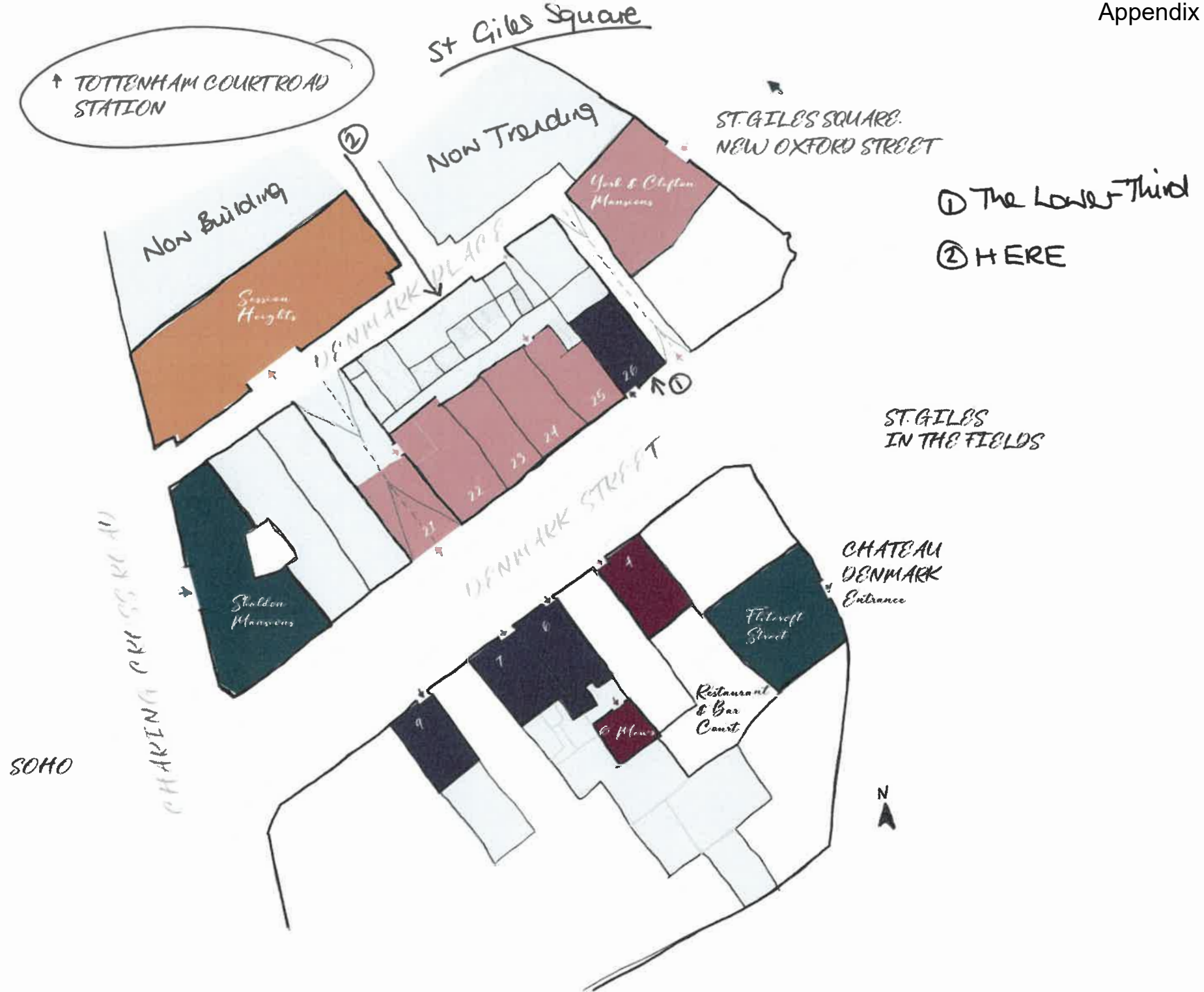


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## Application to vary a premises licence under the Licensing Act 2003

### PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form.  
 If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.  
 You may wish to keep a copy of the completed form for your records.

We Outernet Venue Limited

being the premises licence holder, apply to vary a premises licence under section 34 of the Licensing Act 2003 for the premises described in Part 1 below

<b>Premises licence number</b> PREM-LIC\110349
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### Part 1 – Premises Details

<b>Postal address of premises or, if none, ordnance survey map reference or description</b> HERE St Giles Circus Site Denmark Place
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<b>Post town</b>	London	<b>Post code</b>	WC2H 8LH
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Telephone number at premises (if any)	N.A
Non-domestic rateable value of premises	Rates have not yet been set. The applicant will therefore pay the application fee based on Band C.

### Part 2 – Applicant details

<b>Daytime contact telephone number</b>			
<b>E-mail address (optional)</b>			
<b>Current residential address if different from premises address</b>			
<b>Post Town</b>		<b>Postcode</b>	

**Part 3 - Variation**

Please tick yes

Do you want the proposed variation to have effect as soon as possible?

☒

If not, from what date do you want the variation to take effect?

Day		Month		Year	

Do you want the proposed variation to have effect in relation to the introduction of the late night levy? (Please see guidance note 1)

☐ Yes☒ No**Please describe briefly the nature of the proposed variation** (Please read guidance note 2)

1. To amend the current seasonal variations which permits licensable activities until 02:00 the following morning on 104 occasions per calendar year. To vary this to permit licensable activities until 04:00 on 154 occasions per year.

The permitted licensable activities and the hours on all other occasions to remain as existing.

2. As set out in the schedule of conditions submitted with this application and following pre-application advice, the applicant seeks to (a) amend under conditions 19, 42, 50, 51, 55, 56, 65, 69 & 70; (b) remove and replace condition 38, and (c) proposes that the additional conditions be added to the licence.

If your proposed variation would mean that 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend

N/A

**Part 4 Operating Schedule**

Please complete those parts of the Operating Schedule below which would be subject to change if this application to vary is successful.

**Provision of regulated entertainment** (Please read guidance note 3)**Please tick all that apply**

- a) plays (if ticking yes, fill in box A)
- b) films (if ticking yes, fill in box B)
- c) indoor sporting events (if ticking yes, fill in box C)
- d) boxing or wrestling entertainment (if ticking yes, fill in box D)
- e) live music (if ticking yes, fill in box E)
- f) recorded music (if ticking yes, fill in box F)
- g) performances of dance (if ticking yes, fill in box G)
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)

☒☒☒☒☒☒☒☐**Provision of late night refreshment** (if ticking yes, fill in box I)☒**Sale by retail of alcohol** (if ticking yes, fill in box J)☒**In all cases complete boxes K, L and M**



**A**

<b>Plays</b> Standard days and timings (please read guidance note 8)			<b>Will the performance of a play take place indoors or outdoors or both – please tick</b> (please read guidance note 4)	Indoors	<input checked="" type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish			
Mon	NO CHANGE		<b>Please give further details here</b> (please read guidance note 5)  As existing.		
Tue	NO CHANGE				
Wed	NO CHANGE		<b>State any seasonal variations for performing plays</b> (please read guidance note 6)  See below.		
Thur	NO CHANGE				
Fri	NO CHANGE		<b>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).		
Sat	NO CHANGE				
Sun	NO CHANGE				

**B**

<b>Films</b> Standard days and timings (please read guidance note 8)			<b>Will the exhibition of films take place indoors or outdoors or both – please tick</b> (please read guidance note 4)	Indoors	<input checked="" type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish			
Mon	NO CHANGE		<b>Please give further details here</b> (please read guidance note 5)  As existing		
Tue	NO CHANGE				
Wed	NO CHANGE		<b>State any seasonal variations for the exhibition of films</b> (please read guidance note 6)  See below		
Thur	NO CHANGE				
Fri	NO CHANGE		<b>Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list</b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).		
Sat	NO CHANGE				
Sun	NO CHANGE				

**C**

<b>Indoor sporting events</b> Standard days and timings (please read guidance note 8)			<b><u>Please give further details</u></b> (please read guidance note 5)  As existing	
Day	Start	Finish		
Mon	NO CHANGE			
Tue	NO CHANGE		<b><u>State any seasonal variations for indoor sporting events</u></b> (please read guidance note 6)	
Wed	NO CHANGE		See below	
Thur	NO CHANGE		<b><u>Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)	
Fri	NO CHANGE			
Sat	NO CHANGE			
Sun	NO CHANGE		On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).	

**D**

<b>Boxing or wrestling entertainments</b> Standard days and timings (please read guidance note 8)			<b><u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 4)		Indoors	<input checked="" type="checkbox"/>
					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Day	Start	Finish				
Mon	NO CHANGE		<b><u>Please give further details here</u></b> (please read guidance note 5)			
Tue	NO CHANGE		As existing			
Wed	NO CHANGE		<b><u>State any seasonal variations for boxing or wrestling entertainment</u></b> (please read guidance note 6)			
Thur	NO CHANGE		See below			
Fri	NO CHANGE		<b><u>Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)			
Sat	NO CHANGE					
Sun	NO CHANGE		On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).			

**E**

<b>Live music</b> Standard days and timings (please read guidance note 8)			<b><u>Will the performance of live music take place indoors or outdoors or both – please tick</u></b> (please read guidance note 4)	Indoors	<input checked="" type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b><u>Please give further details here</u></b> (please read guidance note 5)  As existing		
Mon	NO CHANGE				
Tue	NO CHANGE				
Wed	NO CHANGE		<b><u>State any seasonal variations for the performance of live music</u></b> (please read guidance note 6)  See below		
Thur	NO CHANGE				
Fri	NO CHANGE		<b><u>Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).		
Sat	NO CHANGE				
Sun	NO CHANGE				

**F**

<b>Recorded music</b> Standard days and timings (please read guidance note 8)			<b><u>Will the playing of recorded music take place indoors or outdoors or both – please tick</u></b> (please read guidance note 4)	Indoors	<input checked="" type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b><u>Please give further details here</u></b> (please read guidance note 5)  As existing		
Mon	NO CHANGE				
Tue	NO CHANGE				
Wed	NO CHANGE		<b><u>State any seasonal variations for the playing of recorded music</u></b> (please read guidance note 6)  See below		
Thur	NO CHANGE				
Fri	NO CHANGE		<b><u>Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).		
Sat	NO CHANGE				
Sun	NO CHANGE				

**G**

<b>Performances of dance</b> Standard days and timings (please read guidance note 8)			<b><u>Will the performance of dance take place indoors or outdoors or both – please tick</u></b> (please read guidance note 4)		Indoors	<input checked="" type="checkbox"/>
					Outdoors	<input type="checkbox"/>
Day	Start	Finish			Both	<input type="checkbox"/>
Mon	NO CHANGE		<b><u>Please give further details here</u></b> (please read guidance note 5)  As existing			
Tue	NO CHANGE					
Wed	NO CHANGE		<b><u>State any seasonal variations for the performance of dance</u></b> (please read guidance note 6)  See below			
Thur	NO CHANGE					
Fri	NO CHANGE		<b><u>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).			
Sat	NO CHANGE					
Sun	NO CHANGE					

**H**

<b>Anything of a similar description to that falling within (e), (f) or (g)</b> Standard days and timings (please read guidance note 8)			<b><u>Please give a description of the type of entertainment you will be providing</u></b>			
Day	Start	Finish	<b><u>Will this entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 4)		Indoors	<input type="checkbox"/>
Mon					Outdoors	<input type="checkbox"/>
					Both	<input type="checkbox"/>
Tue			<b><u>Please give further details here</u></b> (please read guidance note 5)			
Wed						
Thur			<b><u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u></b> (please read guidance note 6)			
Fri						
Sat			<b><u>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list</u></b> (please read guidance note 7)			
Sun						

I

<b>Late night refreshment</b> Standard days and timings (please read guidance note 8)			<b>Will the provision of late night refreshment take place indoors or outdoors or both – please tick</b> (please read guidance note 4)		Indoors	<input checked="" type="checkbox"/>
					Outdoors	<input type="checkbox"/>
Day	Start	Finish			Both	<input type="checkbox"/>
Mon	NO CHANGE		<b>Please give further details here</b> (please read guidance note 5)  As existing			
Tue	NO CHANGE					
Wed	NO CHANGE		<b>State any seasonal variations for the provision of late night refreshment</b> (please read guidance note 6)  See below			
Thur	NO CHANGE					
Fri	NO CHANGE		<b>Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</b> (please read guidance note 7) On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).			
Sat	NO CHANGE					
Sun	NO CHANGE					

J

<b>Supply of alcohol</b> Standard days and timings (please read guidance note 8)			<b>Will the supply of alcohol be for consumption (Please tick box)</b> (please read guidance note 9)		On the premises	<input type="checkbox"/>
					Off the premises	<input type="checkbox"/>
Day	Start	Finish			Both	<input checked="" type="checkbox"/>
Mon	NO CHANGE		<b>State any seasonal variations for the supply of alcohol</b> (please read guidance note 6)			
Tue	NO CHANGE					
Wed	NO CHANGE					
Thur	NO CHANGE		<b>Non-standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list</b> (please read guidance note 7)  On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following morning. Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime then the permitted hours shall be permitted for a further 1 hour).			
Fri	NO CHANGE					
Sat	NO CHANGE					
Sun	NO CHANGE					



**K**

**Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children** (please read guidance note 8)

**NONE**

**L**

**Hours premises are open to the public**  
Standard days and timings (please read guidance note 8)

Day	Start	Finish
Mon	NO CHANGE	
Tue	NO CHANGE	
Wed	NO CHANGE	
Thur	NO CHANGE	
Fri	NO CHANGE	
Sat	NO CHANGE	
Sun	NO CHANGE	

**State any seasonal variations** (please read guidance note 6)

**Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list** (please read guidance note 7)

Please identify those conditions currently imposed on the licence which you believe could be removed as a consequence of the proposed variation you are seeking.

Please refer to the description of the variation given as this sets out conditions which the applicant wishes to amend, remove, and add to the licence.

Please tick yes

- I have enclosed the premises licence ☒
- I have enclosed the relevant part of the premises licence ☒

If you have not ticked one of these boxes please fill in reasons for not including the licence, or part of it, below

Reasons why I have failed to enclose the premises licence or relevant part of premises licence.

N/A

**M** Describe any additional steps you intend to take to promote the four licensing objectives as a result of the proposed variation:

**a) General – all four licensing objectives (b,c,d,e)** (please read guidance note 11)

Informative: The applicant understands that the premises are in Camden's Seven Dials Cumulative Impact Policy Area. The application is confident that the later hours will be a benefit to the area and allow:

- A broader spectrum of cultural programming (hosting live music nights followed by a DJ) to be accommodated within the venue.
- Mitigate the loss of amenity and diversity in the area as a result of late / live music venues which have ceased to operate in the area and in London generally.
- Enable the applicant to better support more live music and live events industry activities during the week to off-set the lower revenues by having later events.
- Result in more hours to employ staff and more jobs available.
- More activity in the area creating a feel of safety and vibrancy.
- The income generated would enable them to better support non-profitable entertainment cultural programming, together with charitable and outreach work which the premises currently supports.
- The applicant delivers a diverse and broad spectrum of programming from comedy, theatre, film, DJs and live bands to fashion shows, product launches and private events/functions.

The applicant has found that the current permitted hours have restricted business opportunities and have been a barrier to accommodating and hosting a variety of events and shows, which in turn help support creative and cultural events. The later hours will allow the applicant to accommodate certain events where there is demand for later entertainment and supports them to offer a more diverse entertainment and event offering.

The premises currently operate under robust licence conditions imposed following a hearing before the Licensing Committee. They include extensive operating policies (Venue Management Plan; Event Management Plans; Risk Assessments; Event Noise Management Plans and Services Management Plans). The applicant believes that these, together with the conditions set out in the schedule submitted with this application will ensure that the later hours will not add to cumulative impact, or adversely affect the promotion of the licensing objectives.

The applicant is also serving for information purposes a copy of the Venue Management Plan, which has been updated following pre-application advice from the authorities and following a meeting with the Residents Association.

**b) The prevention of crime and disorder**

See schedule of conditions submitted with the application.

**c) Public safety**

See schedule of conditions submitted with the application.

**d) The prevention of public nuisance**

See schedule of conditions submitted with the application.
--

**e) The protection of children from harm**

See schedule of conditions submitted with the application.
--


**Please tick yes**

- I have made or enclosed payment of the fee or ☒
- I have not made or enclosed payment of the fee because this application has been made in relation to the introduction of the late night levy ☐
- I have sent copies of this application and the plan to responsible authorities and others where applicable ☒
- I understand that I must now advertise my application ☒
- I have enclosed the premises licence or relevant part of it or explanation ☒
- I understand that if I do not comply with the above requirements my application will be rejected ☒

**IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.**

**Part 5 – Signatures** (please read guidance note 12)

**Signature of applicant (the current premises licence holder) or applicant's solicitor or other duly authorised agent** (please read guidance note 13). **If signing on behalf of the applicant please state in what capacity.**

Signature	
Date	08/06/2023
Capacity	Poppleston Allen – Solicitors for & on behalf of the applicant

**Where the premises licence is jointly held signature of 2nd applicant (the current premises licence holder) or 2nd applicant's solicitor or other authorised agent** (please read guidance note 14). **If signing on behalf of the applicant please state in what capacity.**

Signature	
-----------	--

Date	
Capacity	

<b>Contact name (where not previously given) and address for correspondence associated with this application</b> (please read guidance note 15)			
<div style="background-color: black; height: 15px; width: 100px; margin-bottom: 5px;"></div> <div style="background-color: black; height: 15px; width: 120px; margin-bottom: 5px;"></div> <div style="background-color: black; height: 15px; width: 100px; margin-bottom: 5px;"></div> <div style="background-color: black; height: 15px; width: 100px;"></div>			
<b>Post town</b>	<div style="background-color: black; width: 100px; height: 15px;"></div>	<b>Post code</b>	<div style="background-color: black; width: 50px; height: 15px;"></div>
<b>Telephone number (if any)</b>	<div style="background-color: black; width: 120px; height: 15px;"></div>		
<b>If you would prefer us to correspond with you by e-mail your e-mail address (optional)</b>			
<div style="background-color: black; width: 100px; height: 15px;"></div>			

### Notes for Guidance

**This application cannot be used to vary the licence so as to extend the period for which the licence has effect or to vary substantially the premises to which it relates. If you wish to make that type of change to the premises licence you should make a new premises licence application under section 17 of the Licensing Act 2003.**

1. You do not have to pay a fee if the only purpose of the variation for which you are applying is to avoid becoming liable for the late night levy
2. Describe the premises. For example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies you must include a description of where the place will be and its proximity to the premises.
3. In terms of specific regulated entertainments please note that:
  - Plays: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500.
  - Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
  - Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
  - Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
  - Live music: no licence permission is required for:
    - a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.

