. It is my opinion that ID scan is off putting for the type of guest we attract and will cause more arguments on the door than a well managed Challenge 25 policy which works well in every other venue we operate.

As indicated in relation to the issue of wellness, those customers who have visited our other sites will not be used to produce ID when they are over 25 as entry will have been gained without the need to produce this at other Adventure Bar sites.

This will lead us to turning away customers who we would welcome and who perhaps are regulars and also could lead to a reputation that we are associated in some way as being a problematic venue even though we will have only just opened.



Summary

In summary, we are really excited to bring the concept Blame Gloria - a cocktail bar concept we are very proud of - to Canary Wharf. My incredibly experienced team will deliver a safe and fun concept that I believe will satisfy all interested parties.

Tobias Jackson, Co-Founder, Adventure Bar Group

Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 2

(1) Agreed Conditions with Police

- 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. There shall be a personal licence holder on duty at the premises at all times when the premises are open to the public and selling alcohol.
- 4. When the designated premise supervisor is not on the premises any or all persons authorised to sell alcohol will be authorised by the designated premises supervisor in writing. This shall be available on request by the Police or any authorised officer.
- 5.1 A minimum of two SIA licensed door supervisors will be on duty on Thursday, Friday and Saturday from 8pm (Adventure would prefer 9pm) until the premises close rising to 3 when the occupancy is 150 and 4 when 200.
- 5.2 On Sunday to Wednesday when the premises trade after midnight a minimum of two SIA door supervisors will be on duty when the occupancy reaches 100 and then a risk assessment as to whether any further door staff is needed will be completed and available to the Responsible Authorities on request.
- 6. 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.

Document Ref: 2148420398

- 7. In the event that a serious assault is committed on the premises (or appears to have been committed) the management will immediately ensure that:
 - a) Call the police (and, where appropriate, the London Ambulance Service) are called without delay;
 - b) All measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police;
 - c) The crime scene is preserved so as to enable a full forensic investigation to be carried out by the police; and
 - d) Such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises.
- 8. 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.
- 9. No open containers of alcohol to be taken outside the premises other than for consumption in the designated external seating area.
- 10. A record shall be kept detailing all refused sales of alcohol. The record must include the date and time of the refused sale, the name of the member of staff who refused the sale, and the reason for the refusal, and what the outcome was, i.e. if left with friends, taxi called etc. The record shall be available for inspection at the premises by a police or Authorised Council Officer all times whilst the premises is open.
- 11. The premises will adopt a search policy on a risk assessment basis. If an additional risk is identified that customers should be searched before entry then this will stipulate how many customers entering should be searched. The policy will include a requirement that if searching does take place any customer who refuses to be searched will be refused entry and a corresponding note must be made in the incident log within 12 hours of the refusal.
- 12. The premises must have a detailed documented security plan that must include an ejections policy, search policy, anti-theft policy which must be made available to police upon request.
- 13. A written entry policy shall be in place and implemented at the premises to move customers into the premises in such a way as to cause minimum disturbance or nuisance to neighbours. The policy shall include details on queue management to ensure any queue to enter the premises the premises is managed effectively and supervised by door staff to ensure that there is no public nuisance or obstruction to the public highway.
- 14. A written egress policy shall be in place and implemented at the premises to move customers into the premises in such a way as to cause minimum disturbance or nuisance to neighbours. The policy shall include details on queue management to ensure any queue to enter the premises is managed effectively and supervised by door staff to ensure that there is no public nuisance or obstruction to the public highway.
- 15. The premises shall adopt the Central East Police Licensing Drugs Policy.

Document Ref: 2148420398 Page 2 of 5 P58352/23

6. Noise Limiter must be fitted to the musical amplification system set at a level determined by and to the satisfaction of an acoustic consultant who is a member of the Institute of Acoustics so as to ensure that no noise nuisance is caused to local residents or businesses. The operation panel of the noise limiter shall then be secured by a key or password to the satisfaction of the acoustic consultant and access shall only be by persons authorised by the Premises Licence Holder. No alteration or modification to any existing sound system(s) should be affected without prior agreement with an acoustic consultant. No additional sound generating equipment shall be used on the premise. without being routed through the sound limiter device."

(3) Conditions in the Operating Schedule not covered with Police & EHO

- 1. 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.
- 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 area immediately outside the premises, shall be swept and or washed, and litter and sweepings collected and stored in accordance with the approved refuse storage arrangements.
- 4. 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.
- 5. Off sales shall only be sold for consumption in the outside area shown on the proposed licensing plans, which shall be monitored by staff at all times.
- 6. All staff responsible for selling alcohol shall receive regular training in the Licensing Act 2003 in terms of the licensing objectives, offences committed under the Act and conditions of the Premises Licence. Written records of staff training in relation to the Licensing Act 2003 shall be retained and made available to police and authorised officers of the Licensing Authority on reasonable request.

(4) Conditions not agreed

- 1. The premises shall use an ID scanner that uses photographic identification documents such as ID cards, passports etc., all persons entering the premises after 8.00pm, on Thursdays, Fridays and Saturdays shall have their ID scanned by this device unless the person or persons appear to be over the age of 35.
- 2. A dedicated welfare officer, to be employed at the venue on Thursday, Friday and Saturday nights from 8.00pm until close. The welfare officer will be easily identifiable to customers, their role will be to monitor the welfare of customers, including identifying any customers who may be at risk of becoming overly intoxicated and liaising with management/security staff to assist them where necessary. All welfare interventions and outcomes to be logged in the welfare log.

Document Ref: 2148420398 Page 4 of 5 P58352/23

- 16. The premises will carry out a risk assessment into all artists and promoters appearing at the venue. The purpose of this is to identify any risks and measures that can be put in place to mitigate against them. Research will include but is not limited to contacting venues they have appeared recently and looking at their social media sites. Mitigating measures will include but is not limited to SIA numbers, male and female SIA ratio, SIA placement. This risk assessment, including all identified risks and mitigating measures taken, must be a documented and made available to Police upon request.
- 17. The premises security, egress, dispersal plans and searching policy as well as searching effectiveness shall be reviewed every 6 months and the results made available to Police upon request.
- 18. Whenever the premises are open for licensable activities an inspection will take place of all toilets at least every 30 minutes and on Fridays and Saturdays every 15 minutes and a register will be completed of each inspection including the name of the member of staff and the time and any relevant information. The register will be available to the Responsible Authorities on request.
- 19. The premises is to have a Welfare Policy and this Policy will detail how the venue will protect its customers who become vulnerable from such things as intoxicating drugs and members of staff who are customer facing will receive training in relation to the Welfare Policy.
- 20. Jugs of water and drinking glasses to be freely available on all tables and at the bars at all times the bar is open.
- 21. All front of house staff shall complete WAVE (Welfare and Vulnerability Engagement) Training prior to commencement of employment at the premises. This training shall be documented and repeated/refreshed at 6 monthly intervals.
- 22. No entry or re-entry shall be permitted to the premises (save for returning smokers) later than 1 hour before the premises closes on Fridays and Saturdays.
- 23. The premises smoking area shall be have a barrier separating it from the rest of the estate and be managed by a member of staff.

(2) EHO Conditions Agreed

- 1. Loudspeakers shall not be located in the entrance lobby or outside the premise building.
- All windows and external doors shall be kept closed after 22:00 hours, or at any time when regulated entertainment takes place, except for the immediate access & egress of persons.
- 3. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.
- 4. Patrons permitted to temporarily leave and then re-enter the premises, e.g. to smoke, shall be limited to 20 persons at any one time.
- 5. The external area shall not be used after 22:<u>30</u> hours, except for patrons permitted to temporarily leave and then re-enter the premises, e.g. to smoke.

Document Ref: 2148420398 Page 3 of 5 P58352/23

Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 3





How do we schieve energy efficiency?

We have partnered with 'OAK' at group level to carry out:

- On-site feasibility surveys
- · Analysis of power bills
- . Installation & monitoring and automation tech

This has already taken place at our sister branch in Oxford Circus and is one of the many ways we are looking to improve energy efficiency group-wide.

This is what a 15 month journey with OAK looks like.



15-month journey with OAK

START of Journey- Q1



This journey starts with a site survey and installation of tech such as IoT sensors etc.

• Weekly analysis report

Improved Recommendations- Q3



- Recommendations based on Descriptive analysis of 6-month data
- Predictive Maintenance (PdM) recommendations
- Base load reduction strategy



Introduction to Analytics- Q2.

- Live dashboard which shows real time consumption, runtime of equipment

 Alerting Dashboard with real-time alerts on email, mobile
- **Energy Forecasting** and recommendations

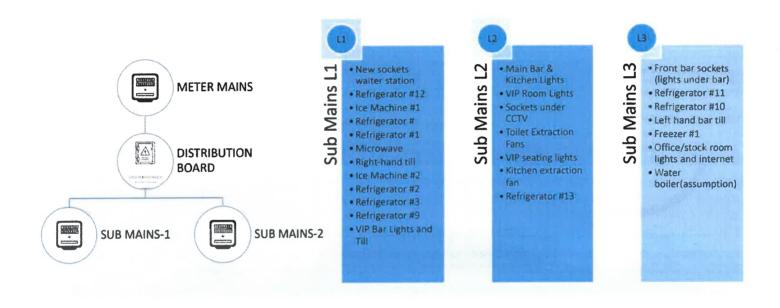


Advance Saving Opportunities- Q4 & Q5

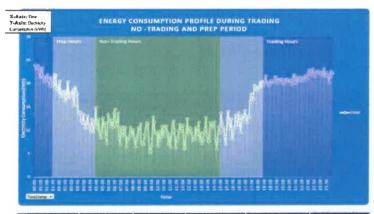
- Solar + Storage recommendations
 Auxiliary equipment & equipment upgrade
- recommendations for energy savings on ROI
- Additional sensor installations for increased granularity and advanced recommendations



Metering Configuration



Operating Hour Breakdown



TRADING CATEGORY	MIN (kWb)	MAX (kWh)	AVERAGE (kWh)	MEDIAN (kWh)	TOTAL DEMAND (kWh)		
NON-TRADING	3.2	21.2	7.3	7.0	2072.0		
PREP	3.9	23.8	11.6	10.6	1398.4		
TRADING	4.5	25.3	15.1	15.0	4783.0		

To support energy insights, OAK plotted the site's daily operations and divided them into three functional periods (Figure 1) as follows:

- Trading: time when the bar is open for business.
- 2. Non-Trading: when the bar is closed for any business activity.
- 3. **Prep:** when the bar is preparing to open at the start of a shift or close down after a shift.

