

# City of London Code of Good Practice for Licensed Premises

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# 1. Introduction

- 1.1. The City of London Licensing Authority acknowledges that well run licensed premises play a major part in the promotion of a vibrant and flourishing nighttime economy; one where businesses are trusted to be socially responsible, where people are safe and feel safe, and where people are encouraged to adopt healthier and responsible behaviours.
- 1.2. Good practice sits at the core of every successful night-time business. Success in the night-time economy is not just about regulation and compliance. Premises must be safe, well-managed and welcoming, with quality processes and management procedures in place, and staff awareness. Alongside the statutory provisions referred to in paragraph 2, we encourage licence holders to reach high operational standards and continuous improvement at their premises by adopting a responsible approach to the provision of alcohol and entertainment through the promotion of good practice.
- 1.3. Good practice can reduce alcohol related crime and disorder at licensed premises. It can lead to a safer environment for customers to socialise in, deter them from engaging in anti-social behaviour and result in fewer alcohol related hospital admissions. This will enable the City's night-time economy to grow and thrive, whilst ensuring that potential impacts to residents, visitors, workers, and emergency services are minimised.
- 1.4. Through this Code of Good Practice (the Code), the City of London is committed to supporting licensed premises in the square mile by providing a single source of information on good practice measures. The Code is not statutory guidance but provides a mechanism for applicants and licensees to identify risks associated with their specific type of venue or operation and recommends mitigating measures to address or minimise those risks.

# 2. Licensing Act 2003

- 2.1. Licensed premises are managed under the provisions of the Licensing Act 2003 (the Act), and its associated regulations and statutory guidance. The Act focuses on four licensing objectives which must be addressed when licensing functions are undertaken. The four licensing objectives are:
  - The prevention of crime and disorder
  - Public safety
  - The prevention of public nuisance
  - The protection of children from harm
- 2.2. When the Licensing Authority grants a premises licence, it may be subject to conditions, which form the parameters in which that premises can lawfully operate. There are three types of conditions that can appear on a premises licence:
  - Mandatory conditions depending on the activity permitted by the licence
  - Proposed conditions drawn from the applicant's operating schedule
  - Imposed conditions following a licensing hearing

2.3. It is a mandatory requirement for licensees to comply with conditions on their licence whenever the licence is in use. However, it is equally important that premises always operate in a way that promotes the four licensing objectives, regardless of whether a specific condition requires them to do so.

# 3. Aim of the code

- 3.1. The aim of this code is to provide applicants and licensees with guidance on good practice for the promotion of the four licensing objectives. It adopts a holistic approach to the licensing regime, incorporating local and national initiatives aimed at protecting the business, its customers, employees, and those working or living nearby.
- 3.2. The code sets out in sections each of the four licensing objectives, it can assist applicants with completing their operating schedules and licensees in complying with their licence conditions. It identifies risks associated with the sale of alcohol and the provision of entertainment and/or late-night refreshment and sets out good practice measures to mitigate those risks. It is not an exhaustive list, but it provides a key mechanism for the promotion of the licensing objectives, for wellrun premises and a responsible approach to the provision of alcohol, entertainment, and late-night refreshment in the City of London.
- 3.3. Risks associated with licensed premises can vary depending on the premises type and characteristics, the design, layout and general environment, the location, the knowledge and experience of management and staff, the policies in place and the type of events held there.
- 3.4. It is recognised that all premises are different and not every risk will be relevant to all premises. Licensees will determine through their own risk assessment what specific measures are relevant to their venue.
- 3.5. The code cannot anticipate every risk, problem or circumstance that may arise from licensed premises. Neither does the code restrict an applicant or licence holder from promoting the licensing objectives through alternative means.

# 4. How will the code be used and by who?

- 4.1. The guidance in this code is not statutory, however it does form part of the City of London Statement of Licensing Policy and the Licensing Authority expects applicants and licensees to have regard to it.
- 4.2. The code is intrinsically linked with the City of London's Traffic Light monitoring scheme and its Safety Thirst accreditation scheme and will be used by the licensing authority to offer advice to premises encountering problems, and to determine Safety Thirst accreditation levels as described in paragraph 4.6 below.
   Applicants and licensees
- 4.3. It is important to take a proactive and preventative approach to managing licensed premises. This will ensure that problems either do not occur, or if they do, are dealt with quickly and appropriately.

- 4.4. The code is a good starting point in assessing the potential risks at licensed premises and applicants should read this document before making an application. The identification of a risk will not necessarily warrant a condition on a licence but could identify a good practice measure to implement.
- 4.5. Similarly, licence holders should be familiar with this document as it will highlight any additional operational measures they can implement if problems occur at their licensed premises.

#### The licensing authority and responsible authorities

- 4.6. The licensing authority and responsible authorities will use this code to:
  - **Offer pre-application advice to applicants** Pre-application advice may consist of a telephone consultation or written advice, and in some cases, it may include a site visit with a licensing officer, environmental health officer and/or City of London police licensing officer dependent on the proposal. The advice will assist applicants in understanding how the City of London statement of licensing policy applies, any specific issues that may arise from their proposal and any good practice measures from this code they need to consider when submitting their application. Applicants can request pre-application advice by emailing <u>licensing@cityoflondon.gov.uk</u>, setting out as much detail about their proposal, including site and operating plans
  - Offer advice to licence holders in general The licensing authority may refer to this code during routine inspections to offer licensees good practice advice that will assist them with legislative compliance.
  - Offer advice to licence holders encountering problems at their premises

The City of London operates a <u>Traffic Light scheme</u> which is a simple monitoring tool where relevant incidents at licensed premises are given penalty points. When premises accrue points due to incidents occurring there, the licensing authority will contact the licensee in writing, setting out actions and good practice measures drawn from this code that can be implemented to prevent an escalation of incidents, improve standards, minimise risks and promote the licensing objectives. The implementation of good practice measures can be a suitable alternative to enforcement action or the review of a premises licence.

• Offer advice to licence holders seeking to achieve the City of London Safety Thirst accreditation

Licensees wishing to participate in the Safety Thirst accreditation scheme (see paragraph 4.9 below) must meet a set of core standards drawn from this code to achieve an award. Where premises do not meet the core standards for the award, written advice will be provided to the applicant, guiding them to the relevant good practice measure (or suitable alternative) to help them achieve the award

#### **Dealing with problem premises**

4.7. Where there are problems or concerns identified at licensed premises, the licensing authority or relevant responsible authority will raise these with the licensee at the earliest possible stage and work in partnership with them to

prevent or minimise subsequent problems. The licensing authority and/or responsible authority will agree appropriate actions with the licence holder, and these may include the implementation of good practice measures from this code.

4.8. The aim of the code is to avoid the need for enforcement action such as prosecution or review, but it will not replace enforcement action where it is necessary.

#### Acknowledging well-managed premises

4.9. The City of London operates a good practice accreditation scheme for licensed premises known as Safety Thirst. Licensees can use this code to adopt good practice measures to assist them in becoming a City of London Safety Thirst accredited premises. To achieve the basic award, premises must meet a set of core criteria drawn from this code. Premises that can demonstrate good practice over and above the core criteria will be accredited with a commended or highly commended award. There is an annual awards ceremony where accredited premises are celebrated and presented with their award. The award can be displayed at the premises to promote the licence-holder's reputation as a responsible licensee and to let customers know they are in a safe and well-managed venue. Accredited premises raise the profile of the City of London as a safe place to enjoy a night out.

# 5. General – all four licensing objectives

This section provides guidance on good practice for the general promotion of all four licensing objectives. Licensees and their staff have responsibility for the effective and safe management of their premises and the promotion of the four licensing objectives. Training is the key to giving licence holders, managers, and staff the knowledge and skills to identify and manage risks associated with licensed premises and prevent problems reoccurring.

