

**L I C E N S I N G   S U B  
C O M M I T T E E   E**

**Supplementary Papers**

14 December 2021

at 2.00pm



To Whom It May Concern,

I understand that heading to a hearing, each party only has a short amount of time to speak or answer any questions, so I write this letter to give some background information on myself as the potential licensee in the hope that it further allays any concerns that yourselves may hold regarding this application. I will also address representations made toward the Premises License application by Thirsty Boy Wine Co Ltd at 2-4 Tottenham Road N1 4BZ.

I have worked in the wine industry for the past 10 years, both in Australia and the UK, holding management positions in both retail and restaurant environments. My time spent working in Sydney overlapped with the introduction of some of the strictest localised and general alcohol legislation anywhere in the world. Even the most basic workplace position in any business related to alcohol requires the completion of Responsible Service of Alcohol qualifications, which have to be renewed periodically. No such required qualification exists in the UK, only those who operate as Designated Premises Supervisors are required to complete accredited Personal Licence training and pass examinations, which I have done. Following discussions with the Police we have agreed on conditions that I as the licensee will be involved in various local initiatives promoting both responsible service and safe consumption of alcohol, and that all staff will be afforded education and training in this area.

Coupled with this is experience working under extremely tight anti-smoking laws, which do not permit smoking in areas where food is consumed and have gone some way to drastically lowering the smoking rates in Australia. This is something which I intend to enforce at the premises for anyone drinking outside whilst seated (if this is approved by Hackney Council). I want patrons to be able to enjoy their wine, and its aromatic complexities without the hindrance of secondhand smoke. As stated in my response to the private representation, those willing to smoke will be directed away from residential areas toward Kingsland Road for this purpose, and will not be permitted to take their drinks with them. This is also intended at reducing instances of littering. It is my intention that all permanent staff be put through Personal Licence training so that they be acutely aware of their responsibilities under the law. All staff will also be participating in WAVE training with the local police and as the licensee I will be attending Hackney Pubwatch. I am a small business owner operating in a highly regulated field, and have no intention of engaging in or permitting any behaviour that puts the sustainability of my business at risk.

I had extended conversations with the landlord prior to agreeing the terms of the lease regarding potential noise and his wish to not disturb local residents, and subsequently with the Police to confirm that there will be steps taken to reduce noise pollution. Any music will be played internally only, and at an ambient level. It will not be audible externally. Furthermore, the contact details of the Licensee and other management will be made readily available should any local residents find issue with noise that they wish to alert me or other staff of. These conversations have extended to highlight the consistent complaints made by the resident in Nimrod Passage toward any sort of development or change in the building. This has been highlighted during the private representation where the building owner is directly accused of not

respecting neighbours. I am of the opinion that whilst some of the concerns raised are warranted and understandable, they have also been answered and methods to alleviate outlined. I am also of the opinion that this private representation is affected by bias based upon previous encounters between this party and the building owner, which should have absolutely no influence on this application. There are two other commercial unit spaces that separate the ground floor unit for which I have applied from the entrance to Nimrod Passage. It is feasible that aside from accessing a mailbox, myself or other persons connected to Thirsty Boy Wine Co Ltd will never enter the passage, and nor will any outdoor seating encroach within 5 metres of this entrance. Furthermore, the representation made by resident/s at De Beauvoir Place which again directly references the owner of the property shows a malicious bias toward this application and is in no way relevant to the granting of this premises licence.

Further addressing the representations made by resident/s within De Beauvoir Place. I had accepted a proposal to meet with the Estate Manager to discuss these representations and better explain the business plan, but this was subsequently ignored. The location is in close proximity to Kingsland Road, and as all noise will be contained within the premises after the closing of any outdoor seating area, will not contribute to any further late night noise pollution in the area. After consultation with the Police I have agreed to the following licensed hours, which incorporate a 30 minute last drinks period to help ensure an orderly dispersal of patrons.

Monday 12:00-21:30

Tuesday 12:00-21:30

Wednesday 12:00-21:30

Thursday 12:00-22:00

Friday 12:00-22:30

Saturday 12:00-22:30

Sunday 12:00-20:30

The premise will function mostly as a wine shop and distribution point for the e-commerce businesses under the Thirsty Boy Wine Co Ltd umbrella. These businesses are partnered with DHL couriers, with strict collection windows that will not add to any traffic or traffic related noise in the street. The premise is to have a capacity limit of 24 persons seated for drinking on premise and only these customers will be served open containers. This is to ensure that customers who are hoping to browse and purchase wine for take away consumption can do so in a comfortable environment as well as to restrict the amount of noise and potential for outside disturbances. I envisage, based on my interactions with other similar venues in London, and conversations with local residents who are already customers, that the vast majority of my customer base will be those wanting to talk about, and learn about wine in a comfortable environment. It is certainly not going to be a late night drinking establishment as described in the representation, where customers are encouraged by access to cheap alcohol to then go on and cause disruption to local residents.

Various premises licenses have been granted within a close proximity to 2-4 Tottenham Road in recent times, including but not limited to the following:

Hector's - 49a Ardleigh Road, N1 4HS  
Sup Ya Ramen - 499 Kingsland Road, E8 4AU  
Strelitzia - 515 Kingsland Road, E8 4AR

In each instance these licenses have been granted to businesses that are in close proximity to residential areas, and operate at extended hours to the ones proposed in this application. I specifically mention the licence granted to Strelitzia, with reference to the point that the space be better suited to a cafe closing at 8pm, contradicting this point as well as the reference toward overprovision. Having consulted the owners of various wine specific businesses in the area I have been heartened by their descriptions of a vibrant local following and engaged community and see no reason why I should have any different experience. It is an area that I have chosen specifically because it shows a dedicated target market of interested consumers, a demographic that is very different from that attending other licensed venues in the area or purchasing alcohol from local off-license or supermarkets. This is a more discerning consumer, the likes of which the local area should be trying to attract.

Referring to Hackney's own licensing consultation report regarding the Dalston SPA there is a consistent theme of both local residents as well as business owners disagreeing with proposals on the grounds of damaging diversity, encouragement for people to drink in the streets rather than licensed venue causing ASB, falling attraction of the area and the severe loss of business. Consistent agreements with the policy note that restricted hours are good for residents and that noise from outdoor events stopping at reasonable time are also positive. Both of these needs have been met by this application. I am in no way deriding the Dalston SPA, I agree with many of the requirements which is why I intend to operate with such a strict policy toward drunk and disorderly behaviour and related anti-social behaviour.

I am sure you will have already seen my direct response to the private representations. I attempted to make this based on logic and reason rather than bringing my own emotions into the picture. There is zero point in causing any sort of antagonism between myself and this party on issues which I believe no amount of reasoning would lead to a change of opinion based on the language used and a clear unwillingness to acknowledge and understand the initial business proposal. Instead I appeal to the sub-committee to allow the granting of this license so that a small business owner who has managed to make something sustainable from the past 18 months of uncertainty can continue to grow a business that has already developed a loyal and supportive customer base, many of whom reside within the borough. As already stated, my background and training is based upon incredibly strict licensing rules, of which I have always upheld and which I will enact in this premise should the licence be granted. I believe that the business plan was fundamentally misinterpreted or ignored by local residents making representations and I look forward to welcoming them to the premise for a glass of wine, should they wish, if this licence is approved.

Regards,  
Daniel Long



Item 7 -  
Additional information from the Applicant

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**CCTV submitted for hearing-**

**Appendix 35- SKG/01**

| <b><u>Footage<br/>Run time</u></b> | <b><u>Date/Times</u></b>       | <b><u>Description of footage</u></b>   |
|------------------------------------|--------------------------------|--|
| <b><u>00:00-00:<br/>09</u></b>     | <b><u>0100 am</u></b>          | <b><u>Calvert Avenue(residential<br/>estate) at 0100 hours on<br/>Monday 6<sup>th</sup> September. Empty of<br/>people- Cargo event finishes at<br/>0100.</u></b>  |
| <b><u>00:10-03<br/>05</u></b>      | <b><u>0129-0132<br/>am</u></b> | <b><u>0129- 0132 hours, 30 minutes<br/>after the CARGO event finishes<br/>the footage shows people<br/>coming out of Rivington Street<br/>and onto on Shoreditch High<br/>Street. The numbers are so vast<br/>this then spills out onto the road<br/>and into moving traffic. At one<br/>point a female is dancing in the<br/>middle of the road, numerous<br/>vehicles and two buses struggle<br/>to move through the crowd.<br/>Some of the revellers then<br/>gather onto Calvert Avenue.</u></b> |
| <b><u>0305-032<br/>0</u></b>       | <b><u>0217 am</u></b>          | <b><u>0217 hours people still hanging<br/>around Calvert Avenue</u></b>  |
| <b><u>0321-032<br/>5</u></b>       | <b><u>0432 am</u></b>          | <b><u>0432 hours, people still loitering<br/>around Calvert</u></b>  |

|                  |                |   |
|------------------|----------------|---|
| <u>0325-0332</u> | <u>0110 am</u> | <u>0110hours- Cargo event has finished and crowds leaving the venue</u>                                 |
| <u>0332-0344</u> | <u>0120 am</u> | <u>0120 hours- people still leaving</u>   |
| <u>0344-0355</u> | <u>0125 am</u> | <u>0125 hours SIA at the top of Rivington St dispersing crowd onto Shoreditch High Street</u>           |
| <u>0355-0400</u> | <u>0132 am</u> | <u>0132 hours, SIA standing at the top of Rivington St whilst crowds are in the middle of the road.</u> |
| <u>0400-end</u>  | <u>0220 am</u> | <u>People still loitering in the area.</u>  |

## Cargo – Police Licensing presentation

| <u>Footage<br/>Run time</u> | <u>Date/Times</u>                       | <u>Description of footage</u>  |
|-----------------------------|---|--|
| <u>00:00-00<br/>:21</u>     | <u>06/09/2020<br/>00:46</u>             | <u>Disorder o/s venue.<br/>Large unmanaged queue to the<br/>left of the venue<br/>Large crowds police having to<br/>walk through with suspect.</u>   |
| <u>00:22-00<br/>:37</u>     | <u>30/05/2021<br/>0046 -0100<br/>am</u> | <u>Police dealing with a stabbing<br/>but have to walk through<br/>dense crowd. This incident<br/>created disorder in the area.<br/>The crowds of people in and<br/>around the entrance to Cargo<br/>(on the left) can be seen. No<br/>proactive dispersal, queue<br/>management or crowd control.</u> |
| <u>00:37-00<br/>:51</u>     | <u>30/05/2021<br/>at 2330</u>           | <u>Police dealing with hostile<br/>crowd.</u>  |
| <u>00:52-01<br/>:13</u>     | <u>25/07/2021<br/>0332 and<br/>0341</u> | <u>Shoreditch High Street-<br/>dispersal time</u>  |
| <u>01:14-01<br/>:16</u>     | <u>05/12/2021<br/>0356</u>              | <u>Shoreditch High Street- same<br/>street but Cargo closed for the<br/>weekend</u>  |
| <u>01:17-<br/>01:28</u>     | <u>14/08/2021<br/>at 0315</u>           | <u>Rivington Street- dense<br/>crowds/lack of dispersal<br/>Cargo closed at 0300</u>   |

|                               |                                     |  |
|-------------------------------|-------------------------------------|--|
| <u>01:28-01</u><br><u>:38</u> | <u>14/08/2021</u><br><u>0322 am</u> | <u>SIA at the top of Rivington St</u><br><u>poor dispersal</u>   |
| <u>01:38-01</u><br><u>:54</u> | <u>12/09/2021</u><br><u>0100</u>    | <u>Large unmanaged queues</u><br><u>despite numerous discussions</u><br><u>highlighting this as a problem.</u> |
| <u>01:55-01</u><br><u>57</u>  | <u>12/09/2021</u><br><u>0316</u>    | <u>crowds- poor dispersal</u>  |
| <u>0158-02</u><br><u>15</u>   | <u>26/09/2021</u><br><u>00:30</u>   | <u>Dress policy- tracksuit/hooded</u>  |
| <u>0215-02</u><br><u>25</u>   | <u>26/09/2021</u><br><u>00:30</u>   | <u>Poor searching</u>  |
| <u>0225-en</u><br><u>d</u>    | <u>05/12/2021</u><br><u>00:51am</u> | <u>Rivington Street during the</u><br><u>weekend Cargo was closed.</u>   |

## **Developments since review application**

On 3<sup>rd</sup> December 2021 I received information from Mr Khan that Cargo would be closing immediately in order to start the planned refurbishment work.

The impact of this venue closing had a significant impact-

Firstly, I worked the Saturday 4<sup>th</sup> December and noticed a drastic change to the area, these changes can be seen in my CCTV footage I have submitted which shows an empty Shoreditch High Street and a very quiet Rivington Street which this illustrates the impact this venue has on the area.

Secondly, there were no reports issues in Calvert/ Boundary estate that weekend from Police or residents.

Thirdly, uniform officers from response team and the neighbourhood task force commented on the low level of disorder they had to deal with that night meaning they were able to fulfil their other obligations and police the entire borough.

Lastly, the crime statistics decreased in the area, as detailed below.

A search was conducted on Rivington Street, taking the first weekend of November and comparing it to the first weekend of December (where CARGO had voluntarily closed).

Below are the results.

### **1<sup>st</sup> weekend of November**

#### **Fri 5<sup>th</sup> November until Monday 8<sup>th</sup> November-**

**14 Police incidents down Rivington Street including- for all the times we do have they ALL occur post midnight.**

2 intel reports regarding a Robbery and Quad bikes causing ASB.

3 Crimes – Sex Assault (0330) ABH (0200) Stabbing (0330) – suspect claimed in interview that he was headed to Cargo but was too late to gain entry.

3 stop and searches (0230, 0245, 0230) in relation to suspected drug dealing, a fight and intel regarding a knife.

5 CADs timing of calls- 0034,0147, 0204,0218,0259 which were all calls from the Police or LAS in relation to assaults, a suspected drink spiking, an unconscious male and an arrest for a breach of dispersal.

1 Community protection warning (CPW) issued to a male causing a nuisance/asb.

**1<sup>st</sup> weekend of December (Cargo closed)**

**Fri 3<sup>rd</sup> December until Monday 6<sup>th</sup> December**

**4 police incidents**

1 crime report of a Robbery (0250)

1 report of a commercial Burglary of a business (0400)

2x stop and searches for in relation to NOX.

## Item 7 - Additional information from the Premises Licence Holder

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Statement from (retd) Hackney Police Licensing Inspector; Martin Waugh

This statement relates to my experiences of policing and crime and disorder in the night time economy area of Shoreditch and my subsequent work with SBG/Novus as a consultant and very recently as a full time employee.

I arrived as a newly promoted uniform police inspector in Hackney borough in 2006 and spent the first 2 years as a response team inspector. In 2008 I transferred across to Hackney Safer Neighbourhoods and then again in 2010 across to the become the Hackney Youth Partnership inspector. Here I was responsible for the Youth Justice police team, the Schools team and Hackney Police Cadets team.

In 2012 I moved again and became the Borough Robbery Task Force and Borough Support Unit inspector where I spent 18 months before moving onto the Borough Intelligence Unit until around 2015. I then made my last move (before retirement) back into Safer Neighbourhood policing where I had additional line management responsibility for the Hackney Police Licensing Team and the Night Time Economy team.

I spent 11 very happy years as an inspector in Hackney and by far the most rewarding of the above roles were those where I working alongside the local authority to problem solve and reduce crime – Safer Neighbourhoods, Youth Justice, Licensing and Night Time Economy.

Around the time of taking my last role in 2015 there had been a series of high profile national events involving young people coming to harm and fatal domestic incidents. The MPS was also still adapting to the structural changes triggered by the financial crash years before which had hugely affected funding for the police nationally. London had elected a new Mayor and the focus started to shift away from volume crime and onto safe guarding young people. I received a number of directions to provide staff from my portfolios to bolster other units as a consequence of this change and they were sent to Community Safety and Missing Persons. I was however still held to account through the Borough Tasking and Co-ordination (BTCG) meeting for theft and violence in Shoreditch and (local authority) Partnership Tasking for antisocial behaviour in the Shoreditch (NTE) area.

With dwindling resources and the need to tackle crime in Shoreditch still – I identified a way to engage businesses and extend our work through them in a manner compatible with the nature of relationship that must exist between local police and licensed premises.

I attended a Pubwatch in Shoreditch and canvassed opinions of managers setting up a Friday night police briefing. The proposal I made was that we would share intelligence with them to identify and arrest local criminals involved in pick pocketing, drug dealing and violence.

The resounding opinion of the managers was that this was precisely what was required and the Friday briefings in Hoxton Square started almost immediately.

This initial piece of work served as a foundation stone upon which our problem solving and collaborative work was built. We drew in local authority wardens and the Hackney ASB manager to undertake a sustained joint plan to tackle all elements of crime and ASB in Shoreditch. We used the new legislation covering community protection warnings and notices to regularly target balloon sellers and unlicensed music pop ups in the area which drew those engaging in crime and disorder into the area. We also worked with UKBA (Immigration officers) at night who were able to remove and process some of those subjects without clogging up police cells and resources.

It was at this point I first encountered Mark McEvoy (Shoreditch Bar Group) who soon became a figurehead and backbone of the police briefings and collaborative work from the business side of the

relationship. Mark was fully committed to assisting us deliver this plan and being such a larger than life figure in the area was able to add momentum to our ambition and plans to get all the main premises in the area coming to the briefings. Other head door staff and managers started to attend the meetings and by showing them images of convicted criminals who were wanted for sentencing for crimes committed at night in the area we were able to jointly make a huge impact on reducing crime and violence. Many of these subjects were subsequently identified by door security teams who called the NTE police team to attend and arrest them. Over the following months we managed to reduce theft and violence to reasonably minimal levels. The NTE police team were able to contact victims of phone theft and identify what clothing they were wearing at the time and where they had been standing in the venue. This information was fed to the businesses who searched for the victim on CCTV and we were quite often able to identify potential suspects. Intelligence gathered was then shared via the briefing and quite often we would receive a call that a possible suspect had arrived at a venue. Mark was a main contributor in this intelligence gathering process and mobilised the considerable security team across their premises to focus on this issue. However, it became evident consistency was key at demanding periods within the police calendar when resources were abstracted for central operations like Notting Hill Carnival, New Year's Eve and large sporting tournaments. During these periods it didn't take long for violence to increase and if it was over more than one or two weekends – for professional dipping teams to return.

This collaborative work and joint problem solving continued to build during my time and up to my retirement in April 2017. Sometime after that a decision was taken to dissolve the police NTE team and send resources to other portfolios. I wasn't sighted on the operational demand at that time but having become aware of this development my view was this would result in an increase in crime. It's my understanding Karen Law (LBH Community Safety Senior Analyst) did identify a spike in crime and disorder that coincided with the end of the NTE team in Hackney. Having that team in place has the same effect as turning a tap off upstream in relation to the flow of work generated by a need such as the nightlife in Shoreditch bars and clubs.