Saving Potential

Operational Optimisations,
Predictive Maintenance &
Tariff Negotiations

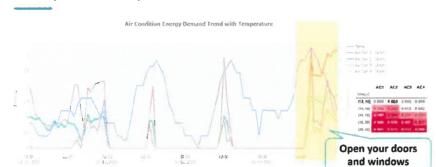
Non Capex

Electrical Configuration Optimisations
Voltage & Power Factor

Equipment Upgrades & Management
Invest in more energy efficiency equipment with a clear data-based ROI

Solar + Storage Systems
OAK identifies the optimal set up for your business

AC Operation Optimization

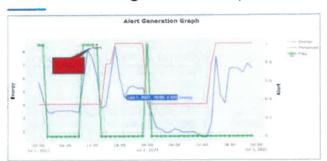


Although there is a positive correlation (>90%) with ambient temperature, AC consumption increases with a decrease in ambient temperature in the highlighted area. Outside airflow could be used to reduce AC usage.

non-truding	Thursday	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Monday	Tuesday	Wednesda
Hour	91-07 2023	02-07 2021	03-07-2021	94-97-2025	05-07-2021	06-07-2923	07-07-2021	08-07-2021	09-07-2021	18-07-2021	11-07-2021	12-07-2921	13-07-2021	14-07-2021
0 -	0	0	9.135	0.222	0.031	0	C	.0	0	0.252	0.079	0.	0	D. 8000
1	0	0	0.339	0.243	e	n	c	. 0	0	0.206		0	Ü	6.576
2	0	0	0.301	0.235	0	0	0	0	0	0.151	0	0	. 6	8,38%
3	- 0	0	0.272	0.464	0	- 0	0	0		0.156	. 0	0	. 0	0.252
4	0	. 0	0.284	b	. 0	0		0	. 0	0.131	0	0	.0	0.234
5	ő	6	0.212	.0	0	.0		0	o.	0.116	0	0	0	0.222
6	0	0	0.223	0	.0	:0	6	0	0	10,2103	0	0.	.0.	0.228
7.	0	0	0.492	.0	10	. 0	0	.0	0.	0.295	0	0:	0	0.465
. 6	0	0	0.404	0	9.026	0	0.	0	9:	0.268	0	0	0	0.533
9	0	0	0.790	0	0.225	0	.0	0	0	0.242	0	0	0	0.103
10	0	0	0.700	. 0	0.143	- 0		0	- 07	0.77	61	0	- Đ	0.110
11	6	0	8.2	- 0	0.072	t)	0	0	. 0	0.268	t)	0.284	0	0.197
12	0	0	0.706	.0	0.022	6	- 6	0		0.991	.0	0.98	0	0.31
13	0							. 0						0.133
23				0.148							0			
fotal Wastage.	(0.00	€0.00	62.57	£0.00	60.00	10.00	10.00	E0.00	(0.00	11.98	10.00	FD.00	10.00	EASE

Potential Savings: ACs were found to be ON during Non-Trading hours resulting into monetary loss of £9.24 across 2 weeks equivalent to value of £240 per year

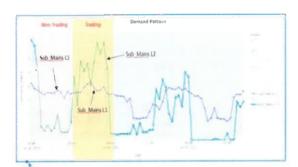
Abnormal Change In Consumption



IN HOUSE ALERTING SYSTEM

OAK's energy efficiency "Alert" system informs LCC when demand deviates from the optimised consumption pattern (calculated from several weeks of analysis). OAK tailors the service in line with business needs, ensuring the Alerts only nudge when required

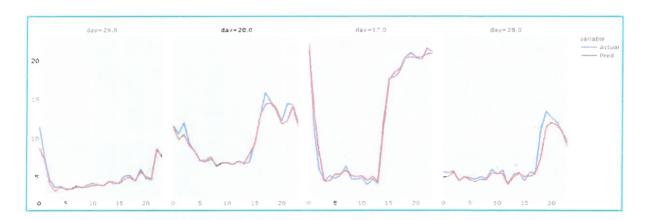




INSIGHTS & RECOMMENDATIONS

OAK's analysis provides an eagle-eyed view of any anomalies occurring onsite. Typically, the energy consumption during non-trading hours should be less, however, Sub Main L1 was consuming similar energy during non-trading hours and trading hours, whilst the pattern was different for other phases. LCC should check the operation of equipment during Non-Trading hours.

Predictive Modelling



Predicting energy demand using Machine Learning allows LCC to accurately forecast consumption, helping you to budget and inform other business improvements in advance.

OAK's Recurrent Neural Network (RNN) model considers various attributes such as temperature, humidity, trading category and weekday effects. It successfully forecasts consumption with an accuracy of ~90%+



Ethical Purchasing

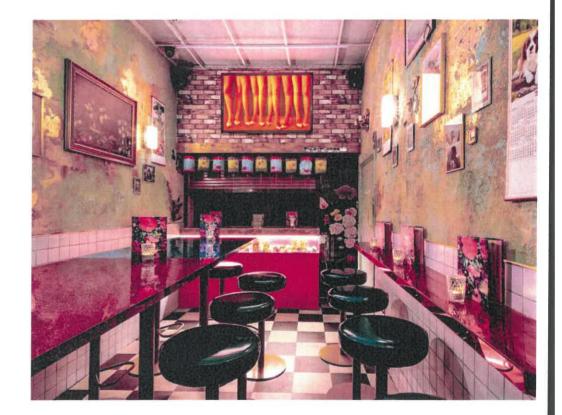
We currently work with Pernod Ricard & Diageo and have started engaging with smaller companies such as Eco Spirits who are the spirit RTM into the beer/keg RTM model. As an example they'll be looking to reduce deliveries from 6 bottles which will become a single unit which will arrive in a tote to be decanted. This has a large carbon footprint saving reducing single glass usage.

Charity Partnerships

We are partnered with Hospitality Action who are a wonderful charity that focus on supporting and offering vital assistance to all who work or have worked within the hospitality industry in the UK.

They provide a bespoke Employee Assistance Programme for us which acts as a care package for all members of our team to keep them happy, healthy, motivated and productive. We found them instrumental when Covid hit in 2020 as they were a real support to our team members. They provided access to a confidential online, telephone and in-person counselling service specialising in legal, debt, money worries and even parenting advice.

Their values mirror our own and we find the support they can offer our teams is immeasurable.





Water Conservation

Whilst we aren't actively conserving water at this stage we have recently approached Smart Flow to discuss a partnership and are awaiting group-level sign-off.

Smart Flow are one of the world's leading water technology companies and they blent their technical knowledge and mechanical expertise with AI Tech to deliver cost savings and property protection. Their mission is to empower their customers to easily manage and reduce their consumption and costs in a sustainable way.

Sustainable Materials

We work with contractors who are committed to using sustainable materials when it comes to site refurbishment and fit-out.

Examples of sustainable materials we have used in the past include:

- Smile plastics
- Recycled/reclaimed chopping boards that are reforms into sheet material and used as table & ber tops.

Reducing our green footprint

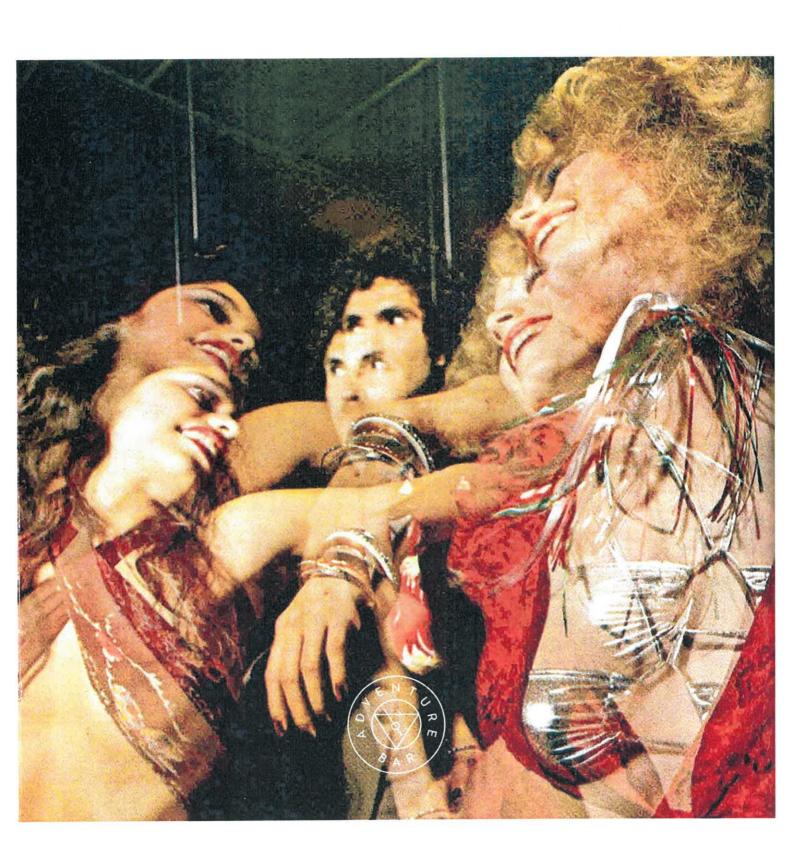
Nightcap PLC is committed to cutting its carbon footprint across the group, whilst also seeking to become more energy efficient.

The company has used online video conferencing platforms throughout the pandemic and, where practicable, will continue to promote this for the majority of internal meetings to minimise travel footprint.

Through conversations with suppliers, the company seeks to promote more environmentally friendly operations, involving less travel and congestion caused by inefficient delivery models.

All stelf, at both head office and bar venues, actively engage in the recycling of all waste materials wherever possible. A key theme across the industry has been the replacement of plastic atraws with 100% biodegradable recyclable paper straws and wrappers, which has been endorsed by the group across all bar venues.















Team Levels & Experience

The Adventure Bar Group have demonstrated 17+ years of operating across the UK which would not have been made possible without the teams who make the magic happen. Through years of trading, expansion and pooling knowledge using industry experts, we believe we have fine-tuned the way our teams operate to maximise guest experience and ensure we have the aces in places. We expect the below from all of our management teams:

- General Managers: Must have at least 6 year's hospitality
 experience with a minimum of 2 years spent in a General Manager
 position managing a similar sized venue for both team size
 and sales, as well as strong leadership skills and a passion for
 developing their team
- Deputy GM: At least 5 years of hospitality experience and a
 previous role as either a General Manager or Deputy General
 Manager. This level will effectively act as a General Manager "in
 waiting" and will stand in for the GM during days off and annual
 leave
- Assistant GM: At least 4 years of hospitality experience, previously worked in the same position for a minimum of 1 year
- <u>Duty Manager:</u> At least 3 years of hospitality experience, will have ideally developed internally within The Adventure Bar Group Family and will have been at the same level before assisting as part of an openings team
- Head Chef: At least 2 year's experience in the same role, must be used to the volume of forecasted sales

The number of hours allocated will vary from full-time team members on 35-40 hours per week and part-time team members on 15 hours per week.

All salaried positions will work 48 hours per week.

Managing Absence During Peak Travel Times

Our staff holiday policy states that all holiday requests are submitted and approved 4 weeks in advance of the date.

We produce all of our rotas three weeks in advance. These are written taking into consideration:

- Team holidays
- Pre-booked sales
- Forecasted sales
- Peak trading shifts
- National/Bank holidays
- Key events within the area & city

We currently operate 7 venues within the central London area and intend to cover last minute sickness or planned holidays by using our 200+ size workforce in this area.

In addition, we have floating London managers who work between the sites to assist on peak days as well as exclusively covering holidays and sickness.

Should any of the above fail, we can reach out to our wider network at PLC level as all operations staff are trained using the same training programme.