Risk	Good	practice measure
Lack of knowledge	G1	Well trained staff in Licensing Act and related
or understanding of the Licensing Act 2003		<b>subjects</b> contribute to well-run premises and effective management of risks associated with licensed premises.
	G2	<b>Formal qualifications</b> - Every designated premises supervisor (DPS) and personal licence holder requires an accredited Award for Personal Licence Holders (APLH). It would be preferential for this training to also be completed by other managers and supervising staff employed at the venue.
	G3	<ul> <li>All front of house staff should be trained in basic licensing law before they are allowed to serve alcohol. This should include (but not limited to)</li> <li>authorised sales of alcohol</li> <li>underage sales / age verification requirements</li> <li>dealing with intoxicated customers</li> <li>offences under the Licensing Act 2003</li> <li>compliance with licence conditions both mandatory and unique conditions to the premises</li> </ul>
	G4	<ul> <li>All staff, including SIA door staff, should be trained on premises specific policies relevant to the operation of the business. This might include:</li> <li>duty of care to vulnerable customers</li> <li>first aid (physical and mental health)</li> <li>drugs awareness</li> <li>conflict management</li> <li>weapons policy</li> <li>crime scene preservation</li> <li>ejection of customers from the premises</li> <li>managing external areas and dispersal of customers</li> <li>emergency evacuation procedures</li> <li>counter terrorism</li> </ul>
	G5	<b>Refresher training</b> should be completed regularly but at least every 12 months.
	G6	<b>Records</b> should be kept of the date and name of every person trained and be made available for inspection by the police or licensing authority

# 6. Prevention of crime and disorder

This section provides guidance on good practice for the prevention of crime and disorder at licensed premises. It can help those applying for new licences or varying existing licences in completing their operating schedules. It can also help licence holders identify risks associated with their premises and offers mitigating measures to manage those risks and prevent crime and disorder.

The main causes of crime and disorder in or around licensed premises arise from inadequate security provisions, poor design and layout, the type of event being promoted there, overcrowding and customers being drunk or under the influence of drugs. This can result in theft, conflict, violence, and anti social behaviour. Excess alcohol consumption is a significant contributory factor to levels of crime and disorder in and around premises. Good management and good practice along with adequate physical controls can make an important difference to the level of alcohol related crime at or near premises.

All applications for new licences and variations should address the steps proposed to prevent crime and disorder and this is best achieved through a premises risk assessment. Such measures should be reflected in the operating schedule.

For new premises or the refurbishment of existing premises, preventative measures should be factored in during the planning and design stage. Consideration should be given to the design and layout of the premises to minimise the potential for crime and disorder. Useful information can be found at the <u>Secured by Design</u> website. This is the official police security initiative that works to improve the security of buildings and their immediate surroundings.

Licensees should take a proactive approach to managing and preventing crime and disorder at their premises. Documented policies should identify all crime and disorder risks associated with their premises and the measures implemented to manage and prevent those risks.

Risk	Good practice measure	
Risk Security in and around the premises	Good CD1	<ul> <li>A monitored intruder alarm system installed at licensed premises acts as a deterrent to burglary and vandalism, protecting it when closed or empty.</li> <li>(a) A system that can be remotely accessed/monitored is best. It should be linked to a digital communicator or text alerts that inform key holders, and/or the alarm company if the alarm is activated when no-one is physically present. An up-to-date key holder list should be maintained with the alarm company.</li> </ul>
		(b) Staff should be familiar with opening and closing procedures to prevent false alarm activations.
		(c) Any private areas such as staff rooms or cellars should be securely closed and only accessible by staff whilst the premises are open to the public.

Risk	Good	practice measure
Security in and		(d) Emergency exits should be alarmed when the
around the premises		premises are open to the public so that staff are immediately notified of unauthorised opening.
	CD2	<b>CCTV</b> provides a vital tool in the management of crime and disorder at licensed premises. It can make staff and customers feel safe, it can act as a deterrent to potential offenders, it can be used to immediately direct staff and security to incidents, and it can produce tangible evidence to support post incident investigation.
		(a) CCTV cameras should be installed inside and outside the premises with cameras covering all areas accessible to the public including entry and exit points. Internal areas at a higher risk of violence, crime, or disorder, such as alcoves or blind spots, should be identified through a risk assessment and have cameras in place.
		(b) Camera systems should use the latest digital colour recording technologies to produce high quality imagery, with remote internet access where possible. The system should be able to provide facial recognition in any light condition.
		(c) The date and time settings on the system must be set correctly. Cameras should continually record whilst the premises are open to the public and recordings should be kept available for a minimum of 31 days. In the event of an incident, recordings should be made available to the police or licensing authority upon request where necessary to detect a crime as it is happening or upon a data protection release request.
		(d) Staff should be trained in using the CCTV system with a record kept of person trained and date. Training records should be made available for inspection by the police or licensing authority upon request.
		(e) A trained member of staff should be on duty to operate the system whenever the premises are open to the public. Where CCTV is required by a condition on the premises licence or the licensee is applying for best practice accreditation, the trained person should be able to show the police or licensing authority the system in operation upon request.
		(f) The system should be regularly maintained to ensure it is working correctly with all cameras recording.

Risk	Good	practice measure
Security in and		(g) The system should be password protected and kept
around the premises		in a secure place or lockable room within the premises
		(h) CCTV systems should comply with the <u>Information</u> <u>Commissioner's Office (ICO)</u> guidance.
		(i) Signs should be clearly displayed within the premises informing members of the public that CCTV is in use.
	CD3	<b>External lighting</b> provides an obvious means of crime deterrent. External lighting should be operated by detection devices which will automatically switch lights on where movement is detected.
		(a) Lights should be checked regularly to ensure they are in good working order.
		(b) Care should be taken so that external lighting does not impact on neighbours at night.
	CD4	<b>Security systems should be integrated</b> so that the alarm, CCTV system and lighting work together in an effective manner.
	CD5	<b>Door supervisors</b> can be essential in ensuring well-run premises and make customers feel safe. They can monitor admissions, refuse entry to intoxicated customers, supervise dispersals to deter anti-social behaviour, carry out authorised searches to prevent drugs or weapons being brought inside, and supervise / interact with customers inside the venue to maintain good behaviour.
		(a) Any person performing the role of a door supervisor must be licensed with the <u>Security Industry Authority</u> (SIA). Licensees need to ensure that any security services bought in are complaint with the law. To assist licensees, the SIA has produced a <u>guidance for buyers</u> <u>of security for events</u> .
		(b) The SIA run a voluntary Approved Contractor Scheme (ACS) which provides buyers of private security services with a form of independent assurance of a contractor's commitment to quality. A <u>list of approved</u> <u>contractors</u> can be found at the SIA website
		(c) All door staff and security must clearly display their SIA badges whilst working. Licensees and venue managers can <u>search the SIA register of licence</u> <u>holders</u> to check whether someone has the correct, valid licence.