- a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
  - Recorded Music: no licence permission is required for:
    - any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
    - any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
    - any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.
  - Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
  - Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
    - any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
    - any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
    - any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
    - any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.
4. Where taking place in a building or other structure please tick as appropriate.  
Indoors may include a tent.
  5. For example state type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.
  6. For example (but not exclusively), where the activity will occur on additional days during the summer months.
  7. For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.
  8. Please give timings in 24 hour clock (e.g. 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.
  9. If you wish people to be able to consume alcohol on the premises please tick on, if you wish people to be able to purchase alcohol to consume away from the premises please tick off. If you wish people to be able to do both please tick both.
  10. Please give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children



regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups or the presence of gaming machines.

11. Please list here steps you will take to promote all four licensing objectives together.
12. The application form must be signed.
13. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
14. Where there is more than one applicant, both applicants or their respective agents must sign the application form.
15. This is the address which we shall use to correspond with you about this application.
- 16.

**HERE****Annex 2 - Conditions consistent with the operating schedule**

19. The sale of alcohol at the premises shall be at all times ancillary to the use of the [premises](#) as a multi-purpose auditorium space. The sale shall be restricted to such occasions as exhibitions; retail events; live pre-recorded music; product launches; fashion shows; film screening; events and conferences, and the like kind.
20. Although the HERE and The Now Building and Now Trending are separate, they shall work in tandem in accordance with the Venue Management Plan and the Event Management Plan to maintain the operational integrity of the site.
21. An event management plan will be prepared for each event and shall be served upon the Police and Environmental Health a minimum of 14 working days ahead of an event for information.
22. The Event Management Plan will include the provision of a designated smoking area and management thereof; provision of a dispersal policy to ensure the safe and quiet movement of people from the area; the provision of additional pop-up toilets (when necessary); provision of a queue management strategy; public safety and security arrangements.
23. The Premises Licence Holder shall provide the Licensing Authority and Police with a list of upcoming events each quarter (or as otherwise agreed with the Licensing Authority and Police) and shall provide such information as is requested by the Licensing Authority and/or Police to assess the potential impact of specific events upon the Licensing Objectives.
24. There shall be no off-sales of alcohol, with the exception of alcohol sold during an exhibition event held at the premises, which is packaged to take home and which is not intended for immediate consumption off the premises.
25. The premises Licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.
26. The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
27. The CCTV camera views are not to be obstructed.
28. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the exits in order to capture clear facial images of all persons leaving the premises.

29. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority upon request.
30. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the Police or an authorised officer in obtaining the CCTV footage.
31. The facility to transfer the images to a compatible, removable format shall be held on the premises.
32. Notices shall be displayed within the premises warning customers about personal thefts; and to be vigilant.
33. The venue shall supply and fit to every static table or counter, suitable anti-theft devices, such as table/counter clips, in order that customers may secure their bags.
34. When the venue is open for licensable activities, the toilets are to be checked by staff at least every two (2) hours and these checks are to be documented on each visit.
35. All flat surfaces in toilet cubicles, including any toilet roll holder eclipses, are to be 'designed-out' in order to prevent drug misuse.
36. At least one member of the management team on duty whilst the premises remain open for the sale of alcohol is to hold a personal license under the Licensing Act 2003.
37. A management document is to be drawn up, maintained and amended as required which will deal with the following:
  - a) Definition of promotions, events and bookings;
  - b) Procedure for the management of each category;
  - c) Security procedures including the reporting of incident;
  - d) Procedure for ensuring promoters are informed of and are managed in such a way as to promote the Licensing Objectives and ensure compliance with the conditions on the premises License;
  - e) Response plan and management structure in the event of an emergency.
38. In relation to any event involving a promoter, their associates, DJ(s) or artists(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit then:
  - a) The licensee shall complete a full risk assessment via open source material reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least 7 days before the event occurs on email [EK-Licensing@met.police.uk](mailto:EK-Licensing@met.police.uk).
  - b) The licensee shall notify Camden Police Licensing Team via the same email if there are any high risk events or any unusual or large scale events (due to

occur within less than 7 days) as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.

- c) Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determined that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.
39. In relation to all other musical events, the Local Camden Police Licensing Team shall be contacted no less than 14 days prior to the event to request if, a full Search Policy is required of all customers.
  40. No persons carrying visibly open alcohol vessels shall be admitted to the premises at anytime that the premises are open for any licensable activity.
  41. No patron shall be allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle whether empty or containing any beverage, other than permitted off-sales.
  42. A challenge 25 policy will be enforced, where any person reasonably looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of identity will be those with photographic identification documents recognised in the Home Office guidance; including passports, photo-card driving licence, military ID cards or proof of age card bearing the PASS hologram.
  43. A sign shall be displayed at the point of sale stating No Proof of Age - No Sale.
  44. The venue shall not engage the service of street promoters to encourage clientele to attend the venue.
  45. Regular glass collection shall be undertaken by staff where the sale of alcohol is occurring at the premises.
  46. Police must be called to incidents of violence and /or disorder.
  47. Signage shall be displayed in a prominent position on the premises requesting that customers leave quietly.
  48. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
  49. Where the sale of alcohol is occurring after 20:00 hours then door staff shall be present at least 1hour prior to the commencement of the event.

The door staff shall be employed to a ratio of 1:100. The following additional requirements apply in relation to those door staff:

- a) There will be a minimum of one (1) female SIA-registered door supervisor on duty when security are required.

b) A door supervisors register shall be updated on occasions when door supervisors are employed. The Register is to be made available for Inspection by the Police and/or Licensing Authority. Details to show:

- Full Name.
- Date of Birth.
- SIA Registration Number.
- Date and Hours Worked; and
- Contact telephone number and email address.

c) A coloured photocopy of each door supervisors' SIA badge shall be taken by the DPS and retained at the premises.

d) They will wear high visibility jackets or vests or high visibility arm bands whilst working at entry/exit points and around the exterior of the building.

e) They shall remain on duty for half an hour after the close of the venue to ensure all patrons are dispersed peacefully from the area.

50. Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept **and maintained** clear.
51. **Where the premises** is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.
52. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.
53. Details of instances of disorder, damage to property or personal injury shall be recorded in an incident book kept at the premises. Such details shall be made available for inspection by the Police and other Responsible Authorities upon request.
54. The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other Responsible Authorities upon request.
55. The licensee shall ensure that staff are trained as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons underage. This training is to be clearly documented **and signed** and any training for future staff must also be organised at the appropriate time. **Refresher training shall be carried out every 6 months**. Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.
56. Where any illegal substance is found within the premises then a record shall be made in the incident book **by a duty manager**. Any illegal substance shall be stored securely



pending collection by the Police unless they are present on site and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book [by a duty manager](#).

57. Where available, a responsible member of staff shall join the local pubwatch or other such local crime reduction scheme approved by the Police.
58. All security staff, stewards and management will be connected by a secure channel hand-held radio system.
59. Staff shall be fully trained on safety issues, including fire safety and management shall carry out regular inspections of the premises.

**Informative:** The below is for information purposes and is not intended to form a condition of the licence):

If a planned event in the here is likely to result in a maximum attendance event then (following risk assessment) The Now Building and Now Trending may be closed off in order that it may operate as a ticket hall and audience holding area.

60. On completion of the works and before the public are admitted, the premises must comply with the requirements of the District Surveyors Association and the Association of British Theatre Technicians 'Technical standard for Places of Public Entertainment' (if applicable)
61. Patrons wishing to smoke will not be permitted to take drinks outside with them.
62. Amplified sound shall not be audible at 1 meter from the facade of any noise sensitive premises.
63. That an Events Noise Management Plan is developed to the satisfaction of the Noise Team to cover any occasion where there is potential for sound breakout beyond the premises boundary, and where sound equipment is added to the existing in-house equipment for a particular event or function. The Noise Management Plan required by virtue of planning shall be updated by the Premises Licence Holder from time to time as appropriate and the Premises Licence Holder shall be bound by the plan. A copy of the Events Noise Management Plan and the Noise Management Plan shall be retained at the premises and made available for inspection by the relevant authorities.
64. That if deemed appropriate by the Environmental Health Team prior to the premises trading under this licence then a noise limiter be installed, located in a separate and remote lockable cabinet from the volume column must be fitted to any musical amplification system and set at a level determined by and to the satisfaction of the Noise Team. The limiter shall not be altered without prior agreement.
65. A Notice shall be fixed in a prominent position near exits reminding [customers](#) that this is a residential area and requesting patrons to leave quickly and quietly.

- 66. The Event Management Plan sets out measures to be taken to ensure effective communication with surrounding residents and businesses concerning planned events.
- 67. The premises will use the central waste collection point provided as part of the development.
- 68. There is a lost children's policy contained within the Event venue Management Plan.
- 69. A proof of age scheme shall operate at the premises and staff shall be trained in its use, e.g. Challenge 25.

### **Annex 3 - Conditions attached after a hearing by the licensing authority**

- 70. The premises will implement a dispersal policy and all relevant staff will be trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the gallery after 23:30 [until close of business](#) to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or East/West on Oxford Street/New Oxford Street. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The Policy will be reviewed regularly and whenever the Licensee becomes aware of issues associated with dispersal.

### **Additional conditions agreed with the CGCA Event Gallery**

- 71. Servicing will take place between 08:00 and 20:00 hours Monday to Sunday and Public/Bank Holidays and will be from the Denmark Street loading bays. (This shall not apply to event equipment and refuse storage and collection which is dealt with by the Service Management Plan approved as part of the S106 agreement and developed to the satisfaction of the Environment Health Team).
- 72. That a 'Service Management Plan' be developed to the satisfaction of the Environmental Health Team, detailing the management of deliveries and servicing which shall include arrangements for the collection and delivery of event equipment, and refuse storage and collection; that the Service Management Plan be updated by the Premises Licence Holder from time to time as appropriate. The Premises Licence Holder shall be bound by the Service Management Plan. A copy of the plan shall be retained at the premises and made available for inspection by the relevant authorities.

### **Additional Conditions**

- 73. [At least 2 \(two\) SIA door supervisors \(to include the door supervisor working on the main entrance\) who are on duty as required by the licence conditions shall wear body worn cameras. Management of the venue to ensure these cameras are working before deployment. In the event of an incident, the footage must be made available to Police upon request. The licence holder shall ensure that a suitable, expeditious playback/downloading system is in place to enable the Police to obtain any evidential](#)

footage. In the event of an incident, body worn camera footage will be stored for a minimum of 14 days and must be made available to Police upon request.

74. All permanent staff working in the evening and security staff to undertake welfare of and vulnerability engagement (WAVE) training and a record to be kept of this.
75. On any occasion the premises operate licensable activities beyond midnight relying upon the seasonal variations permitted then there shall be no new admissions to the premises after 02:30 hours with the exception of VIPs, guest list and / or pre-sold ticket holders. A record of such entries after 02:30 hours shall be maintained and made available for inspection by responsible authorities.
76. The premises shall maintain a complaints log detailing the nature of the complaint, complainant (if known), and any action taken. The log to be made available for inspection by Environmental Health upon reasonable request.
77. Safety Inspection Certificates (which shall be maintained up to date) shall be available on site for inspection by Authorised Officers.
78. The premises shall ensure that an enhanced Risk Assessment shall be carried out to determine how many disabled customers they can safely accommodate and vacate in the event of an emergency.



# HERE



## VENUE MANAGEMENT PLAN

### Document Control, Revision Status and Distribution

<b>Revision</b>	6	FINAL
<b>Prepared by</b>	Allana McCabe, Deon Van Niekerk, Michael Watson & Tristan Hoffman	
<b>Draft and Approval date</b>	1.06.2023	APPROVED / Tristan Hoffman
<b>Date of next review</b>	TBC	
<b>Type of Business</b>	Live Entertainment and Events Venue	
<b>Site Name and Address</b>	HERE, Charing Cross Road, London WC2H 8LH	



## Revision Status

Date	Status	Author	Revision
05.08.2022	Draft	[REDACTED]	1
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17.04.2023	Version 5	[REDACTED]	5
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## Document Control

The following table identifies persons who have reviewed and contributed to the contents of this document

Name	Company	Date	Version
[REDACTED]	Better Compliance Ltd	05.08.2022 to 08.08.22	V1, V2, V3, V4
[REDACTED]	Better Compliance Ltd	05.08.2022 to 08.08.22	V1, V2, V3, V4
[REDACTED]	Licence Consultants Ltd	05.08.2022 to 08.08.22	V1, V2, V3, V4
[REDACTED]	Outernet Venue Limited	05.08.2022 to 1.06.2023	V1, V2, V3, V4, V5, V6





## Distribution

The following table identifies persons who have received a copy of this document.

All copies are issued under the authority of HERE who are totally responsible for the content implementation for any amendment updates. Each copy is uniquely numbered and distributed as follows:

Name	Company	Date	Version
██████████	HERE	08.08.2022	V3
██████████	HERE	11.08.2022	V4
██████████	Poppleston Allen	17.04.2022	V5

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## **Section 1 - Site Information, Description of the Venue Management Plan and Purpose of the Document**

### **VENUE MANAGEMENT PLAN**

#### **1.1 Site Information**

HERE at the Outernet is an 1850 capacity state of the art Live Entertainment and Events venue located under London's historic Denmark Street, a stone's throw from Soho Square Garden and the Phoenix Theatre.

Located within the heart of London's classic entertainment district; the brand new, multi-purpose auditorium is programmed and operated by an experienced team offering Central London an exciting entertainment schedule of Live bands, DJ's, Comedy, Theatre, Film, Cultural and Corporate events.

An innovative and progressive schedule plays host to a diverse array of entertainment from all genres including Pop, Rock, Folk, RnB, Hip Hop, Afrobeats, Electronic, LGBTQ, Comedy, Arts, Theatre, E-sports, Sports and Film screenings, Immersive and Experiential installations and private events from industries including Music, Fashion, Beauty, Lifestyle, Automotive, Gaming and Technology.

#### **1.2 Description of the Venue Management Plan**

The instructions / information contained in this document outline the main duties and responsibilities of the venue management team, however further detailed instructions such as emergency escalation for the site are held at the location by HERE management and are updated as and when required.

The Venue Management Plan will include our Licensing and Health and Safety responsibilities for the venue. Monthly independent audits are undertaken to ensure compliance with licensing and health and safety.

#### **1.3 Purpose of the Document**

The aim and purpose of this Venue Management Plan 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 HERE's minimum operating standards and the policies and procedures to be followed by all staff.

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

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



training sessions.