Training & Development

We have dedicated E-learning platforms (Flow and Upskill) whereby all new employees are allocated training when they join the business. This training covers everything from:

- Health & Safety
- Food Safety & Hygiene
- Allergens
- Fire Safety
- Licensing & Social Responsibility
- Health and Well Being

All staff must complete all modules within their first week of employment and are signed off following individual test completion.

We pride ourselves on achieving over a 95% pass rate on all modules and continuously review content and add in additional modules from both our trainers within the business as well as external leaders that are contracted

Below is some of the course that our teams must complete in order to fulfil their role.

Training & Development Cont...

Before opening any new venue, we run a minimum 3 week training plan in one of our existing venues where we train all hourly staff members on the Adventure Bar standards, culture and bar certification.

All management teams will have participated in a 4 week training plan when joining the business, and if they're an existing team they will have worked through our internal workbooks for their own personal development.

We have a specialised certification and mini-certification process, that all bartenders within the business complete within their first 6 weeks.

We expect all new starters to be mini-certified within their first 3 weeks which consists of knowing all menu specs, free pouring and gaining an understanding of the bar and its set up. They then progress to becoming fully certified by learning additional classic cocktails that don't currently feature on our menu, speed tests, liquor trivia and additional pour tests. This process is aimed to be completed within their first 6 weeks of coming on board. We track this weekly from our In Store Trainers and our in-house training team work within our bars every day coaching, running masterclasses and ensuring both consistency and quality is being delivered. As such, we currently have over 80% of our bartenders fully certified within the business as shown below.

Full Time	0-3 weeks		4-7 weeks			Fully Cert	Total Mini	total	Cert %
	traines	mini	trainee	mini	ready	incl. IST MVP			
Bar Elba	1				3	16	8	20	80.00%
Blame Gloria Junction	1		-17			6	3	7	85.71%
Blame Gloria CG	2		-		1	4	0	7	57.14%
Luna Springs						5	0	5	100.009
The Escapologist	1					5	0	6	83.33
TJ Birmingham	2					6	0	8	75,00%
TJ Cardiff						4	0	4	100.003
TJ Clapham					1	4	0	5	80.00%
TJ Shoreditch/Nikki's			Marin .			4	0	4	100.00
T) Waterloo	1		5	1		6	1	8	75.00%
total	8	0	0	1	5	60	1	74	81.08%





Retention, Incentives & Welfare

Our people strategy is predominantly based on learning and development. We find this to be such a key factor when it comes to retaining our team.

All team members have quarterly appraisals & check-ins with their line manager, and we follow an "observe, practice, teach" methodology to ensure that each member of the team is supported so that they can become the best version of themselves.

We offer a wide range of benefits from:

- Trips abroa
- Additional holiday for every complete year of service
- Dedicated days off for partners, children's and own birthdays.
- Community support days to allow employees to give back to their local areas
- Mental health / wellbeing days
- Private health care
- Death in service
- Meals on shifts
- Tronc
 Bonuses

Regular engagement surveys are also circulated to every employee within the business which allows us to check in with our teams at a group level and use any feedback constructively to ensure we have an engaged workforce who really love what they do. These are all anonymous so our teams get the opportunity to be honest and lu swhat they love or any suggestions for how we can continue to grow and support them.

Operating in high footfall environments

Since the acquisiton of Adventure Bar Group by Nightcap PLC, we have been working tirelessly to ensure that our executive team is formed of some of the most experienced & professional minds in the country. One such appointment was that of our Operations Director Nick Moule who has past experience of operating sites within Network Rail locations (Waterloo & Victoria stations) for a number of years which will undoubtedly be invaluable in this location.

Building a strong and trusting relationship with Network Rail's operations team is of paramount importance to us, and with our previously experienced OD, we would not be in uncharted territory. Given this previous relationship, we also understand Network Rail's way of working.

In addition to the above, we also operate sites within central London where the demand is high.

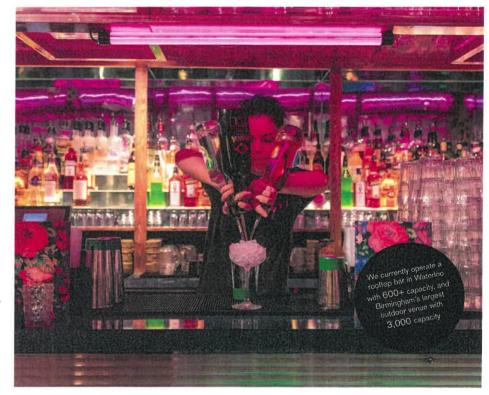
- Bar Elba, rooftop bar opposite Waterloo station with a capacity of 600+ guests is one example and is managed exceptionally well with a very experienced General Manager and senior team who are always on site during peak periods.
- Luna Springs, Birmingham's largest outdoor venue with a capacity of 3,000 guests

During peak times, we ensure there are additional team members supported by very profesional security teams to maintan the very best management during busy periods.

We plan to ensure that stocks are maintained in order to avoid any OOS products.

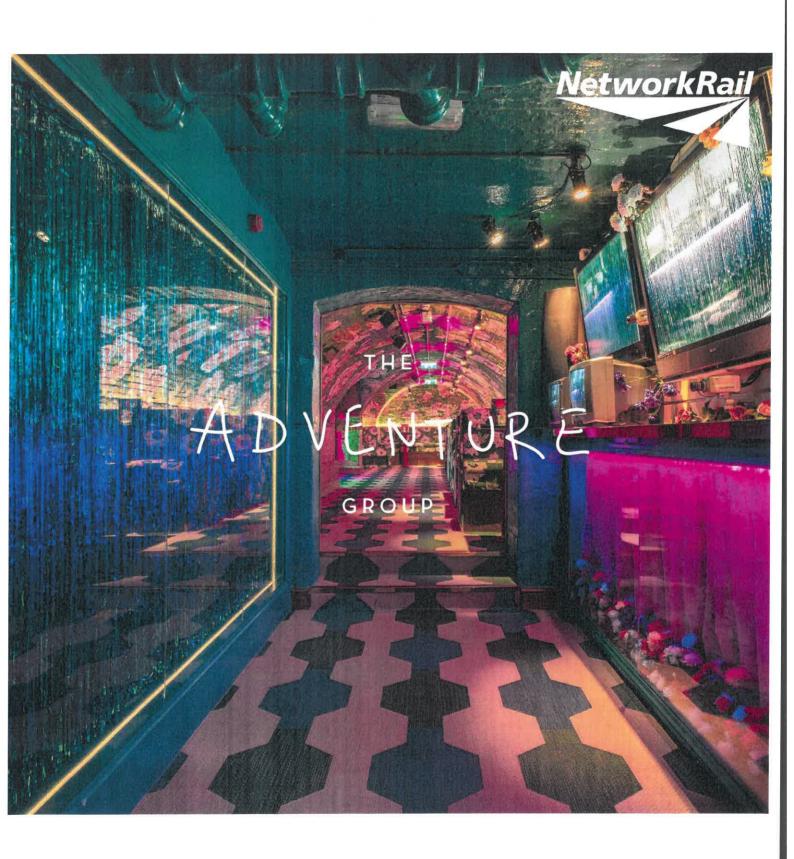
We have dedicated bar back roles whose sole purpose is to ensure all fridges, drinks, glassware eto is always stocked up fully to avoid any items becoming unavailable. We also have stores nearby who can support with stock items should there be any short deliveries. All stock can be transferred at a Head Office level from within store.

Our supply chain is excellent, and we procure the majority of our products from one supplier (ICS) with whom we've had a relationship for 17+ years. We do however, have alternative suppliers should our main one fall short on any deliveries or products.

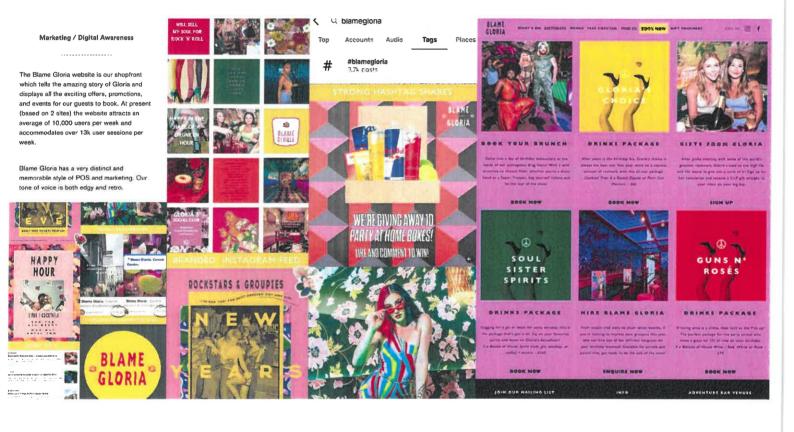














Customer Loyalty

Blame Gloria uses a state-of-the-art CRM (customer retention management) system to mange all stages of the customer life cycle and increase frequency of visit and penetration when needed through scheduled interventions.

At present, the Blame Gloria database is made up of 94.737 pieces of guest data with nearly 40% of these customers contactable by email or phone. In addition, the Adventure Bar Group database proudly boasts $\underline{465.000}$ pieces of GDPR compliant guest data which we can cross promote to.

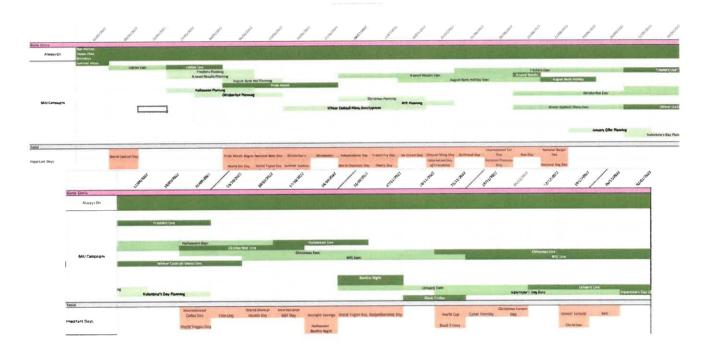
This creates a single customer view (SCV) platform based on our guest's behaviour:

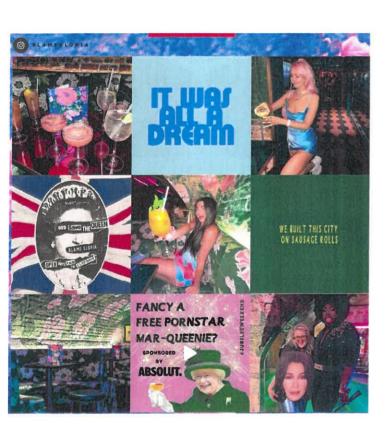


Example Leunch Plan for Blame Gloria London Bridge

	APPIL	Gay .	400	40AY	AUGUST	SEPTEMBLE	OCYCHER	NOVEMBER	DECEMBER
KEY MESSAGE:	New Bar Opening	New Bar Opening	New Bar Open	Late Night BAU	Events Live	Christmas/Corporates	Halloween	Christmas BAU	Christmas BAU
SECONDARY MESSAGE:	N/A	N/A	New Evants Set to Launch	Events Live	Late Night BAU	Freshers	Christmas/Corporates	Christmas/Corporates	January Offer Ramp Up
MARKETING CHANNELS:	- Printed Media - Local Press/Business Listings - Digital Media - Paid Social Campaigna - Ad Words - SEO (Ad Rank)	BAU - SEO (Ad Rank) - Orangic Social	- Prititad Modia - Local Prises - Local Prises - Digital Modie - Sodelifinitumere Outreach - Paul Social (BAU & Eveni) - Power Drops - Ouersia Merkeling (too Cream? - Hunt Cloral (Social Sharing) - CRM (Weekly Mal-Duts)	- Paid Social (BAU & Eventr) - Influencer Culreach (Events) - CRM (Wreek) (Mail-Cuts) - CRM (Wreek) (Mail-Cuts) - Jard Parly Ads - In-Sitors POS - Guernite Marriering (Barringham Pring) - Ad Woote (Running) - Pross Lounch - Event Prinse Release (Printel Model, Digital Medie) - Christmas Trade Show	- Paid Social (Retargeting) - CRM (Automation See Up) - SRP Bryt Listings (Hers) - Aut Work - Aut Work - Aut Work - Website U.K Project (BAU) - Print Marketing (Student Cands, Flyere)	- Local Marketing (Universities) - Ad Winde (Shudent Campaign) - Ad Words (Shudent Campaign) - Ad Words (Shudent Campaign) - Print Manketing (Sludent Cards, Flyers) - CPM Social County Mail-Outs) - CPM Social County (Christmas Adaloween) - Print Manketing (Christmas A-Boards, PCS) - On the Ground (Freshers Fairs) - 3rd Party Listings	-ryers) - 3rd Party Listings - Paid Social (SAU) - Ad Words (Summer Key Words)	- Local Merheting (Universities) - Ast Words (Student Campalgor) - Print Mantering (Student Cards, Flyers) - CRM (Student Mail-Outs) - Paid Social (Christmas) - Phid Macring (Christmas) - Phid Marketing (Christmas) - A-	

Top Line 12 Month Marketing & Activity Calendar





Social Media Utilisation

As previously mentioned, digital marketing and social media are the primary channels for raising awareness of the brand as we roll across the UK.

Blame Gloria currently has over 20k followers on social media and has an average weekly reach of 70,000 customers per week and an average engagement of 2.5% per week (which is very high for hospitality).

A range of content is posted regularly with engaging CTA's (call to actions) such as drinks promotions, video content, Facebook competitions, Instagram reels and photos/videos of our special events (brunches, drag queens, DJ sets). This content helps create FOMO (fear of missing out) within our guests and helps convert customers into pre-booked sales leads for our sales team.

Technology wise, we use several systems to help improve the customer experience. A system called wireless social helps us capture and monitor guest behaviour through simply logging in to the wi-fi in our sites, Our Snapperazzi booths are a fun way for guests to remember their Blame Gloria visit through a group photo. We're also about to launch a new customer experience platform which will help us manage and track all guest feedback (good and bad) across all digital platforms and respond within 3 working days.

Use of relevant commercial channels

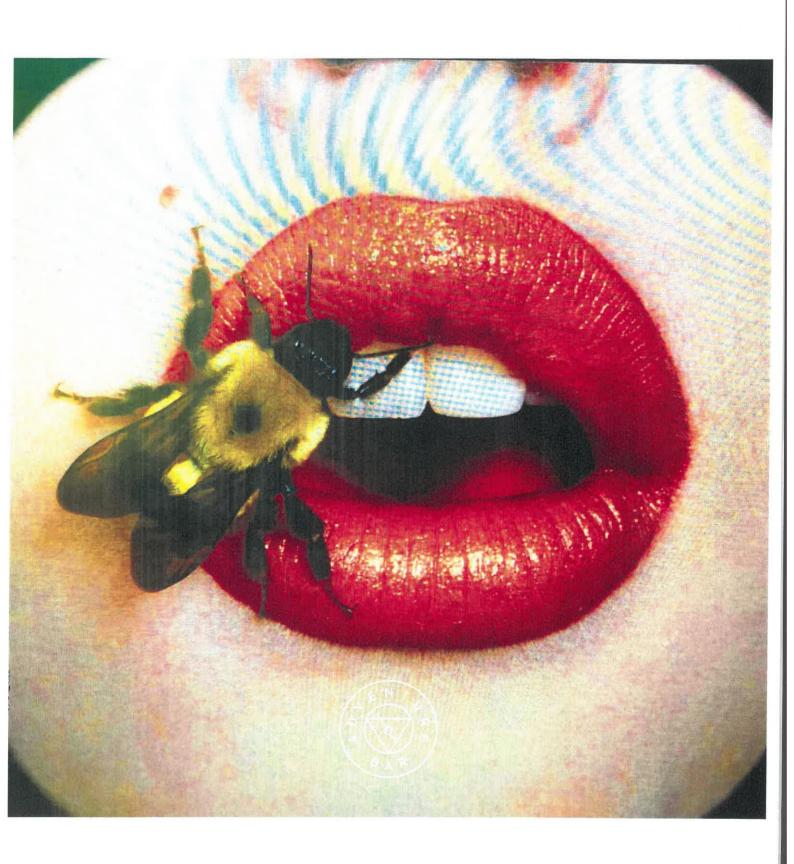
Only a few commercial channels are utilised by Blame Gloria. These include DesignMyNight booking platform where guests can pre-book and pay for events, bookings and food/drink packages before they arrive at the venue. The second commercial channel is guests can purchase gift cards to use as presents for friends, family and colleagues which can be used in return for experiences such as bottomless brunch or attendon teat.

Staff Uniform

All team members wear stone-washed branded tees accessorised with "rock-chick" style accessories such as bandanas, sunglasses and floral garlands.











BLAME GLORIA

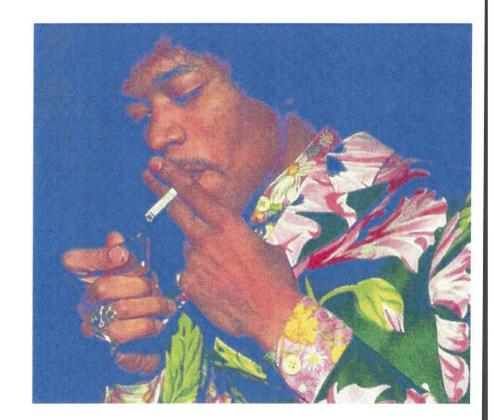
The Brand Proposition

Blame Gloria is a late-night cocktail & wine bar based on the mythical story of Gloria – A socialite and original "IT" girl who infamously had the best legs in Soho. Each Blame Gloria venue (Covent Garden, Clapham Junction & Bristoli) opens "7-days-per-week between 2pm and 2am (or from midday on Saturday and Sunday) and provides the best location for food, after-work drinks, celebratory occasions and a destinational party venue for both tourists, locals, and passers-by.

Who is Gloria you ask...? Well, sho's the most eclectic Nana on the street with a colourful groupie past. After shacking up with Hendrix in the late 60's and pulling all-nighters with the likes of Bowie and Mercury as well as drinking whisky with Elton, it's no wonder she knows how to party like a rockstar. She "allegedly" makes the best whiskey sour in London and spent her life in hotels until she ran out of dosh and moved into the basement where she still throws the best parties around!

The concept is inspired by rock legend Jimi Hendrix and is a mixture of pink and green colour waves, lined with velvet booths and pink neon lights. Instagrammable features such as floral flock wallpaper, video star wall and a photo-booth allow the guests to add a memorable location and backdrop to their big night out.

Famous for its glamourous cocktails, premium wines and opulent Champagnes, Gloria aims to give all her guests a memorable occasion through creating a fun and sate environment, with a retro-sound track, an unbeatable atmosphere and exceptional service.



Market Share

Market share will be gained from targeting locals, commuters, and tourists through an omni-channel marketing campaign across PR and digital channels.

The primary consumer for a Blame Gloria is a 25–35-year-old female (who has a white-collar occupation and earns over £50k per year), followed by a secondary customer of an 18–24-year-old female (again from a white collar occupation, but earns between £25k-£45k per year)

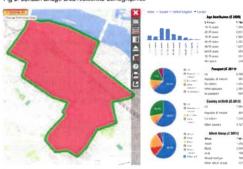
Fig 1: Current customer profile of Blame Gloria Covent Garden & Clapham from wi-h data

115	18-24	25-35	36-55		Total	
Male	9%	15%	5%	1%	29%	
Female	23%	36%	6%	1%	66%	
Other	2%	2%	1%	0%	5%	
	34%	52%	12%	256		

With such a specific customer profile in mind, targeted marketing tools such as paid social media campaigns (Instagram and Facebook), search engine optimisation (Google), Media and influencer PR and email newsletters will be activated to both recruit and engage throughout the customer life cycle. Regular email newsletters are sent to the customer to entice them to visit more often. Brand awareness and reputation will also be a way to capture market share as Blame Gloria has high levels of loyal fans from both our Covent Garden and Clapham Junction stores.

Coincidentally, the target customer for Blame Gioria overlaps with the local residential demographics around the London Bridge station area by 65% (not including commuters).

Fig 2: London Bridge ures residential demographics



Our memorable events such as themed bottomises brunches, quiznights, drag bingo and DI sets are created to stract a new experience seeking consumer which then drives pre-booked sales via our centralised sales team. In our other Blame Ghoria venues across London, prebooked sales account for 30% of total revenue and an average party size of 5.5 book with us regularly.

BLAME GLORIA

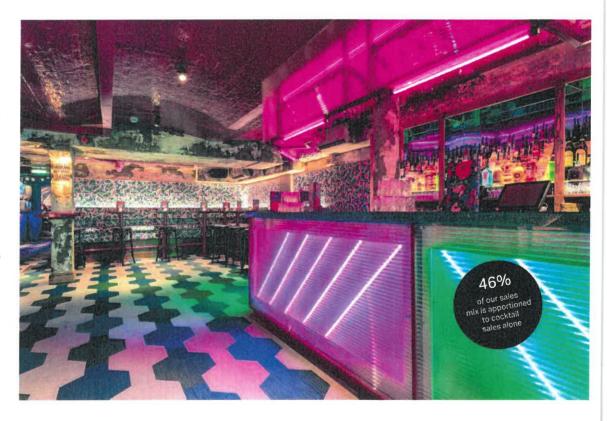
What sets us apart?

Blame Gloria is not just a cocktail bar, we're unlike any other cocktail bar in London. Gloria is fun, experiential, immersive, safe and highly instagrammable, making it the perfect location for the London Bridge audience and a destination venue which will both retain and attract an aspirational 25-35 year old market to the area.

We're also an events space which can adapt to both its audience and its location. In the past we've hosted everything from product launches to fashion shows to TV shoots and more recently, popular dating app 'Thursday' singles events (and everything else in between).

Our USP over our closest competition is our "outof-the-box" thinking to create a fresh and exciting ine-up of ticketed events such as themed bottomless brunches, drag queens, live music and DJ nights. These help us attract experience-seeking guests looking to punchase tickets and book areas via our central sales team.