Risk	Good	practice measure
Security in and around the premises		(d) Door staff should be easily identifiable by wearing a uniform, high visibility jacket or arm bands.
		(e) Door staff should sign into a register detailing their full SIA licence number, their name, contact details and the time and date their duty commenced and concluded. Copies of all door staff badges should be kept at the premises and checked with the SIA for validity.
		(f) Where possible, the same door staff should be used each week, so they are familiar with premises specific policies and procedures.
		(g) The number of door staff will be determined through a risk assessment, the nature and size of the business and the type of crowd attending an event.
		(h) Other staff, such as stewards, at the premises should also be easily identifiable <b>but they must not</b> carry out the duties of a door supervisor if not SIA registered.
	CD6	<b>Counter Terrorism</b> measures will protect businesses, staff and customers and support the Police in making the area safer for everyone. Licence holders and staff should be well prepared and resilient in the event of a terrorist attack. Crowded environments, both indoor and outdoor spaces, have security vulnerabilities, and these should be identified through premises specific risk assessments and managed through both physical measures and staff awareness.
		(a) <b>Physical measures –</b> Businesses and licensees have a duty to protect those using their services. If customers queue on the public highway to gain entry to the premises or use furniture placed on the highway to be served or to consume food or drink purchased from the premises, licensees should consider physical security barriers or hostile vehicle mitigations (HVMs) to protect the area and minimise the risk of a 'vehicle as a weapon' attack. The type of barrier or HVM will depend on the threat and vulnerability specific to the premises. Guidance for hospitality venues is available via: <u>Police</u> <u>Protect UK</u> , (which incorporates the National Counter Terrorism Security Office (NaCTSO)), and <u>Centre for the Protection of National Infrastructure (CPNI)</u> . Further information and advice can also be sought from local Counter Terrorism Security Advisors: <u>CTSA@city-of-Iondon.pnn.police.uk</u>

Risk	Good	practice measure
Security in and		(b) Premises should be searched inside and out for
around the premises		suspect packages before, during and after opening
		hours. Staff should remain vigilant and report any
		suspicious activity immediately to the Police.
		(c) <b>Staff awareness</b> - Licence holders and all their staff should complete an appropriate level of counter terrorism awareness training. Nationally recognised training products such as <u>See, Check and Notify (SCaN)</u> and <u>Action Counters Terrorism (or ACT)</u> cater for different levels of staff, are available electronically and are free of charge.
		(d) Licensees and venue managers should preferably be registered with <u>Protect UK</u> , giving them access to the latest advice, guidance and training on security threats.
		(e) Staff should be made aware of premises specific contingency plans, and their roles and responsibilities in the event of an attack. Rehearsals or drill exercises are important to ensure knowledge retention and to identify any gaps in documented plans/policies.
	CD7	<b>Documented security policies</b> based on risk assessments can protect licensees, their premises, staff and customers from threats, conflict, or violence.
		(a) Security policies should be formulated in consultation with a police crime prevention officer.
		(b) All staff must be aware of a premises security policy with records kept of date and name of person trained.
	CD8	<b>Security reviews</b> should be held regularly between the licence holder or venue manager and door staff provider, to review successes, challenges or areas to improve, with minutes of the meetings recorded.
	CD9	<b>Daily staff briefings and debriefing</b> will enable licensees to improve working practices in their premises. Briefings can be informal, but any problems identified, or remedial action taken should be recorded.
Crime including conflict, assault, violence, or aggression in and	CD10	<b>Promoted events</b> may attract larger than usual crowds and some promotions may have crime and disorder associated with them.
around the premises		(a) Where premises are hosting events that are promoted by third parties, the licensee should complete a risk assessment or event management plan in

Risk	Good practice measure
Crime including	conjunction with the promoter. The risk assessment or
conflict, assault,	event management plan is the licensee's responsibility
violence, or aggression in and	and ownership and must be submitted by them to the City of London Police licensing team at least 14 days in
around the premises	advance of the proposed event.
	(b) As part of the event risk assessment, the licensee should be satisfied that the event promoter has a suitable qualification in managing music promotions, including the provisions of the Licensing Act 2003, admission policies, conflict management, and noise management.
	(c) In the event that a problem or incident should arise during a promoted event, the licensee should inform City of London Police immediately so that on-site support can be provided to prevent the incident escalating into something more serious.
	<b>CD11 Management of the door</b> will depend on the size and type of venue, or the event being held there.
	(a) For large or promoted events, or 'nightclub' events, licensees should install a club scan or ID scan system, to digitally check IDs, detect fake IDs and prevent underage or banned persons from entering the premises. This will protect customers at events and ultimately the premises licence, by making it easier to identify suspects should a crime occur.
	(b) The number of door supervisors should be determined by a risk assessment considering the size of venue, the type of event and the type of crowd the entertainment is likely to attract. For promoted events, a minimum ratio of 1 door supervisor per 50 customers should be considered.
	(c) All entry and exits points should be covered with at least one door staff, and depending on the event, consideration should be given to cloak room cover, roaming door staff and relief cover during breaks.
	(d) Consideration should be given to a sufficient provision of male and female door supervisors, but at least one female door supervisor should be used.
	<b>CD12 A door admissions policy</b> including any age restrictions, expected dress code, or the screening of handbags should be widely publicised on any promotional material, website or social media platforms and clearly displayed at the entrance to the premises.

Risk	Good	practice measure
Crime including conflict, assault, violence, or aggression in and around the premises	CD13	<b>Refusing entry to persons</b> if they do not meet the standards, if they are underage, intoxicated, disorderly, if they are a known troublemaker, if they refuse to be searched or are in possession of drugs or weapons.
		(a) If entry to the venue is dependent on a search, then a 'No Search, No Entry' sign should be clearly displayed at the entrance, explaining what the search will entail
		(b) In the event of a refusal, an entry should be made in an incident logbook. If the refusal relates to possession of drugs or weapons, the Police should be informed.
		(c) If a customer resists refusal, a manager should be called to confirm the refusal. If after management intervention, the customer insists on admission, the Police should be called to assist.
	CD14	<b>Escorting or removing persons</b> from the premises who have become drunk or disorderly after admission. All evictions should be recorded in an incident logbook.
		(a) If a customer becomes violent or aggressive when being escorted off the premises, the Police should be called to assist.
	CD15	A policy to manage capacity should be adopted to prevent overcrowding / localised overcrowding and patrons possibly becoming aggressive through accidental jostling.
		(a) For promoted events and large venues, the use of clickers is essential to record the number of patrons inside the premises or moving from room to room.
		(b) For other events or smaller venues, ticket sales or head counts may be appropriate.
		(c) Consideration should be given to deliberately running below capacity to afford a comfort factor to your patrons and avoid conflict, violence, or aggression within the premises.
		(d) Where a premises holds a special event that is not a promoted event but one that is expected to attract a larger crowd than usual, the licence holder should notify the City of London Police licensing team at least 14 days in advance of the event. They may be able provide support with crowd management during the event.

Risk	Good practice measure
Crime including conflict, assault, violence, or aggression in and around the premises	<b>CD16 Durable and reusable alternatives to glass drinking</b> <b>vessels,</b> made from polycarbonate or non-splintering plastic should be considered to prevent glassware being used as an assault weapon, particularly during promoted events, or for consumption in outdoor areas.
	(a) Where alternatives are not used, there should be a robust glass collection policy in place. This should include regular collection of glassware by staff and prevention of glassware being removed from the premises.
	<ul> <li>CD17 Crime scene preservation - in the event of a crime at licensed premises, the Police must be notified immediately, and measures must be in place to preserve the crime scene until police arrive. Such measures should include: <ul> <li>identifying any injured people, ensuring adequate medical treatment is provided or calling an ambulance</li> <li>creating a secure and sterile cordon around the scene for the preservation of evidence and life</li> <li>preventing others from entering the crime scene and not touching anything</li> <li>preventing the contamination, cleaning, wiping, clearing away or removal of any items or materials from the crime scene. Any bloodstains, broken glass, drugs paraphernalia, weapons or other items used during the crime must remain untouched until Police arrive</li> <li>creating a record of the incident as soon as practicable to do so, including date, time, persons involved, including perpetrators, victims, anyone assisting, and anyone who has left the scene, items at the scene, any smells, take photos, descriptions, and keep CCTV recordings or mobile phone recordings.</li> </ul> </li> </ul>
	(a) A documented crime scene preservation policy should be formulated in consultation with a police crime prevention officer. (c) All staff must receive training on the policy with a
	record kept of the date and name of person trained. Records should be made available for inspection by the police or licensing authority
	<b>CD18 Conflict management training for staff</b> will provide them with the knowledge and confidence to deal with difficult situations. Trained staff should be able to identify conflict as it develops and take appropriate measures to resolve it before it escalates, which can reduce crime and disorder at the premises.

