



9 Cabot Square
London E14 4EB

Operational Manual

LICENSING POLICIES & PROCEDURES

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Contents	Page
1. Introduction	2
2. Management Structure	3
3. Terms of Entry	4
4. Young People	5
5. Search / Seizure	8
6. Preventing & Dealing with Intoxication	10
7. Drugs	14
8. Prevention & Intervention	21
9. Guest Welfare	22
10. Ejections	28
11. Security Roles & Responsibilities	31
12. Security Code of Conduct	32
13. Dealing with Serious Incidents	34
14. Sexual Assaults	36
15. Crime Scene Preservation	42
16. Theft Prevention	44
17. Staff Behaviour	46
18. Events & Private Hire	47
19. Management of Outside & Dispersal	48
20. Smoking	51
21. Incident Reporting & Due Diligence Records	52
22. CCTV and Body Worn Cameras	54
23. Identity Scanner	57

1. Introduction

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

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

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

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

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

2. Management Structure



3. Terms of Entry

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

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

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

The following persons will be refused entry: -

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

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

Guest Dress Code

Smart casual dress.

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

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

Venue Specific Conditions

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

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

4. Young People

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

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

Provisions of the Licensing Act 2003

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

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

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

Under 18 year olds

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

Under 18 year olds

- Cannot sell alcohol unsupervised

Over 18 year olds

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

Offences under the Licensing Act 2003

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

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

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

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

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

Mandatory Conditions

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

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

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

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

Venue Specific Conditions

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

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

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

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

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

5. Search and Seizure

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

- Weapons
- Non-prescription drugs
- Alcohol

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

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

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

In the event of seizure of a weapon or drugs:

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

Drug Seizures

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

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

6. Preventing & Dealing with Intoxication

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

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

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

Procedures

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

Staff Training

Identification

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

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

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

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

Intervention and Refusing Service

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

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

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

Intervention is the plan of action for a server that:

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

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

Intervene early – don't let a problem develop

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

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

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

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

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

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

All serving staff will:

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

Staff will also be taught to use 'intervention Scripts'

Avoiding "you" statements - Using "I" statements

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

To focus on the law and the consequences you face

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

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

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

To focus on the customer's well-being

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

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

Don'ts of service refusal

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

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

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

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

7. Drugs

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

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

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

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

Policy Awareness

Staff

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

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

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

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

Management

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

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

Guests

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

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

Policy Implementation

Staff

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

Staff will receive training on the following:

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

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

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

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

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

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

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

Managers

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

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

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

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

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

In the event of seizure of drugs:

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

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

Therefore never:

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

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

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

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

Spotting the Signs of Dealing in Your Venue

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

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

Drug-Related Litter to be Vigilant for

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

Door Supervisors

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

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

Toilet Attendants

On occasions where toilet attendants are employed their duties include:

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

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

Safe guarding those that have taken drugs

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

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

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

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

- Suspicious behaviour, associated with a DFSA scenario.

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

The Misuse of Drugs Act 1971

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

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

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

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

Offences under the Misuse of Drugs Act 1971

Unlawful possession of a controlled drug

Unlawful possession with intent to supply

Supplying or offering to supply a controlled drug

Producing or being concerned in the production

Cultivating cannabis

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

Psychoactive Substances Act 2016

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

Legal high

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

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

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

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

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

Drugs Signage

WARNING

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

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

By Order of the Management

8. Prevention & Intervention

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

'Early Intervention is better than a cure'

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

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

Comprehensive & Effective Policies & Procedures

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

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

Human Resources

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

Physical Measures

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

9. Guest Welfare

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

But what is Vulnerability?

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

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

Factors Making a Person Vulnerable

Age

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

Alone

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

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

Overconsumption of Drugs & Alcohol

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

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

Considerations:

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

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

State of mind

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

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

Wearing Expensive Jewellery

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

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

Presence of an Offender

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

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

How to recognise vulnerability

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

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

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

Where can we intervene to reduce vulnerability?