Our famous Gloria groupie back-story and the spontaneous "rock & roll" atmosphere which our team create, helps us curate a unique experience unlike any other cocktail bar. Our infamous 2-for-1 happy hour (all cocktails included) rune daily from 5pm-7pm to create the ultimate post-work or precommute refuge.





LIFE'S A BEACH 9.95

CUT NOCKS

HOLIDAY VIRES | COCOMIT | FRIETY | EXOTIC

Havana Club Especial Rum, Mallbu Coconut Rum, margo,
passionfruit, lime, almond syrup

CLORIA LOVES

V.E.P. + 10.95

SUNG
SWEET | LONG | TROPICAL | LOW-CAL
Very Important Funch
Havana Club Especial Rum, orange, pineapple, bitters

RUM BONGO 10.75

wine

FRUITY - FROTIC - LONG , SWEET

Havaisa Club Especial Rum, passionic
mango, pinoapple, citrus juice

JOLLY ROGER - 11.5

CUT ROCKS
STRONG: SHORT: TWISTED
Old Fashioned meets Cubn Libre
Havana Club 7 Year Rum, cola, lime, bitters

ZOMBIE · 12.5

TIEI

TIEI TIEI CONG
Havana Club Especial Rum, Norum Cay Eclipse Rum, pineapple, (iki spices, Absinthe, fire):

FANCY A CLASSIC!

We've got all your old favourites!

Aperol Spritz, Espresso Martini, Mojito, Margarita, Amaretto Sour, Long Island Iced Tea, Old Fashioned, Negroni.

GIN COCKTAILS

LOVE POTION NO. 18 - 10.95

COUPE
GLITTER : FROITY : SWEET : BURBLES
Beefeater Strawberry Pink Gin, ctrus juice, pineapple,
strawberry Jam, Sparkling Wine

BLOOD ORANGE SLING : 10.75

CITRUS | APAREUNG | TART : LONG
Beefeater Blood Orange Gin, Cointreau Orange Liqueur,
blood orange syrup, grapefruit soda

ALGRIA LOVES

KARMA CHAMELEON - 11.25

WINE
FLORAL : FIZZY : INTERACTIVE
Colour changing
Beefeater Gin, lavender, citrus, Butterfly Pea Tea

LUNAR SPRINGS - 11.25

CITRUS : ROTANICAL | SPARKLING
Hendrick's Lunar Gin, Limoncello, white peach, citrus

LONDON LADY 11.95

HENDERSHING FLONG FLOW-CAL FEWERT
Hendrick's Girt, elderflower, fresk lenson juice, ginger ble

WHITE NEGRONI - 11.5

CUT BOOKS

STEON 6: 1 PWSTED 1 DAY
Less bitter, mare Summer
Choice of Besfeater Gin (Pacik & Rappbarry, Blood Orange, Pink or Dry).
Lillet Blact Vermouth, orange Rjouwr

Example Cocktail Menu

The core Blame Gloria drinks menu consissts of a mix of hand-crafted cocktails, a range of wines and premium Champagnes, non-alcoholic cocktails, spritis & mixers as well as soft chinks.

The menu is kept regularly kept exciting and fresh by adding seasonal specials to compliment the different tastes of each season.



Example Food Menu

Our food offer is available every day during trading hours and combines a range of sharers, grazers, wings and burgers to entice both the commuter or passer by into a bite to eat to complement the cocktail or event they're enjoying.









SHARING NACHOS 8.5
Tortilla chips, chopped tomato, jalapeno, cheese sauce, guacamole and sour cream
+ BBQ PULLED PORK ADD ON 4.5

JIMPS LOADED FRIES (VE) 8.5
Served with crispy bacon, sour cream, cheese sauce and jalapenos

HALLOUMI FRIES (V) 6.5 Served with molasses, yogurt, chilli and mint

MAC N CHEESE BITES (V) 6.75 Served with spiced cranberry dip

BUTTERMILK CHICKEN HOT WINGS 7
Served with sour cream

GLORIA'S HUMMUS PLATTER (VE) 6.5 ith olives, roasted chickpeas, sweet peppers, dukkha and

toasted flatbread + KOFTA ADD ON (VE) 2

MIAMI CLASSIC VEGAN BURGER (*GF) (VE) 12.5 Served with chipotle mayo, lettuce, tomato, gherkins, yegan cheddar cheese and fries

GRILLED CHICKEN BURGER (*GF) 12.5 Served with mayo, lettuce, tomato, cucumber, yogurt tzatziki and fries

*GF: GLUTEN FREE AVAILABLE ON REQUEST
If you have a food allergy or intolerance, please informs a member of staff prior to occur.



Business Model Innovation

We utilise the iOrder app which allows quests to order drinks seamlessly to their table during busier times of trade, in addition we do offer a waiter-based table service during off-peak hours for a more personal encounter.

Our till systems are fully integrated with Aztec & Ezora, as well as Fourth which are all digital service providers, enabling us to deploy labour & resource effectively as well as having an industry-leading reporting functionality which facilitates efficient analysis and development. As an example, we have excellent reporting on our guest behaviours throughout different times during the day which in turn has helped shape future decisions around ensuring we have the right teams in place, tailoring menus and fine tuning our guest offerings.

We utilise Wireless Social across all of our bars in the UK. This helps us to glean important data on our guest demographic which we'll reference in more detail in the marketing section.

Blame Gloria is a brand that is communicated and based around:

- Decor and feel
- Product and service
- Music

Our music is a key part of the product we offer to ensure we provide our guests with memorable experiences. We operate a 'Freedom in Framework' policy whereby our teams & guests can choose from large, carefully curated playlists that in turn offers an atmosphere unlike any other.















Our Customer Service Commitment

Our front of house team undergo a fantastic and rigorous training programme with a strong emphasis on personal development that we believe is industry leading within our sector. This enables us to focus on delivering wonderful products and world-class service.

At The Adventure Bar Group, we encourage and facilitate our teams to offer what we call "WOW's". These are the moments where a guest receives service that goes above and beyond to exceed expectations, including (but not limited to) birthday decorations for that special occasion or organising wedding proposals (to name a few).

Our commitment to service is exemplified by the fact that we offer significant additional financial bonuses to our management & executive teams for the stores that achieve the highest standard of excellence in guest service.

We measure the quality of our service, product and atmosphere with a meticulous "visit schedule" whereby every member of the executive beam is expected to visit all stores every week in order to provide feedback and offer coaching. Secondarily, we monitor all of our digital feedback across all of our social media channels, our booking platforms, search engines and direct communications via our CRM system Atreemo. Atreemo consolidates all feedback, advocacy and sentiment to helps us monitor and continually improve our NPS.

Point Of Difference & Pricing Policy

We currently use a pay at table app across all of our sites within The Adventure Bar Group. Given we are a bar operation, it is likely that there will be no click and collect option. We do however operate an online booking system allowing guests to pre-book a table along with pre-booked package options which ensures they are served on arrival without delay. In our London Blame Gloria venues, pre-pooked sales account for 30% of total revenue, with an average party size of 5.5 guests.

Our pricing policy will reflect our London pricing (example menus provided on previous pages), however we regularly carry out competitor surveys to ensure we are not over or under priced.

Being accessible for all guests is important to our business and we regularly review this to sense check what local businesses as well as our nearest competitors are offering.

It is important for both parties to maximise revenue without alienating our potential guests, however we are aware that travel locations can attract a premium pricing policy to maximise revenue whilst maintaining a fantastic guest experience.





Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 4



Dispersal & Egress Policy – Blame Gloria Canary Wharf

Safe and orderly and dispersal of all guests is of the utmost importance

Key Targets for This Policy

The below policy aims to, take all reasonable steps to achieve the following targets

- Guests leave quietly and safely and cause minimum nuisance, disturbance or impact to the surrounding area
- o Residents (located primarily, but not limited to, across the water close to and within the Marriott Hotel and Residential Suites) are not disturbed by noise from our venue or from our guests, or our guests actions
- o Prevention & removal of negative impacting factors on the surrounding area including (but not limited to) urination, littering and damage
- Prevention of crime being caused or committed by our guests or indeed where our quests are the victim(s)
- Assist anyone who is vulnerable in our vicinity, even those who may not be guests
- To be a positive influence on our community & work in conjunction with our neighbours, relevant bodies (inclusive of local security) and fellow operators nearby
- Adherence to the licensing objectives;
 - 1. Prevention of crime and disorder
 - 2. Public safety
 - 3. Prevention of public nuisance
 - 4. Protection of children from harm

Winding Down

On peak days (Thursday to Saturday) or ANY days which we have more than 30 guests present towards closing time, gradual dispersal will be encouraged in the following ways.

- 1. Calling last orders such that there is adequate "drinking-up time".
- 2. Staff encouraging customers to finish their drinks and prepare to leave in plenty of time.
- 3. Adequate signage around respectful exit and transport information.
- 4. We will play music (see below) for an appropriate amount of time (either 'drinking up time or the time allowed on our license, whichever is sooner) after last orders are placed, while guests remain.

















5. 'Dynamic Closing' - i) Use of lighting as the last orders are taken or even before and ii) Utilise our slower music playlists and reducing volume from the time of last orders or even before

Dispersal

Guests will be directed by staff and signage as they exit the premises. Sufficient staff (and door staff where appropriate) will be present at the front entrance to the venue and beyond.

At that point staff (and door staff where appropriate) will encourage customers to disperse primarily to the **left** as they leave. We aim to persuade this via signage, human requests and use of barriers to get guests to turn left along the building, left again onto Frobisher's Passage and finally onto North Colonade.



Staff and Door Supervisors roles (regarding dispersal and closing) will include the following:-

- 1. Door staff, where employed, will be briefed at the beginning of each shift as to the dispersal of customers
- 2. To encourage customers to leave the premises in a quiet and orderly manner.
- 3. Not to allow any drinks to be taken outside the building.
- 4. If customers are found to be loitering near the building, then they will be politely asked to move on as quickly and quietly as possible.















- 5. To do everything in our power to promote the objectives & targets laid out above
- 6. To pay particular attention to guests close to the barriers and body of water. We must intervene with urgency in that instance.

Manager's role:-

It is ultimately the responsibility of the General Manager or Senior Manager on duty to ensure that: -

- 1. Door supervisors and other managers and staff act effectively and responsibly to comply with this policy and are aware of the importance of customers leaving as safely and quietly as possible.
- 2. Ensure that all managers and SIA registered door staff will be in communication through radio contact across all areas of the venue and outside the demise.
- 3. Customers do not cause disturbance or nuisance to any local residents within the vicinity of the premises.
- 4. To prioritise and assist wherever possible in ensuring that customers leave as safely, quietly and in as orderly manner as possible.
- 5. All staff who sell alcohol will receive training in relation to 'Challenge 25'
- Conduct a visual check of the surrounding area subsequent to guests vacating the area to minimise impact on the our neighbouring properties, businesses and public highways caused our guests.
- 7. Conduct cleaning / take action where needed based on point 6

CCTV

CCTV showing the area outside of the entrance (part of the same system and therefor part of the same rules as the internal CCTV system) shall be in place

Vulnerability

We support the Ask For Angela campaign and its objectives (see below)

We are proud to be responsible operators in the area and as such our assistance is not limited to guests alone. We should offer support, advice or assistance to other passers by where we can.