## **Section 2 - Overview of Venue, Organisational Structure and Contact Details and Premises Licence**

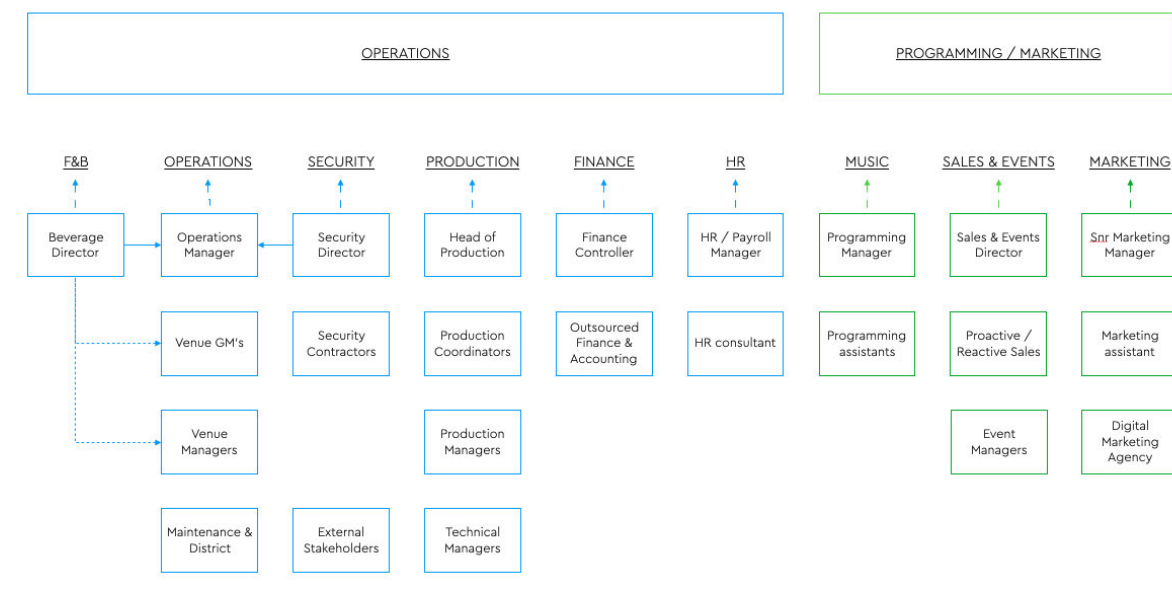
### **2.1 Overview of Venue**

Venue	
<b>Location of venue:</b>	HERE at Outernet, Charing Cross Road, London WC2H 8LH
<b>Opening Hours as permitted by the Premises Licence:</b>	<p>Alcohol; Plays; Films; Indoor Sporting Events; Boxing or Wrestling; Live Music; Recorded Music; Performance of Dance -</p> <p>Monday to Thursday 10:00 to 23:30  Friday and Saturday 10:00 to 00:00  Sunday 11:00 to 22:30</p> <p><i>On <b>104 occasions per calendar year</b> the terminal hour shall be extended until 02:00 hours (the following morning). Such occasions to be notified to the Police and Licensing Authority 14 days prior.</i></p> <p><i>(If the premises elect to trade beyond 01:00 on the commencement of British Summertime then the permitted hours shall be extended for a further 1 hour).</i></p> <p><b><u>Late Night Refreshment -</u></b></p> <p>Monday to Thursday 23:00 to 23:30  Friday and Saturday 23:00 to 00:00</p> <p><i>On <b>104 occasions per calendar year</b> the terminal hour shall be extended until 02:00 hours (the following morning). Such occasions to be notified to the Police and Licensing Authority 14 days prior. (If the premises elect to trade beyond 01:00 on the commencement of British Summertime then the permitted hours shall be extended for a further 1 hour).</i></p> <p><b>Opening hours - Monday to Sunday 24 hours.</b></p>
<b>Capacity:</b>	1850
<b>Licensable Activities:</b>	<p>Alcohol  Late Night Refreshment  Live and recorded music  Performance of Dance  Plays  Film  Indoor Sporting events - Boxing or Wrestling</p>
<b>Onsite DPS</b>	Tristan Hoffman



## 2.2 Organisational Structure and Contact Details

### Organisational Structure:



### Contact details:

<b>OVL Chief Operating Office / DPS</b>	██████████	████████████████████
<b>OVL Operations Manager</b>	██████████	████████████████████
<b>HERE General Manager</b>	██████████	████████████████████
<b>OVL Head Office</b>	██████████	████████████████████
<b>Licensing Consultant</b>	██████████ ██████████	████████████████████
<b>Health &amp; Safety Consultant</b>	██████████ ██████████	████████████████████
<b>Security Director</b>	██████████	████████████████████

The list of emergency contacts, telephone numbers must not be divulged to any third party.



## 2.3 The Premises Licence and Mandatory conditions

### The Premises Licence

Licensed premises in England and Wales have Mandatory conditions attached to their licence however additional conditions vary between premises so all management must familiarise themselves with the specific site requirements.

The management of the Premises Licence is the responsibility of the Designated Premises Supervisor (DPS). The venue management team who are Personal Licence Holders and the Appointed Security Company play a support role in helping the DPS manage the licence.

Premises Licence No. **PREM/LIC/110349** (London Borough of Camden) - *please see Section 7 - Premises Licence*

- **Licence holder – Outernet Venue Limited**
- **On and off sales of alcohol – yes: “Off-sales subject to restrictions – see licence”.**
- **Deposited plan - Please see Section 7 – Plans**
- **Licensable Activities and Hours - Full Premises Licence conditions – see the Premises Licence at Section 7**

### Mandatory conditions

The same MANDATORY conditions appear on all Premises Licences which authorises the supply of alcohol. They include the following requirements:

1. No supply of alcohol may be made at a time when there is no designated premises supervisor in respect of this licence.
2. No supply of alcohol may be made at a time when the designated premises supervisor does not hold a personal licence, or the personal licence is suspended.
3. Every supply of alcohol under this licence must be made or authorised by a person who holds a personal licence.
3. Door supervisors are to be licensed by the Security Industry Authority (SIA) – badges need to be clearly displayed at all times.
4. There will be no irresponsible drink promotions that are a significant risk to the promotion of the Four Licensing Objectives.
5. Free drinking water to be made available to guests on request.
7. A challenge age verification policy.
8. Minimum drink measures are available and advertised to guests - beer or cider:  
½ pint; gin, rum, vodka, or whisky: 25ml or 35 ml; still wine in a glass: 125ml.
9. Alcohol pricing – alcohol cannot be sold for less than the permitted price. The permitted price = the duty chargeable in relation to the alcohol added to the amount of that duty multiplied by the VAT (20%). These measures are displayed in a menu, price list or other printed material which is available to customers on



the premises.

### **Section 3 – Operational Policies and Procedures**

Management and security MUST please be aware of the HERE Company Policies and Procedures that we have in place and ensure that these are adhered to at all times.

Please see each policy listed below:

#### **3.1 Terms of Entry**

##### **Terms of Entry**

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

The *Venue Terms and Conditions* document sets out in detail the requirements for admission and conduct at HERE. This policy sets out the minimum requirements for licensing compliance. 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 intoxicated or under the influence of illegal substances.
2. Any persons carrying or thought to be carrying any form of offensive weapon.
3. Any person who refuses to be searched when asked.
4. Any person who refuses to provide ID when asked.
5. Any persons not in keeping with the dress code, set out below.
6. Any persons, who are known to have been involved in any criminal activities either within or in the areas surrounding HERE.
7. Any ex-employees of the business, whose employment was terminated by the company.
8. Large single sex groups.

**HERE retains the right to search customers as a condition of entry to ensure the safety of both customers and staff.**

##### Guest Dress Code - Dependent on event

If a dress code has been communicated for the event, it will be upheld by the security and hosting team.

Management reserves the right to refuse entry. Possessing an entry ticket or being on a guest list does not guarantee entry.

See Outernet Venue Limited's *Venue Terms and Conditions* for further information.



### **3.2 Young People**

#### **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 [HERE](#).**

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 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 18; 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.

A person guilty of an offence under this section is liable on summary conviction to an unlimited fine.





## **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**

HERE is also subject to specific age-related conditions.

*A Challenge 25 policy will be enforced, where any person reasonably looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of identity will be those with photographic identification documents recognised in the Home Office guidance, including passports, photo-card driving licence, military 1D cards or proof of age card bearing the PASS hologram.*

*A sign shall be displayed at the point of sale stating No Proof of Age - No Sale.*

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

- *The premises operates a strict Challenge 25 policy where any guest appearing under 25 will be required to provide proof of age.*
- 1. No child under the age of 14 will be admitted to any Venue unless otherwise expressly authorised by us in advance in writing.
- 2. Children who are not less than 14 years of age and under the age of 18 on the date of the relevant Event may be admitted provided that any four such children are accompanied, by not less than one adult at all times and the Event admits children.
- 3. This policy is enforced at the entrance by security and managers, and again at the bars by bar staff.
- 4. ID documents recognised by the Home Office as guidance will be acceptable.
- 5. When checking ID staff will: -
  - Check the 3D effect hologram is not stuck on.
  - Check photo to ensure it is the correct person.
  - Check date of birth.
  - Check ID for any tampering.
  - If unsure of the persons age refuse service / entry



6. **IF A GUEST CANNOT PROVIDE SATISFACTORY PROOF OF AGE, ENTRY WILL BE DENIED AND THEY WILL BE REMINDED TO BRING PROOF OF AGE IN FUTURE.**
7. There will be clear and prominent signage displayed at the entrance advising guests of the age policy.
8. The premises will keep a written record each night of guests who are refused entry or service at the bar.
9. 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.

### **Child & Vulnerable Adult Safeguarding Policy**

This document is intended to create clarity, so you understand how we should apply Safeguarding good practice to everyone, every day.

We are committed to delivering a safe and enjoyable experience for everyone who works at or visits HERE.

In particular, we have a duty of care to safeguard and promote the welfare of children and vulnerable adults.

This means we need all our staff, partners, and suppliers to apply Safeguarding consistently and effectively. Although this policy relates to Child Safeguarding, any concerns about Safeguarding risks to vulnerable adults (known as 'adults at risk') at HERE and The Lower Third must be reported using the same procedures.

'Child': A child is defined in law as any person under the age of 18. (The term 'child' includes children and young people).

### **The 5 Rs of Safeguarding**

Recognise	
Respond	
Report	Record
Review	



### What To Do

<b>Recognise</b>			
Do you have a concern about the behaviour or situation a child is in (e.g., lost child, separated from their party, possibly drinking alcohol, appears intoxicated, hanging out with a controlling adult, alone, risk of injury) or has something been reported to you by the child or a colleague.			
If yes			
<b>Respond</b>			
Do you consider that the child may have been harmed or at risk of being harmed?			
Yes		No	
Is the child in need of medical assistance?		Call the senior manager on duty immediately and report concerns.  Follow lost / separated procedures.	
Yes	No		
Call a first aider/consider an ambulance.	Call the senior manager on duty immediately.		
First aider must be the same gender as the child.	Establish what the concern is and follow the policy.		
If safe to do so escort the child to the quiet zone.			
Be aware that this does not mean you should insert yourself into any situation that could result in a negative response or make matters worse.			
Try and establish the facts, assess the situation, and decide on next steps. Remember you are dealing with a child.  Don't promise to keep a secret.			
<b>Report</b>			
Consider calling the parents, guardians and/or the police.  Senior management must be alerted as soon as reasonably practical.			
<b>Record</b>			
Make a record of the incident using the incident report form. Share records with Senior Management as soon as reasonably practical.			
<b>Review</b>			
Review the actions taken and the outcomes - What can be learned? What went wrong? What went right? What should we have done differently? Does the policy need a review?			



### **Lost Children and Vulnerable Adults**

1. A security guard is notified that a child / vulnerable adult has become separated from their party.
2. The security guard must obtain as much information as possible from the person reporting the incident and this must include name, gender, IC classification, clothing, and any other identifiable feature.
3. The security guard must pass this information immediately to the Head Door Supervisor and Venue Management in person or by using a radio.
4. HD will immediately circulate a description of the missing person and their last known location. The door team will prevent any children or vulnerable adults from exiting the premises at this time.
5. The term 'WALT' will be used over the radio for a missing / found vulnerable adult and 'DISNEY' for a child.
6. The safety security guards must remain in the position where the child or vulnerable adult was last sighted for at least five minutes.
7. They should ask the reporting person to wait with them, providing reassurance and explaining the action being taken.
8. If the child or vulnerable adult has not been found within five minutes, the management need to consider further options. This may include allocating more security to assist in the search, viewing CCTV footage of the last known locations, calling the Police, or asking the performers to make an announcement.
9. If the child or vulnerable adult is reported missing during egress or is likely to have left the venue management may deploy staff to search the local vicinity. This may include conducting away from the venue footprint, in which circumstances venue management will consider calling the police.

### **If a security guard locates a child / vulnerable adult who appear to have been separated from their parent / carer.**

1. The security guards must summon a colleague immediately to ensure that two persons are present and that they are not alone with the child / vulnerable adult.
2. When the missing person is found, two security guards must escort them back to their parent / carer.
3. The area identified as the rendezvous point, will be used. The Security guards and Supervisor must attempt to reassure and calm the found person.
4. The Safety Security guards must immediately inform the Venue Management in person or via their radios (whichever is faster).
5. Bodycams should be used in all circumstances. If the security guards initially handling the situation are not wearing bodycams, they must call for the assistance of those that are.



6. The Security guards and Supervisor must attempt to obtain information from the found person which may help to identify or contact their parent or carer.
7. If the parent or carer has not been found within five minutes, the management team may make the decision to authorise a PA announcement for the parent / carer to go to the customer service area (upstairs SOJ).
8. The missing child or vulnerable adult will be reunited with their parent/carer or group.
9. If the parent or carer cannot be located, the Police should be contacted and informed of the situation. Staff will then supervise the found person until officers can attend and take over.
9. A log of the incident will be made, and all staff informed that the person has been found or handed over to the authorities.

**Consideration: If management become aware that the child/vulnerable adult are not accompanied by a parent/carer, then they should be handed to the oldest member of the accompanying group.**

1. Advice should be sought from the management team prior to handing over the child/ young person as to suitability.
2. A child or vulnerable adult will not be handed over to a person who is intoxicated.
3. In these circumstances, the carers or family member/police will be contacted by the venue.
4. If there are any concerns about a parent/carer's ability to care for a child, please seek advice from the senior manager who may consider calling the police.
5. In the unlikely circumstances where the child or vulnerable adult is not repatriated with a parent/carer and the event is concluded, the management will call the police and the investigation over to the police.

### **3.3 Search and Seizure**

#### **Search and Seizure**

**The aim of this policy is to prevent prohibited items being brought into HERE.**

**For the purposes of this policy, prohibited items are considered to be the following:**

- Weapons.
- illegal substances.
- Alcohol.

**Each event will be risk assessed and rated as follows:**

- **Lower** (e.g., corporate and low risk live shows) – All bags and random physical search.
- **Medium** (e.g., club nights) – all bags and physical searches **with random wand scan**.
- **Higher** (e.g., high profile events) – all bags, physical searches supplemented with metal detecting wands.



## Premises Licence Conditions

HERE is subject to the following premises licence condition relating to searching and seizures.

*Where it is a public musical event involving the use of a DJ or MC, who performs to background recorded music then if directed by the Police from 21:00 hours, or when recommended by the Police, every customer shall be searched upon entry. All searches to be conducted by authorised door staff and shall be carried out within an area covered by the premises CCTV system. Refusal to being searched will result in No Entry.*

*Where any illegal substance is found within the premises then a record shall be made in the incident book. Any illegal substance shall be stored securely pending collection by the Police unless they are present on site, and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book.*

**The following procedures will be implemented by managers and security at the entrance. In line with the risk assessments for the event and any advice given by the Police in accordance with the premises licence conditions:**

1. All persons entering will be subject to a search in line with the risk assessment for the event.
2. Signage will be prominently placed at the entrance and queuing area stating:  
*The premises operates a search policy. All persons entering HERE 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. Physical searches will consist of a pat down search of outer clothing and guests may be asked to empty their pockets.
4. When searching with metal detecting wands, if the wand is activated there will be a physical pat down search of the area indicated.
5. All bags will be opened and searched.
6. All searches of customers will take place in a well-lit area clearly covered by CCTV.
7. Searches will take place prior to any entrance fee payment.
8. All searches will have the ability to be same sex, i.e., male security to search male guests and female security to search female guests when requested by customers.
9. Guests may be searched on entry and re-entry.

**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).
- The items will be stored securely in a safe located in the box office.



**In the event of a large quantity of drugs or a weapon being found, call the police immediately (999). Where possible the suspect should be detained (subject to the safety of staff and guests).**

### **Documenting Seizures**

An entry will be made in the weapons/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).

## **3.4 Preventing & Dealing with Intoxication**

### **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.

### **Strategies**

**Vetting entry** – security and staff will assess guests at the entrance to identify and prevent intoxicated patrons from entering the venue.

**Monitoring the environment** - staff, security and management will work together to continually monitor guests in all areas of the venue.

**Security** – a fast response team will be deployed to attend to any person identified as intoxicated.

**Welfare officers** – employed to care for any vulnerable guests.

**Staff Communication** – effective communication across the team throughout the trading period through radios and direct communication.

**Make water freely available** – and have staff offer it regularly to encourage patrons to pace their alcohol consumption.

**Staff training** – Serving staff trained to assess patrons, identify intoxication, and refuse service.

**Lighting** – levels will be bright enough to enable staff to properly monitor patrons' intoxication levels throughout the venue.



**Signage** – displayed to promote responsible drinking and indicate that service will be refused if patrons appear intoxicated.

### **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 and for an intoxication assessment.
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 or supervisor must be present and authorize 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 an assessment 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 a second time, they will not be allowed to re-enter.
12. All walkouts will be recorded in the ejections log. If any physical force is used a full incident report will be written.
13. The guest's welfare will be considered at all times and the WAVE/Guest Welfare Policy followed.
14. Advice on local transport options will be given.
15. Staff will understand that some illnesses can have symptoms which may make a person appear intoxicated and, if this is the case, appropriate medical care will be provided.

**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.

**HERE is subject to the following Premises Licence conditions relating to intoxication: -**

*The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other Responsible Authorities upon request.*

*The licensee shall ensure that staff are trained, as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons under age. This training is to be clearly documented and any training for future staff must also be organised at the appropriate time. Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.*





## **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 if they don't breach 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 and 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 embarrassing the customer in front of others.



All serving staff will:

- Smile, make eye contact, and take your time checking ID.
- Chat with customers to determine their status.
- Watch for signs of visible intoxication (speech, attitude, appearance, behaviour).
- Wait until a customer finishes a drink before offering another.
- Check with co-workers if they have served the customer.
- Slow service to a customer who is drinking rapidly.
- Offer water or other non-alcoholic spacers between drinks.
- When refusing service, inform their manager and co-workers.
- Take a manager or security with you when you must 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: water.
- 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 am not able to serve you another drink tonight. I could get into trouble with the authorities, and we could lose our Licence if I serve you more alcohol. How about I bring you a cup of coffee and get you something to eat or some water."

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

**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".

"Legally, I'm not allowed to serve you another drink. This glass of water will help you avoid getting a hangover tomorrow".

**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.
- 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.



### 3.5 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 areas:

- **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 regarding this policy in a number of ways:

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

#### **Policy Implementation**

##### **Staff**

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

Staff will receive training on the following:

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

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

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

- Always remain vigilant 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 possible.
- Staff shall not attempt to purchase any illegal substances as a means of trying to trap someone who they suspect is dealing – this is illegal.

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

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

### **Managers**

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

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

- The person(s) concerned should be informed that the premises operates a zero tolerance to the use of controlled drugs.
- If practical any controlled drugs should be seized.
- The person(s) concerned should either be warned or instructed to leave the premises depending on the circumstances.
- A written record made of the incident, including a description of the drugs involved and steps taken to prevent the drug use.