Risk	Good practice measure
Crime including conflict, assault, violence, or aggression in and around the premises	<ul> <li>(a) Training should include dealing with abuse, harassment, threatening behaviour, disorderly conduct, aggression and violence. also cover dealing with, logging and reporting incidents if they occur.</li> <li>(b) A record should be kept of the date and name of person trained. Records should be made available for inspection by the police or licensing authority.</li> </ul>
	<b>CD19 Responding to allegations of assault</b> at licensed premises. Licensees must take any allegation about assault or harassment at the premises seriously, and always call the Police if a customer or other person at the venue makes such an allegation.
	<b>CD20 Sharing information</b> with others in the industry about troublemakers, incidents, and common problems in an area can help to manage or reduce crime and antisocial behaviour associated with licensed premises. This can be through local radio network groups, business Whatsapp groups, or through the <u>SentrySIS</u> application, a secure, city-wide data-sharing platform that works in real-time.
	CD21 Membership of a <u>Safer Business Network</u> or Business Crime Reduction Partnership provides businesses with a local network connection, up-to-date information on localised crime and offenders, access to expert advice, free crime reduction training and access to local <u>Pubwatch</u> meetings. City of London Police Licensing also host regular Licensing Forums covering a wide range of topics and initiatives to safeguard licenced premises against crime. Businesses can sign up to attend the City Police licensing forums by emailing <u>licensingoffice@cityoflondon.pnn.police.uk</u>
Drugs and weapons being brought into the premises	<b>CD21</b> A premises specific drugs and weapons policy is a valuable tool for keeping customers safe. It should address all potential drugs and weapons concerns relevant to the business and offer mitigations, provide a basis for staff training, and ultimately safeguard the welfare and safety of the business's staff and customers. Guidance on how to develop a drugs and weapons policy can be found at <u>Safer Nightlife</u> , an online resource produced by the London Drug and Alcohol Policy Forum. Policies should be formulated in consultation with the City of London Police licensing team.

Risk	Good	practice measure
Drugs and weapons	CD22	Preventing drugs and weapons entering the venue
being brought into		can be achieved by searching customers on entry or
the premises		through the provision of amnesty boxes.
		(a) Searches may only be necessary for larger or promoted events, or on busier nights. The premises policy should identify the types of events or days when searches will be conducted. The use of search arches and wands may be appropriate in some cases.
		(b) Search policies must be advertised widely on tickets, promotional leaflets and on websites and prominently in the premises entrance and queuing area. Notices should clearly advise customers that if they refuse to be searched, they will be refused entry.
		(c) Searches should always be carried out in public areas and covered by CCTV.
		(d) Searches must only be conducted by door supervisors with a valid SIA door supervisor registration.
	CD23	<b>Preventing drug dealing at the venue</b> can be achieved through the regular supervision and monitoring of all public areas by roving staff. All public areas should be covered by CCTV cameras and any alcoves or concealed areas should have adequate lighting to enable the capture of clear images.
		(a) Supervising toilet areas can be effective in discouraging drug selling or use. A toilet attendant may be appropriate for promoted events or on busy nights such as Friday and Saturday.
		(b) Removal of flat surfaces in toilet areas can reduce the likelihood of drug misuse
		(c) Regular toilet checks such as swabbing should be considered, and where conducted, these should be documented with date, time and findings.
	CD24	<b>Calling the police</b> if customers are suspected of being in possession of drugs or weapons. A clear procedure should be agreed with City of London Police about the circumstances in which they expect to be called and all staff must be made aware of this requirement.
	CD25	Seizing, retaining and documenting any drugs or weapons found with a clear audit trail and a process for surrendering them to the Police.

Good	practice measure
	(a) A search policy should clearly set out procedures
	that must be followed by staff should they find drugs or
	weapons during a search including circumstances when the police should be called. Procedures should include
	the wearing of gloves, the use of tamper proof bags and
	safe storage of seized items in a lockable box; details
	that need to be recorded and how/when seized items
	should be surrendered to the police.
	(b) Any items seized by staff should be done in a public
	area, witnessed by a colleague and/or in full view of
	CCTV cameras.
CD26	Drug awareness training should be provided for all
	staff, so they have the knowledge to identify any illegal
	drug activity at the venue and to recognise symptoms of
	drug use. A record should be kept of the date and name of person trained, and records should be made available
	for inspection by the police or licensing authority.
CD27	Bag hooks (Chelsea clips) should be provided to
	prevent bag snatching.
CD28	Clear signage should be displayed throughout the
0020	premises about crime prevention and to warn customers
	of the potential for pickpockets and bag/laptop
	snatchers.
CD29	Property patrols, managed cloakrooms and toilet
	attendants can be employed to prevent theft from
	patrons or the premises.
CD30	Premises layout and lighting should be considered.
	Secluded or dimly lit parts of the premises should be
	avoided as they can encourage crime.
CD31	Mirrors used throughout the premises can aid
	supervision and act as deterrents to thieves.
CD32	A lost and found policy should be in place in relation
0032	to lost/found property at the premises. The policy
	should include procedures regarding the logging and
	disposal of property and in particular any valuable
	property. Passports and any other ID found should be handed in to any police station.
CD33	Carefully positioning alcohol in retail premises can
	reduce theft from the premises. Alcohol is a key target for shop thieves, so it is best not to place alcoholic
	beverages within the first few metres near the door as
	CD26 CD27 CD28 CD29 CD30 CD31 CD32

Risk	Good	practice measure
Theft from premises or lost property		this allows thieves to 'grab and run'. It may be helpful for alcohol display areas to be covered by CCTV if possible.
	CD34	<b>Security tagging</b> any items considered a specific target for theft, particularly alcoholic drinks over a certain price level will deter thieves.
Disorder from customers queuing to enter the premises or when leaving the premises	CD35	<b>Reduce the potential for excessive queue lines</b> with a well-managed and efficient door policy. Long queuing times can cause people to become agitated or aggressive. Searches should therefore be conducted as quickly and effectively as possible.
	CD36	A customer dispersal policy can minimise the potential for disorder from customers leaving the premises. A policy should clearly set out measures to avoid a mass exit at the end of the evening such as a gradual change in music style and increasing lighting levels.
		(a) Sufficient staff should be available at the end of the evening to manage a controlled shut down of the premises and maintain good order as customers leave.
	CD37	<b>Staff training in preventing disorder</b> should be provided to give them the knowledge and confidence to deal with difficult situations. A record should be kept of the date and name of person trained. Records should be made available for inspection by the police or licensing authority
Customers getting drunk and dealing with drunken	CD38	<b>Drinks promotions</b> should be socially responsible and not encourage excessive drinking.
customers		(a) A documented policy on responsible drinks promotions should be in place at the premises and should adhere to industry codes such as those recommended by the <u>British Beer and Pub Association</u> ( <u>BBPA</u> ) and <u>The Portman Group</u> . This is in addition to adherence with the mandatory licensing condition regarding irresponsible promotions.
		(b) Any drinks promotion should market the availability of soft drinks, and low or alcohol-free alternatives. <u>Club</u> <u>Soda</u> is mindful drinking movement that offers advice to the hospitality industry on a wide range of alcohol-free drinks.