Potential Signs of Vulnerability:-

- Persons who's intoxication or physical state means they may not be able to be able to look after themselves and make their way safely home
- A guest / potential guest who has been asked to leave or refused entry. Our responsibility doe not stop there. Are we confident that person will get home safely?

















- Those leaving alone or looking lost or unsure of where to go
- People in an highly emotional state
- Persons leaving with a person or group of persons who you suspect are not their friends or trustworthy – For example, a lone guest leaving with a group who have not been guests in the venue may be a cause for suspicion.
- Persons being cajoled, persuaded or physically assisted / corralled away from the venue.
 - Persons asking for assistance or lingering near security operatives / staff and not wanting to leave
- Any body language, behaviour or reports of; violence, sexual misbehaviour or potential domestic abuse, children being in danger or anything else of concern
- Vulnerability is not limited to specific gender or age and not only occurs at the end of the night

If we spot a vulnerable person(s):-

- If a crime is being committed or likely to, please call 999 and a manager should be called to support this process
- For any other issues a manager should be called to assist if not present already
 If there is simply a suspicion of vulnerability often the way to ascertain whether that is
 the case is to simply ask those involved if they re OK or need any assistance
- Remember that in examples of sexual criminal behaviour, the potential victim may
 not feel able to say they need assistance (and may not be aware of the Ask For
 Angela campaign). In such instances we <u>must</u> endeavour to intervene or at the very
 least keep said persons in site while we call 999 for assistance
- In all cases If you are in any doubt it is always preferable to Investigate, report and take action

How can we help:-

- Providing transport advice and information on the local area
- Intervention to prevent crimes or escalation of issues
- Providing safe-haven at our entrance or inside where applicable & possible
- Contacting loved ones, the police or other persons in order to make sure guests get home safely or to assist in other ways
- Managers are permitted to pay for transport or assist in other ways to help those most in need get home
- Reporting (either to police where applicable or internally) issues we have witnessed, details of persons involved, timings of issues etc primarily via our 'Security Action Sheet'
- Full co-operation with the police or other bodies to assist them at the time or in times subsequent to an issue around vulnerability

















Whilst the topic of vulnerability and sexual criminal behaviour is a challenging one, Adventure Bar Group and other operators in our sector are proud to take steps and actions to support vulnerable people in our area.

Remember: Our actions, intervention, integrity and processes could help prevent serious crimes and assist people at their time of need.















Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 5



Entrance Policy – Blame Gloria Canary Wharf

Key Targets for This Policy

The below policy aims to achieve the following targets:

- o A prompt & safe entrance process
- For only suitable guests to be able to gain entrance and not those who may be intoxicated for unsuitable for other reasons
- o To minimise the venue's impact on the surrounding area
- To create a safe environment inside of our venue for our guests, team and contractors
- Promotion of the licensing objectives;
 - 1. Prevention of crime and disorder
 - 2. Public safety
 - 3. Prevention of public nuisance
 - 4. Protection of children from harm

Queue & Selection

- No guests will be permitted entry after 1:00am including guests who have been present earlier, save for smokers who have been to our smoking area.
- Should we have multiple people entering, we should endeavour to ask guests to gueue in an orderly fashion, along the wall leading to Frobisher Passage
- Persons queuing should not stand in front of fire exits, block passers-by or cause a disturbance of any sort
- Guests entering or trying to enter must be reminded to be quiet so as not to cause nuisance
- Security Operatives and Management should, at peak times assess each guest entering to establish suitability.
- Only suitable guests should be granted entrance to the venue
- Persons who are to be refused should be refused politely and professionally
- One a person is refused, we should ask them to stand clear of the entrance so we can continue with our duties
- As well as a visual assessment of suitability, consider engaging with potential guests verbally to help make a judgement
- Potential guests who should be refused entry include those who are; visibly
 intoxicated, under the influence of drugs, exhibiting poor or aggressive behaviour,
 underage (or those unable to prove they are not underage, see below), being
 threatening and dressed unsuitably or unsafely

















Should a person or persons be refused for being heavily intoxicated or for any other
reason that could cause them to be classed as vulnerable, please consider whether
we can offer them assistance in some way. As responsible hospitality operators we
consider our duty of care to extend (where possible) to those who have been refused
entry and indeed to other members of the public in the surrounding area

Age Verification

- We operate with a Challenge 25 policy (see poster below) whereby guests that we believe look younger than 25 years old must have their age verified via a check of valid photographic identification
- The forms of ID we accept are European & UK Driving licenses, Passports and a Citizen Cards with the PASS holographic logo present and only guests that we are certain to be 18 years or over should be granted entrance
- We do not currently accept digital versions of ID, photographs of ID or photocopies of ID
- Special care and attention should be given when checking ID to; i) The Date of Birth
 indicates the holder is 18 years old or over ii) Verifying the photo is a good likeness
 of the person presenting it iii) Ensure that the that ID is genuine
- We do not accept ID that has expired, as we require a more recent photo than would be present in that instance
- We prioritise guests who are 21 and over but are legally permitted to let those in who
 are 18 and over. Should we have numerous persons who are between 18-20 years
 old, the senior manager on duty must grant permission for those to enter
- Should we be unsure about a guests' suitability to enter (for any reason), entrance shall be refused
- We prioritise guests who have reservations but retain our right to refuse entry at all times

Searching

- For peak periods, and for all times we have a security operative present at our entrance, we search guests on a random <u>and</u> risk assessment basis;
 - 1. Random We will endeavour to search guests at random.
 - 2. Risk Assessed Should there be any cause for suspicion about a potential guest or their belongings, a search shall be conducted
- Our searches should be conducted within view of a CCTV camera
- Guests who refuse to be searched should be refused entry
- It is not permitted that guests bring alcohol onto the premises
- We operate a 'zero tolerance' on drugs
- Should the search of a guest result in an illegal substance (or suspected illegal substance) that item should be seized and a record kept. Said substance should be disposed of in accordance with local policing instructions

















Smoking and Re-Entry

- Guest who wish to smoke (cigarettes or E-Cigarettes) should be allowed to do so to the right of our front door
- We will limit the amount of people smoking to 20 persons as a maximum
- Guests smoking must not cause nuisance or issues to the local area, residents or passers by and it is our responsibility to ensure that
- Guests wishing to smoke may not take drinks outside after 10pm
- Guests leaving the venue altogether will not be permitted to take drinks with them at any time
- Guests leaving the venue to go elsewhere may be allowed re-entry but will be subject to fresh assessment and entrance processes such as ID checks, not being intoxicated, searches etc
- Guests re-entering should be subject to increased scrutiny as it may be that they
 have visited another licensed premises and consumed alcohol.
- Police advice and intelligence states that guests entering having left recently should also be subject to increased scrutiny as it may the case that they have left in order to procure illegal substances from a person nearby. That increased scrutiny should be a thorough visual assessment of the guest and potentially a search also

Due Diligence

- Records of many instances should be kept on our 'Security Action Sheet' as part the your security file
- For examples of what is needed to be recorded, refer to the Key at the bottom of said sheet
- Any instances including (but limited to); those requiring physical intervention, sexual
 misbehaviour or harassment, crimes occurring, altercations, visits from police or
 licensing personnel may require an additional report, as such management should be
 made aware of all occurrences immediately



































Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 6

THE

ADVENTURE BAR

GROUP

Incident Reporting - A How to Guide

What is an Incident Report (IR)?

- A process of recording information after an important occurrence or near miss
- The company's method for keeping records long term and time stamped (ABG will have a record as to when the report was completed and by whom)
- The start of a process of follow up or investigation in order to resolve issues and prevent future instances
- The company's first point of diligence to refer to in terms of litigation, police / licensing, non-compliance allegations, prosecution or other issues. As such the potential ramifications of incomplete or incorrect reporting can be huge. Follow the below and please always feel free to seek advice from your line manager should you need it.
- A way for venue staff and management to re-iterate and record the excellent work they do (and the processes ABG / the venue have implemented) in regards to safety etc.
- NB On our reporting portal (RiskProof) an IR is referred to as a Helpline Case

Before you start

- Clear your head and take a moment! If you have been witness to something that requires a report, it may have been stressful to see or be involved with
- Review CCTV / speak to colleagues Prior to writing it, it may be worth doing this to reconfirm what has occurred. It is especially worthwhile in order to get timings and camera numbers noted down
- Complete handwritten notes of what you wish to cover, plus timings and names as above.

When to complete an IR

- Official Officer Visit (Police / Ambulance / Licensing / Council / Fire Brigade / Environmental Health Officer) inc. CCTV Collection. Even if the visit is completely positive and lasts 2 minutes, please report.
- Health & Safety Accident / Incident including Customers / Staff / Contractor. This includes guest Illness.
- Physical altercation (injury or no injury) involving Guests / Staff / Contractor
- Sexual misbehaviour such as unwanted touching, sexual assault and consensual sexual relations on our premises

- Any occasion when Authorities (Police / Ambulance / Licensing / Council / Fire Brigade / Environmental Health Office) are contacted or conduct a visit
- Any incident / accident where Emergency Services have been involved
- CCTV failures, or any other equipment or people issues that affect our ability to comply with our license or other legislation
- Serious pest issues
- Any premises / building related issues included collapse / flood & loss of utilities / issues that require closure or suspension of trade
- Any drugs found in venue / on person
- Forceful ejections or restraint
- When we have a near miss

How to complete

https://client.compliancecentre.co.uk/#/account/login

Complete all drop-down menus and tick boxes as per photographs below.

Key areas we need to take to ensure we adhere to in the main body (the 'describe what happened' section):

- Write your report chronologically from when YOU were involved, if you need to go back to what occurred prior to your arrival / involvement you can do so at the end of the report
- Include the times, locations, persons involved, injuries (if any), staff assisting, actions we took to prevent
- Include witness details
- Any emergency services are involved, record badge numbers or call numbers
- Make note of the positive actions we have completed relating to the incident, including ongoing, prior and post the occurrence itself
- Be honest as to what has happened, but without exaggeration or conjecture
- If there has been an accident, you will need to outline potential causes and also eliminate common causes. For example for a Slip Trip and Fall (if it is the case) make a note of something like "Arriving at the scene approximately 15 seconds after the fall, I could see that the area was well lit. there were not any wet floors or any other possible issues such as trip hazards that may have caused the fall"

If there has been a victim, ensure that you follow up either the next day or a couple of days after to see how they are, also documenting this by adding to your report / case. Please note that this is not a company apology (as this has legal implications) but rather you checking in and getting an update on the condition or aftermath of the persons involved. This should only be conducted by the General Manager / Area Manager

IMPORTANT #1: IF THERE IS ANY ASSAULT ON PERSON, WE MUST ENDEAVOUR TO KEEP BOTH THE VICTIM & AGRESSOR IN SEPARATE LOCATIONS IN THE VENUE & THE POLICE

<u>CALLED.</u> If there are issues keeping either party present, communicate that to the police and seek their advice.

IMPORTANT #2: In the case of accidents or where there are injuries, falls etc we MUST record the fact that we have offered an ambulance or medical attention. We should also take photos of the location and (if possible) the injury.