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

In the event of seizure of drugs:

- Ensure the process is witnessed, ideally by security or another member of staff.
- Confiscate any drugs found, if safe to do so.
- Record and log details of drugs found in the drug register.
- Place drugs in sealed bags (provided by police) or a sealed envelope (signed and dated across the seal).
- Call police on the non-emergency number (101) and inform them of seizure in accordance with local police procedure. Make sure a CAD number is taken and added to the entry in the drugs register Record per show not per seizure.
- In the event of a large quantity of drugs being found, call the police (999) immediately.
- If drug seizure captured on CCTV, secure backup of relevant footage.



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

**Therefore never:**

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

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

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

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

**Spotting the Signs of Dealing in Your Venue**

- A person or group being very popular.
- People taking regular trips to the toilets.
- Customers staying for a short while and not buying drinks.
- Secretive or sly conduct.
- Known users/dealers using the venue.
- Money changing hands.
- Individuals with unusually large amounts of cash

**Drug-Related Litter to be Vigilant for**

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

**Door Supervisors**

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

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

**Toilet Attendants**

On occasions where toilet attendants are employed their duties include:

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



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

### **Safeguarding those that have taken drugs**

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

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

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

- Unattended drinks. Any unattended drinks should be cleared and disposed of.
- 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.

### **The Misuse of Drugs Act 1971**

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

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

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

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

### **Offences under the Misuse of Drugs Act 1971**

- Unlawful possession of a controlled drug.
- Unlawful possession with intent to supply.





- Supplying or offering to supply a controlled drug.
- Producing or being concerned in the production.
- Cultivating cannabis.
- Being the occupier or concerned in the management of premises who knowingly permits or allows certain activities to take place on those premises.

### Psychoactive Substances Act 2016

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

### Legal high

The term 'legal high' is commonly used to describe new psychoactive substances (NPS) but it is misleading. Many 'legal highs' (e.g., types of synthetic cannabinoids) are already controlled under the Misuse of Drugs Act, which now specifies particular drugs and groups of drugs (e.g., synthetic cannabinoids that impact on specific receptors in the brain). Many products sold as 'legal highs' contain multiple NPS and many contain illegal or banned substances.

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

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

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

The following premises licence conditions relate to drugs: -

*All flat surfaces in toilet cubicles, including any toilet roll holder eclipses, are to be 'designed-out' in order to prevent drug misuse.*

*Where any illegal substance is found within the premises then a record shall be made in the incident book. Any illegal substance shall be stored securely pending collection by the Police unless they are present on site, and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book.*



Drugs Signage

# **WARNING**

**HERE 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**





### 3.6 Guest Welfare

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

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

There is a clear responsibility for operators to have a duty of care for their customers. Aside from this, most 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?

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 are of paramount importance and should be considered at all times and the appropriate action taken.**



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

1. Provide a safer environment for the guests.
2. Reduced crime on the premises.
3. Reduce the chance of a sexual assault taking place.
4. Decrease the chances of a guest coming to harm either on or off the premises.
5. Increased guest satisfaction.
6. Improved working partnerships with statutory authorities.
7. Enhanced staff training.
8. Lower instances of ASB (Anti-Social Behaviour).
9. Prevent/reduce sexual offences.
10. Reduce preventable injury linked to alcohol and drug use in the licensed economy.
11. Reduce opportunities for criminal activity and anti-social behaviour in licensed premises.
12. Promote partnerships and engagement with communities and key stakeholders in the licensed economy.

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

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

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

### **But what is Vulnerability?**

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

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

### **Factors Making a Person Vulnerable**

#### **Age**

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

#### **Alone**

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

Where possible, attempts should be made to contact friends who may be able to assist.

CCTV, ID scanners, etc. may well assist in identifying friends.

Is there an opportunity to contact family?

When refusing entry, make sure someone stays with the vulnerable person.



### **Overconsumption of Drugs & Alcohol**

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

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

#### **Considerations:**

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

### **State of mind**

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

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

### **Wearing Expensive Jewellery**

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

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



### Presence of an Offender

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

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

### How to recognise vulnerability

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

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

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

### Where can we intervene to reduce vulnerability?

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



## Ask for Angela

Ask For Angela provides a useful additional tool for dealing with vulnerability. The premises have signed up with Camden Council to operate the scheme. Front of house staff will receive training on the scheme and the steps they should take to keep customers safe.

‘Ask for Angela’ initiative aims to reduce sexual violence and vulnerability by providing customers with a non-descript phrase they can use to gain assistance from staff members in order to be separated from the company of someone with whom they feel unsafe due to that person’s actions, words or behaviour.

By “asking for Angela”, an individual should be treated as a vulnerable person and the interventions you have in place should be applied.

Courtesy of Safer Communities Sexual Violence and Abuse Partnership, Lincolnshire. Originators of the 'Ask for Angela' poster campaign part of the #NoMore sexual violence and abuse in Lincolnshire awareness Campaign. [www.lincolnshire.gov.uk/home](http://www.lincolnshire.gov.uk/home)

# #ASK FOR ANGELA

“ HI I’M ANGELA,

ARE YOU ON A DATE THAT ISN’T WORKING OUT? DO YOU FEEL LIKE YOU’RE NOT IN A SAFE SITUATION?

IS YOUR TINDER OR POF DATE NOT WHO THEY SAID THEY WERE ON THEIR PROFILE? DOES IT ALL FEEL A BIT WEIRD?

IF YOU GO TO THE BAR AND ASK FOR ‘ANGELA’ THE BAR STAFF WILL KNOW YOU NEED SOME HELP GETTING OUT OF YOUR SITUATION AND WILL CALL YOU A TAXI OR HELP YOU OUT DISCREETLY – WITHOUT TOO MUCH FUSS ”

[www.met.police.uk/AskforAngela](http://www.met.police.uk/AskforAngela)

Call **101** for non-emergency enquiries, to report an incident or get help.

If you’re deaf or hard of hearing, use our textphone service on **18001 101**.

Call **999** if it’s an emergency or a crime is in progress.

METROPOLITAN POLICE

DMCT22



### **Safeguarding Departing Guests**

1. Any information regarding thieves, or suspicious activity, in the vicinity of the premises will be reported to the police.
2. Any information or intelligence received from police will be included in pre-opening briefings with security and staff.
3. Staff will receive Welfare and Vulnerability Engagement (WAVE) training.
4. Security and staff at the entrance will proactively monitor guests leaving. Any person who is considered to be at risk or vulnerable will be spoken to by a manager.
5. Any person considered vulnerable will engage the Guest Welfare Policy.
6. A taxi will be offered to any person who is considered to be at risk or vulnerable. If the person concerned has a car nearby security will escort them to their vehicle. A note of the vehicle description and registration number will be recorded and retained.
7. Any intervention, or proactive action, will be recorded including refused assistance.
8. Security will monitor the street and report any suspicious activity to the manager in charge.
9. Security equipped with Body Worn Cameras (BWC) will attempt to video any persons loitering or acting suspiciously in the immediate vicinity.
10. Any relevant information will be shared with neighbouring premises.

### **Lost Children**

See Young Persons section and standalone Lost Child Policy. No member of staff will ever be left alone with a child.

#### **UNDER NO CIRCUMSTANCES: -**

- Will the name or description of the child be relayed out through the PA System or Radio network.
- Will the child be presented on the stage for the guardians to claim.
- Will the guardians names be relayed over the PA System or radio network.
- Will the child be reunited with their guardians without the involvement of a manager.

### **Welfare Response Team**

Each event will be risk assessed and an appropriate number of dedicated, trained staff deployed. A welfare response team will be formed and respond to any calls relating to vulnerable guests.

### **Accessibility and Equality**

Access for people with health conditions or impairments will be assessed for each event. A number of accessible tickets will be available for each live show including admission to a raised viewing area for three wheelchairs.

All staff will receive equality and non-discrimination training.

### **Medical Cover**

Each event will be risk assessed and an appropriate number of dedicated, trained staff deployed. Medical staff will work in conjunction with the Welfare Response Team to ensure any vulnerable guests receive the appropriate medical care.



### **3.7 Ejections**

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

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

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

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

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

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

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

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

The security response team will be called to all situations where a guest is required to be ejected from the premises. The manager in charge will be informed of any ejection. A Manager/security manager/security team leader must authorise all ejections.

#### **Process of Ejection**

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

#### **Ensure you understand the situation and assess it first**

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

#### **Ensure you have support**

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





### **Explain the reasons why a person is being ejected**

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

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

### **All guests should voluntarily walk out**

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

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

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

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

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

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

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

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

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

The Outernet district security will be informed if a person has been ejected.





### **Body Worn Cameras**

Wherever possible, all ejections will be covered by BWC. The team leader of the Response Team is always equipped with a BWC.

### **The Use of Reasonable Force**

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

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

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

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

#### **NECESSARY**

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

#### **REASONABLE**

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

#### **Ask yourself the question!**

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

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

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

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



### **3.8 Security Roles & Responsibilities**

Security staffing plans are created in advance of the event based on the Risk Assessment. The Security Director will determine the level of security to be deployed and, dependent upon the type of event, may deploy two levels of security. All security will sign in the door supervisor log at the beginning of their shift. Positions will be allocated at the security briefing at the beginning of the shift. All security team leaders will be equipped with a body worn camera (BWC). At least one BWC will be deployed at the entrance and on each internal level.

**External security will carry out the following procedures.**

1. Vet entry in line with entry policies.
2. Bring anything untoward to the senior manager's attention.
3. Refusing entry will be conducted in a professional manner.
4. Control of clickers ensuring HERE is never over capacity at any time. Smokers must be included in the clicker count.
5. The clicker count record will be recorded at 30-minute intervals.
6. Search guests in line with search policy.
7. Check IDs.
8. Show guests where to pay and encourage them to use the cloakroom.
9. Ensure that there is a steady flow of guests in and out.
10. Monitor all guests as they leave HERE, ensuring they are not intoxicated. Ensure Guest Welfare Policy is followed for any person assessed as vulnerable. If somebody is believed to be intoxicated, ensure they are with responsible sober company and they have a safe means of transport.
11. Prevent congestion at the front entrance.
12. Ensure Denmark street and Denmark Place is not obstructed.
13. Encourage guests to exit HERE in an orderly and quiet fashion.
14. Direct guests leaving to nearest transport facilities on Tottenham Court Road in line with the dispersal policy.
15. Stop any drinks from leaving HERE.
16. Control numbers of guests smoking.
17. Monitor guests that are smoking.
18. Ask any guests being noisy to be quiet and respect neighbours.
19. Ensure that any beggars, flower sellers or drunks are not harassing guests in the queue or smoking area.
20. Liaise with venue management for cleaners to attend to any litter before during and post event.
21. Liaise with Outernet District Security teams and various stakeholders to coordinate ingress, egress, refusals and ejections, and work in tandem with district security patrols to ensure the perimeter of the district is maintained and any guests of the venue are directed away from the area keeping noise and litter to a minimum.



### **Internal security will carry out the following procedures.**

- Keep the stairs clear, encouraging all guests to keep moving.
- Keep the entrances to the mezzanine/main room clear.
- Monitor for any unattended property.
- Monitor customers behaviour - watch for pushing / aggressive behaviour.
- Be vigilant for any customers who may be intoxicated.
- Control pressure points and prevent congestion.
- Regularly check toilets and liaise with toilet attendants,
- Prevent unauthorised persons accessing back of house areas.
- Monitor fire exits and ensure they are unobstructed.
- Support the bar staff during any incidents.
- Alert staff to any spillages.
- Maintain visual contact with other security, use radios only for important issues.
- Keep the manager / head of security informed of anything that might cause a situation.

### **Venue Specific Licence Conditions**

HERE is also subject to the following premises licence conditions.

*Where it is a public musical event involving the use of a DJ or MC, who performs to background recorded music then if directed by the Police from 21:00 hours, or when recommended by the Police, every customer shall be searched upon entry. All searches to be conducted by authorised door staff and shall be carried out within an area covered by the premises CCTV system. Refusal to being searched will result in No Entry.*

*Where the sale of alcohol is occurring after 20:00 hours then door staff shall be present at least 1 hour prior to the commencement of the event. The door staff shall be employed to a ratio of 1:100. The following additional requirements apply in relation to those door staff:*

*(a) There will be a minimum of 1 (1) female SIA-registered door supervisor on duty when security are required.*

*(b) A door supervisors register shall be updated on occasions when door supervisors are employed. The Register is to be made available for inspection by the Police and/ or Licensing Authority. Details to show:*

- Full Name;
- Date of Birth;
- SIA Registration Number;
- Date and Hours Worked; and
- Contact telephone number and email address.

*(c) A coloured photocopy of each door supervisors' SIA badge shall be taken by the DPS and retained at the premises.*

*(d) They will wear high visibility jackets or vests or high visibility arm bands whilst working at entry / exit points and around the exterior of the building.*

*(e) They shall remain on duty for half an hour after the close of the venue to ensure all patrons are dispersed peacefully from the area.*



*When the Gallery is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.*

*The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.*

*All security staff, stewards and management will be connected by a secure channel handheld radio system.*

### **3.9 Security Code of Conduct**

The following code of conduct will apply to all door supervisors at all times when employed at HERE

#### **Personal Appearance**

Door supervisors should always:

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

#### **Professional Attitude**

Door supervisors should:

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

#### **General Conduct**

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

10. Never solicit or accept any bribe or other consideration from any person.
11. Never abuse his/her position of authority.



12. Never carry any item which is or could be considered to be threatening.
13. Report all incidents to the management.
14. Co-operate fully with members of the police and partners, local authority, SIA, and other statutory agencies with an interest in the premises or the way they are run.
15. Not be alone in the company of a customer except in an area open to the public within the club.
16. Never participate in indecent or inappropriate contact with customers.
17. Never engage in any unlawful activity.
18. Never consume any alcohol whilst on duty.
19. Never consume, possess or be under the influence of any unlawful drug or substance, unless it is personally prescribed medication by a registered doctor.
20. Not invite or knowingly permit their spouses, girlfriends / boyfriends, or friends and acquaintances to enter the club without the express consent of the Designated Premises Supervisor (DPS). If a door supervisor should become aware that a spouse, girlfriend / boyfriend, or friend is in the venue they must notify the manager in charge immediately.
21. Report any person engaged in unlawful activities immediately to a manager.
22. Not encourage, incite, or participate in antisocial behaviour.
23. Not encourage drunkenness in customers.
24. 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.
25. Be familiar with the Premises Licence and all the conditions the Licence is subject to and ensure compliance at all times.
26. Attend the nightly pre-shift security briefing where positions, roles and responsibilities will be allocated. Any absence must be approved by the Security Manager.

#### **HERE Values and Standards**

Door supervisors should:

27. Adhere to HERE's company standards, policies, and procedures.
28. Be perceptive of HERE's values.
29. Contribute to the goals and objectives of HERE.

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

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



### **3.10 Dealing with Serious Incidents**

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

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

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

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

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

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

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



### Venue Specific Licence Conditions

HERE is also subject to the following premises licence condition:

*Police must be called to incidents of violence and /or disorder.*

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

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

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

### Incident Report

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

### Radio Codes

The following radio codes will be used by management, staff, and security.

#### Code    Issue

- |   |                              |
|---|------------------------------|
| 1 | Fire / Smoke                 |
| 2 | Suspicious Item              |
| 3 | Suspicious Person            |
| 4 | Medical Incident             |
| 5 | Crowd Disruption             |
| 6 | Technical / Structural Issue |

- |              |                                  |
|--------------|----------------------------------|
| <b>Amber</b> | Pre-evacuation positions         |
| <b>Red</b>   | Evacuation                       |
| <b>Green</b> | Invacuation                      |
| <b>Blue</b>  | Standard Evacuation Not possible |



### 3.11 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 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),
- tranquillisers, 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 aesthetic 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 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.

### **Tranquillisers**

Tranquillisers 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. Tranquillisers work by slowing down a person's body, relieving tension, and making them feel very relaxed. They normally come as a tablet.

### **Ketamine**

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



### **Preventing Drink Spiking**

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

### **3. Customer Behaviour**

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

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

### **4. Patrolling Premises**

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

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

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

### **5. Vulnerable Areas**

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

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

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

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



## 6. Security

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

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

At least one female door supervisor is employed where possible.

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

## 7. CCTV

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

## 8. Training

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

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

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

## Reactive Measures

### 1. Victim Care

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

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

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

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

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

You must keep any suspect away from the victim.

### 2. Crime Scene Preservation

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



### **3. Suspects**

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

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

You must keep any suspect away from the victim.

### **4. Police**

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

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

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

### **5. CCTV**

Any relevant CCTV images will be saved to USB or Hard Drive 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 manager in charge as per the premises' Incident Reporting Policy. Statements will be provided by any staff who witnessed the incident.

### **7. Press**

The directors will prepare a brief press statement if appropriate.

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

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



### 3.12 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 assault 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 must be moved – a manager must pick it up using gloves (avoiding fingerprints) 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 HERE should run as normal. If the crime scene disrupts the use of one of the fire exits, then the front door should be closed to the public immediately and a view will be taken as to whether trading will continue. If the crime scene will either greatly disrupt the public or jeopardise public safety, then the senior manager on duty will be responsible for the decision to close.***

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

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

**Remember:**

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

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

**Venue Specific Licence Condition**

HERE is also subject to the following premises licence condition.

*The licensee shall ensure that staff are trained, as appropriate, in respect of relevant licensing law, **crime scene best practice** and upon the sale of alcohol to drunks and persons under age. This training is to be clearly documented and any training for future staff must also be organised at the appropriate time. Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.*



### **3.13 Theft Prevention**

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

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 HERE.

#### **Staff awareness**

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

#### **Customer awareness**

- Signage (at entrance and in toilets).
- 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 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 where appropriate.
- CCTV – monitor from office / use to detect suspects following the report of lost property.
- 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 cloakroom throughout the night as they are found.
- All items to be recorded in the office as soon as they are found.
- All items not claimed throughout the evening must be recorded.