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

Ask for Angela

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

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



Safeguarding Departing Guests

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

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

10. Ejections

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

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

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

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

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

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

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

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

Process of Ejection

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

Ensure you understand the situation and assess it first

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

Ensure you have support

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

Explain the reasons why a person is being ejected

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

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

All guests should voluntarily walk out

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

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

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

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

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

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

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

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

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

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

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

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

The Use of Reasonable Force

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

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

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

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

NECESSARY

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

REASONABLE

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

Ask yourself the question!

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

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

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

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

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

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

Remember

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

11. Security Roles & Responsibilities

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

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

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

Security #3 & #4 Roaming

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

Venue Specific Licence Conditions

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

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

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

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

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

12. Security Code of Conduct

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

Personal Appearance

Door supervisors should at all times:

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

Professional Attitude

Door supervisors should:

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

General Conduct

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

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

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

The Cocktail Club's Values and Standards

Door supervisors should:

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

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

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

13. Dealing with Serious Incidents

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

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

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

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

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

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

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

Investigate - Who? What? When? Where?

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

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

Incident Report

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

14. Sexual Assaults

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

1. Offences - Definitions

Rape

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

Assault by penetration

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

Sexual Assault

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

Causing sexual activity without consent

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

What does 'consent' mean?

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

2. Drink Spiking

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

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

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

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

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

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

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

Date Rape Drugs

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

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

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

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

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

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

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

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

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

Alcohol

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

Gamma-hydroxybutyrate and gamma-butyrolactone

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

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

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

Tranquilizers

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

Ketamine

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

Preventing Drink Spiking

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

- Watch out for suspicious behaviour

3. Customer Behaviour

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

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

4. Patrolling Premises

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

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

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

5. Vulnerable Areas

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

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

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

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

6. Security

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

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

At least one female door supervisor is employed where possible.

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

7. CCTV

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

8. Training

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

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

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

Reactive Measures

1. Victim Care

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

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

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

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

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

You must keep any suspect away from the victim.

2. Crime Scene Preservation

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

3. Suspects

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

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

You must keep any suspect away from the victim.

4. Police

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

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

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

5. CCTV

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

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

6. Incident Reporting / Statements

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

7. Press

The directors will prepare a brief press statement if appropriate.

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

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

15. Crime Scene Preservation

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

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

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

2. Crime Scene Preservation

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

Terminology

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

Primary Scene: The original Location

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

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

Suspect: Person thought to have committed a crime

Accomplice: Person associated with suspect

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

Procedures

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

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

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

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

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

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

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

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

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

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

Remember:

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

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

16. Theft Prevention

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

Thefts can be prevented using four broad approaches:-

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

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

Staff awareness

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

Customer awareness

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

Property control

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

Security

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

PIN Theft

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

Unattended Items

- Unattended items to be secured by staff

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

Unclaimed Items

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

17. Staff Behaviour

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

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

18. Private Events

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

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

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

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

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

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

Each event will be risk assessed individually and the appropriate numbers of registered door supervisors employed.

Persons holding the event will be informed that:

- The event will be held subject to a risk assessment
- An invitation does not guarantee entry. All persons will be subject to an ID scan on the door
- All guests will be subject to a search
- The premises operates a strict policy on drugs and weapons. Any person found in possession of either will be detained and reported to the police immediately

The event will be monitored throughout and could, should the management feel appropriate, be stopped at any time.

A risk assessment will be available to police licensing upon request. The assessment will include a start/end time, a description of the event, expected number of guests attending and number of security employed for the event.

19. Management of Outside Area & Dispersal

The aim of the procedures laid out in this document is to ensure there is an absolute minimum of noise and to prevent any nuisance being caused to our neighbours and the general public.

All staff will be trained in the procedures and will receive regular refresher training. This document will be reviewed on an annual basis to ensure its effectiveness and relevance is not compromised.