Risk	Good	practice measure
Customers getting drunk and dealing with drunken customers		If spirits are served in double measures, or wine is served in large measures as a standard, this must be made clear to every customer before purchase and must not be hidden in small print on menus. Customers must be made aware of the availability of single measures of spirit or small measures of wine and served to any customer who requests one.
	CD40	<b>Staff training on the effects of alcohol</b> and how to spot symptoms of drunkenness should be regularly undertaken to give them the knowledge and confidence to deal with drunken patrons. It is an offence for someone to knowingly serve alcohol to a person who is drunk and bar staff must be aware of their responsibilities under the Licensing Act 2003. They should be able to recognise appropriate 'cut off' points for serving drunken customers, to reduce the likelihood of fights or aggressive behaviour. A record should be kept of the date and name of person trained. Records should be made available for inspection by the police or licensing authority.
Consumption of alcohol on the street and street drinkers	CD41	<b>Restrict the sale</b> of strong beer and cider above 5.5% ABV and the sale of single cans or bottles of beer and cider. Such sales can contribute to anti-social behaviour and disorder through the consumption of alcohol on the street and in open spaces by street drinkers or persons who are already drunk.
Sale of alcohol outside permitted hours	CD42	<b>Lockable shutters</b> can be fitted on display units for alcohol in retail premises, which can be closed and locked at the end of permitted hours.
Alcohol pricing	CD43	<b>Customers should be aware of the prices they will</b> <b>be charged</b> for food and drink before they make a purchase. Price lists and menus therefore need to be displayed and easily accessible to customers. Prices must be inclusive of VAT and if automatic service charges are imposed, these must be very clear and not hidden in small print.
Measurement of alcohol	CD44	<b>Correct equipment must be used when selling</b> <b>alcohol in licensed premises.</b> Advice can be found on the government funded website <b>Business Companion</b> , which explains in detail the weights and measures requirements when selling alcohol. All staff must be trained in these responsibilities to ensure the correct quantities of alcohol are sold.

# 7. Public Safety

This section provides guidance on good practice for the promotion of public safety at licensed premises. It can help those applying for new licences or varying existing licences in completing their operating schedules. It is also designed to guide licensees on the promotion and management of public safety at their premises after a licence has been granted.

The carrying on of licensable activities, in particular the provision of alcohol and some types of entertainment, can increased the risks to public safety. The consumption of alcohol, combined with recreational drug use can make some customers vulnerable and expose them to risks. It is important therefore, that applicants and licensees take a proactive approach to protecting and managing public safety at their premises.

All applications for new licences and variations should address the steps proposed to promote public safety and this is best achieved through a premises risk assessment.

For new premises or the refurbishment of existing premises, preventative measures should be factored in during the planning and design stage. Consideration should be given to the design and layout of the premises to achieve the highest possible standard of safety.

Licence holders should have documented policies and procedures in place which identify all public safety risks associated with their premises and measures implemented to prevent, manage and respond to those risks.

Risk	Good	practice measure
General safety of staff and customers	PS1	All employers must manage health and safety risks at their workplace by assessing what might cause harm to people and what can be put into place to minimise or prevent that harm. This is known as a <b>risk</b> assessment.
		(a) A risk assessment is unique to the type of premises and style of operation but may include matters such as slips, trips and falls, violence/aggressive behaviour from customers, manual handling, noise from music, use of pressurised equipment, exposure to high temperatures, hazardous substances, or fire.
		(b) Advice and templates for risk assessments can be found on the the <u>Health and Safety Executive (HSE)</u> website. The City of London <u>Health and Safety Team</u> can also offer advice to businesses on any health and safety matter.
		(c) Premises with 5 or more employees must document the assessment. All staff should be made aware of the risk assessment and precautionary measures therein. A copy of the risk assessment should be kept at the premises and made available for inspection if requested by a City of London officer.

General safety of		(d) There is no set frequency for reviewing the
staff and customers		assessment but it is good practice to review it regularly, and at least every 12 months.
	PS2	<b>First aid boxes</b> should be available at the premises and maintained with sufficient in-date stock.
	PS3	A recognised qualification in first aid should be held by at least one member of staff on duty when the premises licence is in use. Other staff should be trained to a basic first aid standard with records kept of the date and name of person trained.
	PS4	<b>A first aid room</b> or quiet room should be made available to anyone requiring medical attention.
	PS5	<b>Temperature levels</b> and humidity in venues should be controlled for the comfort and safety of customers. An environment that is too hot or too cold can make customers irritable. Premises should be adequately heated and ventilated to avoid this. This can be achieved through use of air conditioning systems, fans, or natural ventilation in non-residential areas.
Overcrowding	PS6	A documented capacity should be set for the premises overall and for individual rooms within the premises. Capacity can be determined by a risk assessment in consultation with the fire safety authority. The risk assessment should consider factors such as floor space, available fire exits, and means of escape as well as comfort factors such as numbers of toilets and potential queuing time.
	PS7	A policy to manage the capacity should be adopted to prevent overcrowding and/or localised overcrowding.
		(a) The use of electronic clocking systems, ID scanning systems, clickers, ticket sales or head counts may be appropriate.
		(b) Consideration should be given to deliberately running below capacity to afford a comfort factor for customers.
Accumulation and disposal of glasses / drinking vessels	PS8	A glass collection policy should include provisions for regular collection of glassware by staff and the prevention of glassware from being taken into external areas. Glassware should not be allowed to accumulate or cause obstruction. Perimeter checks should be made outside the premises for any glasses or bottles. All staff must be made aware of the glass collection policy and their responsibility for the task.

	PS9	<b>Spillages and broken glass</b> should be cleaned up immediately to prevent floors from becoming slippery and unsafe.
	PS10	<b>Bottle bins</b> should be secure and away from public areas.
Accident or other emergency incident on the premises	PS11	Documented policies to deal with all types of accidents & emergency incidents including fire, should be in place at the premises.
		(a) The policies should be based on risk assessments and might include matters such as responding to and recording/reporting of accidents, providing medical care, emergency management, contingency planning and evacuation procedures in the event of fire, bomb threats or suspect packages, when to contact emergency services, and providing support to staff or customers in the aftermath of an accident or incident.
		(b) Evacuation responsibilities should be clearly communicated to staff, routes and exits should be well defined and evacuation plans exercised regularly.
		(a) Copies of the accident, emergency incident and fire risk assessments should be kept at the premises and made available for inspection by the fire authority and licensing authority if required.
	PS12	<b>A fire detection system</b> should be in place at the premises and should be maintained fully functional. The system should be tested regularly with records kept and made available for inspection.
	PS13	<b>Means of escape</b> in case of any emergency must be clearly visible, unobstructed, and well-maintained including areas outside exits leading to a place of ultimate safety such as the street. Checks should be carried out before opening each day to ensure that exits are unlocked and unobstructed.
	PS14	Equipment should be checked and maintained regularly with a record kept of the date and findings of the checks.
	PS15	<b>Staff training in fire safety</b> should be provided for all staff to give them the knowledge and confidence to deal with emergency situations, including location of equipment, utilities, services and layout of premises. Training should include how to use fire extinguishers. Records should be kept of the date and name of person trained and made available for inspection.

Accident or other emergency incident on the premises	PS16	<b>An accident book</b> should be kept on site to record all accidents or incidents and made available for inspection.
Customer Vulnerabilities – drug use, intoxication or drink spiking	PS17	<b>Drug use</b> is common amongst people going out to pubs, bars and clubs and for some people it is integral to a good night out. Despite efficient measures aimed at preventing drugs being brought into or sold at premises, some people will take drugs before going out or will find ways of taking drugs whilst out at licensed premises. Some people may have an adverse medical or psychological reaction to drug use or the combined effects or alcohol and drug consumption. <b>Intoxicated</b> <b>customers</b> may become confused, disorientated, emotional, separated from their friends, or incapacitated. There is therefore an expectation that licensees will take responsibility for people affected by drugs or alcohol from the point they join a queue to get in through to them getting home safely.
	PS18	<b>A duty of care policy</b> should clearly set out how licensees will respond to drug, or alcohol induced problems and the type of interventions available to persons suffering adversely from the effects of drugs or alcohol.
		(a) The policy should include drug awareness training for all staff so that they can recognise the effects of controlled drugs and seek medical attention where necessary.
		(b) The policy should clearly express that every effort will be made by staff to prevent patrons from deteriorating to an uncontrolled intoxicated extent.
		(c) When staff are collecting glasses, they can interact with customers and assess the levels of drunkenness or signs of drug use. Any concerns should be reported back to a manager
		(c) On no account should anyone suffering from ill effects of drug or alcohol use be ejected from the premises or left alone unmonitored. It is important to unite them with their friends to ensure they get home safely.
		(d) Guidance for licensees can be found at <u>Safer</u> <u>Nightlife</u> , an online resource produced by the London Drug and Alcohol Policy Forum.