### **Unclaimed Items**

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

### **Lost Cloakroom Tickets**

- Guests that lose their cloakroom ticket must wait until the end of the evening to claim their items unless it is authorised by the manager in charge.
- 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.

### **Venue Specific Licence Conditions**

HERE is also subject to the following premises licence conditions:

*Notices shall be displayed within the premises warning customers about personal thefts; and to be vigilant.*

*The venue shall supply and fit to every static table or counter, suitable anti-theft devices, such as table/counter clips, in order that customers may secure their bags.*



### **3.14 Staff Code of Conduct**

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

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



### 3.15 Events and Private Hire

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

**All private bookings and events held at HERE will be subject to rigorous vetting. Any booking will not be confirmed without the approval of the Designated Premises Supervisor. All events will be operated in line with the Event Management Plan.**

Anyone wishing to book a private party will be required to attend HERE 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.
4. A full guest list prior to the 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 DJ's playing at the private party.
7. Whether tickets are being sold.
8. A copy of the invitation prior to the event.

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

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

Persons holding the event will be informed that:

- The event will be held subject to a venue risk assessment.
- An invitation or ticket 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.

#### EVENT INFO

Key information for each event is collated and disseminated to relevant stakeholders during regular Operations meetings.

All Event information pertaining to Artist, Promoter, Genre, Crowd type, Ticket sales, Production requirements and risk level is included in the Event Advance sheet.



## EVENT TYPE

- Public – public ticketed events
- Private – private, corporate events

## ENTERTAINMENT TYPES

- LIVE – Live bands, Spoken word
- DJ – Electronic, DJ based
- COMEDY - Comedy
- SCREENING – Film or sports screenings
- EXHIBITION – Product launch, Art exhibition, Fashion show etc

## EVENT CONFIGURATION

- SRO – Standing Room Only / Live music
- STD – THEATRE - Seated event, theatre / conference style arrangement
- STD – DINNER – Seated event, round table dinner arrangement
- CLUB – Nightclub event

A majority of public events are promoted by established external music promoters including Livenation, AEG, Metropolis etc.

Promoter contact details as well as artist and event information are captured in the Event Advance sheet.

All events promoted by 3rd party promoters are advertised independently via print / OOH / Digital / social media channels and listed on the Venues Website. The venue will support events through its own social media and marketing channels.

Promoters and clients are given an agreed capacity in line with the Event Configuration, Risk Assessment and Production requirements. Demand is tracked through 'waiting lists' via our ticketing platform Dice. This will give a real time indication of demand and allow restrictive measures to be placed on the promoter if necessary.

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

**HERE is subject to the following premises licence conditions relating to events:**

*An Event Management Plan will be prepared for each event and shall be served upon the Police and Environmental Health a minimum of 14 working days ahead of an event for information.*

*The Event Management Plan will include the provision of a designated smoking area and management thereof; provision of a dispersal policy to ensure the safe and quiet movement of people from the area; the provision of additional pop-up toilets (when necessary); provision of a queue management strategy; public safety and security arrangements.*

*The Premises Licence Holder shall provide the Licensing Authority and Police with a list of upcoming events each quarter (or as otherwise agreed with the Licensing Authority and Police) and shall provide such information as is requested by the Licensing Authority and/or Police to assess the potential impact of specific events upon the Licensing Objectives.*

*A management document is to be drawn up, maintained, and amended as required which will deal with the following: (a) Definition of promotions, events and bookings (b) Procedure for the management of each category. (c) Security procedures including the reporting of incidents. (d) Procedure for ensuring promoters are informed of and are managed in such a way as to promote the*



*Licensing Objectives and ensure compliance with the conditions on the premises Licence. (e) Response plan and management structure in the event of an emergency.*

*In relation to any event involving a promoter, their associates, DJ or artist (e), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for a profit then: (a) The licensee shall complete a risk assessment form 696 and email it to: [SCD9proactivelicensinaintelligence@met.pnn.police.uk](mailto:SCD9proactivelicensinaintelligence@met.pnn.police.uk) and copied to [EKLicensing@met.police.uk](mailto:EKLicensing@met.police.uk) at least 14 days prior to the event. The licensee shall notify the Metropolitan Police using the same emails if there are any short notice bookings of event or any unusual or large scale events as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.*

*In relation to all other musical events, the Local Camden Police Licensing Team shall be contacted no less than 14 days prior to the event to request if a full Search Policy is required of all customers.*

*That an Events Noise Management Plan is developed to the satisfaction of the Noise Team to cover any occasion where there is potential for sound breakout beyond the premises boundary, and where sound equipment is added to the existing in-house equipment for a particular event or function. The Noise Management Plan required by virtue of planning shall be updated by the Premises Licence Holder from time to time as appropriate and the Premises Licence Holder shall be bound by the plan. A copy of the Events Noise Management Plan and the Noise Management Plan shall be retained at the premises and made available for inspection by the relevant authorities.*

*The Event Management Plan sets out measures to be taken to ensure effective communication with surrounding residents and businesses concerning planned events.*

*There is a lost children's policy contained within the Event Venue Management Plan*



### **3.16 Management of Outside Area & Dispersal**

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

All staff will be trained in the procedures and will receive regular refresher training.

This document will be reviewed on an annual basis to ensure its effectiveness and relevance is not compromised.

#### **1. Roles and Responsibilities**

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

#### **2. Entry Controls**

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

#### **3. During Trading**

- 3.1. Door supervisors outside HERE will wear high visibility clothing.
- 3.2. Door supervisors will monitor activity in the vicinity of HERE throughout each night to prevent crime and disorder, noise or disturbance arising from customers.
- 3.3. Door supervisors will discourage illegal taxi touts from congregating outside HERE.
- 3.4. Door supervisors will ensure customers do not congregate outside. Any guests outside will either be directed to the smoking area or back inside HERE.



#### **4. Guests Smoking**

- 4.1. Guests will only be permitted outside to smoke in line with Smoking Policy.
- 4.2. The smoking policies for HERE will be determined via the Event Risk Assessment to either be fixed outside the front doors, or dynamic flowing round to Denmark St and back through the ingress route.
- 4.3. Door supervisors will monitor guests smoking at all times to manage noise pollution.

#### **5. Exit Controls**

- 5.1. Door supervisors will endeavour to control the stream of customers and guests leaving HERE.
- 5.2. Staff will disperse guests towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or West/East on Oxford Street/New Oxford Street.
- 5.3. Staff will discourage guests as they leave from dispersing into the Piazza area of St Giles Square to the North and East of the premises.
- 5.4. Door supervisors and stewards will be positioned at the north end of Denmark Place, in the Now Arcade and Denmark Street to direct guests towards Charing Cross Road.
- 5.5. Door supervisors will be proactive dispersing groups of people outside HERE. Guests will be encouraged to leave the area quickly and quietly.
- 5.6. Door supervisors will patrol the street outside HERE to ensure customers and guests leave the area quietly. Any customers and guests causing noise or disturbance will be asked to be quiet and leave the area.
- 5.7. A manager will be on duty and stationed at the exit 30 minutes from close to oversee dispersal. For this period at least two door supervisors will also be on duty to assist with the safe dispersal of guests.
- 5.8. As customers leave and HERE empties, door supervisors from inside HERE will be posted outside to assist with dispersal.
- 5.9. Guests will not be allowed to take drinks with them as they leave.

#### **6. Other Measures**

- 6.1. The HERE website will contain information regarding transport links to and from the venue.
- 6.2. Notices will be prominently displayed at exits requesting the guests to respect the needs of local residents and to leave HERE and the area quietly in a considerate manner.
- 6.3. Staff will conduct a litter and cleaning patrol of the area immediately outside HERE.
- 6.4. External noise marshals will be deployed based upon risk assessment to assist with the arrival and departure of guests.
- 6.5. Based upon risk assessment, traffic marshals may be deployed and / or a trusted Traffic Management Company may be retained during high profile events where there is a likelihood that high numbers of guests attending are likely to arrive and leave by vehicles as opposed to public transport.
- 6.6. On the website, information shall be available to guests upon suitable travel options, including public transport, vehicle drop off locations and parking options.



## **7. Complaints procedure and contacts**

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





## 8. Venue specific licence conditions

The premises is subject to the following licence conditions: -

*The Event Management Plan will include the provision of a designated smoking area and management thereof; provision of a dispersal policy to ensure the safe and quiet movement of people from the area; the provision of additional pop-up toilets (when necessary); provision of a queue management strategy; public safety and security arrangements.*

*The dispersal policy shall contain measures intended to encourage patrons leaving the gallery after 23.30 to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or West/East on Oxford Street/New Oxford Street. It will contain measures actively to encourage patrons from dispersing into the Piazza area to the North and East of the premises.*

*No patron shall be allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle whether empty or containing any beverage, other than permitted off-sales.*

*Signage shall be displayed in a prominent position on the premises requesting that customers leave quietly.*

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

*Where the sale of alcohol is occurring after 20:00 hours then door staff shall be present at least 1 hour prior to the commencement of the event. The door staff shall be employed to a ratio of 1:100. The following additional requirements apply in relation to those door staff:*

*(a) There will be a minimum of 1 (1) female SIA-registered door supervisor on duty when security are required.*

*(b) A door supervisors register shall be updated on occasions when door supervisors are employed. The Register is to be made available for inspection by the Police and/ or Licensing Authority. Details to show:*

- Full Name;
- Date of Birth;
- SIA Registration Number;
- Date and Hours Worked; and
- Contact telephone number and email address.

*(c) A coloured photocopy of each door supervisors' SIA badge shall be taken by the DPS and retained at the premises.*

*(d) They will wear high visibility jackets or vests or high visibility armbands whilst working at entry / exit points and around the exterior of the building.*

*(e) They shall remain on duty for half an hour after the close of the venue to ensure all patrons are dispersed peacefully from the area.*

*Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept clear.*

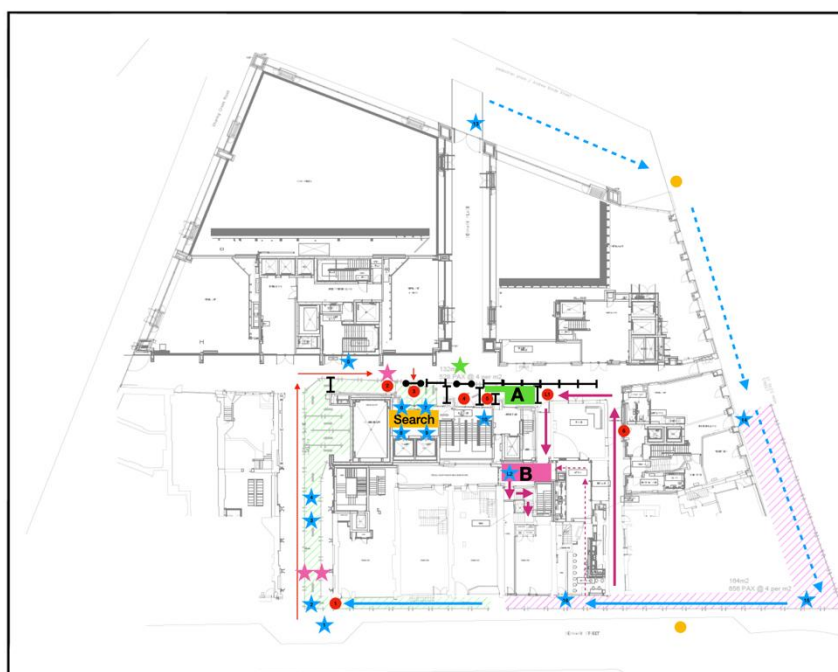


*When the premises is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.*

*The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway. Where two or more events operate on the same day, then as part of the events planning and risk assessment, ingress and egress shall be considered to ensure that customers departing and arriving can do so safely and without any adverse impact upon health and safety, or without causing a public nuisance.*

### **QUEUEING STRATEGY – Please see indicative diagrams below.**

#### **Ground Floor INGRESS**

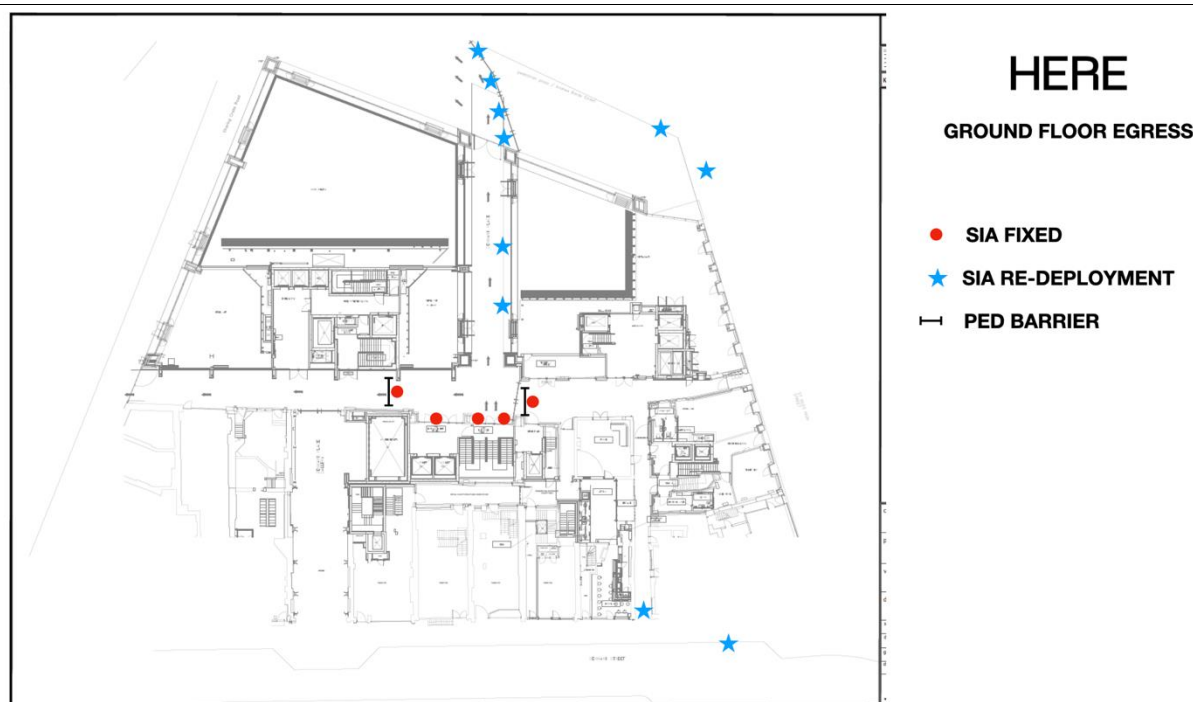


#### **HERE X LOWER THIRD COMBINED GROUND FLOOR INGRESS**

- ★ SIA HOS / ROAM
- SIA FIXED
- ★ SIA RE-DEPLOY
- STEWARDS / NOISE
- ★ TICKETS / GUESTLIST
- Tensabarrier
- PED Barrier
- HERE GA
- HERE Guestlist
- Lower Third
- Lower Third Guestlist / Early entry
- A** HERE Smoking
- B** Lower Third Smoking



## Ground Floor EGRESS



### 3.17 Smoking

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

**HERE operates a smoking area. The following policy will be in operation whenever this area is in use.**



5. The standard smoking area for HERE is to the left of the entrance (as you look at the venue) with the GA queue ingress point on the right.
6. On occasion, a dynamic smoking system is put in place to ease congestion in the smoking area and queues inside the venue. Guests are directed to the right of the venue on Denmark Place and are circulated back on to Denmark Street, where they can smoke and re-join the GA ingress system to be re-searched upon re-entry. This system breaks up any congestion and allows for better noise management of the smoking area when busy.
7. The maximum capacity of the smoking area will be assessed for each event.
8. The security team leader will decide when the smoking area is opened.
9. Guests waiting to use the smoking area will form a queue on the stairs which will be supervised.
10. The smoking areas will be constantly monitored by at least one door supervisor after 20:00 hours whenever it is in use.
11. Customers will not be permitted to block the public highway or access/egress to/from the venue.
12. The smoking areas will be cleaned of litter at regular intervals.
13. Customers will be reminded to keep the noise down and to respect the residents in the area.
14. Any person causing a nuisance or disturbance in the smoking area will be asked to leave HERE immediately.

### **Venue specific licence conditions**

HERE is subject to the following premises licence conditions relating to smoking.

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

*When the Gallery is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.*

*Patrons wishing to smoke will not be permitted to take drinks outside with them.*



### **3.18 Incident Reporting & Due Diligence Records**

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

#### **1. Incident Reports**

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

The following incidents will be fully reported:

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

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

**Each incident report will contain the following:**

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



- Describe all persons involved in the incident.
- Give details of all witnesses to the incident.

**STAFF WILL BE INSTRUCTED NOT TO:**

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

## **2. Due Diligence Records**

The following daily records will be completed:

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

### **Venue specific licence conditions**

HERE is also subject to the following premises licence conditions:

*When the venue is open for licensable activities, the toilets are to be checked by staff at least every two (2) hours and these checks are to be documented on each visit.*

*Details of instances of disorder, damage to property or personal injury shall be recorded in an incident book kept at the premises. Such details shall be made available for inspection by the Police and other Responsible Authorities upon request.*

*The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other Responsible Authorities upon request.*

*Where any illegal substance is found within the premises then a record shall be made in the incident book. Any illegal substance shall be stored securely pending collection by the Police unless they are present on site and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book.*



### **3.19 CCTV & Body Worn Cameras (BWC)**

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

HERE operates a CCTV system that conforms to the Data Protection Act 2018 and The General Data Protection Regulation 2016/679 (GDPR). The Data Controller is Outernet Venue Ltd.