1. Roles and Responsibilities

- 1.1. The manager in charge will be responsible for ensuring the plan is fully implemented.
- 1.2. There will be a briefing each trading night where staff are assigned specific roles and responsibilities.
- 1.3. The briefing will be documented and will address any issues or complaints from the previous trading night.
- 1.4. Each briefing will consider any aspects of trading that could cause a nuisance to neighbours and put appropriate measures in place accordingly.
- 1.5. The briefing will also ensure that each member of staff has an effective means of communicating with the manager and other members of staff.

2. Entry Controls

- 2.1. Whenever there is a queue, it will be supervised at all times by at least one door supervisor to ensure guests do not congregate outside.
- 2.2. Guests in the queue will be advised on likely waiting times.
- 2.3. Guests will be advised that entry may be subject to a search.
- 2.4. If waiting times for entry are excessive customers will be asked to leave.
- 2.5. Any guests causing noise or disturbance or who appeared to be impaired / intoxicated through alcohol or drugs will be REFUSED ENTRY and asked to leave.
- 2.6. A manager will check the outside area regularly throughout the night.
- 2.7. A manager will be on duty at the entrance on busy nights.
- 2.8. The entrance must not be obstructed.

3. During Trading

- 3.1. Door supervisors will monitor activity in the vicinity of The Cocktail Club throughout each night to prevent crime and disorder, noise or disturbance arising from customers.
- 3.2. Door supervisors will ensure customers do not congregate outside. Any guests outside will either be directed to the smoking area or back inside The Cocktail Club.

4. Guests Smoking

- 4.1. Guests will only be permitted outside to smoke in line with Smoking Policy.
- 4.2. The smoking area for The Cocktail Club is in the area to the left hand side of the entrance (as you look at it).
- 4.3. Door supervisors will monitor guests smoking.

5. Exit Controls

- 5.1. Door supervisors will endeavour to control a slow stream of customers and guests leaving The Cocktail Club.
- 5.2. Door supervisors will be proactive about dispersal of groups of people outside The Cocktail Club.
- 5.3. Guests will be encouraged to leave the area quickly and quietly.
- 5.4. Door supervisors will patrol the terrace outside The Cocktail Club to ensure customers and guests leave the area quietly. Any customers and guests causing noise or disturbance will be asked to be quiet. Those that do not will be refused entry in the future.
- 5.5. A manager will be on duty and stationed at the exit to oversee dispersal. For this period at least two door supervisors will also be on duty to assist with the safe dispersal of guests.
- 5.6. The SIA supervisors shall monitor the area outside the premises to ensure that customers leave the premises safely and to prevent serious crime and disorder from occurring.
- 5.7. As customers leave and The Cocktail Club empties, door supervisors from inside The Cocktail Club will be posted outside to assist with dispersal.
- 5.8. Guests will not be allowed to take drinks with them as they leave.

6. Other Measures

- 6.1. The tempo of music will be slowed down and the volume will be lowered gradually at the end of the night to encourage guests exit in a calm manner.
- 6.2. The house lights will be raised gradually at the terminal hour for licensable activities.
- 6.3. Guests will be supplied with information on transport options available late at night.
- 6.4. Notices will be prominently displayed at exits requesting the guests to respect the needs of local residents and to leave The Cocktail Club and the area quietly in a considerate manner.
- 6.5. The Licensee will ensure that staff will conduct a litter and cleaning patrol of area immediately outside The Cocktail Club.

- 6.6. The Licensee will contact the police as necessary if people who have left are causing a public nuisance, threatening property or people or otherwise engaged in anti-social behaviour.
- 6.7. Management and security will utilize the radio to communicate with Canary Wharf as and when necessary.

7. Complaints procedure and contacts

- 7.1. A telephone number will be available to local residents for them to call should they have an issue. The telephone number will be published on the website.
- 7.2. Any complaint will be dealt with promptly by the senior member of staff on duty. The complaint will also be reviewed and followed up by the DPS on the next working day.
- 7.3. A detailed record will be kept of any complaint received. This will include the nature of the complaint and action taken together with the details of the complainant.