Important to Remember

- The senior manager directly involved in the incident / accident must complete the report, and this MUST be completed on the night and not at a future date.
- You should contact your area manager by phone if the incident is serous.
- Increasingly, police officers and others may ask to see incident reports as part of their investigation. We are happy to assist in this regard.

Helpful Hints

- Unsure as to whether to complete? It is always best to complete an IR. Err on the side of caution and there is no harm in completing one.
- What you do during and immediately *after* an incident has an impact on the writing of an Incident Report. As such, use this training document to help you in how you deal with them as well as write the reports.
- Write the body of the report with words and sentences you would be happy to read in court or to your Operations Director – Professional, thorough and well-written
- Take care when using the words 'he' 'they' etc, in longer reports in can be confusing as to who you are referring to. Use their name / term instead, even if that sounds repetitive
- On the same note, making a 'term' for each person involved is helpful to define who you are referring to; See M1 in the attached example.
- Outline those terms at the start of your report, see attached for example
- Make it clear what YOU have seen, or what is being reported to you or on CCTV. If
 you write something and don't make it clear, it will appear that you have seen it,
 when in fact you may have inferred or been told from a colleague / witness. This can
 be crucial in subsequent legal matters such as court cases or civil litigation
- Re-read your report before submitting
- It is a useful process to check your Shield weekly (as a minimum) and check any actions your venue has
- Make a note of....everything! The more you can write down or note down on your phone from the start of an occurrence the more it will save time and assist later.

Example Report (taken from an imaginary venue)

M1 = The victim, would not give his name, short brown hair, approx. 5ft11", medium beard, IC1, male, bright white t-shirts nut with black sleeves, dark bottoms.

M2 = M1's close friend, name Joel Baxter, 10.06.1992, IC1, male, dark clothing including a dark blazer, vellow trainers with a distinctive stripe across them.

F1 = Unknown female, IC5, long red dress, long dark hair, tattoos on her right shoulder quite large.

At 21:06 I was asked to attend table 34 next to the smoking section.

On arrival I found M1 and M2 trying to stop F1 go towards them, F1 was throwing her arms at M1 in a physical confrontation, I would describe it as F1 slapping and scratching towards M1.

M2 was a peacekeeper and was trying to usher her away.

M1 was defending himself and not striking her in any way.

Jack (Jack Phillips DM at Venue X) helped calm F1 and split up M2 and F1, whilst ushering F1 towards the kitchen corridor at 21:07.

I told him to try and keep her there, and a female security joined him to assist (Bella Boltoi SIA 35667649).

Meanwhile myself and security team-member Mo (Mohamad Malki SIA 983390837) spoke to M1.

I would describe the altercation between the three of them as relatively light, with no blows thrown and F1's attempted slaps / scratches fortunately not landed.

M1 described that "She had just started going crazy and swearing".

M1 was not injured in any way (confirmed by asking him AND looking at him).

M1 did not want the police involved (confirmed in front of Mo).

I intended to remove F1 from the premises (due to having tried to be violent), and to politely ask M1 to leave with M2.

However, Jack spoke to F2 who said that M1 had "Grabbed my bum and when I turned to remonstrate we both raised our hands".

Some witnesses nearby (speaking to Mo) agreed they thought M1 had done something a little bit wrong.

This seemed logical to me and we reviewed CCTV quickly as everybody waited.

CCTV showed that in fact M1 had slapped F1's bottom, close to the top part near her lower back.

CCTV confirmed that the small altercation that followed did not involve any blows.

I was now considering M1 as a potential offender rather than victim, based on what we understood happened.

F1 confirmed to Jack that she didn't want the police involved, and in fact said she refused to deal with police, I witnessed that repeatedly.

I asked M1 for his ID and made a record of it for Shield, just in case anything should ever come from the situation.

As the nature of the misbehaviour towards F1 was not (given her interpretation and what she had described) a sexual assault in my interpretation, however we would not be happy with M1 remaining as a guest.

We asked M1 to leave and F1 was leaving anyway.

F1 thanked us as she left.

M1 and M2 were together and left peacefully.

CCTV shows that Mo arrived at the altercation 7 seconds after it happened, which is very speedy, as he was on a roaming patrol through the busy areas.

We had 4 members of security working at the time it happened, and CCTV coverage is good and the area well lit.

I deleted M1's details once uploaded to Shield.

End

Incident Reporting- A How to Guide, July 2021 K Manning, V1.2

Signing below indicates you have been trained on, agree to comply with and are in full understanding of the points and sentiments on pages 1-4 of this document. If you require further training or assistance please ask your senior management <u>before</u> you sign.

Trainer		
Name	Sign	Date
Trainee		
Name	Sign	Date

Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 7







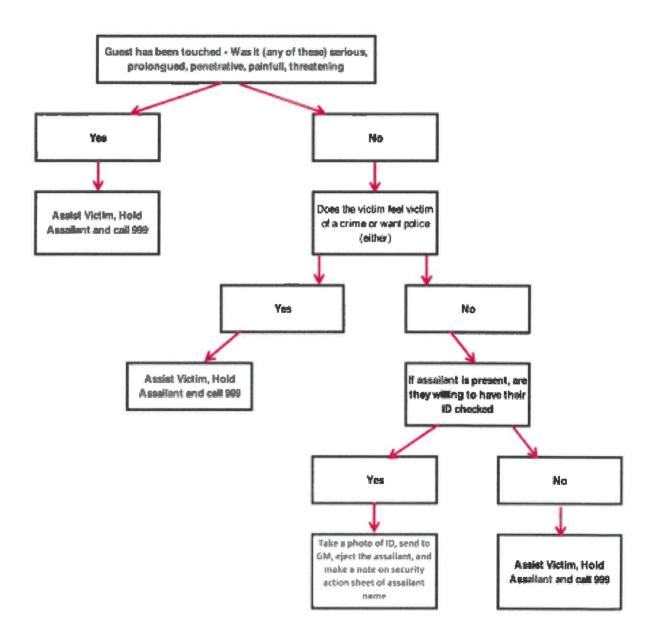








Unwanted Attention & Sexual Touching



The above timeline is based on current advice across the majority of the police licensing units we deal with. Should that advice change, please communicate with your OM as it may indicate a necessity for a change in policy required centrally.















Ask For Angela

If a person 'Asks For Angela' for example "Hi, is Angela here tonight?" then they may need assistance. Our first priority is to get the victim to a place of safety and provide the support they require, from there we can consider our plan around VOWS (where applicable).



We support the Ask For Angela campaign and its objectives (see poster below)

We are proud to be responsible operators in the areas in which we trade and as such our assistance is not limited to guests alone. We should offer support, advice or assistance to other passers by where we can.

Potential Signs of Vulnerability:-

- Persons who's intoxication or physical state means they may not be able to be able to look after themselves and make their way safely home
- A guest / potential guest who has been asked to leave or refused entry. Our responsibility doe not stop there. Are we confident that person will get home safely?
- Those leaving alone or looking lost or unsure of where to go
- People in an highly emotional state
- Persons leaving with a person or group of persons who you suspect are not their friends or trustworthy – For example, a lone guest leaving with a group who have not been guests in the venue may be a cause for suspicion.





Trainer Name.....











example, if a Victim is stable and not in danger, you could ask a colleague to stay with them while you attempt to find evidence, look for an offender or ask around for witnesses.

3. **Due Diligence** – Reporting situations properly on Shield and taking full details from as many people involved is crucial. Make sure you to both.

Signing below indicates you have been trained on, agree to comply with and are in full understanding of the points, sentiments and imagery in pages 1-5 of this document. If you require further training or assistance please ask your senior management <u>before</u> you sign.			
Trainees			
Name	Sign	Date	















- Persons being cajoled, persuaded or physically assisted / corralled away from the venue
 - Persons asking for assistance or lingering near security operatives / staff and not wanting to leave
- Any body language, behaviour or reports of; violence, sexual misbehaviour or potential domestic abuse, children being in danger or anything else of concern
- Vulnerability is not limited to specific gender or age and not only occurs at the end of the night

If we spot a vulnerable person(s):-

- If a crime is being committed or likely to, please call 999 and a manager should be called to support this process
- For any other issues a manager should be called to assist if not present already If there is simply a suspicion of vulnerability often the way to ascertain whether that is the case is to simply ask those involved if they re OK or need any assistance
- Remember that in examples of sexual criminal behaviour, the potential victim may
 not feel able to say they need assistance (and may not be aware of the Ask For
 Angela campaign). In such instances we <u>must</u> endeavour to intervene or at the very
 least keep said persons in site while we call 999 for assistance
- In all cases If you are in any doubt it is always preferable to Investigate, report and take action

How can we help:-

- Providing transport advice and information on the local area
- Intervention to prevent crimes or escalation of issues
- Providing safe-haven at our entrance or inside where applicable & possible
- Contacting loved ones, the police or other persons in order to make sure guests get home safely or to assist in other ways
- Managers are permitted to pay for transport or assist in other ways to help those most in need get home
- Reporting (either to police where applicable or internally) issues we have witnessed, details of persons involved, timings of issues etc primarily via our 'Security Action Sheet'
- Full co-operation with the police or other bodies to assist them at the time or in times subsequent to an issue around vulnerability

Whilst the topic of vulnerability and sexual criminal behaviour is a challenging one, Adventure Bar Group and other operators in our sector are proud to take steps and actions to support vulnerable people in our area.

Remember: Our actions, intervention, integrity and processes could help prevent serious crimes and assist people at their time of need.















'Spiking' and Drink Tampering

The illegal process of adding drugs, substances or alcohol to a person's drink, often for the purposes of facilitating further crimes such as sexual assault or theft.



If we have a report or suspicion of drink tampering, we must take several steps;

- 1. Our first duty is to the victim. Only when he / she is safe, and their wellbeing is guaranteed can we move on to dealing with the tampering issues from a Police / Offender perspective. Obviously if the victim requires it, call 999 for paramedic assistance immediately.
- 2. Ascertain if there is evidence of tampering.
- 3. Such evidence could be; the tampering being witnessed, the symptoms of the victim being different to those of people who simply intoxicated, .
- 4. If that evidence exists, call the police 101 and seek advice or call 999 if the situation is ongoing and immediate assistance would help.
- 5. Should there be a suspicion that the person who tampered with a drink is *present*, call 999 and try to keep that person in the venue if that can be done safely and legally.
- 6. If the victim wishes for us to call the police, please do so immediately, regardless of the presence of evidence or not.
- 7. If we do NOT have any evidence that drink tampering has taken place AND the victim does not want the police informed then we should i) Take the victims details, ii) Make sure we are confident the victim is safe and will get home and iii) Report the incident on Shield.

Three Key Points

- For various reasons there has reportedly been a large rise in the number of false allegations
 in this regard. However, our role is to be professional and sensitive to potential victims, not
 to judge or prejudice them in any way. As such we look at the evidence and situation
 objectively on each occasion to establish our plan of action, but do not cast aspersions on
 the honesty or judgement of potential victims. The experts such as police and paramedics
 should be the ones to make the decision
- 2. **Get Help** When considering VOWS and creating your plan as how to deal with a situation, remember 'You're not alone'. Utilise your colleagues and people nearby in order to help. For

Adventure Bar, Unit 6 Frobisher Passage, London E14 5HA.