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

There is a dedicated CCTV room within the premises known as the Security Operational Control room (SOC). When the venue is operational, there is a fully licensed and trained CCTV operator who manages the SOC. The SOC operator monitors all areas of the venue via CCTV, receives and records all radio traffic, coordinates response teams and medics with managers on the ground and maintains communication with external stakeholders, local authorities etc where required. In addition, the Outernet Development is extensively covered by CCTV which is controlled by the landlord from a central security office. Both SOC rooms are in direct communication to coordinate between the venue and the district team as required in relation to any evacuations, ejections, or crowd management scenarios. If any of the statutory authorities request access to footage of Denmark Street, Denmark Place or St Giles Square then the Director of Security will liaise with the landlord's Head of Security to arrange access.

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

1. One camera will show a close-up of the entrance to the premises, to capture a clear, full-length image of anyone entering. The system will provide full coverage of the interior of the premises and any exterior part of the premises accessible to the public.
2. The system will record in real time and recordings will be date and timestamped.
3. Recordings shall be kept for a minimum of 31 days and shall be made available upon request by an authorised officer of the licensing authority or by a police officer within 24 hours.
4. The CCTV system shall continually record whilst HERE is open for licensable activities and during all times when customers remain on the premises.
5. The CCTV system will capture a clear head and shoulders image of "identification standard" of every person entering the premises. Persons entering HERE should be asked to remove any headwear which obscures the persons' face unless it is worn as part of religious observance.
6. The CCTV system will be kept secure at all times. Access will be limited to the DPS, managers and authorised security.
7. A dedicated CCTV system log will be kept at HERE. All usage, checks, faults, and requests for images will be recorded in the log. Any person taking a copy of the CCTV such as the police, fire authority or local authority officer MUST sign in the relevant section of the log acknowledging receipt of the data. The signing officer must also enter their place of work and a contact telephone number.





8. A full incident report will be made of any faults with the system.
9. When reporting any faults with the CCTV system, anticipated times scales for repairs and who the issue has been escalated to if these time scales are not met will be included.
10. The DPS and all managers will all be trained in the use of the CCTV system. The training will include interrogation of the system and transfer of images to separate media (CD, DVD, flash drive, USB stick external hard drive etc.)
11. There will be at least one person who is suitably trained and conversant with the CCTV system on the premises at all times it is open to the public.
12. The DPS will ensure as far as possible that the system is maintained and working correctly at all times. At minimum, a weekly, documented test will be carried out to ensure the system is working correctly. A record of these checks, showing the date and name of the person checking, will be kept, and made available to the police or other authorised officer on request.
13. Relevant CCTV images will be burnt to playable media as soon as possible following any serious incident. Two copies will be retained – one for police and a backup placed in the safe at the premises.
14. All searches of customers will take place in an area clearly covered by CCTV.
15. Signage will be placed prominently at the entrance to HERE advising all persons entering that CCTV is in operation in accordance with the Data Protection Act 2018 and GDPR.

### **BODY WORN CAMERAS (BWC)**

When the security team deploy Body Worn Cameras, the following measures will be place. The use of BWC is to promote the four licensing objectives; to protect staff, customers, members of the public and their property, and prevent and detect crime.

The use of BWC should be:

- Incident specific
- Proportionate
- Legitimate
- Necessary
- Justifiable

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

All security team leaders will be deployed with BWCs. The issue of BWCs to other members of the security team will be assessed for each event.

1. The premises shall ensure that the use of such BWC is dealt with within any training it provides to the security personnel team.
2. Door Supervisors based at HERE will 'book out' their BWC from a pool of devices shared amongst a number of staff members.





3. Door Supervisors are required to ensure the device is charged, all previously captured images and audio is automatically removed prior to deployment. The device will then be fixed to the Door Supervisors outer clothing where the field of view is clear and not obscured.
4. BWC video footage will be held in compliance with the Data Protection Act and GDPR requirements. Footage will be held for 31 days unless there is a need for it to be held longer – i.e., as evidence of a crime etc.
5. BWC footage will be provided to police upon request with the absolute minimum of delay.
6. Door supervisors with BWC will record, where possible, any physical ejections and any incidents of crime and/or disorder.

#### **Venue specific premises licence conditions**

HERE is also subject to the following premises licence conditions regarding CCTV:

*The premises licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.*

*The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.*

*The CCTV camera views are not to be obstructed.*

*At least one CCTV camera is to be placed no more than seven feet above floor level; near to the exits in order to capture clear facial images of all persons leaving the premises.*

*The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority upon request.*

*At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the Police or an authorised officer in obtaining the CCTV footage.*

*The facility to transfer the images to a compatible, removable format shall be held on the premises.*



### 3.20 Terrorism

**The Protect Duty legislation (coming in 2022/23) requires all security and the venue to be familiar with the emergency plans and have preventative measures in place.**

Furthermore, all staff need to undertake counter terrorism courses / training which includes the ACT and SCan courses.

In the United Kingdom, for the purposes of legislation the definition of Terrorism is:  
‘The use of violence for political ends and includes any use of violence for the purpose of putting the public or any section of the public in fear’ Weinberg 2005.

It is important to recognise the fact that; despite the prominence given to one particular threat by the media, there are many active extremist groups across the globe willing and capable of carrying out some form of terrorist action within the UK such as Religious and Political Extremists, Pro-Life and Anti-Abortionist Leagues, Animal Rights and Environmental Activists etc, plus of course the lone individual.

These instructions are intended to act as a guide should a situation arise where an explosive/incendiary device is located on the premises and/or information is received that such a device has been placed on site.

In the United Kingdom the modes of attack can include:

- An incendiary device or explosive package delivered to site (either by an individual, a courier or even Royal Mail).
- An improvised explosive device (IED) detonated/left on site.
- A Vehicle mounted IED detonated/left on site.
- An armed assailant (i.e., with a knife)

**Delivered Parcel Devices** – the letter/parcel bomb is generally designed for local impact i.e., to maim or kill the person opening it, although high grade explosives are capable of causing significant structural damage even in small quantities.

The recognition of such devices is not simple, although the following may indicate that a package is suspicious:

- The package is unusually heavy for its size.
- There is an excessive amount of postage on the package.
- The packaging has greasy or sweaty marks on it.
- The weight of the package may be unevenly distributed.
- Tin foil or wiring may be evident.
- There may be small pin pricks in the packaging.
- There is an unusual smell, sickly sweet, almond or marzipan, strong chlorine, or bleach type aroma.

#### **Improvised Explosive Devices**

**Internal** - An explosive device can come in almost any packaging such as cigarette packets, cassettes, boxes, and bags. Devices of this type are designed to cause death at source and serious injury in the immediate vicinity. Traditionally, this type of device is packed into a bag or briefcase and left in a public access area to be detonated via a timer or remote control.



**External** – Handheld or carried devices have regularly been used in open area attacks in the past, with devices left in litter bins for example.

**Vehicle** – Vehicles are commonly used to deliver explosive devices; this can range from a standard car to a lorry or service vehicle. Vehicle borne devices have been known to deliver up to 1 tonne of high explosives to a target. Such devices can cause significant structural damage to buildings within 50m of the blast, death at distances of up to 250m and serious injury at a range of 500m.

### **If a suspicious item is found - Dealing with Suspicious Packages - HOT protocols**

No unattended item should be ignored, but should always be assessed proportionately, considering what can be seen and anything you know about its discovery.

For example, in the case of unattended hand luggage, it may be possible to ask if its owner is nearby. However, when an item has been:

- **hidden from view deliberately.**
- has **visual clues suggesting it may be hazardous** - wires, circuit boards, batteries, adhesive tape, liquids, putty-like or unusual substances.
- or **found after a suspicious event**; an **immediate and focused response is required.**

### **Why is this important:**

Unattended and suspicious items can be encountered in any crowded/public place, such as a **nightclub, bars, restaurants**, shopping centre, transport hub or large public event.

### **If a suspicious item is found -**

**The H-O-T protocol** will assist this process and what does it stand for?

There are **three things** to consider in the assessment - In particular, consider whether the item is:

**(H) Hidden?** Has the item been deliberately hidden, or has a deliberate attempt been made to conceal it from view?

**(O) Obviously suspicious?** Has it been left in plain view on a bench where people were sitting a moment before? Could it be an Improvised Explosive Device (IED); for example are there wires, circuit boards, batteries, tape, liquids or putty-like substances visible?

- Has the item been found after seeing suspicious behaviour? Check with others in the area and use CCTV, if available

### **(T) Typical of what you would expect to find in this location?**

- Most lost property is found in locations where people congregate or wait, so ask if anyone nearby has left the item or saw who did.
- If the item is assessed to be unattended rather than suspicious, then examine further, paying particular attention to the contents, before applying lost property procedures. However, if you believe the item represents a possible risk to life, then follow the protocol as follows.

**If, after employing the HOT protocol, you still believe the item is suspicious – CALL 999**



### Tips

- Don't panic – remain calm and composed.
- Do not use your radio within 20 feet of the item.
- Communicate with your 'site' / management'.
- Describe what you have and where it is exactly.
- Ensure the emergency services are called.
- Instigate an evacuation or invacuation (perhaps if the only way out is past the item).

### Threat Call

- Treat all calls as genuine.
- Obtain as much information as possible from the informant (keep them talking and never hang up) and complete a check sheet.
- Always stay calm. Never get angry or argue with the caller.
- When the caller has hung up, dial 1471 to obtain the number (if Facility available).
- Inform Manager on duty.
- Await management's instructions with regards to calling the police.
- Inform Security Area Supervisor.
- On Police arrival show them the check sheet and act upon their instructions.

**Note:** For any evacuation strategy there is no right or wrong answer, the situation is fluid with circumstances changing regularly and therefore the management on site must make an operational decision based on the information currently available as to which routes/assembly points are acceptable for use.

**Note:** As effective blast ranges of recent IED attacks have been 500m, it is important that the secondary assembly point is at least 500m from the primary point and preferably 500m from any large expanses of glazing or metal.

**Please ensure that you follow any internal site policies and procedures in relation to terrorism at all time.**



### **3.22 In the Event of a Telephone Bomb Threat**

#### **Telephone Bomb Threat:**

If you receive a telephone call that an explosive device has allegedly been placed on the premises, officers should take the following action:

- Elicit as much information as possible from the informant.

The more information obtained the better chance of locating the device and assisting the Police in their enquiries.

Inform management on site and follow their instructions or the instructions with the site emergency procedures.

**Should the call be made in silent hours and the premises are not occupied, inform the Police at once and await their arrival. DO NOT ATTEMPT TO SEARCH FOR THE DEVICE.**

On their arrival the Police should be handed a copy of the completed Bomb Threat Call Check Sheet and the security team should then act upon their instructions.

**If:**

- They witness or have reasonable grounds to believe that a person has committed a crime.
- They witness or have reasonable grounds to believe that a person is in the act of committing a crime.
- To protect a person from causing injury to themselves or others.
- Prevent a person from damaging property or causing a loss to the business/organisation.
- To stop a person from leaving the scene before an officer arrives to take over responsibility.

#### **An arrest is legal if -**

- The person making the arrest is doing so because a police officer is not reasonably available to do so.
- Or the arrest is necessary to prevent the person from:
  - Physically injuring them self or others
  - Suffering physical injury
  - Damaging or destroying property
  - Absconding before held accountable for their actions.

Security and Management are not to make an arrest unless there is clear evidence that an offence has been or is being committed, suspicion alone is not enough, and permission **MUST** be sought by senior management.



### 3.23 Powers of Arrest

It is important to note that as a manager or security guard you don't actually possess any more legal powers than anyone else.

Like any other civilian, **managers and security guards** are permitted to perform a citizen's arrest as long as they have reasonable grounds for suspicion of the person they are planning to arrest.

**But there are specific conditions that the circumstances must meet in order for the arrest to be legal.**

- A person cannot be arrested unless they've committed a crime, or you have reasonable grounds to suspect that they have.
- This should only be done if arrest by a police officer isn't feasible.
- Alternatively, if an arrest is necessary to protect the offenders or suspected offenders.

In the **Police and Criminal Evidence Act 1984, under Section 24A**, security guards like any member of the public are allowed to make a citizen's arrest.

**If:**

- They witness or have reasonable grounds to believe that a person has committed a crime.
- They witness or have reasonable grounds to believe that a person is in the act of committing a crime.
- To protect a person from causing injury to themselves or others.
- Prevent a person from damaging property or causing a loss to the business/organisation.
- To stop a person from leaving the scene before an officer arrives to take over responsibility.

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- Or the arrest is necessary to prevent the person from:
  - Physically injuring them self or others
  - Suffering physical injury
  - Damaging or destroying property
  - Absconding before held accountable for their actions.

Security personnel are not to make an arrest unless there is clear evidence that an offence has been or is being committed, suspicion alone is not enough.



### **3.24 Procedure for offensive weapon**

#### **Definition of a weapon**

The definition of a weapon can be either of the following, constructed i.e. (knife) or adapted i.e. (baseball bat that is being carried but can be adapted to facilitate a crime)

There will always be the possibility that a manager or security working on shift may be called to an incident where individuals are using offensive weapons. It is important for the Health, Safety & Welfare of all management, security, and members of the public that the following precautions are taken:

- Contact the premises management immediately and they will contact Police informing them that an incident involving an offensive weapon has taking place/or is taken place.
- Review CCTV footage where possible to assist in identifying and monitoring the incident and where necessary writing the Incident Report.
- Retreat to a safe distance and keep in contact with the control room at all times.
- If possible, create an exclusion zone by being polite and informing members of the public to keep clear.
- Do not attempt to approach or disarm the offenders, wait for the Police to arrive.
- Ensure you keep an accurate log of the event to assist the Police in their investigation.

By following the above instructions, the potential to cause harm to management, security and members of the public would be minimised, while at the same time the information obtained would assist the Police.



## **Section 4 - Emergency Procedures, Evacuation Plan and Fire Safety**

### **4.1 Emergency Procedure**

All staff and contractors working at HERE are trained on the venues Fire Safety Evacuation Plan developed in conjunction with a venues Fire Risk Assessment (FRA)

Fire Wardens will be trained prior to opening and emergency procedures shared with all staff at induction.

Opening checklist requires fire checks be carried out prior to opening including that all exits are clear.

### **4.2 Evacuation and Contingency Plan**

All Management and Security personnel are to acquaint themselves with this document and be fully conversant with its procedure.

### **4.3 Lift Alarms**

The lifts are fitted with suitable alarms.

### **4.4 Fire Safety**

**The following procedures must be executed immediately by Management and Security in the event of a fire:**

- Ensure that the fire brigade is called as soon as possible and provide key information about the premises.
- Ensure that the fire brigade is greeted on arrival to the premises, and they are informed of the location of the fire.
- Ensure that any guests evacuating the premises do so safely and assist where necessary is directing them to a position of safety.
- Liaise with the attending fire brigade to provide information as necessary. It is important that, as part of this process, guests understand the evacuation strategy as well as the evacuation procedures and what action they should take upon leaving the premises.

**Following the identification of a confirmed fire, management will:**

- Ensure that the fire brigade is called immediately; such is the importance of this action that one member of security / management should be tasked with ensuring that this action has been taken.
- Reduce as far as reasonably practicable the evacuation time (e.g., supporting guests to leave).
- Assist with the evacuation of people who are mobility impaired.





## Calling the Fire Service

In the event of fire, make an immediate call to the fire brigade by dialling 999, stating:

- The address of the premises.
- The total number of floors of the building.
- Where the fire has started.
- That a simultaneous evacuation is under way.
- Where known, the number and location of any people who may not be able to self-evacuate.
- Any other information as relevant.
- Where possible one member of the security or management team should meet the fire brigade on their arrival to pass on relevant information.

## Vulnerable guests

- Where a guest has been identified as being unable to respond to the evacuation signal and/or unable to self-evacuate, the Responsible Person will have agreed a **PEEP** with that person.

*A PEEP is a plan for a person who may need assistance, for instance, a person with impaired mobility, to evacuate a building or reach a place of safety in the event of an emergency.*

- Management and Security should be aware of the contents of each **PEEP** and the agreed control measures.
- The designated member of security or management who will meet the fire brigade on their arrival must be able to report information on each guest for which a **PEEP** has been agreed but is not yet accounted for.

## Training & Communications

- Training has been given to all the management team and members of security to ensure they fully understand the purpose of their role and what individual tasks they are responsible for both during normal activities and in the event of a fire.
- In the event of a fire the priority for management and security is to promote the evacuation of the building.
- Training will need to be repeated if there are any new members or if any arrangement changes.
- All staff will receive regular refresher training.
- It is important that management and security can instantly and constantly communicate with each other. The method of communication is as follows – by personal radios.
- Radio traffic should be kept to a minimum to ensure that the system is available for appropriate communications. The adequacy and effectiveness of radio communication throughout the building should be tested and confirmed. – see above.
- If personal radios are to be relied on for any of the above purposes. it should be ensured that radios have sufficient charge, and they should be tried and tested and its functionality regularly checked.



### **Test of the process**

- The process will be tested in the form of regular training exercises to ensure that everyone understands their roles and that the system is appropriate for the specific premises. These tests should be recorded along with any improvements required.

#### **4.5 Fire Alarms**

Management and Security should refer to the Fire Operating procedures for the fire alarm at the Fire Alarm Panel.

#### **4.6 Evacuation Point**

The Primary evacuation point is St Giles Circus

#### **4.7 Escape Route and Fire Points**

Ensure that these are clear and not obstructed.

#### **4.8 Fire Extinguishers**

Only trained officers should use firefighting equipment.

#### **4.9 Fire Evacuation Drills**

Managers and Security if required to do so will participate in fire evacuation procedures as requested by HERE senior management.