8. Venue specific licence conditions

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

Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.

Notices shall be prominently displayed at all exits requesting patrons to respect the needs of the locality and leave the area quietly.

The area immediately outside the premises shall be swept or washed and litter and sweepings collected and stored in accordance with the approved refuse storage arrangement.

The venue is to provide information on local taxi firms and transport links to patrons leaving the venue upon request.

A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.

All windows and external doors shall be kept closed after 23:00 hours, or at any time when regulated entertainment takes place, except for the immediate access and egress of persons.

20. Smoking

The Cocktail Club operates a zero tolerance policy to smoking in the venue in line with the Smoke Free regulations and Health Act 2006.

1. “No Smoking” signage will be displayed at The Cocktail Club that clearly states it is against the law to smoke anywhere inside the premises.
2. Staff will take immediate action if any customer attempts to smoke inside The Cocktail Club. Any customer who still attempts to smoke inside the premises will be asked to leave.
3. Staff will not smoke anywhere inside The Cocktail Club, including back of house areas.
4. All staff will receive training on dealing with smoking in smoke free premises including the penalties involved:-
 - Smoking in smoke free premises: a fixed penalty notice of £50 (reduced to £30 if paid in 15 days) imposed on the person smoking. Or a maximum fine of £200 if prosecuted and convicted by a court.
 - Failure to display no-smoking signs: a fixed penalty notice of £200 (reduced to £150 if paid in 15 days) imposed on whoever manages or occupies the smoke free premises. Or a maximum fine of £1000 if prosecuted and convicted by a court.
 - Failing to prevent smoking in a smoke free place: a maximum fine of £2500 imposed on whoever manages or controls the smoke free premises if prosecuted and convicted by a court. There is no fixed penalty notice for this offence.

The Cocktail Club operates two smoking areas; one on Worship Street and another on the rooftop terrace. The following policy will be in operation:

5. The smoking area for The Cocktail Club is in the area to the left-hand side of the entrance (as you look at it).
6. The smoking area will be monitored by staff and door supervisors.
7. The smoking areas will be cleaned of litter at regular intervals.
8. Customers will be reminded to keep the noise down and to respect the residents in the area. This will be supported by clear and prominent signage.
9. Any person causing a nuisance or disturbance in the smoking area will be asked to leave The Cocktail Club immediately.

Venue specific licence conditions

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

Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.

The area immediately outside the premises shall be swept or washed and litter and sweepings collected and stored in accordance with the approved refuse storage arrangement.

21. Incident Reporting & Due Diligence Records

The aim of this policy is to detail the records that will be kept to provide evidence of due diligence and the responsible operation of the premises in line with the Four Licensing Objectives.

1. Incident Reports

It is important accurate details of any incident is recorded at the time should there be a requirement for investigation at a later date and to show that incidents were dealt with correctly.

The following incidents will be fully reported:

1. All crime reported to the premises that has occurred within it or which relates to a patron attending the premises or waiting to be admitted to the premises
2. All ejections of patrons where force was used
3. Any complaints received relating to the promotion of the licensing objectives
4. Any incidents of disorder occurring within the premises or outside the premises and where they relate to matters outside the premises they involve patrons of the premises or persons waiting to be admitted to the premises
5. All seizures of drugs or weapons
6. any faults in the CCTV system, body worn cameras or ID scanner
7. any visit by a relevant authority or emergency service
8. any emergency situation such a fire, flood, loss of power, or bomb threat
9. any accident or injury to employee, contactor or customer

A separate record will also be kept of refusals (of entry and service) and ejections (where no force was used)

Each incident report will contain the following:

- The full name and position of person reporting
- Their SIA registration if security
- Date, time and location of incident
- Whether the incident was captured by CCTV – which camera – have the images been burnt onto DVD?
- Was a crime scene preserved
- Full details of the incident
- Whether the police were called (and who called them)
- Police CAD number (if police were called)
- Whether police attended (if so provide shoulder numbers)
- Whether anyone was injured (give full details, including any medical assistance given and whether an ambulance attended)
- Describe all persons involved in the incident