A later decision was made to police Shoreditch with the Territorial Support Group working on overtime but my view was that there would be no real local ownership and accountability beyond a nightly tasking return. The TSG would not have the capacity to sit down with partners and local businesses and develop a plan that properly tackled the issue long term.

I remained in contact with Mark McEvoy and SBG after retirement and we met regularly to discuss the business operation and the challenges it faced. I attended a number of Shoreditch pub watch meetings where the increase in crime and disorder was raised by police senior leaders. We asked repeatedly for a re-introduction of the Friday night briefing and I also asked if we could explore ways of tackling phone theft through police led investigation with the victim. None of this was forthcoming mainly because acquisitive crime was no longer being measured by the police. We were pretty much 'blind' to the extent of the problem in our venues and around Shoreditch without the data and ability to track victims through clothing on CCTV. The only information we had was for the thefts reported to us at the time by the victims and anything generic we could access through Police.uk. This hugely affected our ability to problem solve.

A consistent, structured and focussed partnership plan seemed to be lacking in the area. Both police and local authority wardens were less visible and any night operations were fairly intermittent. In my view this led to the return of the less desirable elements with a visible increase in balloon sellers, almost certainly drug dealers and an increase in crime and ASB. The area felt more hostile. Although Rivington St is a small side street – it actually serves as a main thoroughfare through the centre of Shoreditch. People pass through it when travelling home at night if they live east. The night busses operate in Shoreditch High St at the junction with Rivington St. There are 'Boris bikes' located nearby and Uber drivers can circulate there close to Arnold Circus to pick up passengers. Cargo is a

flagship location and people refer to it as a bit of a landmark when meeting up in the vicinity at the end of the night. Balloon sellers were used operating there because its profitable and very little visible enforcement action had been taken against them until recently. These are all factors that play into the tempo of the feel of the night in the area which I believe have been overlooked and in part neglected for an extended period of time.

SBG staff noticed the change in people frequenting the area and made some changes in relation to music genres at Lighthouse (in Rivington St). They continued to attend pub watch meetings and made e mail contact a couple of times approaching key periods in the police calendar – Autumn nights to offer help. These offers were to establish what they could do to assist Hackney police tackle crime and disorder. Having established a lack of resources was the issue - they made offers to part fund patrols by an accredited security company (Park Guard) to patrol the public realm in Rivington St. Park Guard is a significant part of Islington's NTE plan. They also offered to 'staff' police observation towers that are central police assets that can be bid for and have historically been situated at hotspot locations in the Shoreditch area (Old St, Rivington St and Shoreditch High St). I have used these during my time in Shoreditch and they are a very effective prevention tactic. Staff occupying these posts would communicate issues to Hackney CCTV control room via the night time radio. Although these offers were clearly received – they were unfortunately not taken up.

Having the opportunity to work for the company in Westminster has shown more strategic work could be done.

- A strategic framework within the business community to coordinate and drive problem solving. A Safer Business Partnership (such as the one in the west end) would further glue everything together and galvanise the businesses in the area. It would provide consistent input and training on key areas of safety such as Ask for Angela and WAVE. It was in fact the Westminster Sapphire team that delivered serious sexual offences (first response) training to our Shoreditch staff in Westminster (on the SBG's request). It has also canvassed operators for what other training inputs we would like for our staff (under age sales, use of force, ejections, managing conflict and crime scenes etc). It would assist with delineation of certain criminal/anti-social behaviours that need a specific solution. This would be more collaborative as opposed to an arbitrary approach of aligning a problem to venues because its taking place in the street outside and then requiring the venue to disperse members of the public when they have no legal powers to do so. This ultimately leads to allegations of assault and other civil actions taken against personnel.
- Police/Business liaison. There is a police officer employed full time in the Licensing Team as business community liaison who conducts weekly crime analysis for licensed premises and meets with operators to understand what's going wrong and what needs to be put in place. Operators are under no illusions of the severity of incidents and crime problems in their premises but the whole experience has a far more of a stepped approach feel to it - starting with the offer of help and advice and suggesting tactics that have worked in other premises in the borough.
- Consistent Policing. Shoreditch has not been policed consistently with a dedicated team for over 4 years. Officers are having to re-learn all the legislation and procedures and lost experience in relation to tackling crime and ASB. Getting to know the faces too. The new policing arrangements put in place are very much welcomed but the business network above is an important part of an overall strategy that needs to run alongside and take pressure off of police at key points on key periods.

There is some important balance that I think needs to be taken into consideration within this process. SBG/Novus have a strong history of working with police and local authority. They have always taken responsibility where things have gone wrong and learn from incidents where they need to. This is corroborated in Westminster where their managers and staff have received commendation certificates from the Sapphire team in relation to female safety and positive action. This is likely to continue with further female safety awards suggested (by Sapphire) in 2022 for the ongoing risk reduction operation they have in place there.

In Shoreditch they volunteered to help with staffing and funding to directly tackle crime and improve safety because they could see the direction in travel with crime increasing in the area. This became more evident since coming out of lockdown in July 2021.

Like many other operators, SBG have missed being an extension of the police/council operation in Shoreditch. Club operators through to SIA are facing significant challenges in experience and recruiting and this is coming into play during some incidents across the industry. Police, local authority and businesses need to consolidate their resources at night with a joint operation that reduces risk and makes the area safer for everyone.

**“Cargo”**

**83 Rivington Street, EC2A 3AY**

**Guy Hicks**

**Consultant at Raven Consultants**

**December 2021**

1. I am an independent licensing consultant and I sit on the board of directors for Shoreditch Bar Group (SBG) in a non-executive role advising the board accordingly in relation to crime and disorder matters arising from incidents at their premises. I have been asked to provide this statement in relation to a review of the premises licence at Cargo, 83 Rivington Street sought by the Metropolitan Police (MPS).
2. I retired from the MPS on the 14<sup>th</sup> of August 2019 having served in a variety of roles. My final 7 years' service were spent as the Sergeant in charge of the licensing unit covering two boroughs, Hackney and Tower Hamlets. In this role I headed up a team of officers responsible for policing the large number of licensed premises on the two boroughs. I was responsible for overseeing applications, Temporary event notice applications, crime and disorder issues, partnership working, in fact anything related to a licensed premises. Since retirement I have set up a consultancy to provide independent professional advice, opinion, and assistance to licensed premises, training, evidence gathering, observations, professional witness services and advice with regards due diligence.

3. Whilst employed as a police officer on the borough one of my tasks was to analyse crime data provided by one of my officers regarding overnight crimes. I would also be privy to crime statistics provided by an analyst at the London Borough of Hackney (LBH) highlighting any problematic venues. Depending upon the crime type and action or lack of action by the venue in question I would task officers to apply the 'stepped approach' to deal with the problematic venue. The stepped approach would involve starting with a meeting to highlight the issues and the expectations of the police in dealing with those issues through to warning letters, action plans and potentially review of the licence. Partner agencies such as LBH licensing enforcement would be informed where applicable. It is worth noting that the stepped approach to licensing is a policy driven centrally by what was formally known as the central licensing team and is the expected standard for licensing units within the MPS when dealing with their licensed premises.
4. During my time in the licensing Sergeant role, I had many interactions with SBG, Mr. Shmail Khan and Mr. Mark McEvoy. Cargo was and still is one of the larger venues within an area known as the Shoreditch triangle. The venue is not perfect, I would not necessarily describe it as a model operation and has had its issues in terms of violence and acquisitive crime. However, SBG can be described as model operators in the way they conduct their business across a number of sites in London and the UK, especially in

regards their willingness to engage with the authorities within the licensing arena.

5. I cannot recall a single occasion where Mr Khan and Mr McEvoy were anything but engaging, professional and extremely keen to work in partnership with the Police and other authorities within the night-time economy (NTE). Any requests made to them to assist in reducing crime in and around their venue were met with enthusiasm and a willingness to help that I did not experience with many other operators. Our meetings did not always have negative connotations in terms of crime reduction relating to their operation. SBG were always keen to assist in general terms around NTE issues such as terrorism, acid attacks, Welfare & Vulnerability Engagement (WAVE) and initiatives such as breath testing devices used on their doors to assess drunkenness prior to entry. I recall a number of occasions when the venue, Cargo, was used by various policing teams conducting training scenarios relating to the previously mentioned issues and SBG would ensure large numbers of their own staff were involved in and benefitted from the training when many other operators did not attend. A specific example would be the use of Cargo as a 'live' nightclub experiencing a multiple victim acid attack for police, fire and ambulance service to deal with in a scenario as close as possible to the real thing.
6. I previously mentioned the breath testing devices, not only did SBG offer to take part in the trial (February 2015) at Cargo they continued to use the device post trial, added further devices to other SBG venues and were one of very few operators to volunteer in the first place.
7. In operational terms there have been numerous occasions when SBG staff including Mr McEvoy have assisted in the apprehension

of offenders and have also previously prevented potential loss of life in the street near to Cargo. When incidents have occurred inside Cargo Mr McEvoy has been responsible for ensuring crime scenes were secured as well as offenders being detained for the police service. He has previously spent hours scouring CCTV or the ID scan data base to assist Police apprehending offenders who may have frequented Cargo but had committed crimes elsewhere on the borough.

8. In summary it is my professional opinion that SBG are very responsible operators and in my experience the only operator I came across during my service as the Licensing Sergeant who would go over and above in assisting the authorities in order to create a safe and secure environment within the NTE area in Shoreditch.
9. I understand that my duty is to the court/committee and this statement has been compiled in accordance with that duty. All matters relevant to the task on which my expert evidence is given have been included in this report. I believe the facts I state in this report to be honest and true and that the opinions I have expressed are correct to the best of my judgement.



Mark Page

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3<sup>rd</sup> December 2021

Dear Hackney Licensing,

My name is Mark Page, I am a retired Metropolitan Police Sergeant. My police warrant number was p208644.

I joined the Metropolitan police in January 2003 and retired in July 2020.

In early 2015 I was appointed as the sergeant on what was then called the “Night time Economy Team” – NET for short - and I was based at Shoreditch Police station. My role was to work in the Shoreditch area, heading up a team of constables to police the Shoreditch area both overtly and covertly.

My team of 11 constables worked shifts from 6pm to 5am Thursday, Friday, Saturday and Sunday.

The Shoreditch area of London has a very busy night time economy attracting up to 25,000 people every weekend, attracted by the night life of over 200 venues including restaurants, bars, pubs and nightclubs.

Having such a small team of police officers it was essential that all agencies working within the area had a joint approach and worked together.

After a few months I had established contacts within the area and began to understand the complexities and challenges that lied ahead. There were lots of different people in the area, all doing good things but there was not any teamwork or collaboration.

These other agencies included Hackney Street wardens, Police Community Support Officers, Traffic Wardens, CCTV operators and most importantly owners of venues within Shoreditch and their security staff.

For reasons of their own not all venue owners wanted to be a part of this joined up approach.

I held a meeting with managers and owners. It was agreed that a weekly street briefing would be held, every Friday at 8pm in Hoxton Square. The purpose of this briefing was to share information amongst all agencies and to develop new ideas for the future.

One of the people who was fully committed to this joined up approach was Mark McEvoy, the Operations Director of the Shoreditch Bar Group. The Shoreditch Bar Group comprises

of several major venues within Shoreditch, the largest and busiest being Cargo in Rivington Street.

Mark suggested to me that we set up a WhatsApp Group between venues, security staff and Council wardens. The idea being that venues could share images and information on “troublemakers” with other venues. Basically, not just simply moving on these people to other venues to continue their antics but to make others aware and give reason for refusal of entry. Mark McEvoy was the administrator of the group and the driving force behind it.

This WhatsApp Group was a huge success, as were the street briefings and as far as I am aware they still exist to this day.

Moving forward Mark and I worked closely together, developing and improving many aspects of public safety, such as Hackney CCTV positioning, security staff awareness and partnership working to name but a few.

Cargo and its staff were, and still are instrumental in making Shoreditch a safer environment for all. They were the first venue to electronically record the ID of everyone who entered – this massively assisted in police investigations.

Further examples of the Shoreditch Bar Group’s drive for improvement and safety include Mark setting up Cargo to run real-life terrorism and chemical attack scenarios which included the London Ambulance and Fire Brigade Services.

The Shoreditch Bar Group and their Operations Director Mark McEvoy are a driving force on teamwork and collectively they motivate others to do the same.

I am willing to attend any hearing and answer any questions that you may want to ask me.

Yours sincerely



Mark Page

Statement of Rodney Vitalis, London Fire Brigade, Borough Commander for City of Westminster  
5<sup>th</sup> December 2021

At the time of working with Mr Mark McEvoy and the Shoreditch Bar Group, I held the position of Interim Borough Commander for the Borough of Hackney in the London Fire Brigade. Our working relationship was established in 2017 following the corrosive substance attack at Mangle E8 Night Club in Hackney, where 20 people were injured leaving many of them with permanent, life changing injuries.

The emerging threat of corrosive substance attacks on London streets and in venues at the time meant there was a greater responsibility for owners, licence holders and managers of establishments such as Night Time Economy Businesses, Hoteliers, Embassy's, Shopping Centres etc. to be prepared to react in the event of an attack and ensure the safety of the public and their own employees should an incident occur.

To ensure these establishments were prepared for a corrosive substance attack the Metropolitan Police, working collaboratively with London Fire Brigade, London Ambulance Service and Resilience Direct developed Project Diffuse. Initially we worked closely in Partnership with Local Authorities and supportive businesses such as the Shoreditch Bar Group, which included the Cargo Nightclub, to host the first three Project Diffuse events.

Our aim was to educate responsible persons on their initial actions and response to care for victims when witnessing a corrosive substance attack and key learning from the Mangles nightclub attack was embedded into the training so that business' were better able to procure equipment, plan for and train their staff in reacting to an incident.

Project Diffuse was delivered using immersive demonstration, including active sound, lighting, victim actors (prepared injuries made up by make-up artists) who act out the attack from within the audience (200 – 300 people). A response was then given by bar staff, security personnel and emergency services. The audience were unaware of their presence until a role player in the crowd sprayed the audience with water and the victims revealed their injuries and took up role. First responders (security/staff) then began treatment to various corrosive injuries until the emergency services arrived. Cargo's nightclub supplied the venue, their managers, bar staff ,security and catering, while also allowing the London Fire Brigade (LFB) to use 1500 litres of water inside of their premises.

The joint working involved in the project gave the audience the opportunity to watch Cargo staff demonstrate their response to an corrosive attack in a realistic working environment.

Due to Cargo's collaboration with emergency services on this project other business' saw the benefit and made approaches to host similar events, resulting in Project Diffuse being delivered to 800 business employees at various venues across London.

LFB was also subsequently approached by other UK Fire and Rescue Services, to train their staff in order to deliver Project Diffuse locally in their regions.

In November 2018 PC Neil Parham and myself received an LFB Assistant Commissioner's Certificate of Commendation for our work on Project Diffuse.

In December 2019 The London Fire Brigade were nominated and won "The Project of the Year" from Fire Magazine, Excellence in Fire and Emergency awards 2019

The Shoreditch bar group and Cargos night club were instrumental in the positive outcomes from this project and have continually offered their infrastructure and staff to support future LFB initiatives.

Reference:

[https://twitter.com/Wayne\\_Brown5/status/1202976532865650688?s=20](https://twitter.com/Wayne_Brown5/status/1202976532865650688?s=20)

<https://twitter.com/RodneyV66/status/1063470671127330816?s=20>

Statement of; Mark McEvoy old DPS of Cargo

[REDACTED]  
DPS; Cargo, 83 Rivington Street, EC2AY 3AY

My name is Mark McEvoy and I have been the longstanding DPS of Cargo. I joined the company in July 2013. I spent about 5 years working closely alongside the director of the company Shmail Khan in the management of Cargo. I was specifically tasked to build compliance and develop the working in partnership culture with the police; in order to ensure we were driving down crime and upholding the licensing objectives- making Cargo a leading operation in the Shoreditch Night Time Economy.

I have been the DPS of the premises of 8 years. Of those 8 years the director and I worked closely until I took the full reins approximately 3 years ago. Throughout my time I worked 6 days per week and I have always ensured I was operational at the site every Friday and Saturday night, Bank Holidays and New Year's Eve. I have built and trained compliance and operational management teams. I have taken the lead in developing relations with responsible authorities and other premises in the area to ensure we are tackling problems as a community and undertaking the objectives of the police as a group, head on.

In 2013 I was first invited to Shoreditch Pubwatch, where I first met Hackney Police Licensing and Hackney Council Licensing. I have been a constant attendee since 2013 to all Pubwatch meetings both in person and virtually, including Super Pubwatch meetings that happen nationwide. I have always tried to be a vocal part of the meeting and have chaired them historically when Paul Merry (Ex-chair) was absent. It was here where I was able to network with other operators in the borough and special guest speakers from all responsible authorities including LAS, LFB, SO15, Central Licensing and Sapphire Police Unit. Since my attendance at these meetings I have always made a very conscious effort to identify key police objectives and identified risk areas of operating in Shoreditch. Ive always then used this information to brief SIA, operational and management teams on new protocol to ensure we are working alongside the police and tackling crime.

My own personal training also developed while working as Operations Director for SBG. I have done an advanced licensing course with CPL as well as a Fire Marshalling course. I have attended numerous Project Argus and Project Griffin Counter Terrorism events and was honoured to be selected to give feedback in a bid to make improvements in future Project Argus sessions in 2018. I have always offered Cargo to be a meeting place for large scale presentations made by police in all sectors. One such event was Project Diffuse. This was a live exercise hosted by Cargo where actors staged an acid attack. I, myself, and my team were first responders to the attack and participated in the entirety of the training. This was an eye-opening experience as to the repercussions of a substance attack in a nightclub, which is what happened at Mangle Nightclub in April 2017.

Over the course of the years, I have undertaken training for the Cargo team on the following schemes:

WAVE Training  
Ask Angela  
Project Argus (Terrorist attack training)  
Project Griffin (Terrorist attack training)  
Project Diffuse (Acid attack training)  
Incident report writing  
Crime Scene Preservation  
Advanced Licensing Course  
Fire Warden Training  
Fire Risk Assessment Writing

In Early 2015 Mark Page was appointed Sergeant of the Night-time Economy Team (NET). The NET was a plain clothed police operation who I would work alongside every Thursday, Friday, and Saturday evening. Sgt Page would hold a street briefing every Friday night and share photos of wanted suspects in the borough. This form of policing proved very successful as several suspects were identified by Licensed Premises both inside their venues and on the streets of Shoreditch. Myself and my operations team attended every briefing as we were keen to be the extra set of eyes for the NET. In fact these meetings and being part of the overall crime reduction effort was very inspirational and gave us a focussed outlook and strong purpose when at work. It was at these briefings that I suggested to create a Shoreditch wide WhatsApp Group for SIA and venue managers. This proved very successful in sharing wanted criminals and problematic people in and around the Shoreditch Area. This same group is still in action today. When the merger between Hackney and Tower Hamlets happened in 2018 the NET was closed, and the briefings ceased. Since August 2021 the briefings were restarted, I have been an ever-present attendee.