## **Section 5 – Health & Safety**

### **5.1 Health and Safety**

Management and Security are to be fully conversant and comply with the HERE Health and Safety policies, emergency procedures and systems at all times. A full copy of the Health and Safety Procedures Manual is held in the management office.

### **5.2 Health & Safety Policy Statement**

#### **General Policy Statement**

**Our policy is to provide adequate control of the Health and Safety risks arising from our work activities and to ensure compliance with all our legal obligations.**

It is the policy of the company to ensure that so far as reasonably practicable, the Health, Safety and Welfare of its employees while they are at work and any other persons who may be affected by their undertakings, and to comply with relevant legislation as appropriate.

- **We shall provide adequate resources to ensure the highest possible standards of Health and Safety are achieved within the organisation.**
- **We shall provide and maintain safe plant and equipment,**
- **Ensure safe handling and use of substances in order to prevent accidents and cases of work-related ill health.**
- **Provide all employees with adequate information and training.**
- **Ensure that all employees are competent to carry out their duties in a safe manner.**
- **We shall consult with our employees on matters affecting their Health and Safety.**
- **Provide safety devices and protective equipment and supervise their use.**
- **Identify risks and remove or reduce them to a safe level.**

Health and Safety responsibilities and the particular arrangements that we have made to implement the policy are laid out here and also within the rest of the Health and Safety Manual.

This policy will be kept up to date and will be reviewed and re-signed every year.



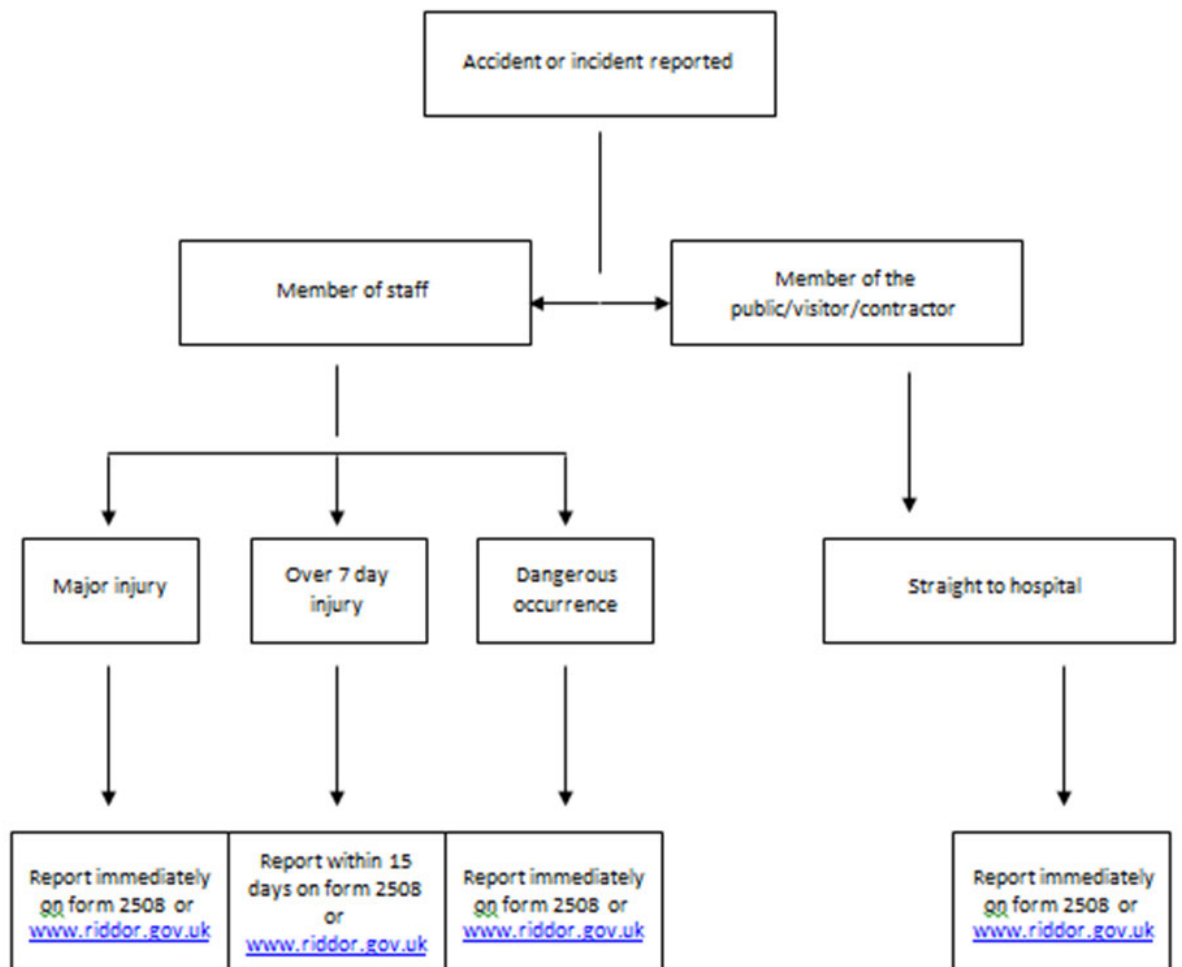
### 5.3 Accident Reporting

- All accidents/incidents should be reported to management and Head of Security immediately.
- The correct accident report form should be completed as per the premises policies and procedures.
- RIDDOR reporting will be undertaken when required.

#### Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

- Work-related fatalities
- Major injuries
- ‘Over-seven-day’ injuries
- Work-related diseases
- Dangerous occurrences

**RIDDOR Flowchart**





#### **5.4 COSHH**

A COSHH assessment should be completed for any hazardous substances on site. This will have been completed by HERE. In the event of a chemical accident obtain the relevant Chemical Safety Data Sheet and pass to emergency responders.

#### **5.5 Control of Contractors**

All contractors that undertake work at HERE will be approved in line with HERE requirements and should hold site specific risk assessments for the work they are undertaking.

They may also be required to work under a permit to work which must be issued by a competent person.

**Security Officers are not authorised to issue permits to work.**

#### **5.6 First Aid**

The Health and Safety (First Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and people to ensure their employees receive immediate attention if they are injured or taken ill at work.

#### **REMEMBER**

A first aid report should be completed for anyone who administers first aid, this should be submitted to the Manager with a copy of the Incident Report.



## 5.7 Risk Assessments

Please see listed below all of the Health & Safety Risk Assessments we have in place:

### **Name of Risk Assessment:**

- Acid Attacks
- Acts and Performers
- Alcohol abuse and misuse
- Asbestos
- Beer Cellar
- Changing Light Bulbs
- Checking Toilets
- Cleaning and mopping floors
- Crowd Management Policy and Assessment
- Dealing with Violence or Aggression
- Deliveries
- Disabled Guests (The premises are working towards being awarded Gold Standard by Attitude Everything, who are a charity that connects disabled people with music and live event industries to improve access).
- Display Screen Equipment
- Drug Abuse and misuse
- Electricity and use of electrical equipment
- Evacuation of Venue
- First Aid
- Food and drink service in the venue
- Gas Cylinders and pressurised equipment
- Hazardous substances
- Ingress
- Lone working
- Manual Handling
- Mosh Pit
- Noise
- PPE
- Raised Stage
- Reception and Cloakroom
- Removing people from venue
- Slips, trips and falls
- Stress
- Terrorism
- Use of glass
- Use of knives
- Use of ladders
- Use of radios
- Use of Work Equipment
- Venue Set Up
- Waste disposal
- Welfare, Health and Safety
- Working at Height



### **Section 6 - Approval Sign Off Sheet**

<b>Approved by:</b> <b>(HERE)</b>	<b>Signature:</b>	<b>Date:</b>
--------------------------------------	-------------------	--------------

<b>Approved by:</b> <b>?</b>	<b>Signature:</b>	<b>Date:</b>
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<b>Next Review Date:</b>	<b>TBC</b>
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<b>Amendments:</b>	
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## Section 7 – Premises Licence and Plans



HERE, St Giles Circus Site, Denmark Place, London, WC2H 8NL

And

The Lower Third, 26 Denmark Street, London, WC2H 8NL

Licensing Panel Hearing – 21<sup>st</sup> September 2023 at 7pm

Index of Additional Evidence

1. Statement of Michael Watson, Better Compliance and Licensing Compliance Audits for HERE and The Lower Third.
2. Licensing Observation Report of Brian Hunter, Patriot Licensing.
3. Letter from Andy Hickey.
4. Letter from Jamie Franklin.
5. Letter from Andy Rowberry.
6. Amended Conditions on HERE.
7. Conditions agreed with Police on The Lower Third.
8. Link to Petition in Support of Applications.
9. Schedule of Late-Night Entertainment Venues which have ceased trading due to the Crossrail Development.
10. CV of Robbie Naish, Security Director, Outernet Venues.



**HERE**  
**St Giles Circus Site, Denmark Place London WC2H 8LH**  
**&**  
**The Lower Third**  
**26 Denmark Street London WC2H 8NL**

**Introduction**

1. I, Michael Watson, of Better Compliance, make this statement to provide additional relevant supporting information regarding the variation applications of the premises licences for HERE to permit licensable activities until 04:00 on 154 occasions per year and The Lower Third to permit licensable activities until 04:00 Thursday to Saturday the following days.
2. I have been a licensing consultant since 2004. My consultancy service has a respected reputation amongst the Police, local authorities, and our private clients.
3. Previously, I was:
  - a. a civilian licensing officer with the Metropolitan Police Clubs and Vice Unit (CO14) from 1994 to 2001; and
  - b. a licensing officer at the London Borough of Islington from February 2001 to June 2004.
4. I have attained the Certificate of Higher Education in Licensing Law from Birmingham University and I am a member of the Institute of Licensing (MIoL). I am also an Associate of the Chartered Institute of Environmental Health (ACIEH). My role as a consultant is to work in partnership with the statutory authorities. I have given evidence at

Licensing Committees, planning appeals, and licensing appeals before Magistrates and the Crown Court.

5. I have been an independent licensing consultant for over nineteen years. I have worked with a wide variety of premises including nightclubs, bars, restaurants, and hotels. My retainer clients include The London Park Lane Hilton (Westminster), the Truman Brewery complex (Tower Hamlets), The Outernet – HERE and The Lower Third (Camden), The Piano Works (Islington and Westminster), The Windmill Theatre Soho (Westminster), Tape London (Westminster), The Box Soho (Westminster), Cirque Le Soir (Westminster), Reign (Westminster), Raffles (Royal Borough of Kensington and Chelsea), Tabu (Westminster), Swingers Golf (City of London and Westminster), Lio London (Westminster), Mothership Group – Queen of Hoxton, Colours and The Book Club (Hackney) and The Night Group – Night Tales and NTs Loft (Hackney).
6. I am the co-author of the book, *“Staying Open – An Essential Guide for Managers of Licensed Premises”*.
7. I have worked with many venues, in many different environments, to design successful management procedures to ensure the promotion of the Four Licensing Objectives, current best practice and compliance with legislation and regulations.

#### **Instructions and Scope of Work**

8. I have worked as a licensing consultant with HERE and The Lower Third since they opened in 2022.
9. My role is to provide support and guidance in relation to compliance with the Licensing Act 2003, premises licence conditions and best practice operational policies and procedures for the promotion of the four Licensing Objectives.

10. I confirm that, notwithstanding that I have been engaged as a consultant by Outernet Venue Ltd, I have prepared this Witness Statement together with all opinions expressed herein, as an independent professional licensing consultant.

### **Licensing Compliance Audits**

11. Comprehensive licensing audits of the premises are conducted by qualified consultants, including myself, to ensure compliance with the Licensing Act 2003, the promotion of the Four Licensing Objectives and any specific conditions attached to the premises licence.
12. The audits also measure the success and effectiveness of operational procedures and aim to build a body of positive due diligence evidence for the premises. They also serve as a management tool; giving confidence that the premises is compliant and acts as an early warning system if issues are identified.
13. The audits cover the following areas:
- Licences and Signage
  - Licensing Compliance
  - Door Supervisors
  - Outside Management
  - Fire Safety
  - Record Keeping
  - Internal Management
  - Toilets
  - CCTV & Body Worn Video Cameras
14. The audits are conducted once a calendar month.
15. The audits are unannounced and carried out whilst the venue is trading at peak times.
16. I attach copies of the licensing compliance audits for the last month.

17. It is not a requirement of either premises licence that these monthly audits be conducted. The premises licence holders took it upon themselves to instruct that these audits be carried out.

18. This type of licensing compliance audit has previously been imposed as a premises licence condition by a Licensing Sub-Committee in Camden.

19. One of my clients had the following condition imposed by a Camden Licensing Sub-Committee in October 2022: -

*Unannounced monthly audits of the premises during trading hours shall be conducted by an independent accredited auditor, and records retained for inspection by the police and local authority.*

### **Online Compliance System**

20. Both venues also operate the Report Support online licensing compliance system.

21. Report Support is a unique system for licensed premises. It has been designed by a team of experts with vast experience in licensing enforcement, working with leading night-time economy operators.

22. Report is a secure digital system for licensing due diligence, providing a centralised platform for recording all compliance activities.

23. Key features of Report Support include a digital daily records system for compliance checks including opening safety checklists, capacity counts, door supervisor logs, ejections and refusals, positive guest welfare interventions, and incident reports.

### **Conclusions**

24. The measures detailed in this statement give the businesses a highly effective means of managing licensing compliance.

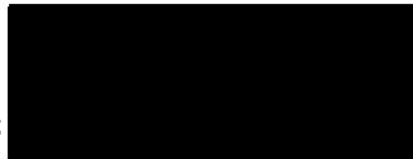
25. These measures demonstrate a clear commitment from the leadership of the businesses to go beyond minimum standards of compliance to

achieve best possible practices. I have seen that the businesses have been fully committed to implementing and enthusiastically maintaining these measures since before opening.

26. It is my professional opinion that HERE and The Lower Third have a highly effective compliance infrastructure in place to ensure an increase to permit licensable activities does not have an adverse effect on the promotion of the four licensing objectives.

27. I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

Signed:



Dated: 7<sup>th</sup> September 2023

Michael Watson



## Licensing Compliance Audit

Improve compliance | Safeguard your business | Enjoy peace of mind



## HERE

24 Aug 2023

**Complete**

Score **7,570 / 7,570 (100%)** Flagged items

**0** Actions

**0**

**Conducted on**

24 Aug 2023 10:32 PM BST

**Name of auditor**

Nad Valaydon

**Client / Site**

Outernet Venue Limited

**Name of premises**

HERE

**Location**

St Giles Circus  
Denmark Place  
London  
WC2H 8LH



**Disclaimer**

The auditor believe the information contained within this report to be correct at the time of printing. The auditor does not accept responsibility for any consequences arising from the use of the information herein. The report is based on matters which were observed or came to the attention of the auditor during the day of the inspection and should not be relied upon as an exhaustive record of all possible risks or hazards that may exist or potential improvements that can be made.

**Confidentiality Statement**

In order to maintain the integrity and credibility of the audit process and to protect the parties involved, it is understood that the auditor will not divulge to unauthorised persons any information obtained during this risk audit unless legally obligated to do so.