- Give details of all witnesses to the incident

STAFF WILL BE INSTRUCTED NOT TO:

- Use slang
- Use acronyms, abbreviations or terminology that may not be understood
- Make assumptions or speculate – be factual

2. Due Diligence Records

The following daily records will be completed:

- Pre-opening safety checks – to show that emergency exits, lighting, signage and fire safety equipment is all maintained, working and in place.
- Clicker counts / accommodation numbers – to show that a safe capacity is managed and never exceeded.
- Refusals of entry – to show customers are vetted before allowed entry
- Refusal of service – to show that we do not serve intoxicated or underage persons
- Ejections – to show that unsuitable guests (e.g. through intoxication, behaviour etc.) are asked to leave The Cocktail Club.
- Door supervisor log – to show that properly SIA registered staff are employed at The Cocktail Club.
- Toilet checks – to show that toilets are regularly checked for criminal activity / antisocial behaviour.
- CCTV checks – to show our CCTV is working correctly and holds footage for the minimum required 31 days.

Venue specific licence condition

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

An incident log shall be kept at the premises, and be available on request to the Police or an authorised officer. It must be completed within 24 hours of any incident and will record the following:

- a) all crimes reported to the venue;*
- b) all ejections of patrons;*
- c) any complaints received concerning crime and disorder*
- d) any incidents of disorder;*
- e) all seizures of drugs or offensive weapons;*
- f) any faults in the CCTV system, searching equipment or scanning equipment;*
- g) any visit by a relevant authority or emergency service.*

22. CCTV & Body Worn Cameras (BWC)

The aim of this policy is to ensure CCTV and BWC are operated effectively and that records are retained for due diligence purposes.

The Cocktail Club operates a CCTV system that conforms to the Data Protection Act 2018. The Data Controller is The London Cocktail Club Ltd.

It is very important to be able to demonstrate that the system is working, has been operational historically, and that any issues are resolved as soon as possible.

CCTV is operated for the purposes the prevention and detection of crime, public safety and employee security. The following procedures are in place:

1. One camera will show a close-up of the entrance to the premises, to capture a clear, full length image of anyone entering. The system will provide full coverage of the interior of the premises and any exterior part of the premises accessible to the public.
2. The system will record in real time and recordings will be date and timestamped.
3. Recordings shall be kept for a minimum of 31 days and shall be made available upon request by an authorised officer of the licensing authority or by a police officer within 24 hours.
4. The CCTV system shall continually record whilst The Cocktail Club is open for licensable activities and during all times when customers remain on the premises.
5. The CCTV system will capture a clear head and shoulders image of “identification standard” of every person entering the premises. Persons entering The Cocktail Club should be asked to remove any headwear which obscures the persons’ face unless it is worn as part of religious observance.
6. The CCTV system will be kept secure at all times. Access will be limited to the DPS and managers.
7. A dedicated CCTV system log will be kept at The Cocktail Club. All usage, checks, faults and requests for images will be recorded in the log. Any person taking a copy of the CCTV such as the police, fire authority or local authority officer MUST sign in the relevant section of the log acknowledging receipt of the data. The signing officer must also enter their place of work and a contact telephone number.
8. A full incident report will be made of any faults with the system.
9. When reporting any faults with the CCTV system, anticipated times scales for repairs and who the issue has been escalated to if these time scales are not met will be included.
10. The DPS and all managers will all be trained in the use of the CCTV system. The training will include interrogation of the system and transfer of images to separate media (flash drive, USB stick external hard drive etc.)
11. There will be at least one person who is suitably trained and conversant with the CCTV system on The Cocktail Club at all times it is open to the public.