Ever since the NET were disbanded, I have personally witnessed the levels of crime rise enormously from 2018 to the present date. My team and I have collated multiple videos of the gang violence, street roaming nightclubs, and other alcohol/NOX pop up stalls; these can all be seen in the submitted catalogue of video evidence. I have regularly assisted with police on the streets and in the office where I have put hours of work investigating crimes, not just linked to Cargo, but by having a footprint in the area, helping investigating officers creating a case of crimes that have taken place on the streets. I have always offered my assistance to the police when they are operating on the weekends in Shoreditch and have on many occasions directly got involved supporting where police numbers were inadequate to deal with the urgent incident.

On Saturday 6<sup>th</sup> November 2021 I was witness to a knife attack on Rivington Street at 3.30am. The people involved in the incident were not customers of Cargo but were passing through an otherwise empty Rivington Street. A young male was stabbed in the abdomen and his intestines were protruding out of his body. The SIA team of Cargo (who were leaving to go home) and myself immediately went into action and brought an end to the altercation. We notified nearby police officers and we detained the suspects. I then created a crime scene to preserve the evidence. I am happy to say that this young male survived this attack which otherwise would likely have resulted in loss of life. This is one example of many such incidents occurring in and around the area which me and my team are typically

first responders to, calling in CCTV and the police. There was another occasion where I spotted a wanted person wondering through Rivington and then followed him all the way to Bethnal Green Road and called the police- resulting in the arrest of that wanted criminal. The vast majority of the incidents occurring are caused by gang members who have created mobile nightclubs and alcohol selling stalls and NOX gas stalls; they typically fight amongst themselves, possibly for territory. We have always done our best to move these groups away and have diffused some very risky situations that arise across Shoreditch. My ability to undertake the broader dispersal and prevention of these illegal activities of the gangs is limited by the law and is outside the remit of my designated powers as an authority. If it wasn't I would be doing a lot more.

During COVID on 24<sup>th</sup> September 2020 I had a visit from Commissioner Cressida Dick at Cargo. I was honoured to have been selected to meet her and was extremely happy and proud to have been able to speak to her. We discussed the positive work Cargo had been doing with the police and I was thanked for our ongoing efforts in our crime reduction work. I emailed Commissioner Dick the following day expressing my thanks to her and Hackney Police Licensing Department, including Superintendent Andy Port, for their expertise during those troubling times and ongoing working in partnership. BCU Commander Marcus Barnett replied to my email asking for a meeting in the coming weeks. Unfortunately, with lockdown happening again this did not happen. I was very proud of the crime reduction work I had been doing and the recognition of this by the head of the police was a significant moment in my career. The relationship with the police which was all being put to work making Shoreditch a safer place was a main part of my approach at work. It was very inspiring to receive such praise and recognition for all the positive work I had undertaken at Cargo and in Shoreditch.

My commitment to working at Cargo and the Shoreditch area has never wavered and I always put 110% effort into what I do. I have worked in this industry now for 27 years and would like to work for 27 more. I see Shoreditch as my home and am committed to doing my part solving, alongside the police, any issues which may arise in the area.

With all this historical work I have undertaken, especially during the very high risk times Shoreditch is facing. It is very upsetting that I have managed to lose the confidence of the police. The premises only operated, without covid restrictions, for 3 full months between the positive meeting with Commissioner Dick and the review of the license. This sudden loss in confidence is especially upsetting given it has occurred based on only 3 months of a 10 year operational history and time I have given to the area and the working in partnership to reduce crime.

I wish to be given another opportunity to continue the working in partnership with the police, which I believe has reduced crime in Shoreditch and is an asset to the night time economy. I am passionate about the night time economy and am committed to make the Shoreditch triangle, a place I have given a decade to, as safe as I possibly can. I will work very hard so that I can win the police's confidence in my ability again.

Mark McEvoy

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Directory of Video footage compiled on issues in Shoreditch; Car Bars, Portable nightclubs etc

A substantial directory of evidence has been compiled over time which show the Car Bars, NOX sellers, mobile roaming nightclub carnival stands and other issues being faced in Shoreditch. These issues have compromised the safety of the public and our customers visiting Shoreditch. These external risks are out of our remit of authorised control. Notwithstanding this, we use our resource to encourage people to move on and we are very typically first responders to any criminality we observe (often making the very first call to police/CCTV in relation to observed threats). However we do NOT have the powers to resolve these issues which are occurring in the public domain. Furthermore the safety of our own staff cannot be compromised in dealing with these ongoing issues. We have on more than one occasion offered to commit resource to pay for a third party security company (with handcuff powers) to support the police- these offers were never commented on.

There are 30 clips which we have provided. These clips, clearly show, organised gangs of balloon sellers with car bars who are parked all over the shoreditch area terrorising passers by etc. The clips also clearly show mobile nightclub operations; groups with thumping street sound systems who form roaming carnival parties every weekend in Shoreditch. It is not uncommon to find several separate such mobile nightclubs in different parts of shoreditch which they would typically combine to form one enormous street party. They carry their own alcohol, typically purchased from off licenses, and NOX and their groups can range in numbers occasionally surpassing 100 people! These groups tend to make pit stops in different areas of shoreditch and set up their music stands. They don't have any interest in entering or using the facilities of any licensed premises. These organised groups are very distinctive from our typical patrons and this difference is very clear to us.

Clips; 29, 27, 26, 24, 23, 19, 10, 8, 7; have been selected to give an overview of what's been captured.

The video clips below contain their date and time (these are approximations);

1. 12 November 2021 mass street fight outside Busaba Old Street; we do not know this as fact but quite possibly a gang fight due to a car bar epicentre in Hoxton Square.
2. 12 November 2021 unauthorised nightclubs set up in residential properties on old street; this is not uncommon whereby various flats, used for Air bnb, are utilised as pop up nightclubs open ALL night with people coming and going in and out of a completely uncontrolled nightclub environment.
3. 7th November 2021 03:14 Curtain Road street drinking and carnival party
4. 29 October 2021 23:30; large groups of street drinkers at various street junctions across shoreditch area.
5. 7 October 2021 20:30; Full Live band with 4 strong band members setting up for a live show on the street (great eastern street and old street intersection).
6. 20 September 2021 00:35; Enormous mobile PA system setting up on street corner to launch a street party (junction of Rivington street and Shoreditch high street).
7. 17 September 2021 02:00; portable nightclub PA system Curtain Road.
8. 11 September 2021 02:30; street party unauthorised carnival style party, popped on Rivington street and then moved on as best we could
9. 10 September 2021 22:00; car bars set up on Redchurch street
10. 5th September 2021 02:00; enormous carnival party outside exit of Barrio Bar Rivington street circa 200 people carnival party

11. 5 September 2021 00:40 Rivington street junction shoreditch high street static party nightclub street music system.
12. 4 September 2021 03:30 curtain road balloon sellers gang related fight.
13. 4 September 2021 03:00 gang street fight.
14. 1 September 2021 02:47; we prevented a massive fire at Barrio East.
15. 22 August 2021 open windows at other clubs with music blaring out leading to the formation of street carnival parties.
16. 28 August 2021 organised gang balloon sellers given dispersal orders.
17. 27 August 2021 01:00 can be seen that the queue to Cargo is empty But there is an enormous portable nightclub street music system with a carnival party happening on Rivington street (this is out of our control and authorised remit of control).
18. 26 August 2021 01:00 again portable nightclub set up with balloon sellers curtain road; they use Rivington street as a main arterial transit route.
19. 25 August 2021 01:00: Rivington Street unauthorised nightclub set up on street and massive carnival party.
20. 24 August 2021 01:00 can be seen an organised queue at Cargo but a massive fight on the street between balloon sellers which we have stopped. These are NOT our customers but are part of the local gangs.
21. 21 August 01:00 2021; car bar with blaring music system.
22. 19 August 02:00 2021; enormous street party spilling on the middle of the road with mobile nightclub pa sound system unit on Old Street.
23. 14 August 03:00 2021; Curtain Road street car party with drug gangs.
24. 14 August 02:3 2021; enormous nightclub roaming street party.
25. 8th August 02:30 2021; boom box street carnival party.
26. 5 August 02:30 2021; Curtain road static street nightclub party.
27. 24th July 2021; gang violence in middle of the road, no police. One of our operations personnel stops it and calls the police.
28. 17 July 2021; Shoreditch high street massive car bar party resulting in a huge fight.
29. 10 July 2021 03:30; curtain road Blues kitchen massive mobile nightclub system carnival party.
30. BBC news article about the car bars which are described as the source of the major issues. They are described as “unlicensed nightclubs” which not enough action is being taken against. Residents describe them as alternative nightclubs for those who “cannot afford” the licensed clubs. <https://youtu.be/m-wuh-ajkEY>

## EXAMPLES OF WORK DONE BY CARGO OPERATIONS AND SECURITY

### WHITE TOYOTA PRIUS DRIVES THROUGH RIVINGTON STREET

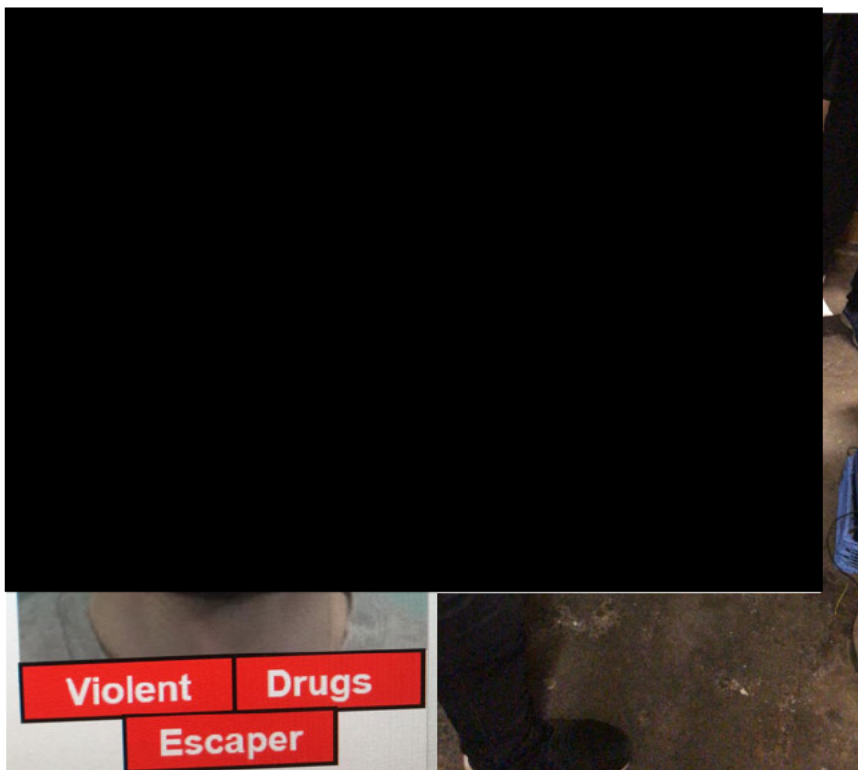
28/07/18

At 03:10, mid dispersal of Rivington Street outside Cargo, a white Toyota Prius speeds through Rivington Street knocking people out of the way onto the ground. Security from Cargo run after the car up towards Browns near Shoreditch Church and manage to grab the steering wheel and steer the car off the road. Security realise that the car was an Uber and there were passengers in the back of the car. An angry mob also made chase of the white Prius and attempted to attack the Uber driver. Cargo Security, Browns Security and Hackney Wardens create a barrier to stop any violence. Police arrive shortly after and take control. 1 IC3 female was taken away from Rivington Street by LAS as her leg was run over. There were 3-4 others with bumps and bruises. The driver was detained by the attending police officers who commended the Cargo security for their work in stopping the vehicle and preventing any further incidents.

### CAUGHT WANTED THIEF

19/12/18

At 8pm my operations team caught a wanted male trying to steal DJ equipment from one of our venues. We received a wanted photo of him back in early December 2018 to keep an eye out for him. On catching him in the act we were able to hand him over to the relevant Police offers.



### MALE FOUND STABBED ON CORNER OF RIVINGTON STREET AND CURTAIN ROAD

23/06/19

As I was patrolling the Shoreditch area, I came across a male slumped outside The Diner on Curtain Road. I noticed blood had stained his white t-shirt. I went to call CCTV on my SNOW

radio when I saw the NTF further up Curtain Road in traffic coming my way. I ran over to the vehicle and spoke to the Sergeant Vicki McBride and brought her to the victim. Police then took over the incident.

#### MALE STABBED ON SHOREDITCH HIGH STREET/CALVERT AVENUE

17/07/21

At around 4am there was an altercation between 2 gangs of people on Shoreditch High Street who were throwing bottles at each other. I was positioned on the High Street as well and attempted to call it in via SNOW radio. I repeatedly called in with no response. At the same time a large fight took place on the corner of Shoreditch High Street and Calvert Avenue. Again, I made a call onto SNOW radio continuously requesting for assistance. I could see that a male had been stabbed. CCTV finally responded and I was able to give my report. There were no police in the vicinity and the first responding vehicle was a prisoner transport van. At this point the injured male was surrounded by people trying to help. As the police officer got out of his van, he produced his baton and extended it. I was there to explain to the officer that the suspects were not there, and these were trying help. On review of the fight that led to the stabbing I recognised an ic3 male who was involved with the incident. I gave the name and phone number of the said male to investigating police and police licensing.

#### MALE REPORTED TO HAVE A KNIFE

12/09/21

At approx. 3am I received a call from a colleague saying he saw an ic3 male wearing all black clothing, a balaclava and a black backpack drop a knife from his bag and quickly put it back. This was reported on Kingsland Road. I was on the corner of Curtain Road and Old Street and reported this to Sergeant Steve Parmenter. As I was explaining what was reported to me, I received another call from my colleague saying the male with the knife was just walking past us now. I pointed out the male to Sergeant Parmenter and he, with 2 other colleagues went to apprehend the ic3 male. As they attempted to grab him the male managed to slip past them and make a run for it. I was backing up the police at the time and caught the male and put him to the ground. The police then put the male in handcuffs. This arrest attracted a lot of attention with other ic3 males in the area who then started to show anger towards the police. I positioned myself between the crowd and the police and calmed them down while the police moved away with the suspect.

## SHOREDITCH NIGHT TIME ECONOMY

### UPLIFT POLICING PLAN

#### INFORMATION:

The Neighbourhood Taskforce actively patrol Shoreditch on Thursday, Friday and Saturday night. It has been identified Violent and drug related crimes are increasing within the area. Large groups of males who are affiliated to gangs are travelling from all over the MPS to Shoreditch. They are engaging in antisocial behaviour selling NOX Canisters, taking legal highs, causing alarm harassment and distress to the local community and committing acts of violence. This has led to gang rivalry, which is a key link to the increase in anti-social behaviour, violent crime, and drug related offences.

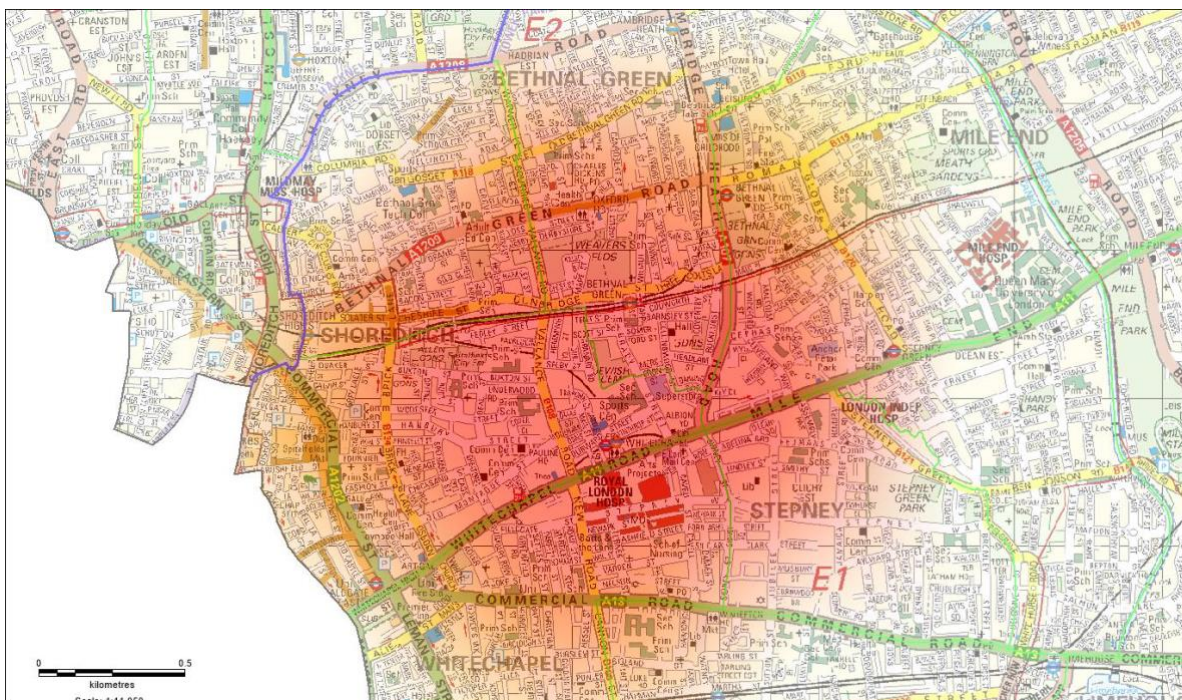
In addition, the following facts have been identified:

#### VIOLENT CRIME:

- Violence crime has been increasing within the Central east command between 1<sup>st</sup> February 2019 and 20<sup>th</sup> May 2019. There were 303 Knife related offences recorded, 61 percent were in Hackney and 94 Percent of offences featured a Knife or Bladed instrument.
- Within the MPS Hackney has been recorded as the third most affected Borough by knife crime.
- Friday and Saturday are the peak days for knife related offences, each accounting for 17 percent of all crimes.
- Hoxton East and Shoreditch were some of the the most affected wards, each housing 17 offences accounting for 9 percent of the GD total.