Customer	PS19	Refusing entry to anyone who appears to be showing
Vulnerabilities –		signs of drug use or intoxication and contacting the
drug use,		emergency services in appropriate circumstances. In
intoxication or drink		such cases, an entry should be made in an incident
spiking		logbook.
5		5
	PS20	Drink-aware posters can be displayed in the premises
		to remind customers of the unit content in alcoholic
		drinks and the safe alcohol consumption limits
	PS21	Prevent the possibility of drink spiking by offering
		preventative measures and guidance to customers. A
		drink can be spiked by adding drugs to it or by adding
		more alcohol to it. A spiked drink can have dangerous
		consequences for the health or welfare of the person
		whose drink it is and can make them vulnerable to
		assault.
		(a) Preventative measures might include
		• the provision of drink protectors such bottle stoppers
		or StopTopps foil covers to customers
		displaying prominent signage reminding customers
		not to leave their drinks unattended and not to accept
		drinks from strangers
		<ul> <li>staff awareness and vigilance in monitoring</li> </ul>
		disorientated customers and unattended drinks, and
		reporting any suspicious activity to a manager and to
		the police.
		(b) If a customer suspects that their drink has been
		spiked, you should report it to the police immediately
		and record as much information as you can about the
		incident:
		<ul> <li>full details of the affected person</li> </ul>
		• full description of the suspected perpetrator if known
		• time and location of the incident
		• seize, preserve and secure the drinking vessel
		containing suspected drug until Police arrive
		• ensure the well-being of the customer, calling an
		ambulance if required, and ensuring they are with
		trusted friends
		(a) A process for this should be also due set sut in success
		(c) A process for this should be clearly set out in your
		duty of care policy.
		(c) Eurthor guidance can be found at Local Covernment
		(c) Further guidance can be found at <u>Local Government</u>
		Association and Drinkaware
	PS22	A 'chill out' area should be provided for vulnerable or
	1 022	unwell customers. This should be a cooler and quieter
		area than rest of venue, with the availability of water
		and support staff.

Customer Vulnerability – sexual harassment	<b>PS23 Sexual harassment or assault,</b> usually gender-based, can occur at licensed premises, and can be exacerbated if customers have become vulnerable due to alcohol or drug consumption.
	(a) Businesses and licensees should develop anti- sexual harassment policies to promote a safer night- time environment in venues, provide information to customers on how to report sexual harassment, and encourage bystanders to identify, challenge and report unwanted behaviours. Guidance, information and membership can be found at <u>Good Night Out</u> and at <u>Mayor of London Women's Night Safety Charter</u>
	(b) Staff should be educated to understand and respon- to reports of sexual harassment. Accredited training such as that provided by <u>Good Night Out</u> or the free Safer Sounds Partnership <u>Welfare and Vulnerability</u> <u>Engagement (WAVE)</u> training is preferential.
	(c) Licensees should adopt the ' <b>Ask for Angela</b> ' campaign at their venues. Ask for Angela is a consume facing campaign which allows people who feel like they are in an unsafe situation to ask for help from the venue. Information can be found at <u>Safer Sounds</u> <u>WAVE programme</u>
	(d) Campaign posters such as <u>'Reframe the Night'</u> can be displayed at premises to help change people's attitudes to harassment.
Customer Vulnerability – suicide	<b>PS24 Licensed premises within high rise buildings with</b> <b>outdoor roof terraces</b> could create potential suicide risks to vulnerable persons.
	(a) Licensees with outdoor roof terraces should take a proactive approach to identify and design out or mitigate any suicide risks. Mitigations may include physical barriers such as balustrades or planting as a deterrent from accessing the edge of the building, lighting, or additional staffing arrangements in high-risk areas. Guidance and information can be found on the Gov.UK website, <u>Suicide Prevention in Public Places</u>
	(b) Staff should be trained in suicide prevention awareness, enabling them to recognise warning signs and giving them the confidence to intervene or distract vulnerable person and to seek assistance for them. Free Suicide Prevention Awareness training is available to City businesses via The City of London Corporation's

		<ul> <li>Business Healthy team: Business Healthy Events and to anyone via the Mayor of London's <u>#ZeroSuicideLDN</u> campaign</li> <li>(c) Licensees should ensure there are arrangements in place to support the mental wellbeing of their employees and to support staff who have intervened or witnessed a suicide.</li> </ul>
Smoking on the premises	PS25	Staff should be aware of their responsibilities regarding smoke-free legislation, including the use of e-cigarettes, and for monitoring compliance.
Safety of customers when leaving the premises	PS26	<b>Discourage drink driving</b> by promoting schemes such as Designated Driver, with notices clearly displayed throughout the premises.
	PS27	<b>Display information</b> to customers on safe travel at night options, including public transport options, access to licensed taxi cabs / taxi ranks and licensed pre- booked private hire vehicles.
	PS28	A 'chill out' period at the end of an evening can facilitate a slow dispersal from the premises allowing door staff to manage any problem individuals or anti- social behaviour / clashes with groups from other venues.
	PS29	<b>Increased lighting</b> inside the premises should be considered towards the end of an evening to affect the alertness of customers before they leave the premises.
		(a) <b>Increased external lighting</b> particularly in car parks under the direct control of the licence holder will provide added safety for customers as they leave the premises. Care should be taken so that lighting does not impact on neighbours, particularly in and close to established residential areas.

# 8. Prevention of public nuisance

This section provides guidance on good practice for the prevention and management of public nuisance from licensed premises. It can help those applying for new licences or varying existing licences in completing their operating schedules. It can also help licence holders with the prevention and management of noise and other public nuisance issues from their premises after a licence has been granted.

Excessive noise and nuisance from licensed premises are major concerns for persons living or working in the area. It is therefore recommended that applicants and licensees take a proactive approach to preventing and managing public nuisance from their premises.

All applications for new licences and variations should address the steps proposed to prevent public nuisance. Where entertainment or other potentially noisy activity is planned, a noise assessment should be carried out. For some premises, the assessment will need to be carried out by a suitably qualified noise consultant.

For new premises or the refurbishment of existing premises, preventative measures should be factored in during the planning and design stage. Consideration should be given to the structure and layout of the premises and equipment both internally and externally, to ensure that the premises are fit for purpose. Sound attenuation measures can include wall linings, acoustic curtains and acoustic treatment to mechanical ventilation or air conditioning systems. Consideration should also be given to historical noise problems at the premises with measures put in place to prevent them from recurring.

Licence holders should have clearly documented policies and procedures in place which identify all public nuisance risks associated with their premises and measures implemented to prevent, manage and respond to those risks. Licence holders should engage with local residents and businesses on a regular basis to ensure that they are being good neighbours and dealing with problems as they arise.

Risk Music, singing and speech noise breakout from the premises	Good practice measure		
	PN1	A premises specific noise management policy should be in place that sets out sound attenuation measures to prevent or control noise break out of music, singing or speech from the premises.	
		(a) The policy should preferably be based on the findings of an acoustic consultant's assessment.	
		(b) All staff should be trained on the content of the policy to ensure a commitment to good noise management. A record should be kept of the date and name of person trained and made available for inspection by the licensing authority or environmental health responsible authority.	