DOCUMENT 8



Observation Report:

Blame Gloria 20 Bedford Street London WC2E 9HP

Observations carried out on Friday 8th July 2022

Prepared by Frank Fender, Licensing Consultant at FJF Licensing Solutions, on behalf of Poppleston Allen Solicitors



1.0 Qualifications and Experience

- 1.1 My name is Frank Fender and I am the owner of FJF Licensing Solutions. I am a sole trader and I operate as a Licensing Consultant. I specialise in the Licensing Act 2003 and have made many licensing applications for clients based all over the country.
- 1.2 I also deliver nationally accredited licensing training to individuals who are new to the licensed trade, and to local authority personnel and police officers. I also provide other training to operators of licensed premises, tailoring the training to the specific needs of venues.
- 1.3 I have over 20 (twenty) years' experience working in the licensed sector. I was a Police Licensing Sergeant from 2002 when licensing was regulated under the Licensing Act 1964, and I was in that post when the Licensing Act 2003 was introduced.
- 1.4 On retiring from the Police Force in 2008, I carried out licensing work with a Local Authority, delivering licensing excellence across the Borough of Bedford.
- 1.5 I began work as a private licensing consultant in May 2011 and have represented clients across the country since that date.
- 1.6 As well as making numerous applications for new premises licences, variation of existing premises licences and other similar applications, I have represented clients at hearings for those applications, and also for hearings where review applications have been lodged against licensed premises.
- 1.7 I have carried out many audit inspections of licensed premises, examining policies and procedures designed to ensure staff and customer safety when working in the night time economy.



- 1.8 I have also carried out covert work at and around licensed premises, assessing whether the licensing objectives are being promoted or undermined. I have given evidence in the Magistrates Court regarding such visits.
- 1.9 As a private consultant, I delivered the first year of the Best Bar None scheme in Bedford, on behalf of Bedford Borough Council. This scheme assessed various licensed premises in Bedford Town Centre, examining policies and procedures which were in place at those premises, which ensured staff and customer safety when working in the night time economy.

2.0 Introduction

- 2.1 FJF Licensing Solutions were instructed by Poppleston Allen Solicitors to undertake a covert observational visit to Blame Gloria a cocktail bar located at 20 Bedford Street, London WC2E 9HP (hereafter referred to as 'The Premises).
- 2.2 The visit took place on Friday 8th July 2022.
- 2.3 The purpose of the visit was to observe the practices and procedures undertaken by staff at the premises, when customers arrive at the premises and whilst customers use the premises.

3.0 Blame Gloria cocktail bar

- 3.0 The premises are located in the basement of a premises in Bedford Street, London. The location is within a cumulative impact zone as specified in Westminster Council's Statement of Licensing Policy.
- 3.1 A set of double doors at the entrance to the premises from Bedford Street, lead down a stairway into the bar and seating area of the premises.



3.2 Just inside the double doors, to the left-hand side of the premises as entry is made, is a small office, accessed by a single door.

4.0 Observation Report – from 17.00hrs to 20.30hrs

- 4.1 I arrived in Bedford Street at 16.55hrs and stood on the footpath on the opposite side of the road from the premises. From this position, I had a clear and unobstructed view of the front door of the premises.
- 4.2 At this time, the double doors of the premises were both open, and the stairway was clear to see. Standing at the entrance was a female whom I presumed was a member of staff.
- 4.3 Directly opposite the premises is an Italian bar and restaurant called Pasta Brown which has some external seating for customers. At 17.10hrs, I occupied one of the seats outside Pasta Brown, from where my view towards the premises remained clear and unobstructed.
- 4.4 Between 17.10hrs and 17.30hrs, I observed 4 customers enter the premises. All were spoken to at the entrance by the female who was standing at the entrance. The female guided the customers to the stairs leading down to the bar area.
- 4.5 All four customers appeared to be over the age of 25. I did not observe them showing any form of ID I would not have expected them to be asked if the premises were operating a Challenge 25 age verification policy.
- 4.6 At 17.30hrs, an SIA door supervisor came up the stairs from the bar area and took up a position at the door. I saw that he was holding some papers, which he placed on a shelf just inside the double doors of the premises.



- 4.7 On his arrival, the other female who had been standing outside, went inside.
- 4.8 Between 17.30hrs and 17.50hrs, a few more people entered the premises. All were met with a friendly smile by the door supervisor. On two occasions, I saw young looking females go to their bags and produce what appeared to be passports both were handed to the door supervisor who examined them, returned the documents to them and allowed them to enter the premises.
- 4.9 In my opinion, both of those female customers looked under the age of 25 and it was clear that ID was requested. I believe this is in accordance with the age verification policy at the premises.
- 4.10 I entered the premises at 17.55hrs. The female who had earlier been at the entrance was standing at the entrance, with the door supervisor. Both made me feel welcomed by greeting me with a smile and friendly demeanour and conversation.
- 4.11 I walked down the stairs and as I entered the bar area, I noted a small guest reception desk immediately in front of me. The bar serving counter was on the left-hand side of the room. Further away from the bar area were customer seating areas, which stretched from the bar servery along a tunnel-like room, with tables and 'boothed' seating further along.
- 4.12 After purchasing a drink, I made my way along the 'tunnel like' room and sat at a table from where I had a good view of the entrance into the bar area at the bottom of the stairs.
- 4.13 I counted 21 customers in the premises at this time. All were seated. Incidental music provided a vibrant ambience, and staff were all friendly and welcoming.
- 4.14 After about 10 minutes, I moved my position back towards the bar servery and sat in the customer area from where I had a clear view of the bar servery, the guest reception desk, and the entrance into the bar area from the bottom of the stairs.



- 4.15 Some customers left the premises whilst I was sat in this position, and staff made a point of saying goodbye. Other customers arrived at the premises, including a group of 4 females. These girls were greeted by a staff member at the reception desk.
- 4.16 I left the premises at 18.50hrs, and staff thanked me and said goodbye. This included the door supervisor at the top of the stairs and the female member of staff who was again at the entrance from Bedford Street.
- 4.17 I then continued to observe the entrance to the premises from across the road. 'People traffic' in Bedford Street was getting slightly busier and a few more customers went into the premises.
- 4.18 At 19.15hrs, another door supervisor came and stood at the entrance with the existing door supervisor. The female member of staff then went into the premises.
- 4.19 All subsequent customers of the premises appeared to be greeted in the same friendly way, and the younger looking customers were asked for ID. ID was produced – I noted that some customers already had their ID ready for examination as they clearly expected to be asked for it.
- 4.20 Customers were varied in age and were approximately 60% female, 40% male
- 4.21 I left the area of Bedford Street at 20.15hrs. Although there was not a massive surge in the numbers of customers entering the premises, those who had entered were all greeted in a friendly manner, ID was requested where appropriate (and, I suspect, in accordance with the premises age verification policy).

5.0 Summary of Observation

5.1 The premises clearly has a friendly atmosphere with friendly and engaging staff.



- 5.2 It was pleasing to see that the staff controlling entry to the premises carry out this function at street level, rather than at the entrance into the bar area at the bottom of the stairs. Should entry be refused for any reason, it would be easier to handle this at street level rather than in a more enclosed confined space (no incidents of this nature were witnessed).
- 5.3 The age verification policy is clearly being enforced, and ID requested when appropriate. It was pleasing to see the Door Supervisor take time to examine the documents produced as opposed to a cursory glance. This was evident from the time taken to look at each document.
- 5.4 The premises clearly appeals to people of all ages. Whilst not particularly busy during the period of observation, I got the sense that customers enjoyed the friendly relaxed manner of all staff members and felt comfortable and safe.
- 5.5 I saw nothing during this observational visit that would give me any cause for concern about the way in which the premises are operated.

6.0 My thoughts / professional opinion of ID Scan equipment at licensed premises

- 6.1 I have been asked to express my professional opinion on the use of identification (ID) scanning equipment at licensed premises and in what circumstances would ID scanning equipment usually be required.
- 6.2 Where a licensed premises uses ID scanning equipment, it is my experience that the premises have probably been subject to enforcement action from the Authorities due to increasing numbers of incidents (usually associated with crime, disorder and anti-social behaviour) occurring at their premises.
- 6.3 During my 20 years of working with The Licensing Act 2003, on both the Authority side of the business and as a private consultant, I can only recount one application where ID scanning equipment was requested by Police at the time of an initial application for a new premises licence.



- 6.4 There was a good reason for this the applicant had previously been the subject of a premises licence review application in a different Authority area, where allegations of crimes amongst different 'gang members' were made. On this occasion, the applicant accepted a condition (proposed by Police) regarding the installation of ID scanning equipment.
- 6.5 It is extremely rare that such a condition is requested at the initial application stage, and in this particular case, there was much supporting evidence to justify the request.
- 6.6 It is more common for this type of condition to be asked for once a premises has been operating under a premises licence, and then issues have arisen at the premises which may justify such a condition being appended to the premises licence.
- 6.5 ID scan is also sometimes requested by Police in respect of a licensed premises where issues in respect of underage sales of alcohol are occurring.
- The Police, in addressing these types of issues at premises (crime, disorder, underage sales etc) where a premises licence exists, will sometimes suggest the use of ID scan to an operator, and an operator will agree to do so on a voluntary basis, usually to avoid any further action being taken in respect of the premises licence.
- 6.7 There are occasions where a condition is imposed on a premises licence following an application to review the premises licence that condition being that ID scan must be installed and used at the premises. Again, this would be because of existing crime and disorder problems at the premises resulting in the review application being made in the first place.
- 6.8 I am not convinced that ID scanning equipment solves issues of crime and disorder or prevents underage sales taking place.
- 6.9 The Police often argue that crime is reduced because customers know that their personal details have been scanned and this therefore makes them behave better.



- 6.10 The police will also argue that ID scan detects fake or fraudulent ID, and also instantly shows that the producer of the ID is over the age of 18. I disagree with this thought fake ID can bypass ID scanning equipment, as it cannot detect some of the features which would indicate the ID is fake i.e.
 - Likeness of the person producing the ID
 - Air pockets where ID has been laminated
 - Raised edges where photos have been covered over
 - Spelling mistakes on ID cards
- 6.11 And of course, ID scan does not ask questions of the person producing their ID questions can confirm or refute some of the information on an ID card.
- 6.12 Another argument the police would use for implementing ID scan is that if there was an incident at the premises, the premises would have a database of persons who visited the premises on any given day, thereby providing details of potential witnesses or suspects.
- 6.13 In order to maintain a database of customers would mean every single customer, regardless of how old they actually are or how old they look, would have to produce ID before they are admitted to the premises.
- 6.13 This could also breach General Data Protection Rules in that personal information must not be stored for longer than is necessary. It could be argued that once ID is scanned and it is shown that the person producing the ID is the person they say they are, then that information should be deleted from any databank.
- 6.14 If staff at licensed premises do their jobs properly, and check ID thoroughly, then the need for ID scan at a premises where there have been no issues or concerns does not exist.

1

FJF Licensing Solutions

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true,

Signature Fuell

FRANK JAMES FENDER

Dated 10 7 2022