#### DRUG RELATED CRIME:

- For the year 2018/2019 a review of drug related offences has been conducted, within the CE BCU, a grand total of 3'483 drug offences were recorded on the CRIS database with possession of drugs accounting for over 90% of the total number of crimes, this is an increase of 33.85% from the previous year.
- *Figure 2 - 2018/19 CRIS CE BCU Hotspot Close Up*



- The key location for this type of crime is well-connected main roads in close proximity to tube stations. Shoreditch is primarily linked via Old street.
- It can be inferred that due to the transport links in close proximity to Shoreditch (which has an active nightlife), some offences can be attributed to the younger demographic, possibly carrying multiple types of drugs whilst travelling, seeking to enjoy themselves during the week/weekend in bars or clubs.
- The hotspot, in figure 2 above, covers Shoreditch, which has a very active nightlife and is attractive, though not limited to a younger demographic. Shoreditch also hosts a number of student nights leaving students vulnerable when gangs are travelling from all over the MPS to Shoreditch to commit crime.

### **INTELLIGENCE:**

- The below crimes are an example of how violent crime and drug related incidents are affecting the local community within the Shoreditch footprint.
- On 5<sup>th</sup> July 2019 PS HORTON, APS SPURRELL, PC BURKE, PC SAHEL, PC BURGESS, and PC SAUNDERS were patrolling Shoreditch; they witnessed a male on a motor bike traveling in the wrong direction down CURTAIN STREET. The male was stopped and subsequently processed for driving a motor bike without no insurance; inside the motor bike, ten wraps of cocaine were found which lead to the suspect being arrested for PWITS. Officers have searched the suspect's home address where seven knives, a sword, a shotgun containing two spent cartridges and 12 live shotgun cartridges were recovered. This resulted in the male getting further arrested for possession of a firearm, trident continued the investigation where they charged and remanded the suspect due to the danger he possessed to the public.
- **4617496/19** - On 23/06/2019, CCTV informed police that a male was selling nitrous oxide balloons to members of the public in Rivington Place, EC2. The male was detained and subsequently searched during which a large RAMBO knife was found in the males waistband. The male stated he knew that he was carrying a knife and he was already on licence for carrying a knife. The Rambo knife was approximately 10 inches long with two serrated edges to it with a black handle.
- **4617513/19** - On 23/06/2019, Police were flagged down by the manager of Cargo nightclub on Rivington Street junction with Curtain Road, as a male had been stabbed suffering injuries to his body, shoulder, neck and hands. The City of London TSG have come to assist officers with crowd control and first aid.
- **4621274/19** - Police were called to HOXTON Street as a male was seen armed with a knife and he was threatening to "Shank" people (A street term to stab). The male then proceeded to produce the knife from his bag which was around his neck to prove that he would use it. Police attended, detained male matching description, on conducting a search he was found in possession of a knife in its packaging, subsequently the male was arrested for Possession of an offensive weapon and Affray.
- **4619016/19** - LAS reported a 21-year-old female had been stabbed in the chest on CHARLOTTE ROAD EC2. An ARV unit were first on scene locating the victim on CURTAIN ROAD near to the junction of RIVINGTON STREET EC2. VIW1 had one laceration in the lower part of her right breast, which was initially assessed by the ARV officers in the back of a marked police van for VIW1s privacy, which she was worried about.

- **4619053/19** – Police were called to Rivington Street stating he had been robbed at knifepoint. The victim reported that four males surrounded him and took his phone and wallet but left his driving licence and keys.
- **4620421/19** - Police were called to Curtain Road to where a victim had been attacked by a bottle. VIW1 was found sat upright on some steps; he had his shirt over his head which was soaked in blood.
- **4620544/19** - On SATURDAY 20th JULY 2019 at hours a male SUS approached a crime scene relating to a serious RTC, he wanted to get across and when advised on what to do became aggressive causing nuisance on the scene. It was apparent that this male was intoxicated from his glazed eyes and strong smell of alcohol coming from his breath. PC MURRELL was approached by SUS who said "I will slap you move out of the way, you stupid bitch" , PC MURRELL tried to warn and advise SUS to leave the area at which point in the presence of 2 traffic sergeants SUS used the back of his right hand to smack PC MURRELL in the face hitting the right cheek.
- **4621476/19** – On 28<sup>th</sup> July 2019 officers were dealing with a victim of an assault on Rivington Street, whilst PS MCBRIDE was taking details a male connected to the assault has approached them, the victim tried to take a picture of him and in doing so he has gone to swipe her phone and has pushed PS MCBRIDE in the shoulder causing pain and tenderness.

#### **INTENTION:**

- To increase the number of police resources (TSG), provide a visible presence to licences, have a zero tolerance approach to crime/disorder and ASB.
- To reduce drug, violent and theft related offences.
- To tackle anti-social behaviour, target NOX dealers and those using legal highs that are causing anti-social behaviour.
- To utilise the specialist skills of the TSG, Enforcement officers and CCTV operatives to support officers from the neighbourhood taskforce.

#### **METHOD:**

- **22:00 – 02:00 hours:**
- Police units to actively patrol the Shoreditch area providing visible reassurance to the local community and Licensee's.
- Plain Clothes assets, enforcement officers and CCTV operatives to actively seek those using NOX canisters evidencing their anti-social behaviour (Littering, swearing, causing disruption to the local community)
- Once groups are identified the NTF uniform asset and enforcement officers will have a zero tolerance approach issuing ASB notices/Dispersion notices/CPW notices/CPN notices/conducting searches etc....
- It is common for large groups of males who are affiliated to gangs engage in anti-social behaviour, TSG are to support NTF officers with large groups so they can operate in a safe environment.
- **02:00 – 04:30 Hours:**
- This is the busiest period of the evening due to the majority of clubs and bars closing, this leads to a large volume of intoxicated people on the streets of Shoreditch, this leads to violent crimes being committed.
- The main flash points are Rivington Street junction with Curtain Road and Rivington Street junction with Shoreditch High Street. TSG serials are to deploy on foot either end of Rivington Street, to deal with disorder and prevent crime being committed.
- NTF will patrol on foot in the centre of Rivington Street outside Cargo nightclub.

- LNL officers to carry out mobile patrols responding to any night time economy incidents and where necessary other assets can be called upon to assist where needed.
- **04:30 – 05:30 Hours:**
- One TSG serial and Core night duty NTF to deploy outside CATCH/TUK TUK Bar on Kingsland Road. These bars are open until 06:00 hours, a large number of people go here after attending Cargo on Rivington street.
- This results in vehicles parking in the road blocking traffic, large crowds gathering, disorder breaking out and NOX dealers operating.
- The second TSG serial and LNL to deploy to LA CABINA and SHELTER Kingsland Road these venues also have a late licence. The Police have received a high volume of calls from local residents complaining about large groups fighting, and acting in an anti-social manner, which is affecting their quality of life during the weekend.

#### **ADMINISTRATION:**

- Gold – Superintendent Rolston
- Silver – GD1 / INSP SMITH
- Bronze - PS 657GD HORTON
- CAD – .....
- BWV to be worn and used in compliance with SOP
- Ensure vehicles are equipped with First Aid kit and de-fib
- All prisoners to be handed to team – CPU has been provided.
- If any arrests are made or Use of force is used complete MG11/Use of force form
- Returns form to PS 657CE Horton

#### **RISK ASSESSMENT:**

- Please follow the corporate generic risk assessment for the deployment of uniform and plain-clothes officers.
- All officers to be in possession of their personal protective equipment and be in date with OST/ELS
- Reminder of use of force powers:
- **COMMON LAW** - A PERSON MAY USE FORCE AS IS REASONABLE AND NECESSARY IN SELF DEFENCE OF ANOTHER, AND TO PREVENT OR STOP A BREACH OF THE PEACE
- **SECTION 3 CRIMINAL LAW ACT 1967** - A PERSON MAY USE SUCH FORCE AS IS REASONABLE IN THE CIRCUMSTANCES IN THE PREVENTION OF CRIME, IN EFFECTING OR ASSISTING IN THE LAWFUL ARREST OF OFFENDERS, SUSPECTED OFFENDERS OR PERSONS UNLAWFULLY AT LARGE
- **SECTION 117 PACE** - A CONSTABLE MAY USE REASONABLE FORCE, IF NECESSARY IN THE EXECUTION OF THAT POWER UNDER PACE
- There is no specific CT threat to this operation however; I would like to remind officers of the UK threat levels.



|  |                 |
|--|-----------------|
| The threat to Mainland Britain from International terrorism is         | <b>SEVERE</b>   |
| The threat to Great Britain from NIRT (N Ireland Related terrorism) is | <b>MODERATE</b> |
| The threat in N Ireland from NIRT (N Ireland Related terrorism) is     | <b>SEVERE</b>   |

|                    |  |
|--------------------|--|
| <b>CRITICAL</b>    | <b>An attack is expected imminently</b>      |
| <b>SEVERE</b>      | <b>An attack is Highly likely</b>            |
| <b>SUBSTANTIAL</b> | <b>An attack is a strong possibility</b>     |
| <b>MODERATE</b>    | <b>An attack is possible, but not likely</b> |
| <b>LOW</b>         | <b>An attack is unlikely</b>                 |

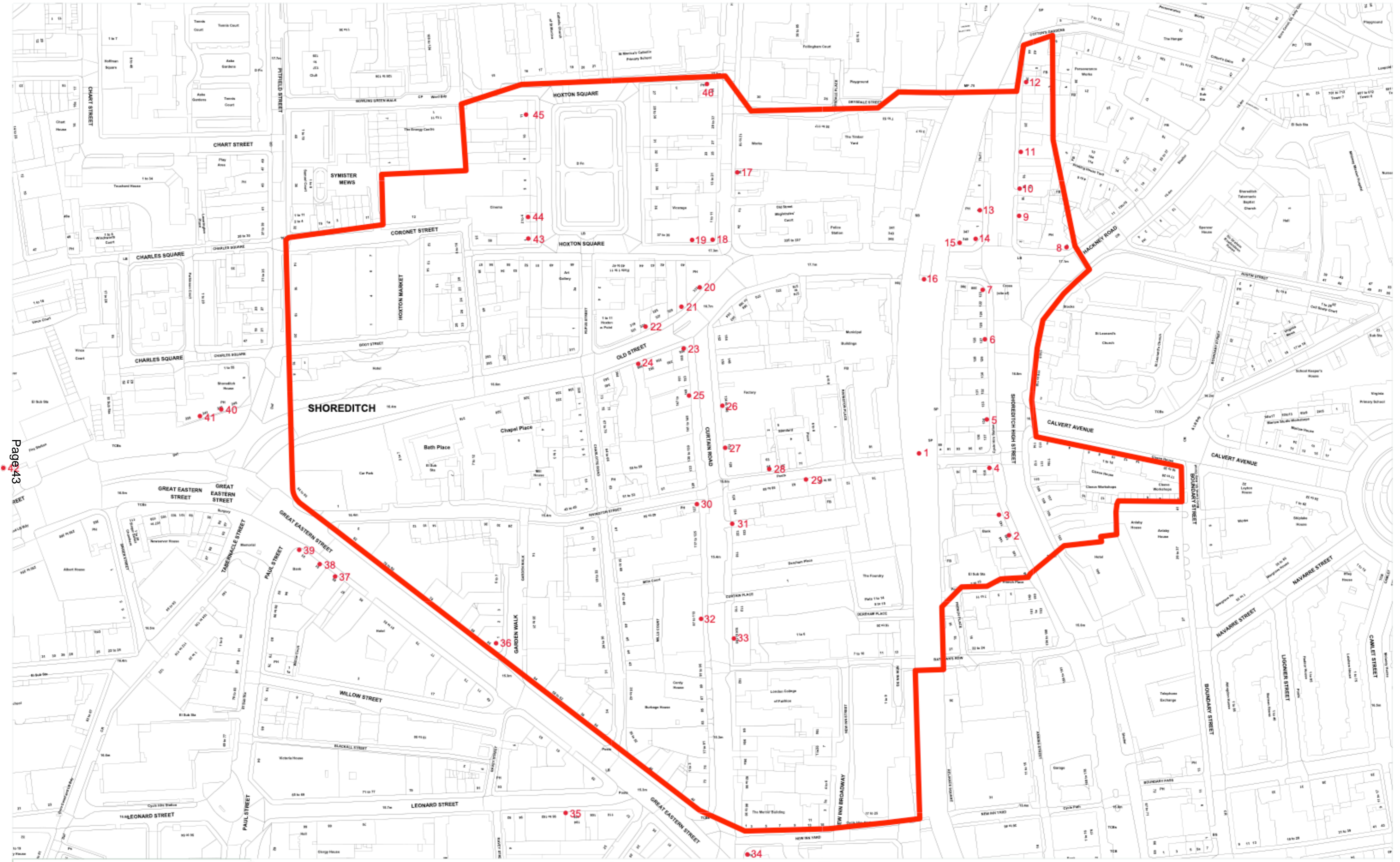
**COMMUNICATION:**

- All officers to monitor GD Despatch 01
- GD CRIME - Intel / PNC Checks
- PS HORTON 07850085349

**HUMAN RIGHTS:**

- **Proportionate** – This is a proportionate policing response to crimes that are being committed in Shoreditch with the deployment of uniformed officers and plain clothes officers. There is an expectation from key stakeholders for there to be a visible police presence to maintain the safety of the local community.
- **Legal** – It is legal within the HRA and is supported by the relevant authorities. All relevant legislation and authority has been adhered to.
- **Accountability** – Officers will be held accountable for their individual actions. Specific command structures are in place with roles and responsibilities.
- **Necessity**- This operation is necessary for the detection and prevention of crime. Your attention is drawn to Article 2: Right to life, Article 3: Right of prohibition of torture, Article 4: Right to liberty, Article 5: Right to fair trial, Article 10 freedom of expression, Article 11 Freedom of Assembly and Association , Article 14: Freedom from discrimination

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- |                             |                                 |                              |                              |                             |                            |
|-----------------------------|---------------------------------|------------------------------|------------------------------|-----------------------------|----------------------------|
| 1. CARGO – 3AM              | 9. TEQUILA MOCKINGBIRD – 1.30AM | 17. TROY BAR – 3AM           | 25. SUNSET BAR – 4AM         | 33. HOXTON PONY – 2AM       | 41. BOUNCE – 1AM           |
| 2. THE SHOREDITCH – 2AM     | 10. LUXE – 3AM                  | 18. NIKKI'S BAR – 1AM        | 26. THE BLUES KITCHEN – 3AM  | 34. THE OLD BLUE LAST – 2AM | 42. SIMMONS – 2AM          |
| 3. BARRIO – 2AM             | 11. CATCH – 2AM                 | 19. TONIGHT JOSEPHINE – 1AM  | 27. COTTONS – 2AM            | 35. THE BOOK CLUB – 2AM     | 43. HAVANNA – 12AM         |
| 4. THE PHOENIX BAR – 2.30AM | 12. JAGUAR SHOES – 1.30AM       | 20. BALLS – 1AM              | 28. CALLOOH CALLAY – 2AM     | 36. HOXTON 7 – 1AM          | 44. COLOURS HOXTON – 2AM   |
| 5. MATCHBOX – 12AM          | 13. THE SPREAD EAGLE – 2AM      | 21. TRAFIK – 2AM             | 29. THE LIGHTHOUSE BAR – 3AM | 37. TRAPEZE – 3.30AM        | 45. GIGI'S HOXTON – 3.30AM |
| 6. KICK BAR – 1AM           | 14. JUNCTION EAST – 1AM         | 22. CIRQUE – 2AM             | 30. THE BARLEY MOW – 12AM    | 38. SWIFT BAR – 12AM        | 46. THE RED LION – 12AM    |
| 7. CORNERSHOP – 2AM         | 15. SHOREDITCH PLATFORM – 2AM   | 23. OLD STREET RECORDS – 2AM | 31. THE STRONGROOM BAR – 2AM | 39. FLORIPA – 3AM           |                            |
| 8. BROWNS – 3AM             | 16. THE BIKE SHED – 12AM        | 24. BE AT ONE – 2AM          | 32. BALLIE BALLERSON – 2AM   | 40. ROADTRIP – 3AM          |                            |

**SHOREDITCH LATE NIGHT VENUES CLOSING TIMES FRIDAY & SATURDAY**

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Statement from Chairman of Company; Lieutenant General (ret'd) AMD Palmer CB CBE

I have been the Non-executive Chairman of the Advisory Board of the Shoreditch Bar Group (SBG) for nearly ten years. I left the Army sixteen years ago. My last appointment was as Deputy to the Chief of the Defence Staff (the senior officer in the Services.) Since then, I have a number of appointments in the private sector and have been Chairman of various charities as well as Chair of Governors of two schools.

My operational service has included many tours in Northern Ireland and as NATO operational Commander in Bosnia. While in Northern Ireland in both junior and senior appointments I have always operated in close support of the police and consequently have, not only a good understanding of their modus operandi but the highest opinion of their work.

I met Mr Khan ten years ago when he was looking for a senior consultant to assist him in managing the growth and governance of his business which at that time consisted of five premises in Shoreditch (including Cargo). At that time, I had no experience of nightclubs (at least from a business perspective) Nevertheless I thought it would be an interesting challenge and agreed to do the job for a probationary period of six months. My role is advisory and associated with providing strategic advice related to the business. Nevertheless, given my experience and reputation I have always been clear that my continued work for SBG would be dependent not only on us conducting an entirely lawful business, but that SBG policy would always have at its heart the requirement to support the police in the very difficult job they have in maintaining law and order in Shoreditch.

While not being involved in day-to-day operations I have always kept an eye on how this policy was being implemented in our clubs. I do this by visiting the clubs from time to time most recently, and in the light of the threat to young women from hypodermic needles, to ensure that managers had fully taken on board the seriousness of the situation and to discuss the measures they were taking to implement SBG policy to guard against it.

Mr Khan has set out the history of SBG in his statement and I support it. I will therefore not repeat what he has said. The series of allegations in the review document are very serious. We are intent on implementing the changes outlined in Mr Khan's statement. As further evidence of the seriousness with which we take the police allegations and as a consequence of their request for this Review we have closed Cargo. As you will understand this is at considerable cost to SBG especially over the Christmas period and bearing in mind that the pandemic brought the business to the verge of collapse as it did for so many businesses in our sector. Nevertheless, Mr Khan and I are determined that we will commit unequivocally to correct the issues identified in the review document. I firmly believe the plan that Mr Khan has outlined represents a way forward that balances police concerns with the requirement to run a viable business. In summary SBG has worked collaboratively and I believe successfully with the police over many years, and we are committed to continue to doing this. Our business has managed to overcome the severe problems associated with the pandemic. I believe SBG has a workable plan to meet the concerns of the police however it crucially depends on the retention of our current licence.

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Statement from Director of the Company; Shmail Khan

### The Development and operation of Cargo

Cargo was a music led venue established circa 20 years ago. There has never been a review of this premises license before.