	<ul><li>(c) DJs, event promoters or other entertainment providers should be made aware of the policy in advance of any performance.</li><li>(d) Use an approved list of DJs, event promoters or other entertainment providers who have signed up to the</li></ul>
PN2	policy. Windows and doors should be kept closed whilst the premises licence is in use to prevent noise breakout.
	Ventilation should be provided by mechanical means.
	(a) Windows should be sound insulated.
	(b) Emergency exits should be sealed acoustic doors.
	(c) A lobbied area (two sets of self-closing doors) should be provided at the entrance and exit to the premises.
	(d) Doors should be fitted with self-closing devices.
PN3	<b>A sound limiting device</b> should be installed, set and sealed at a level approved by an acoustic consultant.
	(a) The sound limiting device should always be used when music or other forms of entertainment is taking place, including all externally promoted events.
	(b) Only the premises licence holder or a nominated deputy and the designated premises supervisor should have access to the sound limiting device.
PN4	<b>Locate entertainment facilities</b> such as DJ booth, stage, and speakers inside the premises and not position them near or pointing at doors and windows. Rubber speaker mounts can be used to minimise structure borne noise.
PN5	<b>Methods for monitoring noise</b> should be included in a noise policy. Methods could range from simple perimeter checks and listening tests by the licence holder/staff to a detailed measurement taken by a qualified consultant using sound measuring equipment.
	(a) Noise monitoring should actively be carried out on a regular basis and particularly when a new form of entertainment is introduced at the premises, when alterations are made to the premises or when a complaint is made directly to the venue.
	PN3

Music, singing and speech noise breakout from the premises	PN6	<b>A logbook</b> should be kept of any noise monitoring carried, the findings and any remedial action taken. The log should indicate whether it was routine noise monitoring or the result of a complaint. The logbook should be made available for inspection by the licensing authority or environmental health responsible authority.
	PN7	A contact telephone number should be made available to residents and businesses in the immediate area which they can use to report noise disturbances to a responsible person at the venue as and when they occur. The phone line should always be available when the premises licence is in use.
Noise and nuisance from customers arriving and leaving the premises	PN8	<b>Reduce the potential for excessive queue lines</b> with a well-managed and efficient door policy.
		(a) Long queues should be avoided, and any queues should be directed away from residential properties.
		(b) Queues should be actively managed by door staff, especially later in the evening, to keep noise to a minimum. Rowdy behaviour from people queuing to get in should not be tolerated. Door staff should refuse entry to anyone behaving in an anti-social way.
		(c) In residential areas, consider restricting admittance or re-admittance to the premises after 11pm.
	PN9	A customer dispersal policy can minimise noise disturbance to residents from customers leaving the premises. A policy should clearly set out measures to avoid a mass exit at the end of the evening.
		(a) A gradual change in music style and reduction in volume, for example quiet or mellow music towards the end of an evening and increasing lighting levels can help to reduce the potential for rowdy behaviour.
		(b) Sufficient staff should be available at the end of the evening to manage a controlled shut down of the premises, to aid dispersal and maintain good order as customers leave.
	PN10	<b>Display prominent notices</b> close to the exit doors, requesting patrons to leave the area quickly and quietly.
		(a) Make announcements at the end of an evening, requesting patrons to leave the premises and area quickly and quietly

Noise and nuisance from customers arriving and leaving the premises	PN11	<ul> <li>(b) Display notices in car parks reminding patrons that they are in a residential area and to leave quickly and quietly and not to slam doors, rev engines, sound horns or play loud music.</li> <li>Provide an internal waiting area for customers waiting for taxis to prevent noise disturbance to neighbours. Steps should be taken to ensure that customers board their taxi or private hire vehicle as quickly and quietly as possible to prevent engines idling unnecessarily or horns being sounded.</li> </ul>
Noise, nuisance, anti-social behaviour, or odours from customers using external areas such as beer	PN12	<b>Display prominent signs</b> in external areas such as beer gardens, roof terraces, pavement licensed areas and forecourts asking customers to be respectful to neighbouring property owners and to keep noise to a minimum.
gardens, roof terraces, forecourts, pavement licenced areas, or public highway / open	PN13	<b>Restrict the use of external areas</b> after 10pm if premises are in a residential area. Some areas in the City may require earlier finish times depending on sensitivity.
spaces.	PN14	<b>Door supervisors or staff</b> should regularly monitor and manage external areas to ensure that customers are not obstructing the highway or causing a disturbance to residents.
		(a) Do not permit customers to obstruct the public highway or the doorways of neighbouring residential, commercial or office premises. Pedestrians must have unobstructed access to the highway and should not be forced to step into the road to pass by.
		(b) For private forecourts, a physical barrier such as a rope should be used to mark the boundary of the area outside the premises where customers are allowed.
	PN15	Limit the number of smokers permitted outside at any one time after a certain time, discourage smokers from loitering outside by not permitting them to take their drinks with them and removing external furniture after a certain time and locate smoking areas away from residential premises
	PN16	Locate designated smoking areas away from residential properties or offices

Noise from staff and entertainment providers leaving the premises	PN17	<b>Staff and performers who depart late at night or in the early hours</b> of the morning when the business has ceased trading, should conduct themselves in such a manner as to avoid causing disturbance to nearby residents. This includes the loading and unloading of artists' equipment.
Noise and disturbance caused by deliveries, collections and waste disposal	PN18	<b>Commercial deliveries, collections and storage/ disposal of waste</b> , including beer deliveries, refuse collections and storage / disposal of waste and recyclables in external areas should be restricted to normal working hours between 8am and 6pm Monday to Friday.
	PN19	<b>Use rubber matting</b> for the movement of barrels, cylinders and bottles.
Litter and waste around the premises	PN20	Flyers should not be distributed outside the premises by the licence holder, any staff employed by the licence holder, or by promoters of events at their premises.
		(a) Procedures should be in place for the prompt collection of street litter generated by the premises for example flyers, cigarette butts, disposable e-cigarettes, or food wrappers.
		(b) Regular patrols of the area outside the premises should be undertaken by staff to clear any litter attributable to the premises.
		(c) Use wall or floor mounted cigarette bins in designated smoking areas for customers.
Disturbance from external lighting	PN21	<b>External lighting</b> for the premises should be turned off after the premises are closed to the public.
Noise or odours from plant and machinery or alarms	PN22	<b>Plant and machinery should not cause nuisance</b> to residents by way of noise, odours or vibration. Acoustic measures such as screening, enclosures, anti-vibration mounts, silencers or timing clocks should be used if necessary.
	PN23	<b>Noise from an activated alarm -</b> if the alarm is activated when no-one is physically present at the premises, it should be capable of being deactivated remotely and/or the City's Environmental Health team should be provided with an up-to-date key holder list and contact numbers.

# 9. Protection of children from harm

This section provides guidance on good practice for the protection of children from harm at licensed premises. It can help those applying for new licences or varying existing licences in completing their operating schedules. It can also help licence holders with the protection of children from harm at their premises after a licence has been granted.

The carrying on of licensable activities in particular the provision of alcohol and some types of entertainment can increase risks of harm to children attending licensed premises. It is therefore recommended that applicants and licensees take a proactive approach to protecting and managing the well being of children at their premises.

All applications for new licences and variations should address the steps proposed to protect children from harm. This is best achieved through a premises risk assessment.

Licence holders should have clearly documented policies and procedures in place which identify all age restricted risks at their premises and measures implemented to prevent, manage and respond to those risks.

Risk	Good	practice measure
Children in licensed premises	СН1	The City encourages all demographics, and does not wish to discourage families and children from enjoying visits in the City. Many venues in the City of London are family friendly places offering a warm welcome to parents and children. To protect children from harm whilst in licensed premises, licensees should have a <b>documented policy to protect children from harm.</b> A policy should consider:
		<ul> <li>training for all staff in what the Licensing Act says on the restriction of alcohol sales to under 18s and the personal penalties if found responsible for doing so</li> </ul>
		<ul> <li>operating a Challenge 25 scheme and staff serving alcohol to ask for ID from anyone appearing to be under the age of 25</li> </ul>
		<ul> <li>electronic point of sale prompts to ask for ID</li> </ul>
		<ul> <li>documenting acceptable forms of ID to accept and a procedure for dealing with fake IDs</li> </ul>
		<ul> <li>actively monitoring the venue for any underage consumption</li> </ul>
		<ul> <li>the screening of any films are age appropriate</li> </ul>
		•the provision of any entertainment is age appropriate . All staff including door staff and bar staff should be trained on the policy.