12. The DPS will ensure as far as possible that the system is maintained and working correctly at all times. At minimum, a weekly, documented test will be carried out to ensure the system is working correctly. A record of these checks, showing the date and name of the person checking, will be kept and made available to the police or other authorised officer on request.
13. Relevant CCTV images will be burnt to playable media as soon as possible following any serious incident. Two copies will be retained – one for police and a backup placed in the safe at the premises.
14. All searches of customers will take place in an area clearly covered by CCTV.
15. Signage will be placed prominently at the entrance to The Cocktail Club advising all persons entering that CCTV is in operation in accordance with the Data Protection Act 1998 and GDPR.

BODY WORN CAMERAS (BWC)

In the event The Cocktail Club opted to use BWC, the following measures will be place. The use of BWC would be to promote the four licensing objectives; to protect staff, customers, members of the public and their property, and prevent and detect crime.

The use of BWC should be:

- Incident specific
- Proportionate
- Legitimate
- Necessary
- Justifiable

BWC are capable of capturing primary evidence in such a way that it is able to bring a compelling and an indisputable account of the circumstances at that time. This will not replace the needs to capture other types of evidence but will go a considerable way in reducing any ambiguities and should be considered as an additional security aid.

1. The premises shall ensure that the use of such BWC is dealt with within any training it provides to the security personnel team.
2. Door Supervisors based at The Cocktail Club will 'book out' their BWC from a pool of devices shared amongst a number of staff members.
3. Door Supervisors are required to ensure the device is charged, all previously captured images and audio is automatically removed prior to deployment. The device will then be fixed to the Door Supervisors outer clothing where the field of view is clear and not obscured.
4. BWC video footage will be held in compliance with the Data Protection Act requirements. Footage will be held for 31 days unless there is a need for it to be held longer – i.e., as evidence of a crime etc.
5. BWC footage will be provided to police upon request with the absolute minimum of delay.

6. Door supervisors with BWC will record, where possible, any physical ejections and any incidents of crime and/or disorder.

Venue specific licence condition

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

The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Tower Hamlets Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31 day period.

A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.

23. Identity Scanner

The Cocktail Club operates an identity scanning system that conforms to the Data Protection Act 2018. It is operated for the purposes the prevention of crime, public and employee security and safety. The Data Controller is The London Cocktail Club Ltd.

The Cocktail Club follows the Information Commissioner's Office Good Practice advice.

1. Signage

Signs are prominently displayed at the entrance of premises which explain why the ID system is in operation. The notice will also explain to customers that providing satisfactory identification to be electronically scanned and recorded is a condition of entry.

2. Sharing Information

A manager will decide whether information should be shared on the system in the interests of preventing crime or public safety.

Personal information will not be used or shared for marketing or commercial activity.

Personal information will be shared with police, or other enforcement agencies, investigating crimes upon request.

Only relevant information will be scanned for the purposes of confirming and recording the identity of customers.

3. Access to Personal Information

Access to scanning system records is restricted to those whose duties require it. Only managers will be able to access to all record fields, including addresses, on the ID scanning machine. The data is stored and encrypted locally on the HDD of a computer. This is kept securely and only managers are able to access the data. The data on the computer is password protected and staff with authority have individual usernames and passwords. There is a record of any person accessing personal data.

The ID scanning equipment has a transactional logging and audit capability to allow regular security reviews to counter any possible system abuse.

4. Data Retention

The Cocktail Club will only keep records for as long as there is a reasonable requirement to do so. Any details relating to a customer who has not visited The Cocktail Club in over a year will be deleted unless there is a serious reason to not do so.

Data is retained for a minimum of 6 months and this is reviewed annually when senior management will conduct a purge of data.

5. Subject Access

Individuals may request copies of the personal information held on the identity scanning machine using The Cocktail Club's subject access procedures. Any request to delete personal data will be considered and decided by The Cocktail Club management.

6. Maintenance and Faults

The identity scanning system will be kept in good working order and any faults or operating issues will be fully incident reported. If for any reason the scanner fails during trading, the manager in charge will ensure that photographic images are taken of IDs and the guest presenting the ID, prior

to the person entering the premises. All data will be handled in line with the requirements of the Data Protection Act.