Eden Gardens Entertainment acquired the premises circa 13 years ago. One week prior to our acquisition of the premises Professor Green was stabbed in the neck whilst on stage performing at the premises. This was a gang related incident and was heavily publicised in the press. A week later we completed the acquisition and immediately began to develop deep working partnership with the police to resolve the issues the premises had been facing. We, as the operators, worked tremendously hard heeding all advice and guidance from various police departments to mitigate all risk associated with the running of the premises. We successfully managed, through partnership work, to build the premises into a well run and ever evolving operation, with a key focus on safety and the identification and mitigation of new risk areas which emerged with time.

Over the years we have continued our working in partnership with the police authority. We have seen various different risk profiles emerge over the years ALL of which we have been committed to mitigating as proactively as we possibly can. Some examples are below:

- London, circa 5-7 years ago, saw an immense rise in acquisitive crime. In particular mobile theft crime. There were organised gangs discovered to be visiting London on weekends specifically to undertake acquisitive crime. We worked in partnership with not only the Met Police and associated under cover police officers BUT also with police that were flown in from countries that these gangs originated from. We granted free access to the police and set up look outs across Shoreditch. We were successful in aiding the capture of several phone thieves and eventually were part of the successful break down of this gang criminality.
- There were times during which London saw peaks in certain drug taking culture with intelligence of “bad batch” drugs in circulation. We worked with police to set up mobile drug testing units on Rivington Street AND voluntarily enforced as a condition of entry to Cargo a compulsory drugs test at the testing unit.
- We have undertaken a variety of key training courses at Cargo for the broader hackney night time community and have spearheaded policy in high risk areas. Some examples;
  - Acid Attack scenarios
  - Terrorism training
  - Gang violence
- We have always risk assessed voluntarily ALL types of promoters utilised at the premises. We have always heeded police advice and direction where offered. We have always shared intelligence and CCTV proactively whenever we have witnessed any specific gang issues in the area. Never have we hosted an event at the premises against police advice. We have always cancelled ANY future events from a promoter who has not complied with our protocols or where we have received negative feedback from the responsible authorities.
- We have trialled a variety of technologies and controls as suggested by the police at Cargo, prior to that control being distributed across the broader night time economy;
  - Breathalyser test kits
  - Drug swab test kits
  - ID scan technology

Cargo has always been synonymous with providing a platform for up and coming talent to show case their creativity. It has a deep longstanding connection with Music of Black Origin and is a venue that has given many African origin and black British performing artists a platform to showcase. Some examples of these performers are; Guru from Jazzmatazz, Roots Manuva, Rudimental, Kanye West, Femi Kuti and Kelis. There are many big name artists that have performed at Cargo and since risen to stardom. One such example is Ed Sheeran who in an interview mentioned his thanks to Cargo for offering him a platform in the early days of his career. Artists such as Banksy, Ben Eine and Shepard Ferry had their very early art exhibitions at Cargo and indeed their art works still adorn the premises. We see 1000s of tourists visiting the premises each year especially to experience these art works.

We employ circa 60 staff consisting of mainly young local talent both at site level and also in the office which is involved in the marketing and event curation side of the premises. Many of are staff at inception were unqualified and over time we have trained them and put much focus on their individual development. We have examples of people rising from basic waitresses through to being head of corporate sales division.

It has always been our commitment to work alongside the police to ensure all issues highlighted to us are rectified and where suggested controls are put in place we do so immediately to the best of our ability. An example of this commitment was our willingness to take on two experts in the field of crime reduction and problem solving; Guy Hicks and Martin Waugh (their statements are attached). They were taken on board in order to allow the company to benefit from their wealth of experience of problem solving and mitigating risk in the late night sector. We have, again over the years, worked hard to implement all suggestions from these individuals into our operation. We also have continued to maintain strong open lines of communication with all police departments over the years. There are multiple examples of great partnership work in the area including catching criminals through intelligence sharing. Cargo being the biggest premises in the Shoreditch Triangle meant our management teams were also the most substantial and to that end we had a very strong footprint of eyes and ears in the area.

#### Evolution of present issues

Over the last 2-3 years, and especially since the reopening post pandemic, I was aware and had seen that Shoreditch was becoming an area of significant risk. There were multiple street parties and regular carnival style parties, all unlicensed, happening across the Shoreditch triangle almost every weekend. Certain key individuals on a repeated basis would host pop up street parties across Shoreditch. These "events" would involve a very powerful mobile nightclub sound system, a bar often hosted from a car or bags of alcohol from off licenses and nitrous oxide sellers. These events were held regularly throughout the weekend and often there would be multiple events of this kind in several different locations in Shoreditch. These events would draw in large numbers of people and would last for long periods of time. On occasion, if they were broken down, they would simply move to another location and restart the event. The consequences of this type of activity rapidly deteriorated the environment in Shoreditch. It led to massive street brawls, gangs taking position on certain areas and members of the public being harassed. We continued to work with the police and made proposals in relation to providing hand cuff trained roaming security forces to assist with the large task at hand.

During the pandemic we saw this type of activity hit climax and indeed the incidents we witnessed in the area also hit climax. Throughout this period we continued sharing as much intelligence of the happenings in the area with the police and indeed our team were often the first on seen, making the call to the authorities. I can confidently say we have prevented many very serious crimes happening in the area, not associated with our premises, which otherwise could have been very serious. On all



occasions that police have been called to the area; our senior management team has been first to go alongside the police to resolve a situation as best as possible.

Over the years, we have continued to work closely with established promoters and talent from the black community affording the community a platform for creative expertise which traditionally it has struggled to attain. The street issues are vastly down to organised gangs of nitrous oxide sellers and roaming street parties organised in the area on a regular basis. Furthermore the rise in Air BnB flats being used for pop up unauthorised nightclub events has soared. All these factors, of unauthorised and unregulated activities, have brought criminality to the area. Cargo is a very well known brand situated on one of the busiest thoroughfares of the nighttime economy (one which has a higher footfall than some of Soho's busiest streets), it is very often used as a point of reference due to it being a landmark premises.

From Eden Gardens acquisition of the premises 13 years ago till circa 3 years ago I was working almost 7 nights at the premises. Mark McEvoy (DPS) and I overlapped for circa 5 years until a point I took a step back from the premises and Mark took charge entirely. We share ALL the concerns noted by the police.

#### Response to application for review

We believe, as Shoreditch's biggest licensed premises we have a duty to the community. In light of the police's concerns in relation to Cargo and my own investigations, we have decided to close Cargo down forever. This decision has had some very serious implications for the business. The Christmas and New Years Eve periods are the key periods of the year upon which the viability of the rest of the year rests; the financial and other consequences are very severe and so such a decision cannot be taken lightly. Notwithstanding this, our responsibility takes priority and as such we have taken the decision to close cargo down and develop an entirely new operation at the premises.

At group level we have opened dialogue with Paul Broadhurst and Amy Lane from the Mayor's Office. They have put forward some key suggestions which we have now acted upon. In particular is their suggestion that our group take the lead in attempting to create a forum consisting of all the key stakeholders in Shoreditch. This would consist of the Hackney Nights Initiative, local residents, council, police and other licensed premises. As far as possible, if afforded the opportunity, we will endeavour to take this lead with creating as much of a joined up approach as possible. We intend to coordinate regular meetings with all the key parties at the new premises. In addition to the parties already mentioned we would look to organise attendance from the main SIA providers, toilet attendant providers, entertainment agencies and any other smaller third parties which, often overlooked, provide personnel to the Shoreditch Night Time economy. We are of the opinion that this initiative will make a strong impact on tackling issues in the shoreditch area. We have already reached out to both Sam Mathys and David Tuitt requesting a meeting so that we can make an immediate start on this.

In addition we plan to undertake a complete overhaul of the premises to enshrine a new operating style;

- Mark McEvoy and his management team have been removed entirely from the premises and will not return to the premises.
- A new DPS Hamish Glenn has been recruited to run the premises and has been introduced to the police.
  - Hamish Glenn will be sole DPS for only this premises.

- Hamish Glenn will be dedicated as a sole point of contact for all responsible authorities.
- HAMISH Glenn will be onsite for majority of evening busy trading periods.
- A full operational manual for the new premises has been created by Hamish Glenn and demonstrates the controls, checks and policies that will be in place to tackle the issues identified by the police.
- SIA; We will build a core SIA team in house and utilise a third party company for extra SIA requirements. This will result in building consistency into the SIA team onsite and weave the SIA personnel into the managerial/operational fabric of the premises.
- We have volunteered a list of conditions for the premises license to allay police concerns.
- We have shared a mood board and proposal for the new premises. We are rebranding the premises as Rivington Street Arches. The key foundation of the proposal is a complete overhaul of the nature of the premises. The overhaul is so substantial, entirely removing the Cargo brand and all of its associated following, that we are confident the issues of concern for the police will not longer arise, we have closed the Cargo nightclub premises permanently.

This proposal involves an investment of £1m and would retain many jobs in the premises whilst we trust satisfactorily allaying the police concerns. Further details of the new premises can be seen in the mood board and design document including pictorial design proposals. Some key areas of the premises are as follows;

- A brand new high end concept will be built into the premises. (Design and level of product similar to the Kingshead which we built and have traded for circa 10 years with a 5am license with approximately 40-50 thousand customers per year through the doors with no more than a couple of incidents involving police in all that time).
- The build phase will take circa 3 months, during which the premises will remain closed.
- The 3 month closure will also cut the link between the old Cargo premises and our new brand.
- The premises will undergo a full physical, conceptual and offering repositioning.
- The premises will have no elements of its historic 'nightclub' music characteristics. It will be a 'product and environment' led premises.
- Cargo, alongside its circa 50 site level workers, employed circa 12 full time employees in the office. Their roles are predominantly based around the nightclub function of the premises. However, following consultation, we would reposition duties away from event booking and promoter driven efforts towards driving the new concept and launch of the new premises within a significantly changed target market/customer base. These personnel will be deployed with immediate effect towards the digital launch of the new concept thus affording gearing up time on PR and marketing prior to opening. The project, as outlined below, is fully deliverable and indeed the team has experience of delivering similar quality projects historically.
- We envisage the refurbishment would take circa 3 months from sign off of design and build plans and it would;
  - Create a different identity for each of three arches;
    - Arch 1- dedicated to food with an immersive ordering and visual experience. Full menus from brunch through to dinner and nibbles sharing plates would be on offer.
    - Arch 2- dedicated to draught beers. We will team up with our existing brewery partners to deliver a "beer tank" tap room. We would host guest beers and look to showcase beers from across the borough of Hackney and further afield. We would host a variety of events centred around beer and

- its production with a host of master brewers offering lectures and tasting evenings.
- Arch 3- dedicated to mixology with experiential service. We would look to build a platform whereby the top mixologists would offer their own guest appearances and signature drinks. We would look to enter the various mixology contests held throughout the year.
  - The garden would be utilised to provide outdoor space for ALL of the above functions of the premises; the art, which currently draws 1000s of tourists and visitors each year, will become a decorative centre point of arrangements. We will continue to host up and coming artists from around the world inviting them to undertake live art shows and offering a space to display their works.
  - ALL areas will contain a variety of seating styles to increase pre bookings and encourage group led activity. An additional feature of the premises will be its daytime offering as a hub for people to work and socialise in. The layout of tables/chairs/banquettes will be amenable for this activity.
  - We will look for all opportunities to digitise the premises. Utilisation of QR code table ordering systems through to other booking platforms and many pioneering digital innovations for the hospitality sector will be incorporated.
- The refurbishment will remove the following elements from the premises;
    - Arch 3, which is purely a dedicated dance floor and stage, will no longer retain this identity. We will instal booths and seating areas throughout this arch.
    - The nightclub style lighting will be removed throughout the premises.
    - Dark areas will not be a feature of the premises. All lighting will be replaced with feature ambient lighting.
    - ALL arches will contain a combination of low and high level seating (the current predominant functionality of arch 3 will therefore be all together removed).
  - The new concept will therefore;
    - Remove ALL dance led promoted events but will introduce some brunch, performance led and cultural events.
    - Draw patrons from far and wide through its pioneering design and product offering quality.
    - Serve to significantly shift client base and attract patrons looking for a modern day “taproom, cocktail saloon and eatery” offering rather than the historical offering- a pure dance and music nightclub offering.
  - Operational amendments;
    - We envisage the repositioning of the premises will lead to a drastic shift in the booking, attendance and behavioural patterns of patrons. We expect to see an increase in prebookings and hope, eventually, to get to a stage where our customer base grow to recognise the importance of a prebooking in order to ensure access. It will take time to educate the new customer base.
    - We are confident that the repositioning of the venue will significantly mitigate the build up of queues. Nightclub patrons typically all arrive at their destinations from circa 11:30pm onwards- this usually correlates with the start time of music led DJ performers etc. In turn queues build up due to all patrons arriving during the same time window. However with the repositioning of the venue; in particular removal of the dedicated use of arch 3 for purely dancing and other nightclub elements, we do not envisage queues building up at the premises.

- Nevertheless as an additional protective layer, the refurbishment will incorporate a fully revised internal queuing system, which will have capacity to hold circa 60 patrons, under supervision. This will be off the public highway and will be part of the demise of the premises.
- We are very confident that the works outlined above will resolve issues as identified by the police. Some of the main areas are;
  - There would be a material change in the character of the premises and indeed the area providing a high end unique hospitality offering. The customers looking for a purely nightclub, dance orientated experience would no longer find this at the premises; indeed Cargo will no longer exist.
  - The lack of any nightclub features to the premises will shape customer attendance patterns in a way that will prevent the build up of a queue. There will be no specific event or music Dj which would cause all patrons to arrive simultaneously. Therefore we do not envisage a queue. Nevertheless an internal queuing system has been developed as an additional protective step.
  - The internal queuing system will also clearly identify the patrons of the premises as distinct from members of the public utilising Rivington Street.
  - The visibility of the internal queuing system would be significantly more limited compared to the historic queuing system of Cargo. At Cargo there was a long queue running alongside the street at the entrance. This will no longer be the case and as such will not attract any undesirable peoples trying to cause distraction, entice or rally up our patrons.
  - The terminal entry hour of 02:00 on the weekends will promote a gradual dispersal towards the end of the night. In addition it will prevent build up of any people attempting to attain entry during the last hour of opening.
  - The mobile nightclub units and car bars are almost entirely affiliated with UK drill and grime music genres. These will not form any part of the identity of the new premises. The new premises will have a focus on Rock'a'Billy, Jive, Rock'n'Roll and Blues music genres. The new premises would therefore not be an attractive premises for the undesirable groups roaming the shoreditch streets.
  - Large groups of people collectively dancing will no longer be a feature of the premises. This would mitigate against the chances of incidents occurring inside the premises.
  - The old premises was almost entirely based on vertical drinking. The new premises, whilst permitting vertical drinking, will contain seating across the entirety of the premises spaced out to encourage horizontal drinking. This in turn will reduce risk inside the premises.

We have just come out of a pandemic which has completely decimated our business. We were very close to insolvency and the future remains very uncertain for the hospitality sector. We have taken the decision to voluntarily close down during the busiest time of the year for the business- a trading period which typically sustains much of the rest of the year. This is a sign of our commitment and effort to win back police confidence and demonstrate our commitment to the promotion of the licensing objectives. The viability of the business is very significantly based on the existing late opening hours of the premises but not the "nightclub" use of the premises. In order for our product offering, in the new proposal, to be viable we need to be able to offer later service to our customers (an 'under one roof' offering).

The removal of the management team, permanent closure of the nightclub premises, building of a completely new branded premises, instatement of a new DPS with a wealth of licensing/operational management experience and our commitment to ongoing partnership work we request that;

- The terminal hour for the premises on Fridays and Saturdays remains 3am
- Last entry time of 2am is introduced

Without these operational hours, in light of the investment level and existing financial liabilities, the likelihood of the premises to sustain itself is very low.

- A large portion of consumers typically organise evenings with food and drink in mind. An evening out can typically consist of a dinner and then drinks after. Our ability to offer this all under one roof is core to our branding and ability to attract customers. Cutting hours shorter will lead to less consumers identifying our premises as a place where they can spend their entire evening without the need to move from premises to premises to attain each element of their evening out.
- The new premises will be marketed heavily towards the corporate bookings sector. Very typically corporate events bookers look for late opening hours so that their employees can enjoy an evening all under one roof without them having to coordinate multiple venues and under take additional responsibilities associated with multi venue events- this comes with its own risks.
- The premises has secured a significant investment to facilitate the transformation, which we forecast returning over the course of 10 years. The forecasts have been undertaken in line with the existing hours. Curtailing the hours of trade for the premises would fundamentally compromise the forecasting, debt service capability and thus viability of the business as a whole.
- With the existing opening hours the tendency will be for customers to disperse gradually from the premises as they each bring their nights to a close.
- The existing opening hours of the premises will diminish the culture of last minute binge drinking which may otherwise arise if the premises had shorter opening hours.
- There are no places offering substantial table meal food in Shoreditch past midnight. The majority of the outlets are fast food takeaways. The premises with its existing hours will therefore service people looking for a table meal during the late hours.

Specific issues: the management of the area outside the premises: dispersal and queuing; the quality and effectiveness of the management team

We believe that each of these concerns have now been adequately addressed through the detailed operating manual WITH detailed corresponding policies to each of the above. A summary of each;

1. The dispersal policy contains the detailed controls and checks. In particular we believe voluntarily introducing a terminal hour of entry of 2am will allow for gradual dispersal of the premises over an hour through till 3am. The document shared titled "Operational hours of other premises in Shoreditch and effect on dispersal" shows the operating hours of other licensed premises in the area. Introducing a terminal hour of entry with a delayed gradual dispersal will prevent other venues, with later operating hours, becoming hot spot locations.
2. The queue management policy outlines the controls and checks being proposed. Following a meeting with Sian Giles and Adam Rowe from licensing we have heeded Adam Rowe's suggestion of an internal queuing system. To this end we have now commissioned our designers to make allowance for this system and incorporate it into our design. The internal queue, which will be within the demise of the premises and not encroach on the public

highway, could hold circa 60 people. Whilst we do not envisage the build up of a queue at the new premises we would have this mechanism retained in a worst case scenario.

3. Mark McEvoy and his entire management team have been removed entirely from the premises. The new DPS who will be dedicated to only this premises has now been introduced to the police and he has written the Operational Manual which will form the backbone of the premises operation. Hamish Glenn's experience and understanding of the issues outlined will allow him to tackle and resolve the issues directly if and when they may arise.
4. I am also committed now to undertake regular audits of the premises and the operational performance of the team onsite. As ever I will make myself personally available to attain feedback directly from the responsible authorities.