	CH2	Licensees must restrict access to children under 16 years old who are not accompanied by an adult if:
		(a) the premises are primarily or exclusively used for the sale and consumption of alcohol; and
		(b) in any premises, between the hours of midnight and 5am.
Underage sales of alcohol	СНЗ	<b>Operate a strict 'No ID, No Sale' policy. A Challenge</b> <b>25 scheme</b> gives staff additional support and encouragement to ask for ID from any person appearing to be under 25 years of age to prove that they are over 18. It serves as a reminder to staff to be vigilant in preventing underage sales and to customers that it is against the law for anyone under 18 to purchase alcohol. Guidance can be found at the <u>Retail of Alcohol</u> <u>Standards Group (RASG)</u>
		(a) Only accept photographic driving licences, passports or PASS (Proof of Age Standards Scheme) cards approved as means of ID. If you accept other forms of ID such as EU National ID cards, these must bear a photograph, date of birth and holographic mark. Guidance and information can be found at <u>PASS</u>
		(b) Use till prompts to remind staff to ask for proof of age.
		(c) Prominently advertise the scheme in your premises so that customers are aware and display proof of age signs at the point of sale.
	CH4	<b>Display posters at the premises</b> stating that it is an offence to purchase alcohol on behalf of an underage person (proxy sales).
	CH5	Adverts or promotions for alcohol should not appeal to young persons.
	CH6	<b>Keep a refusals logbook</b> (or refusal button on EPOS – Electronic Point of Sale) on the premises and ensure it is completed whenever a sale is refused to a person who cannot prove they are over the age of 18.
		(a) The logbook should contain the date and time of the incident, a description of the customer, the name of the staff member who refused the sale, and the reason the sale was refused, and should be made available to Police and authorised Council officers on request

		(b) The logbook or electronic record should be reviewed on a regular basis to see if any patterns emerge.
	СН7	<b>Staff training</b> in the age-related sections of the Licensing Act 2003 should be provided to all door, bar and till staff. This includes the ability to competently check customers' identification where necessary. A record should be kept of the date and name of person trained.
Access to age restricted films	CH8	Adequate provisions for restricting children from viewing age restricted films should be in place at the premises.
		(a) Staff should be trained to check ages at point of sale and prior to entry to a screening room to ensure that admission of children to films is in accordance with the recommendations of the British Board of Film Classifications (BBFC).
Access to age restricted gaming machines	СН9	Age restricted gaming or vending machines should have suitable signage setting out the age restrictions and should be in full view of staff for monitoring to prevent underage gambling.
		(a) All category C gaming machines musts be located in a place within the premises that can be supervised by staff
		(b) anyone who appears to be under the age of 18 must be aged checked. If they cannot provide ID, they must be refused access to the gaming machine
Access to entertainment of an adult nature	CH10	<b>Children under the age of 18 should be excluded</b> from the premises or part of the premises when specified activities such as adult entertainment are taking place.
	CH11	Adverts for entertainment of an adult nature should not be displayed externally on the premises or in any part of the premises internally where they can be seen by young persons.
Child Sexual Exploitation at licensed premises	CH12	<b>Recognise indicators of child sexual exploitation</b> through the premises risk assessment and operating policy. Licensed premises may be used to groom or exploit young people. In order to mitigate any risks of

child sexual exploitation at licensed premises, licensees should:
<ul> <li>include within their business operating policy or duty of care policy, provisions to protect young people from child sexual exploitation</li> </ul>
<ul> <li>report any suspicious activities or concerns about possible perpetrators of child sexual exploitation to the Police</li> </ul>

#### **Useful Contacts**

#### City of London Counter Terrorism Security Advisors CTSA@city-of-london.pnn.police.uk

#### City of London Health and SafetyTeam

Markets and Consumer Protection PO Box 270, Guildhall London EC2P 2EJ Telephone: 020 7606 3030 Email: M&CP-EH-Commercial@cityoflondon.gov.uk

#### City of London Environmental Health Team

Markets and Consumer Protection PO Box 270, Guildhall London EC2P 2EJ **Telephone: 020 7606 3030 Email:** <u>DES-EH-Pollution@cityoflondon.gov.uk</u>City of London Licensing Authority Markets and Consumer Protection PO Box 270, Guildhall London EC2P 2EJ **Telephone: 020 7332 3406 Email:** <u>licensing@cityoflondon.gov.uk</u>

#### **City of London Planning Team**

Department of the Built Environment PO Box 270, Guildhall London EC2P 2EJ Telephone: 020 7332 1710 Email: plans@cityoflondon.gov.uk

#### City of London Police Licensing Team

PO Box 270, Guildhall London EC2P 2EJ Telephone: 020 7601 2736 Email: licensingoffice@cityoflondon.pnn.police.uk

City and Hackney Public Health team Email: public.health@hackney.gov.uk

#### City of London Trading Standards Team

Markets and Consumer Protection PO Box 270, Guildhall London EC2P 2EJ Telephone: 020 7606 3406 Email: trading.standards@cityoflondon.gov.uk **Resources:** 

# Α

Action Counters Terrorism (ACT) training https://ct.highfieldelearning.com

# В

British Beer and Pub Association (BBPA) https://www.beerandpub.com

British Institute of Innkeeping (BII) https://www.bii.org

Business Companion https://www.businesscompanion.info

# С

Centre for the Protection of National Infrastructure <a href="https://www.cpni.gov.uk/">https://www.cpni.gov.uk/</a>

City of London Business Healthy <u>https://www.businesshealthy.org</u>

Club Soda https://joinclubsoda.com

D

Drinkaware https://www.drinkaware.co.uk

G

Good Night Out Campaign https://goodnightoutcampaign.org

# Η

Health and Safety Executive http://www.hse.gov.uk

#### I

Information Commissioner's Office <u>https://ico.org.uk</u>

Institute of Acoustics http://www.ioa.org.uk

L

Local Government Association <u>https://local.gov.uk</u>

Μ

Mayor of London's Women's Night Safety Charter <u>https://www.london.gov.uk/what-we-do/arts-and-culture/24-hour-london/womens-night-safety-charter</u>

Mayor of London's Zero Suicide Campaign https://thriveldn.co.uk/campaigns/zerosuicideldn/

Ν

National Pubwatch https://www.nationalpubwatch.org.uk

Night-Time Industries Association (NTIA) <a href="https://www.ntia.co.uk">https://www.ntia.co.uk</a>

Ρ

PASS – National Proof of Age Standards Scheme <a href="https://www.pass-scheme.org.uk">https://www.pass-scheme.org.uk</a>

Police Protect UK (incorporating National Counter Terrorism Security Office (NaCTSO)) https://www.protectuk.police.uk/

Portman Group http://www.portmangroup.org.uk

R

Retail of Alcohol Standards Group (RASG) https://rasg.org.uk

Reframe the Night <a href="https://www.cityoflondon.gov.uk/services/community-and-safety/reframe-the-night">https://www.cityoflondon.gov.uk/services/community-and-safety/reframe-the-night</a>

S

Safer Business Network https://www.saferbusiness.org.uk

Safer Nightlife https://www.safernightlife.info

Secured by Design www.securedbydesign.com

# Security Industry Authority

https://www.gov.uk/government/organisations/security-industry-authority

SentrySIS https://sentrysis.com

Suicide Prevention in Public Places

https://www.gov.uk/government/publications/suicide-prevention-suicides-in-publicplaces

W

Welfare and Vulnerability Engagement (WAVE) <a href="https://www.safersounds.org.uk/wave">https://www.safersounds.org.uk/wave</a>