### In Conclusion

Our group commitment to the police remains very strong, working in partnership is core to our corporate culture. We have decided to close permanently Cargo. This in turn will end the use of the premises as a nightclub (a music led premises in which patrons typically all arrival in a similar small time window). The new concept which we propose will not be an attraction for any of the undesirable types of peoples descending on Shoreditch and causing nuisance and criminality. We have the ability to execute and perform on this proposal as can be seen from our operation such as the Kingshead which has operated with a 5am license for circa 10 years. Furthermore we have removed the management team. We are proposing to put in place a new DPS with an entirely new operational mode. We are confident that with the hours and license in place we can run a safe premises, firmly promoting the Licensing Objectives, which will be an asset for all the Shoreditch Community and beyond.

Shmail Khan

HAMISH GLENN

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My name is Hamish Glenn and I am the proposed DPS of 83 Rivington Street.

**Personal Background**

Having been involved in the Hospitality industry for the majority of my life, 11 years in the West End of London as well as Lancaster, Leeds, Newcastle and Dubai. I have dealt with many issues successfully and always been a responsible and proactive operator. I have operated several high volume, high profile and high turnover venues such as the Sports Cafe, Mr & Mrs Foggs of the Inception Group, Mahiki, Dirty Harrys. I have also managed venues in the Westminster stress area (equivalent of the Shoreditch SPA). The experience gained in each venue and different locations will stand me in good stead to operate the new premises.

I have held a Personal License since 2007 and have undertaken many short courses throughout my career to bolster my knowledge and experience within the sector from front Line SIA, Conflict Management, First Aid, to Food Hygiene levels 1-4. I will employ an experienced management team and when needed engage professionals in the fields of Licensing, H&S, Acoustics and training. I am confident in my abilities to deliver the project beyond expectation and ensure the problems associated with the past do not resurface.

A copy of my CV is attached.

**Permanent Closure of Cargo and the relaunch of an entirely new premises**

I have been involved in the creation of a new venue and brand unconnected to Cargo in anyway. Creating a new space appealing to the local residents and a general higher end of clientele with a focus on food, beverage and service. Three distinct offerings of food, beer and cocktails connected by a revamped garden area taking guests on a voyage of discovery throughout the building. Open all day and late into the evening providing a space for co-working, corporate events, after work drinks and late bar.

I believe that the new concept will comprehensively mitigate the various risk profiles that have been identified by the police. There will be no elements of the new premises that would appeal, in any way, to the "problem people," that currently visit the area on a regular basis. It is clearly not a venue that will cater for them, in terms of style of venue, offer, music policy and price point.

I have produced the new Operational Manual attached, based on my survey of the premises, its surroundings, issues identified by the police and my experience of successfully operating similar venues in similar locations. The Operation manual contains details of risk management in all areas of

the operation. Some of core areas of the operating manual, which I believe will mitigate key areas of risk and issues identified, are;

- Queue management Policy; in particular the development of the internal queuing system
- Dispersal policy and management of the outside
- Guest Welfare
- Preventing and dealing with intoxication

Hamish Glenn  
Proposed DPS of 83 Rivington Street, EC2A 3AY



## **Hamish Glenn**



An experienced, dynamic, senior General/multi-site/operations manager with a diverse range of experience across multiple facets of the industry.

I have attained a variety of skills and outlooks throughout my career, providing me with a well-educated, innovative and pragmatic point of view

### **The Apartment Group – Newcastle Upon Tyne**

Senior General Manager – DPS



Capacity – 2000

Hours of Operation – 11am – 3am

Licensing Authority – Newcastle Upon Tyne

Type of Venue – All day venue, competitive socialising, cocktail bars, Nightclub, Students

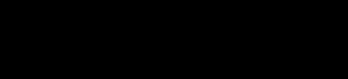
Footfall – High

Approx Turnover - £200k

Guest Profile – Afterwork drinkers, corporate, students, tourists, stag & hen, birthdays, club goers

### **The Inception Group – Mr Fogg’s Society of Exploration – Mrs Fogg’s Dockside Drinkery & Distillery “Group Manager” – General Manager – DPS**

(Capacity 300/750)



Capacity 300

Hours of Operation 5pm – 1am

Licensing Authority – Westminster

Type of Venue – Cocktail Bar

Footfall – High

Approx Turnover - £50k

Guest Profile – 18 -65, afterwork drinkers, tourists, local residents, corporate

Capacity 750

Hours of Operation 11am – 1am

Licensing Authority – City of London

Type of Venue – Cocktail Bar/Restaurant/Pub/Club

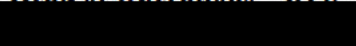
Footfall – High

Approx Turnover - £80k

Guest Profile – 18 -65, after work drinkers, city workers, transit hub, destination drinkers, corporate

### **PC Soho Ltd – Dirty Harrys Soho, After All, Bordello, London**

Head of Operations – DPS



Capacity 300

Hours of Operation 5pm – 3am

Licensing Authority – Westminster

Type of Venue – Entertainment lead, high volume, late cocktail bar  
Footfall – High  
Turnover - £80k  
Guest Profile – 25-45, afterwork drinkers, local residents, London residents, tourists, destination drinkers, corporate

Capacity 300  
Hours of Operation 11pm – 3:30am  
Licensing Authority – Westminster  
Type of Venue – Bottle Service Nightclub  
Footfall – High  
Turnover - £100k  
Guest Profile 21-35, club goers, promoters, artists, celebrities

Capacity 200  
Hours of Operation 2am – 6am  
Licensing Authority – Westminster  
Type of Venue – After Party Nightclub  
Footfall – High  
Turnover - £50k  
Guest Profile – 21-35, club goers, promoters, artists, celebrities

**Simmons Bars – Soho, Camden, Fitzrovia, Kings Cross, Liverpool St, Tower Hill, Fulham  
Area Manager**

[REDACTED]

Capacity – Various  
Hours of Operation – Various  
Licensing Authority – Westminster, Camden, City of London, Tower Hamlets, Hammersmith and Fulham  
Type of Venue – Late Bars  
Footfall – High  
Turnover – Range £25k-£50k  
Guest profile – 18-25, after work drinkers, local residents, London residents, tourists

**The Lucky Pig Group – Fitzrovia & Fulham (Capacity 150 / 300)  
Group General Manager – DPS both sites.**

[REDACTED]

Capacity - 150  
Hours of Operation – 5pm – 2am  
Licensing Authority – Westminster  
Type of Venue – Cocktail Bar  
Footfall – High  
Turnover - £35k  
Guest Profile – 21-65, after work drinkers, tourists, local residents, London residents, destination drinkers, corporate

Capacity – 300  
Hours of Operation 11am – 12am  
Licensing Authority – Hammersmith and Fulham  
Type of Venue – Restaurant/Cocktail Bar  
Footfall – Low  
Turnover - £30k  
Guest Profile – 21-65, local residents, destination diners, corporate

**Riley's Sports Bars Ltd – Riley's Sports Bar Haymarket, London (Capacity – 570)  
General Manager - DPS**

[REDACTED]

Capacity – 570

Hours of Operation – 12pm – 3am

Licensing Authority – Westminster

Type of Venue – High Volume Sports Bar/Nightclub

Footfall – High

Turnover - £80k- £120k

Guest Profile – 18-65, sports viewing, teams, tourists, London residents, sports stars, corporate

**Imovation Middle East Restaurants LLC – SPiN Dubai, Pyramids at WAFI, Dubai  
Operations Manager – PIC (DPS equivalent)**

[REDACTED]

Capacity – 1000

Hours of Operation – 5pm – 3am

Licensing Authority – Dubai CID

Type of Venue – Competitive Socialising Nightclub

Footfall – Low

Weekly Turnover - £100k

Guest Profile – 21-45, Table tennis enthusiasts, local residents, tourists

**Mahiki Facilities Management Services – Mahiki, Jumeirah Beach Hotel, Dubai  
Operations Manager – PIC (DPS equivalent)**

[REDACTED]

Capacity – 500

Hours of Operation – 5pm – 3am

Licensing Authority – Dubai CID

Type of Venue – Exclusive Bottle Service Nightclub and Cocktail Bar, Celebrity Hotspot

Footfall – High

Weekly Turnover - £250k

Guest Profile – 21-65, tourists, celebrities, high net worth individuals, artists, tourists

**Novus Leisure – The Piccadilly Institute, London  
Assistant General Manager**

[REDACTED]

Capacity – 1550

Hours of Operation – 5pm – 3am

Licensing Authority – Westminster

Type of Venue – High volume Nightclub

Footfall – High

Turnover - £80k

Guest Profile – 18 -25, students, tourists, London residents

**Live Acts Entertainment Ltd T/A Charlotte Street Blues, London (Capacity - 480)  
General Manager - DPS**

[REDACTED]

Capacity – 480

Hours of Operation 5pm – 3am

Licensing Authority - Camden

Type of Venue – Live Music, Blues Bar

Footfall - Medium  
Turnover - £50k - £60k  
Guest Profile – 25-65, After work drinkers, tourists, destination drinkers, blues enthusiasts

**Novus Leisure – Amber, London**  
**Bar Manager**

████████████████████

Capacity – 760  
Hours of Operation – 11am – 3am  
Licensing Authority – City of London  
Type of Venue – High volume Nightclub  
Footfall - High  
Turnover – £75k  
Guest Profile – City workers, 21 - 65

**Maxwell’s Restaurant Group – Roadhouse, Covent Garden, London (Capacity – 575)**  
**Bar Manager**

████████████████████

Capacity – 575  
Hours of Operation – 5pm – 3am  
Licensing Authority – Westminster  
Type of Venue – High volume Cocktail Bar/Club  
Footfall – Very High  
Turnover - £120k  
Guest Profile – 18 – 65, Tourists, Destination drinkers, after work, corporate, industry

**Cuba Inns Ltd – LAONE / Cuba Bar & Nightclub, Lancaster (Capacity – 300/780)**  
**General Manager - DPS**

████████████████████

Capacity – 300  
Hours of Operation – 12pm – 1am  
Licensing Authority – Lancaster City Council  
Type of Venue – High Volume Style Bar  
Footfall – High  
Turnover - £30k  
Guest Profile – 25 – 45, local people

**Bar Manager**

████████████████████

Capacity – 780  
Hours of Operation – 5pm – 3am  
Licensing Authority – Lancaster City Council  
Type of Venue – High Volume Cocktail Bar / Nightclub  
Footfall – High  
Turnover - £55k  
Guest Profile – 18-30, students, local residents, destination drinkers

**Short Courses taken**

**BIIAB Personal Licence Holder – ██████████**  
**SIA Door Supervisor – ██████████**

**Human Resources (Novus Leisure) – [REDACTED]**  
**Train the Trainer (Novus Leisure) – [REDACTED]**  
**Person in Charge Level 3 (Merit) – [REDACTED]**  
**Basic Food Hygiene Level 3 – [REDACTED]**  
**Level 2 - Emergency First Aid at Work – [REDACTED]**  
**Food Safety Level 4 – [REDACTED]**  
**WAVE – Welfare & Vulnerability Engagement Training – [REDACTED]**

**Education and Qualifications**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

**Additional Information**

**Director of F&B, LDN7’s Festival – Chiswick – DPS  
2018, 2019, 2020, 2021,**

Since 2017 I have been involved in the production and management of a veterans owned Rugby 7’s and Music festival held at Chiswick Rugby Club in London. It is held over the May Bank Holiday, (Friday to Sunday) to coincide and become the afterparty for the Army vs Navy Rugby Match at Twickenham.

The festival has built in all aspects every year from 2000 in attendance year one to over 6000 in year two, with 2 main stages, 70 metre Marquee, 6 different bars, Glamping and Camping Arenas.

2020 saw us move the Festival to August due to COVID restrictions and despite being as COVID secure as possible unfortunately at the eleventh hour after completing the build and selling over 4000 tickets the Council requested the festival not go ahead.

2021 the festival was held over the Weekend of 7<sup>th</sup>/8<sup>th</sup> of August and was a sell out success. Over 400 participants in the Rugby, 8000 festival tickets sold, Solardo Headline act.

**NB:** I have successfully operated the festival each year without it impeding on my full-time work commitments, working on the festival in my spare time or Holidays.

**References are available on request.**

# **Operations Manual**

January 2022

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## **1. Introduction**

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

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

The manual sets out Rivington St'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 Rivington St 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 Rivington St 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 or refuses to have their ID scanned
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 Rivington St.
7. Any ex-employees of the business, whose employment was terminated by the Company including any employee currently employed by the business beneath the level of senior management.
8. Large single sex groups, at the discretion of the management where protected characteristics may prove a deciding factor.

**Rivington St 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 reserve the right of entry. Being on a guest list, or having a table reservation, does not guarantee entry.

## **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 Rivington Street**

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**

Rivington St, is also subject to specific age related conditions.

#### **Annex 2, condition 19**

“A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as driving license or passport.”

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 operates a strict ‘Challenge 25’ policy where any guest appearing under 25 will be required to provide proof of age
2. Rivington St does not allow under 18 year olds on the premises unsupervised.
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. The premises operates an identity scanner at the discretion of the management.
- 7. 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**

8. 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”
9. The age policy will be displayed on the premises’ website and any promotional material
10. The premises will keep a written record each night of guests who are refused entry or service at the bar
11. Staff serving alcohol must also question a customer’s age 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 Rivington St. 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 Rivington St 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 metal detecting wands and, if the wand is activated or at the discretion of staff, then 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 (provided by police).
- 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. Where possible the suspect should be detained (subject to the safety of staff).

**Premises Licence Conditions**

N/A

**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
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 of Rivington St 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 other  
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 your 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 some water 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 notices (see appendix 3).
- 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 (see Appendix 5).
- 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 (see appendix 4).
- 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.

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.

**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.

Toilet attendants will be provided with Radios to provide a direct line of communication to both security and 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.

A quiet safe BOH area will be utilised as a medical/first aid room when necessary.

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”. 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 will be disposed of by a member of staff and replaced if requested by a guest upon their return.
- 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.**



**Employee Declaration**

**I confirm that I have read this drug policy, received appropriate training and I understand it is my responsibility to ask questions on any points I do not understand.**

**I understand that failure on my part to comply with this policy may lead to disciplinary proceedings against me.**

Name of employee:.....

Signature of employee:.....

Date:.....

Name of manager:.....

Manager's signature:.....

Date:.....

## Appendix 1 – Relevant Drug Laws

The **Misuse of Drugs Act 1971** is the main piece of legislation covering drugs and their categorisation. The following table sets out a summary of the potential penalties for possession and dealing controlled drugs:

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

### Drug Seizure

**Section 5, Misuse of Drugs Act 1971**, allows for certain circumstances when a person may have legitimate reason for being in possession of controlled drugs:

“In any proceedings for an offence under subsection (2) above in which it is proved that the accused had a controlled drug in his possession, it shall be a defence for him to prove—

- (a) that, knowing or suspecting it to be a controlled drug, he took possession of it for the purpose of preventing another from committing or continuing to commit an offence in connection with that drug and that as soon as possible after taking possession of it he took all such steps as were reasonably open to him to destroy the drug or to deliver it into the custody of a person lawfully entitled to take custody of it; or
- (b) that, knowing or suspecting it to be a controlled drug, he took possession of it for the purpose of delivering it into the custody of a person lawfully entitled to take custody of it and that as soon as possible after taking possession of it he took all such steps as were reasonably open to him to deliver it into the custody of such a person”

### Consequence of Allowing Drug Use

**Section 8, Misuse of Drugs Act 1971.**

“A person commits an offence if, being the occupier or concerned in the management of any premises, he knowingly\* permits or suffers any of the following activities to take place on those premises, that is to say—

- (a) producing or attempting to produce a controlled drug in contravention of section 4(1) of this Act;
- (b) supplying or attempting to supply a controlled drug to another in contravention of section 4(1) of this Act, or offering to supply a controlled drug to another in contravention of section 4(1);
- (c) preparing opium for smoking;
- (d) smoking cannabis, cannabis resin or prepared opium.”

\*knowingly includes reference to what you should know, i.e. it is not permissible to “turn a blind eye”. If you are concerned in the management of the premises and are made aware of the use or attempted use of controlled drugs you have a legal obligation to take action.

### **Licence Review**

Under the **Licensing Act 2003** the Police may seek a review of a Premises Licence where they believe a licensed premises is connected with crime and disorder. Evidence of controlled drug use or dealing is considered a serious matter and therefore could potentially lead to a review of the Premises Licence. A review of the Premises Licence has serious consequences and could result in the Licence being revoked by the Local Authority.

Controlled drugs can be divided into three categories, depending on their likely effect: stimulants, depressants and hallucinogens.

| Type          | Example   | Symptoms   | Form                               |
|---------------|---|--|------------------------------------|
| Stimulants    | Ecstasy,<br>Amphetamines,<br>Cocaine, Herbal<br>Highs | Hyperactivity<br>Anxiety/Paranoia<br>Teeth grinding<br>Excess sweating<br>Dilated pupils | Tablet<br>Powder<br>Rocks          |
| Depressant    | "G" GHB/GBL<br>Heroin<br>Codeine                      | Lethargy<br>Vomiting<br>Unresponsiveness<br>Constricted pupils                           | Liquid<br>Tablets<br>Powder        |
| Hallucinogens | LSD<br>Ketamine<br>Mushrooms                          | Hallucination<br>Paranoia<br>Aggression<br>Anxiety                                       | Nova<br>Powder<br>Liquid<br>Tablet |

### **Signs of Misuse**

- Torn pieces of cardboard such as beer mats, cigarette and "Rizla" packets.
- Small packets of paper, pieces of foil, plastic packets and sweet wrappers.
- Use of tightly rolled bank notes.
- Syringes and spoons.
- Burnt foil.
- Powder traces, on surfaces and around the nose.
- Small bottles.

### **Signs of Drug Dealing**

- A person receiving several visitors for short periods of time.
- Secretive exchanges of cash and packages.
- Conversation containing drug references.

### **Appendix 3 Drugs Signage**

# **WARNING**

**Rivington St. 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**

Appendix 4 - Drugs / Weapons Confiscation Form

| DATE OF SEIZURE | LOCATION OF SEIZURE | REPORTED BY | DESCRIPTION OF DRUGS FOUND | NAME / DESCRIPTION OF OFFENDER | CONFISCATION BAG SERIAL NUMBER | DATE COLLECTED BY POLICE | NAME + NUMBER OF POLICE OFFICER COLLECTING | SIGNATURE OF POLICE OFFICER COLLECTING |
|-----------------|---------------------|-------------|----------------------------|--------------------------------|--------------------------------|--------------------------|--|--|
|                 |                     |             |                            |                                |                                |                          |  |  |
|                 |                     |             |                            |                                |                                |                          |  |  |
|                 |                     |             |                            |                                |                                |                          |  |  |
|                 |                     |             |                            |                                |                                |                          |  |  |
|                 |                     |             |                            |                                |                                |                          |  |  |
|                 |                     |             |                            |                                |                                |                          |  |  |

## 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
- Events
- Smoking
- CCTV

### **Human Resources**

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

### **Physical Measures**

- Design of Premises – lines of sight etc.
- Access Controls
- Search Equipment
- ID Scanning Equipment
- CCTV
- Good Premises Maintenance
- Polycarbonate Glassware in Rivington St will be used at the discretion of the Management post a dynamic risk assessment on a night by night basis, all glassware except cocktail and wine
- 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.**

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?**

If they are, you should consider the following:-

- Do they have the means to get home safely? Should you offer to book a taxi (and even pay for it if necessary)
- Do they have their property? E.g. coat (especially if it is winter)
- Are they with their friends? Could you help them make contact?
- Do they need assistance? – Whether it be medical, a bottle of water or just onward travel advice
- Who is the right person to help them? If it is a female, consider a female member of staff or, if it is a more serious situation, the police or an ambulance (whichever is appropriate).

**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.**



## **WAVE – Welfare and Vulnerability Engagement**

Specifically: Female Safety – Our Number 1 priority.

If you either witness an incident or receive information that a customer or member of staff may have been sexually assaulted, harassed or pestered by another customer, you must report this immediately.

If a victim feels uncomfortable, remember what we **SAID**:

Secure the victim and take them to some place safe.

Apprehend and detain the suspect.

Inform management and/or Risk Reduction Team

Debrief management/Risk Reduction Team with exactly what happened – **FACTS ONLY**. Not opinion.

### Remember

- Any victim of a sexual assault is to be considered an extremely vulnerable person.
- Do not try and interview the victim (other than basic questions to ascertain if the suspect is on the premises).
- The victim is a crime scene. Make sure Victim and Suspect are kept apart.

Crime Scene Preservation - The scene of the assault must be preserved pending arrival of the Police.

The suspect should not be permitted to go to the toilet or wash hands etc, in order to preserve valuable evidence for police. The suspect should never be left unattended

All members of staff and management including third parties eg. Toilet attendants will undergo WAVE training upon appointment and receive 3 monthly refresher training.

Ask for Angela Scheme will be implemented with posters advertising “ask for Angela” throughout the venue and as with WAVE all Staff, Managers and third party contractors will all be briefed of its relevance and actions on a guest “Asking for Angela.”

## **10. Ejections**

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

**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.**

**Security will be instructed to use the following procedures:-**

We employ a strict procedure which is set out to ensure safe ejection for both the Customer and Contracted Door Staff, whilst causing the minimum disruption to other guests.

**ALWAYS USE THE FRONT ENTRANCE (WHERE POSSIBLE) AND USE YOUR RADIO TO INFORM THE DOOR**

### **Hands off Ejection**

Wherever possible, the person(s) being ejected should not be touched, although in law, reasonable force may be used.

### **Yellow / Red Card Warning Rule**

For minor misdemeanours, for example “refusing to move away from a designated fire exit”, or “standing on a chair”, a ‘yellow card’ warning may be issued. If there is a further instance of misbehaviour the persons may be ejected using the ‘Hands off Policy’. The manager in charge must be informed of any warnings.

### **Understanding the Situation**

Security should always take account of the whole situation, e.g. those involved may be with large groups of friends who may react badly.

### **Staff**

Staff will be trained to identify potentially dangerous and / or violent situations. However, security should deal with any potentially violent situation NOT bar staff. It is good practice to keep radios behind bars and in the cloakroom. Staff will be trained to use the radios to inform door supervisors and management of any potentially violent behaviour.

### **Confrontations between Customers**

Generally, any situation that disrupts the business will lead to both parties being ejected, using more than one exit, or delay one party leaving, to avoid further confrontation outside.

The manager on duty or the DPS (if in attendance) will have the final say on who is ejected following any confrontation in Rivington Street.

### **Records**

In all cases a record will be kept of all ejections. Where any force has been used a full incident report will be written. If the Authorities require further statements and / or your attendance is required at a Police Station, this must be done immediately, or as the Police request.

### **Staff Procedures**

1. On identifying a potential ejection; radio security to your location and the reason they have been called, possible intoxication, inappropriate behaviour etc.
2. On their arrival summarise your observations of the situation to them.
3. It is a manager’s responsibility to talk to guests who made need to be asked to leave the premises.
4. Observe the customer and if it is decided there is a problem with the person identified make first contact with them introducing yourself and giving the reason for approaching them. If the customer shows signs of aggression, then at least two members of security will approach the person, but the manager will observe and coordinate the walking out of the person, to the front door, other emergency exits will only be used in less of an emergency or deemed unsafe to do it any other way.
5. Once the person is outside the venue put them in a location where they are being recorded on CCTV (if possible), the customer then needs to be informed they are on CCTV and explain the reason for their removal from the venue.
6. Security will position themselves in a casual manner in order to support the manager.
7. Speak to the customer in a manner you would wish to be spoken to if you were in their position.
8. Asses the customers behaviour, speech, posture, ability to respond to establish the customers’ state.

9. Decide whether the customer will be permitted to remain in the venue or be asked to leave.
10. If it is decided the customer has to leave the reason will be clearly explained to them.
11. After the decision has been made, should the customer not understand the reason after two explanations then disengage and hand responsibility to security who will advise the customer that they will be shown the route off site by security, the manager will observe their removal at all times.
12. Should a physical ejection be necessary only reasonable force will be used.
13. Offer to find the friends of the customer and collect any coat or personal belonging they have left in the venue. **REMEMBER GUEST WELFARE.** The customer will remain with the manager and the member of security while these happen.
14. Give advice on how to get home safely.
15. If a customer refuses to have their friends leave with them then appropriate help will be provided to ensure they leave safely and are able to get home, to the best of our ability. If appropriate pay for a taxi home.
16. 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.
17. The customer will be offered fresh water.
18. Take the details and description of any customer being ejected from the venue and make a written record.

## 11. Security Roles & Responsibilities

This is an example of security positions and roles when 83 Rivington Street 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.

1. Internal Queue/Holding area Management
2. Internal Queue/Holding area Management towards rear/entrance
3. ID Scan / Search
4. ID Scan / Search
5. Arch 1 static
6. Arch 2 static
7. Arch 3 static
8. WC lobby area
9. Cloakroom
10. Exit Arch 1
11. Exit Arch 2
12. Exit Arch 3
13. Roaming Response
14. Roaming Response
15. Acquisitive crime Champion
16. Welfare Champion
17. External Dispersal static
18. External Dispersal static

NB: This Section will be amended on an ongoing risk assessed basis. During close time a minimum of 6 but up to 10 of the SIA listed above will be outside the premises undertaking the gradual dispersal of the premises.

## 12. 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 defined (by police) as the following:

- An injury has occurred due to some form of weapon, eg; 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 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

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

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?

Find out **WHEN** it happened – treat and speak to injured person(s), trace offender (if there is one), view CCTV.

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

## **13. 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,
- 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/ Welfare Champion 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
- Areas further from main staff concentration points (e.g. Bars)
- Back of house / cupboards
- Fire exits

We carefully assess our 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. CCTV system will be monitored by in accordance with licence condition:

### **Annex 2, condition 10 & 11**

*10 - The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer. 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. Recordings shall be made available immediately upon the request of the Police or authorised officer throughout the preceding 31-day period.*

*11 – 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 to the public. This staff member must be able to show a Police or authorised council officer recent data or footage when requested.*

## **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 venue 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 USB 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.

# 14. 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 Rivington Street 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 – EG. 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

## **15. Theft Prevention**

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

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 Rivington Street.

### **Staff awareness**

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

### **Customer awareness**

- Signage (at entrance and in toilets)
- Chelsea Clips will be provided for use throughout the venue
- Direct guests to cloakroom on entry
- Verbal advice to look after property

### **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 encourage the use of cloakrooms
- Encourage all guests to use cloakroom
- Bags to be placed in the cloakroom at no charge at managers' discretion
- Security & managers to be vigilant; all unattended bags and jackets will be confiscated, logged and held in a secure room with CCTV monitoring. These items will be handed back to the patron upon successful identification
- All staff have a part to play
- 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
- 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**

- Inform guests of cloakroom facilities
- Unattended items to be placed in the secure holding room
- All items to be recorded as soon as they are confiscated
- All items not claimed throughout the evening must be recorded on a spreadsheet

**Unclaimed Items**

- All phones, wallets, bags, passports and items of value MUST be left in the appropriate secure place and recorded on the internal spreadsheet
- Each item must be logged 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

**Lost Cloakroom Tickets**

- Guests that lose their cloakroom ticket must wait until the end of the evening to claim their items
- Only the senior manager on duty can authorise the release of property before the end of the evening. This is only to be done in the case that clearly identifiable items are in the pockets and these items are required for that person to get home. For example, purse, keys etc.
- Guests that claim property without a ticket the following day must sign and print their contact details if future follow up is required.

## **16. Staff Behaviour**

**The following code of conduct will apply to all staff employed at Rivington Street.**

1. Members of staff are not to be in the company of a customer except in an area open to the public within the venue.
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 of staff 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 venue 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.

## **17. Events & Private Hire**

**The aim of this policy is to reduce the risk of serious violent crime at events held at Rivington Street. The only such events held at Rivington St will be Corporate events, private parties and other strictly NON-music led events (such as; product launches, speed dating, conferences, tech gatherings and brunches and activity led gatherings).**

**All private bookings and events held at Rivington Street will be subject to rigorous vetting.**



**Any booking will not be confirmed without the approval of the Designated Premises Supervisor.**

Anyone wishing to book a private party will be required to attend Rivington Street 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 party will be required to provide the following information:

1. The nature of the event (e.g., corporate event, launch party etc.)
2. The numbers invited
3. The style of music to be played- in order to assess to whether it maybe a music event (in which case it would be immediately dropped)
4. A full guest list prior to the event (in order to assess to what degree it's a public event Vs a private event)
5. The name, date of birth, home address, e-mail address and landline telephone number of the organiser (photographic ID will be supplied)
6. The name, date of birth, home address and landline telephone number of any entertainers at the private party
7. Whether tickets are being sold
8. A copy of the invitation prior to the event

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 the Police's risk assessment
- An invitation does not guarantee entry. All persons will be vetted on the door
- All guests may 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.**

## **18. Management of Outside Area, Internal Queueing System & 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. The outside of the premises will be managed in such a way to prevent the outside of the area**

**becoming an attractive area for people to gather. Patrons of the premises must be clearly identifiable from the passing public along Rivington Street. The external environment to be as clinical as possible to avoid roaming party goers stopping externally.**

**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**

- The manager in charge will be responsible for ensuring the plan is fully implemented.
- There will be a briefing each trading night where staff are assigned specific roles and responsibilities.
- The briefing will be documented and will address any issues or complaints from the previous trading night.
- Each briefing will consider any aspects of trading that could cause a nuisance to neighbours and put appropriate measures in place accordingly.
- 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 & Internal queuing system**

Whilst we do not envisage queues building at the premises we have nevertheless created a Queue Management policy which will be implemented in case a queue does develop.

- Any point, during the day/evening, at which the frequency of patron arrival hits a rate which could lead to the development of a queue, management will immediately trigger the implementation of the internal queuing system.
- The internal queueing system can hold circa 40 patrons and thus the public footpath should not be used in any situation to hold waiting patrons.
- The waiting time within the internal queuing system is limited by the search, ID scanning and checking in at reception desk.
- 1 SIA will be dedicated to the monitoring and management of the internal waiting patrons and steward the checking in of these patrons through the reception area.
- A further 2 SIA will undertake the searching and ID scanning of the patrons
- A further 1 SIA at the entrance of internal queue system whose sole duty will be management and stewarding of customers arriving at the premises. Screening for intoxic, attitude and an initial ID check prior to joining the queue will happen at this stage.
- Any guests causing noise or disturbance or who appear to be impaired/intoxicated through alcohol or drugs will be refused and asked to leave.
- 2 SIA will be positioned outside the premises ensuring order, moving non patrons along and preventing the build up of any congregations.
- The premises has a partner virtual queuing system, which allows customers to join a digital queue, subject to availability. The capacity and internal queueing system will be managed in accordance to the online register.
- The premises will not hold a queue once the premises has reached capacity, patrons will be asked to leave and return on another occasion.
- All the premises marketing paraphernalia will state the need for customers to make an advanced booking to avoid disappointment on the day/night
- At any point during the evening when the premises is reaching 75% of its capacity there will be a static senior manager outside in order to overlook the external management of the premises and ensure the policy is fully implemented.

- During times of high footfall along Rivington street a manager will be on duty outside the premises to ensure all external risks are effectively managed alongside our in house queueing policies and protocol.

### **3. During Trading**

- 2 SIA outside Rivington Street will wear highly identifiable clothing.
- SIA will monitor activity in the vicinity of Rivington Street throughout each night to prevent crime and disorder, noise or disturbance arising from customers.
- Guests will not be allowed to take drinks outside of the demise.
- SIA will ensure customers do not congregate outside, the premises will retain 2SIA dedicated to the management of dispersal during trading.
- The numbers of SIA will increase to 6-10 at closing to undertake the end of night dispersal at the premises

### **4. Guests Smoking**

- Guests will only be permitted outside to smoke in line with Smoking Policy.
- The smoking area for Rivington Street is in a designated outdoor garden area.
- 3 SIA will be stationed in the smoking area to monitor guests smoking.
- Notices will be prominently placed in smoking areas reminding guests to be quiet and consider our neighbours.

### **5. Exit and Dispersal Controls**

The premises does not permit entry or reentry from 02:00am during Friday and Saturday nights. The premises closes at 03:00am on both these days. During the hour between 02:00 and 03:00 we envisage a gradual dispersal/exiting of the customers. The Dispersal Policy is as follows;

- The last 30 mins of the opening hours will be utilised to wind down the environment and make it conducive to encouraging a gradual dispersal of patrons.
- The DPS/Senior management will remain outside the premises from 30 minutes prior to closing until all customers are fully dispersed from the area. This manager is responsible for the effective execution of this dispersal policy.
- The two dedicated dispersal SIA (who would have been outside the premises during the trading period) will lead the team to execute the end of night dispersal.
- Between 02:30 and till all the customers have dispersed there will be a team of between 6 and 10 SIA outside the premises to ensure patrons are being moved on swiftly and without causing any kind of public nuisance.
- Cleaners will be deployed outside the premises to further signal the end of the night and to break down ANY groups of peoples loitering
- SIA will endeavour to maintain a slow stream of customers leaving Rivington Street.
- Patrons will be dispersed towards Curtain Road and Shoreditch Sigh Street to minimise any concentration points
- Guests will be directed towards the nearest transport link as they leave Rivington Street.
- Guests will be encouraged to leave the area quickly and quietly. Those that do not will be refused entry in the future.
- Guests will not be allowed to take drinks with them as they leave. Security will be posted at the exit to prevent this happening.

- Guests waiting for taxis/Ubbers should only leave Rivington Street once their car has arrived. Guests should not wait outside if their car is not yet there.
- SIA will be proactive about dispersal of groups of people outside Rivington Street.
- A welfare champion will be deployed outside the premises throughout the course of the dispersal to identify any vulnerable people

## **6. Other Measures**

- The ambience will be slowed down and lowered gradually at the end of the night to encourage guests to exit in a calm manner.
- The brightness of the lighting inside will be increased gradually as part of a ‘cooling off’ period.
- Guests will be supplied with information on transport options available late at night.
- Notices will be prominently displayed at exits requesting the guests to respect the needs of residents and to leave Rivington Street and the area quietly.

## **7. Complaint’s procedure and contacts**

- A telephone number will be available to local residents for them to call during all trading times should they have an issue. The telephone number will be published on the website.
- 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.
- 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.

# **19. Smoking**

**Rivington Street 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 Rivington Street 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 Rivington Street. Any customer who still attempts to smoke inside the premises will be asked to leave.
3. Staff will not smoke anywhere inside Rivington Street, 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.

**Rivington Street operates an external smoking areas. The following policy will be in operation whenever this area is in use.**

5. Rivington Street customers will be directed to the closest exit to the smoking area relevant to their current location
6. The smoking area will be constantly monitored by at least one door supervisor whenever it is being used.
7. Customers will not be permitted to block the public highway.
8. The smoking areas will be cleaned of litter at regular intervals and at least once every 30 minutes.
9. Customers will be reminded to keep the noise down and to respect the residents in the area.
10. Any person causing a nuisance or disturbance in the smoking area will be asked to leave Rivington Street immediately.
11. There will be a suitable number of ashtrays in the smoking area at all times

## **20. 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 crimes reported to the venue
2. all ejections of patrons where there has been physical force used
3. any complaints received relating to the four licensing objectives
4. any incidents of disorder or violence
5. seizures of drugs or offensive weapons
6. any faults in the CCTV system
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 USB.
- 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 Rivington Street.
- Door supervisor log – to show that properly SIA registered staff are employed at Rivington Street.
- 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.

## 21. CCTV

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

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. The CCTV system shall continually record whilst Rivington Street is open for licensable activities and during all times when customers remain on the premises.
2. The CCTV system will retain images for a period of not less than 31 days. Copies of images will be provided to police upon request with the absolute minimum of delay.
3. The CCTV system will capture a clear head and shoulders image of “identification standard” of every person entering the premises. Persons entering Rivington Street should be asked to remove any headwear which obscures the persons’ face unless it is worn as part of religious observance.
4. The CCTV system will be kept secure at all times. Access will be limited to the DPS and managers.

5. A dedicated CCTV system log will be kept at Rivington Street. 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.
6. A full incident report will be made of any faults with the system.
7. 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.
8. 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 (CD, DVD, flash drive etc.)
9. There will be at least one person who is suitably trained and conversant with the CCTV system at Rivington Street at all times it is open to the public.
10. 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.
11. Relevant CCTV images will be burnt to DVD, CD or USB stick as soon as possible following any serious incident. Four copies will be retained – one for police, one for the licensing solicitor, one for the directors and a backup placed in the safe at the premise..
12. All searches of customers will take place in an area clearly covered by CCTV.
13. Signage will be placed prominently at the entrance to Rivington Street advising all persons entering that CCTV is in operation in accordance with the Data Protection Act 1998.



## Proposed Dispersal Plan for new Premises

The proposed hours of; 2am for a terminal entry and 3am as a closure (Fridays and Saturdays) will significantly reduce any risk of intensity arising from dispersal. Whilst we envisage customers over the hour will naturally leave the premises gradually and disperse from the area we, nevertheless, have created a Dispersal policy to protect against any potential risk associated with this area of the operation. The full detailed policy and other policies which flow into and contextualise the dispersal policy can be seen from the submitted Operation Manual. Some of the key areas of the dispersal policy are listed below;

- There will be no entry or reentry to the premises on the weekends from 02:00
- The last 30 mins of the opening hours will be utilised to wind down the environment and make it conducive to encouraging a gradual dispersal of patrons.
- The DPS/Senior management will remain outside the premises from 30 minutes prior to closing until all customers are fully dispersed from the area. This manager is responsible for the effective execution of this dispersal policy.
- The two dedicated dispersal SIA (who would have been outside the premises during the trading period) will lead the team to execute the end of night dispersal.
- Between 02:30 and till all the customers have dispersed there will be a team of between 6 and 10 SIA outside the premises to ensure patrons are being moved on swiftly and without causing any kind of public nuisance.
- Cleaners will be deployed outside the premises to further signal the end of the night and to break down ANY groups of peoples loitering.
- SIA will endeavour to maintain a slow stream of customers leaving Rivington Street.
- Patrons will be dispersed towards Curtain Road and Shoreditch Sigh Street to minimise any concentration points.
- Guests will be directed towards the nearest transport link as they leave Rivington Street.
- Guests will be encouraged to leave the area quickly and quietly. Those that do not will be refused entry in the future.
- Guests will not be allowed to take drinks with them as they leave. Security will be posted at the exit to prevent this happening.
- Guests waiting for taxis/Ubbers should only leave Rivington Street once their car has arrived. Guests should not wait outside if their car is not yet there.
- SIA will be proactive about dispersal of groups of people outside Rivington Street.
- A welfare champion will be deployed outside the premises throughout the course of the dispersal to identify any vulnerable people.

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## Proposed Queue Management Plan for new premises

Whilst we do not envisage queues building at the premises due to a radical overhaul of the nature of the premises we have nevertheless created a Queue Management policy which will be implemented in case a queue does develop. In creating this plan we have heeded all advice and direction offered by the police in particular Adam Rowe's suggestion on an internal queue system as outlined during our most recent meeting with the police. The full detailed policy of "entrance and internal queue management" and associated relevant policies can be seen in the submitted Operation Manual. Some of the key areas of the Queue management policy are listed below;

- The overhaul and build of the new premises will incorporate an internal queueing system/holding pen which we estimate should be able to contain circa 60 patrons whilst we log in their attendance at the premises; this will remove the need for any kind of use of the public highway (the internal system will be within the demise of the premises).
- Any point, during the day/evening, at which the frequency of patron arrival hits a rate which could lead to the development of a queue, management will immediately trigger the implementation of the internal queueing system.
- The internal queueing system can hold circa 40 patrons and thus the public footpath should not be used in any situation to hold waiting patrons.
- The waiting time within the internal queueing system is limited by the search, ID scanning and checking in at reception desk.
- 1 SIA will be dedicated to the monitoring and management of the internal waiting patrons and steward the checking in of these patrons through the reception area.
- A further 2 SIA will undertake the searching and ID scanning of the patrons
- A further 1 SIA at the entrance of internal queue system whose sole duty will be management and stewarding of customers arriving at the premises. Screening for intoxic, attitude and an initial ID check prior to joining the queue will happen at this stage.
- Any guests causing noise or disturbance or who appear to be impaired/intoxicated through alcohol or drugs will be refused and asked to leave.
- 2 SIA will be positioned outside the premises ensuring order, moving non patrons along and preventing the build up of any congregations.
- The premises has a partner virtual queueing system, which allows customers to join a digital queue, subject to availability. The capacity and internal queueing system will be managed in accordance to this online register.
- The premises will not hold a queue once the premises has reached capacity, patrons will be asked to leave and return on another occasion.
- All the premises marketing paraphernalia will state the need for customers to make an advanced booking to avoid disappointment on the day/night.
- At any point during the evening when the premises is reaching 75% of its capacity there will be a static senior manager outside in order to overlook the external management of the premises and ensure the policy is fully implemented.
- During times of high footfall along Rivington street a manager will be on duty outside the premises to ensure all external risks are effectively managed alongside our in house queueing policies and protocol.

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## List of voluntary self imposed proposed Conditions for the new premises

Conditions consistent with an overhaul of the premises and the full time closure of the Nightclub;

- The sole functionality of Arch 3, as a fully dedicated dance floor, will be removed in its entirety.
- No other arch of the premises will be used as a dedicated dance floor
- Laser lights typically associated with nightclubs will not be used at the premises
- Third party music/Dj led promoted events will not be held at the premises (this is effectively the backbone of the business and as such will restrict our ability to ever return the premises to its current form)
- Dark areas will no longer be a feature of any part of the premises

Conditions consistent with Queue Management;

- The venue will retain an internal queuing system/holding pen. This system to be triggered into action based on an ongoing risk assessed basis.
- The venue will retain a virtual queuing system, such as Walkup or similar
- The marketing across all platforms will make a statement that the venue discourages the build up of any queue and thus patrons are encouraged to make reservations
- The premises will not hold a queue on the public foot path in case of the premises being at capacity. Patrons will be advised to utilise the virtual queuing app and make a reservation online.

Conditions consistent with Dispersal Management;

- There will be no entry or reentry to the premises from 02:00 till close (this will afford one whole hour of dispersal during which we envisage a large portion of the patrons will have already dispersed and left the area)
- Senior Management will remain outside the premises from 30 mins prior to close of the premises through till completion of the dispersal in line with the written policy
- All litter will be removed from the street fronting the premises and through standard place and the same will be swept clean.
- Patrons will be dispersed all the way through to Shoreditch High Street and Curtain Road in order to prevent any concentration
- Dispersal will be undertaken in a gradual way so to prevent build up of peoples outside the premises
- The environment of the premises during the terminal 30mins will evolve to signal closing time in order to encourage a gradual dispersal

Conditions consistent with new DPS and management concerns;

- The DPS of the premises will be not be DPS of any other premises
- The DPS will be the dedicated point of contact for all responsible authorities
- The premises will retain a dedicated vulnerable peoples champion on all Friday and Saturday nights

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Launch of a premises at  
83 Rivington Street, EC2A 3AY



GENERAL NOTES:

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**01** Location Plan  
Scale: 1:500@A3

Scale 1:500



Drawing Status: **FOR REVIEW**

Client / Project: **SBG / Cargo**

Title: **Location Plan**

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| Rev | Description | Date     |
|-----|-------------|----------|
| A1  | For Review  | 01.12.21 |

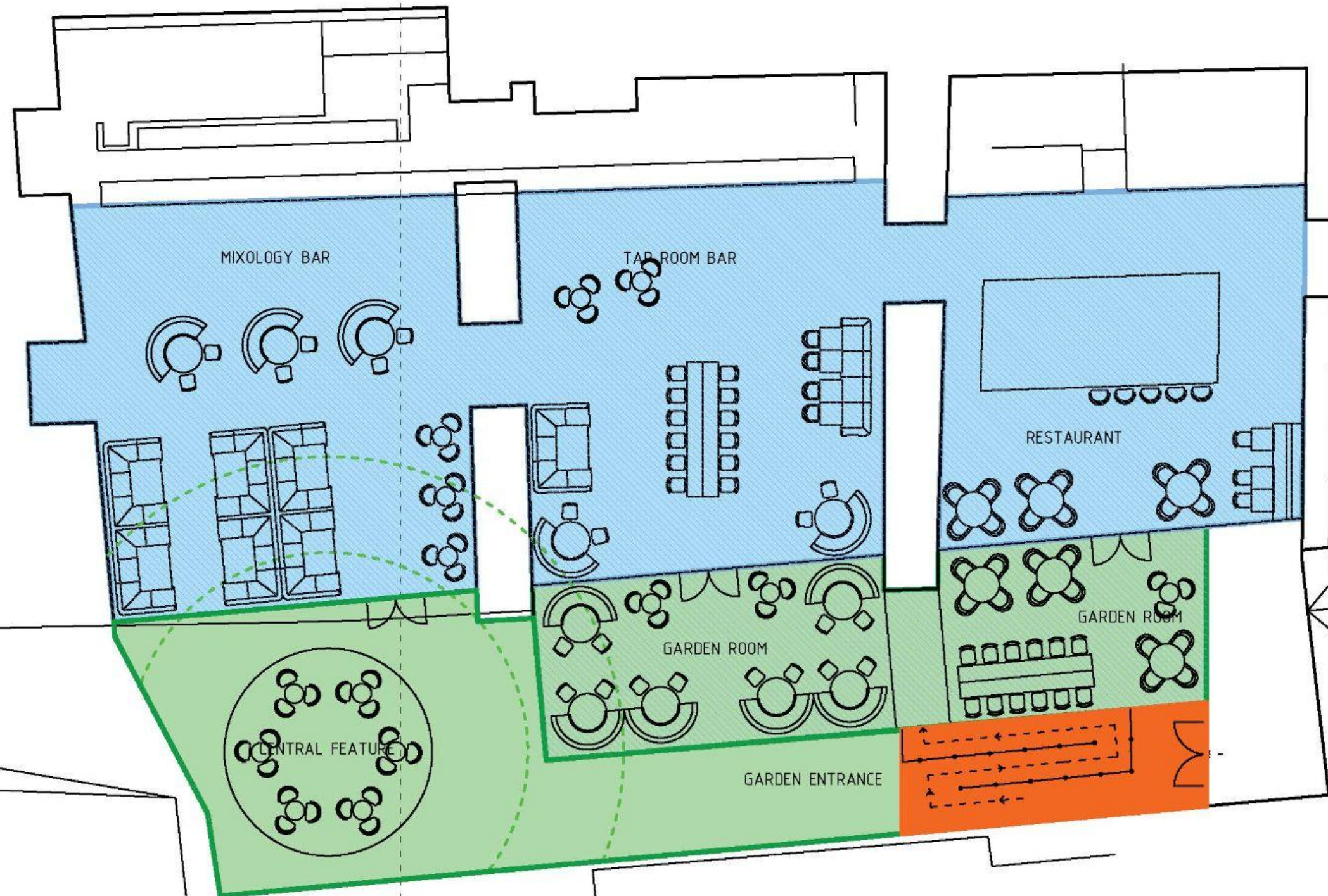
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02 Plan  
Scale: 1:150@A3



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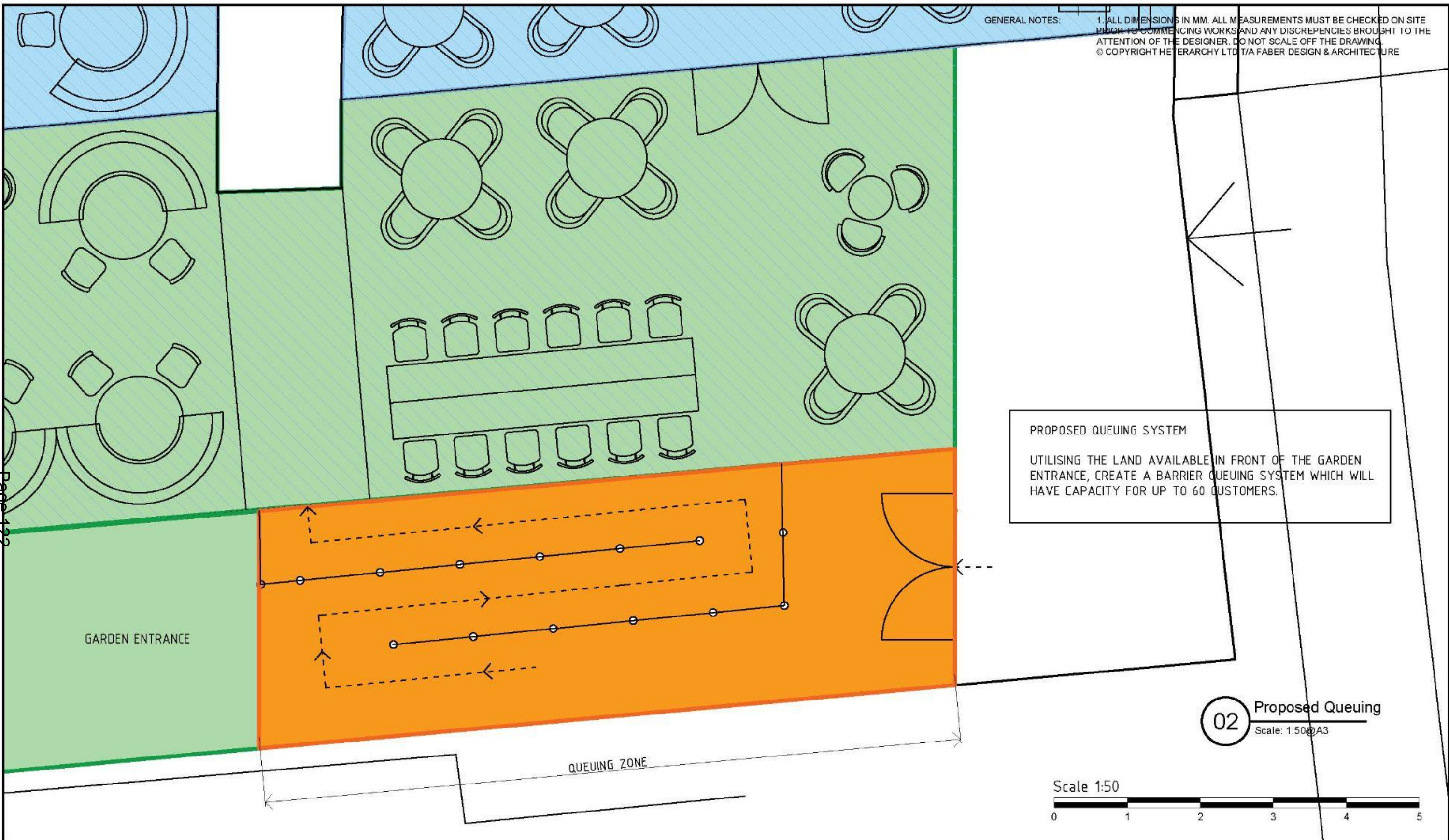
Client / Project: SBG / Cargo

Title: Outline Floor Plan

| Rev | Description | Date     |
|-----|-------------|----------|
| A1  | For Review  | 01.12.21 |

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02 Proposed Queuing  
 Scale: 1:50@A3

Scale 1:50  
 0 1 2 3 4 5



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The Garden | SBG, Cargo

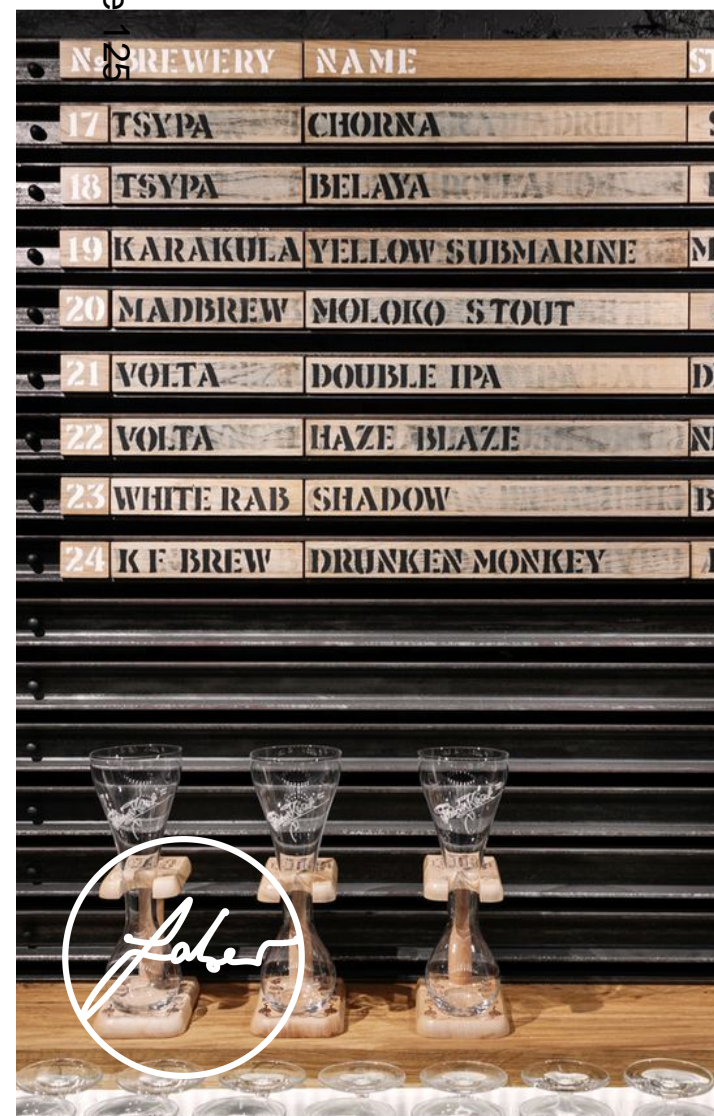
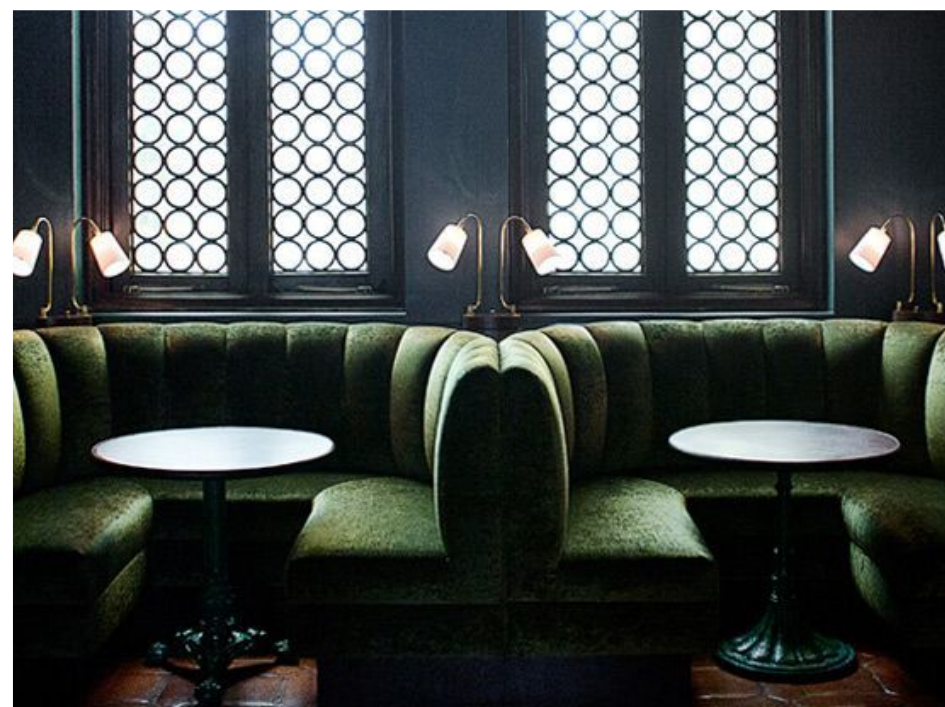


THE RESTAURANT

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The Arches | SBG, Cargo





**MIXOLOGY**



Arch 3 - Mixology | SBG, Cargo