**General**

**Current Premises Licence number** PREM-LIC\110349

**Name of Designated Premises Supervisor (DPS)** Tristan Hoffman

**Number of customers inside premises** 645

**Number of customers queuing** 0

**Number of customers drinking/smoking outside** 6

**Name of person in charge** Mark Ellicott

**Number of door supervisors employed at premises** **19**  
From 0 to 50

**What is the premises search policy** All persons physical searched

All persons wanted

All bags searched

**Number of IDs scanned** N/A

**Number of persons refused entry** 0

**Number of persons ejected / refused re-entry / refused service** 0

**Licences & Signage** 150 / 150 (100%)

**Premises Licence summary, Part B, correctly displayed**

Yes

**Section 57, custody of Licence notice, correctly displayed**

Yes

**CCTV warning signs displayed**

Yes

**ID scanning equipment warning signs displayed**

N/A

**Search policy notice displayed**

Yes

**Anti-drug signage displayed**

Yes

**Age verification policy displayed**

Yes

**Please leave quietly, or similar, notices displayed**

Yes

**Licence Compliance** 1,930 / 1,930 (100%)

## Licensable activities being provided

Sale by retail of alcohol

Regulated entertainment

Premises compliant with Licence conditions

Yes

Premises Licensee / delegated person on the premises

Yes

Current Premises Licence available

Yes

Personal Licence Holder able to produce their original Licence

Yes



Photo 1

Staff authorised to make alcohol sales by Personal Licence Holder

Yes

Premises does not have any irresponsible drinks promotions

Yes

Tap water available on request

Yes

Mandatory minimum prescribed measures available and advertised to customers

Yes

At least one Personal Licence Holder on duty

Yes

## Door Supervisors

210 / 210 (100%)

Adequate number of door supervisors employed at the entrance

Yes

Door supervisors clearly identifiable

Yes

All door supervisors' SIA registration badges correctly displayed

Yes

Door supervisor log completed and correct

Yes

All door supervisor SIA registrations current

Yes

Adequate security provision within the premises

Yes

Door supervisors alert and vigilant

Yes

Door supervisor roles and responsibilities clearly defined

Yes

<b>Outside Managment</b>	90 / 90 (100%)
Outside areas clearly defined (queues, smoking area etc.)	Yes
Queue management sufficient	Yes
Queue adequately supervised	Yes
Smokers adequately supervised	Yes
Outside area clear of bottles and glasses	Yes
Outside area clear of cigarette butts and litter	Yes
Entrance adequately managed	Yes
Customers properly vetted prior to entry	Yes
Customers searched in line with premises' policy	Yes
<b>Fire Safety</b>	3,710 / 3,710 (100%)
Escape routes clearly signed	Yes
Escape routes adequately lit	Yes
Escape routes unobstructed	Yes
Escape doors available and open freely	Yes
Fire extinguishers / safety equipment properly positioned	Yes
Fire extinguishers / safety equipment within test date	Yes
All fire doors closed or fitted with automatic closers	Yes
Fire alarm panel free of faults	Yes
Fire marshal on duty	Yes
Fire action notices displayed	Yes
Emergency lighting working	Yes
Walls/floors/ceilings in good state of repair	Yes
<b>Record Keeping</b>	150 / 150 (100%)
Written record of daily safety checks	Yes

**Written record of occupancy numbers**

Yes

**Written record of split capacity occupancy numbers**

Yes

**Reportable incidents recorded**

Yes

**Refusals of entry recorded**

Yes

**Customer ejections recorded**

Yes

**Record of staff on duty**

Yes

### **Internal Management**

870 / 870 (100%)

**Premises is not overcrowded**

Yes

**Cloakroom available for customer use**

Yes

**Premises clear of unattended property**

Yes

**Store cupboards locked and secure**

Yes

**Adequate lighting in customer areas**

Yes

**Empty drinking vessels and bottles being collected**

Yes

**Floor dry and any spillages being cleared**

Yes

**Floor clear of trip hazards**

Yes

**Intoxication levels adequately managed**

Yes

**No underage customers on premises**

Yes

**Sufficient number of first aiders on duty**

Yes

**Sufficient first aid facilities available**

Yes

**Polycarbonate / plastic bottles and drink vessels used**

Yes

**Mixture of glass and polycarbonate**

N/A

**Food available**

### **Toilets**

370 / 370 (100%)

**Attendant employed in the toilets**

Yes

**Toilets clean and floor dry**

Yes

**Toilets free of any evidence of suspected drug use**

Yes

**Toilets checked regularly by staff**

Yes

**Written record of toilet checks**

Yes

**Store cupboards within toilets locked and/or secure**

Yes

**Toilets and wash basins available for use**

Yes

**Toilets free of uncollected drinking vessels and bottles**

Yes

**CCTV & ID Scanning Equipment**

90 / 90 (100%)

**CCTV installed in the premises**

Yes

**CCTV system working correctly**

Yes

**CCTV date and time correct**

Yes

**Minimum of 31 days CCTV footage available**

Yes

**Adequate CCTV coverage of premises**

Yes

**Sufficient stock of CCTV recording media**

Yes

**At least one member of staff on duty able to fully operate CCTV system**

Yes

**Written record of routine CCTV checks**

Yes

**ID scanning equipment working correctly**

N/A

**Appropriate staff issued with operational radios**

Yes

**How many staff issued with Body Worn Cameras**

**0**  
From 0 to 20

**Are Body Worn Camera recordings retained for 31 days**

N/A

**Media summary**

Photo 1



## Licensing Compliance Audit

Improve compliance | Safeguard your business | Enjoy peace of mind





## The Lower Third

9 Aug 2023

Complete

Score **7,580 / 7,580 (100%)** Flagged items

0 Actions

0

**Conducted on**

9 Aug 2023 10:31 PM BST

**Name of auditor**

Nad Valaydon

**Client / Site**

Outernet Venue Limited

**Name of premises**

The Lower Third

**Location**

26 Denmark Street  
London  
WC2H 8NN

**Disclaimer**

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**Confidentiality Statement**

In order to maintain the integrity and credibility of the audit process and to protect the parties involved, it is understood that the auditor will not divulge to unauthorised persons any information obtained during this risk audit unless legally obligated to do so.

**General**

**Current Premises Licence number** PREM-LIC\110306

**Name of Designated Premises Supervisor (DPS)** Tristan Hoffman

**Number of customers inside premises** 15 bar 96 basement

**Number of customers queuing** 0 bar 8 basement

**Number of customers drinking/smoking outside** 0 bar 7 basement

**Name of person in charge** Zaeinab Ibrahim

**Number of door supervisors employed at premises** **4**  
From 0 to 50

**What is the premises search policy** All persons physical searched

All bags searched

**Number of IDs scanned** N/A

**Number of persons refused entry** 0 bar 0 basement

**Number of persons ejected / refused re-entry / refused service** 0 bar 0 basement

**Licences & Signage** 150 / 150 (100%)

**Premises Licence summary, Part B, correctly displayed**

Yes

**Section 57, custody of Licence notice, correctly displayed**

Yes

**CCTV warning signs displayed**

Yes

**ID scanning equipment warning signs displayed**

N/A

**Search policy notice displayed**

Yes

**Anti-drug signage displayed**

Yes

**Age verification policy displayed**

Yes

**Please leave quietly, or similar, notices displayed**

Yes

**Licence Compliance** 1,930 / 1,930 (100%)

**Licensable activities being provided** Sale by retail of alcohol

Regulated entertainment

**Premises compliant with Licence conditions**

Yes

**Premises Licensee / delegated person on the premises**

Yes

**Current Premises Licence available**

Yes

**Personal Licence Holder able to produce their original Licence**

Yes



Photo 1

**Staff authorised to make alcohol sales by Personal Licence Holder**

Yes

**Premises does not have any irresponsible drinks promotions**

Yes

**Tap water available on request**

Yes

**Mandatory minimum prescribed measures available and advertised to customers**

Yes

**At least one Personal Licence Holder on duty**

Yes

**Door Supervisors**

210 / 210 (100%)

**Adequate number of door supervisors employed at the entrance**

Yes

**Door supervisors clearly identifiable**

Yes

**All door supervisors' SIA registration badges correctly displayed**

Yes

**Door supervisor log completed and correct**

Yes

**All door supervisor SIA registrations current**

Yes

**Adequate security provision within the premises**

Yes

**Door supervisors alert and vigilant**

Yes

**Door supervisor roles and responsibilities clearly defined**

Yes

**Outside Managment**

90 / 90 (100%)

**Outside areas clearly defined (queues, smoking area etc.)**

Yes

<b>Queue management sufficient</b>	Yes
<b>Queue adequately supervised</b>	Yes
<b>Smokers adequately supervised</b>	Yes
<b>Outside area clear of bottles and glasses</b>	Yes
<b>Outside area clear of cigarette butts and litter</b>	Yes
<b>Entrance adequately managed</b>	Yes
<b>Customers properly vetted prior to entry</b>	Yes
<b>Customers searched in line with premises' policy</b>	Yes
<b>Fire Safety</b>	3,710 / 3,710 (100%)
<b>Escape routes clearly signed</b>	Yes
<b>Escape routes adequately lit</b>	Yes
<b>Escape routes unobstructed</b>	Yes
<b>Escape doors available and open freely</b>	Yes
<b>Fire extinguishers / safety equipment properly positioned</b>	Yes
<b>Fire extinguishers / safety equipment within test date</b>	Yes
<b>All fire doors closed or fitted with automatic closers</b>	Yes
<b>Fire alarm panel free of faults</b>	Yes
<b>Fire marshal on duty</b>	Yes
<b>Fire action notices displayed</b>	Yes
<b>Emergency lighting working</b>	Yes
<b>Walls/floors/ceilings in good state of repair</b>	Yes
<b>Record Keeping</b>	150 / 150 (100%)
<b>Written record of daily safety checks</b>	Yes
<b>Written record of occupancy numbers</b>	Yes
<b>Written record of split capacity occupancy numbers</b>	Yes

<b>Reportable incidents recorded</b>	Yes
<b>Refusals of entry recorded</b>	Yes
<b>Customer ejections recorded</b>	Yes
<b>Record of staff on duty</b>	Yes
<b>Internal Management</b>	870 / 870 (100%)
<b>Premises is not overcrowded</b>	Yes
<b>Cloakroom available for customer use</b>	Yes
<b>Premises clear of unattended property</b>	Yes
<b>Store cupboards locked and secure</b>	Yes
<b>Adequate lighting in customer areas</b>	Yes
<b>Empty drinking vessels and bottles being collected</b>	Yes
<b>Floor dry and any spillages being cleared</b>	Yes
<b>Floor clear of trip hazards</b>	Yes
<b>Intoxication levels adequately managed</b>	Yes
<b>No underage customers on premises</b>	Yes
<b>Sufficient number of first aiders on duty</b>	Yes
<b>Sufficient first aid facilities available</b>	Yes
<b>Polycarbonate / plastic bottles and drink vessels used</b>	Yes
	Mixture of glass and polycarbonate
<b>Food available</b>	N/A
<b>Toilets</b>	370 / 370 (100%)
<b>Attendant employed in the toilets</b>	Yes
<b>Toilets clean and floor dry</b>	Yes
<b>Toilets free of any evidence of suspected drug use</b>	Yes
<b>Toilets checked regularly by staff</b>	Yes

**Written record of toilet checks**

Yes

**Store cupboards within toilets locked and/or secure**

Yes

**Toilets and wash basins available for use**

Yes

**Toilets free of uncollected drinking vessels and bottles**

Yes

**CCTV & ID Scanning Equipment**

100 / 100 (100%)

**CCTV installed in the premises**

Yes

**CCTV system working correctly**

Yes

**CCTV date and time correct**

Yes

**Minimum of 31 days CCTV footage available**

Yes

**Adequate CCTV coverage of premises**

Yes

**Sufficient stock of CCTV recording media**

Yes

**At least one member of staff on duty able to fully operate CCTV system**

Yes

**Written record of routine CCTV checks**

Yes

**ID scanning equipment working correctly**

N/A

**Appropriate staff issued with operational radios**

Yes

**How many staff issued with Body Worn Cameras**

**1**  
From 0 to 20

**Are Body Worn Camera recordings retained for 31 days**

Yes

**Media summary**

Photo 1





## **1. PERSONAL SUMMARY - Brian Hunter**

I retired from the Metropolitan Police Service as a Police Officer on the 11<sup>th</sup> of September 2022, having completed 30 years exemplary Service.

During my last 5 years' service, I had the privilege of serving on the Westminster Police Licensing Team, as the dedicated partnership and engagement officer. This involved delegated authority for over 5000 licensed premises, one of the largest night-time economies in Europe. I identified and mitigated risk and engaged with stakeholders to make improvements in support of the licensing objectives and to drive down crime trends.

During my time on the Team, I have dealt with many licensing applications, committee hearings and reviews. I would sit on the monthly Senior Leadership Taskforce meetings relating to Violence Against Woman and Girls (VAWG) within the night-time economy and helped drive the implementation of the policies.

I also attended many cross-border meetings to discuss and where appropriate, implement best practice. I attended the Licensing Operations Safety Planning Group (LOSPG) along with all other relevant agencies. I was the Police Licensing point of contact for both public order events and events such as Pride, St Patricks Day and the Summertime concerts to name a few, and had input to the event management plans around alcohol licensing and compliance to ensure the safe delivery of those events.

I delivered Welfare and Vulnerability Engagement (WAVE) and 'Ask for Angela' training across the night-time economy in order to enhance and promote learning and best equip operators to identify vulnerability and to implement a positive action policy.

I further had the privilege on behalf of the Metropolitan Police Service, to be the nominated licensing officer managing the Fan Zone in Trafalgar Square for its safe delivery of the Euro Football tournament, dealing with all interested parties, and applications for a premises licence to ensure the event was delivered safely.

I hold a BIIAB Level 2 award for licensing and practitioners (Alcohol) and I am also a member of the Institute of Licensing.

## **2. INSTRUCTIONS**

I have been instructed by Lisa Sharkey of Poppleston Allen Solicitors, to provide my independent opinion and recommendations to ensure the premises licence

applications for HERE, St Giles Circus Site and The Lower Third Cocktail Bar, Denmark Street, Central London, are promoting the four licensing objectives, specifically during Ingress and Egress to the venues.

I conducted my observations on two dates: Thursday 6<sup>th</sup> July - 18:30 - 02:30 hours and Saturday 8<sup>th</sup> July – 23.00 - 02:30 hours, to monitor the dispersal of customers.

I have been provided with documentation relating to these applications, which consists of the proposed licence application, conditions and a copy of the event management plans. I will refer to them during my report for ease and to assist the licensing committee. I have been made aware of representations to the submission, relating to noise concerns and the movement of customers.

I have been instructed to provide an independent written assessment as to the local area and to provide any recommendations that can promote the four licensing objectives.

#### (a) **Licensing Objectives**

- The prevention of Crime and Disorder
- Public Safety
- The prevention of Public Nuisance
- The Protection of Children from Harm

#### (b) **Premises**

- (i) **HERE** - St Giles Circus Site, Denmark Place, London, WC2H 8LH is a 1500-1800 capacity venue, hosting a broad range of live entertainment such as concerts, club nights, comedy shows, as well as private and corporate events, fashion Shows, product launches, conferences, and film premiers.

The venue operates under premises license **PREM-LIC\110349** issued by the London Borough of Camden. The current hours for retail sale of alcohol are **Mon-Thu 10:00-23:30. Fri-Sat 10:00-00:00 and Sun 11:00-22:30.**

The license contains a seasonal variation that on 104 occasions per calendar year, the terminal hour shall be extended until **02:00** the following morning.

The venue has applied for a variation to extend the seasonal variation from **02:00 to 04:00**, on 154 occasions per year.

- (ii) **The Lower Third Cocktail Bar & Venue** 26 Denmark Street, London WC2H 8LH is described as a 350 Capacity venue, split over two floors, comprising a 15 seated/25 standing capacity ground floor Cocktail bar, with 25 seated/75 standing capacity performance space, and additionally has a 250-capacity basement venue.

The venue operates under premises license **PREM-LIC\110306** issued by London Borough of Camden.

The license current hours for retail sale of alcohol are **Mon-Sat 10:00-02:00 and Sun 12:00-00:30.**

The venue has submitted a variation to extend the hours **Thu-Sat 10:00-04:00.**

### **3. LOCAL AREA**

(As described on <https://www.burohappold.com/projects/st-giles-circus/#>)

Located close to Tottenham Court Road, St Giles Circus is home to several famous West End music shops and venues.

*The site includes 'Outernet London' a multi-media centre and 2000-person capacity underground venue, which has been dubbed a "contemporary amphitheatre", with a focus on providing space for commercial product launches. The mix of uses across the wider site also includes residential units, a hotel, office space, restaurants, bars, and shops.*

*The semi-internal, semi-external event space in the 16m-high gallery is designed to be fully immersive, with 2,000m<sup>2</sup> of high-quality LED screens covering all the walls and the ceiling. Those on the ceiling and two of the walls are fixed, and there are two retractable screens that can slide into place as required.*

*The brass-coloured louvres that form the two key facade walls are 9.5m high and each weigh 2.5 tonnes. They are designed to pivot and open along tracks to reveal the space within, like theatrical curtains. LED screens are embedded within the facade itself to allow for the projection of imagery on the outside and inside of the space.*

*Within Denmark Street there are various residences and recording studios, within St Giles Square is the Centre Point Building. To the East of the Square there are various food outlets, including the Arcade Food Hall and additional residential premises.*

#### **Transport Links to facilitate dispersal.**

The venue is well supported by public transport links via Tottenham Court Road and Oxford Street underground stations. It is also enhanced by the night tube on Fridays and Saturdays as well as the night bus network.

On Thursdays there are multiple bus routes in operation as shown on the below map.



### (a) Parking

There are 6 parking spaces in Denmark Street on the North footway and 2 parking spaces in Flitcroft Street, 8 in total. See map below.

Number of spaces: 8

Tariff: £6.63 (non-diesel) / £8.06 (diesel), per hour

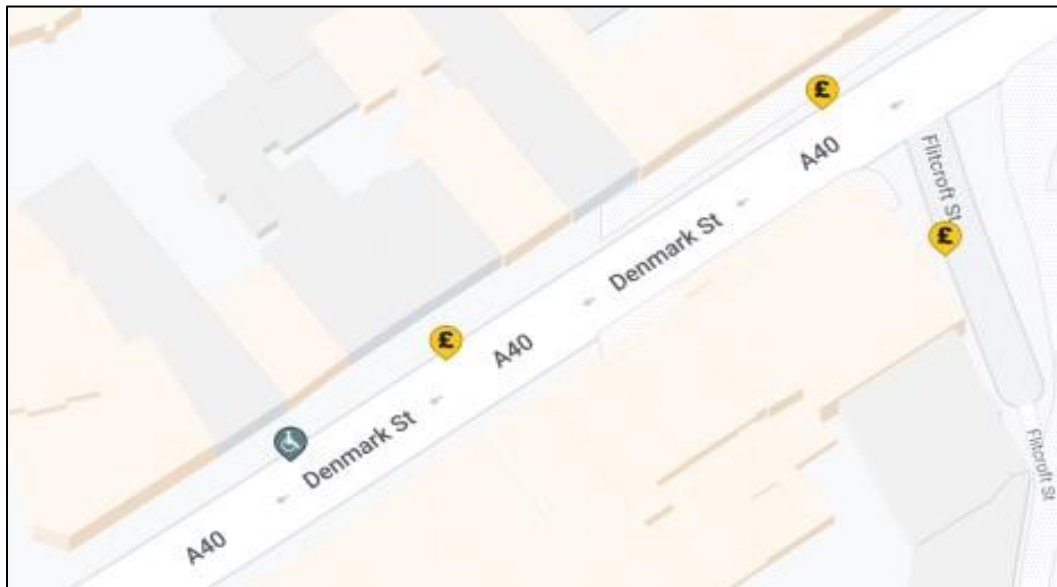
Duration: 2 hours

Controlled parking zone:

CA-C Controlled hours:

Mon-sat 08:30-18:30

**Outside of these hours anyone** can park in these bays for free.



Source:

<https://maps.camden.gov.uk/parking.aspx?area=Denmark%20Street&type=All>

## 4. POLICY CONSIDERATIONS

- The premises are situated within the Seven Dials Cumulative Impact Zone (CIZ)
- Hours Policy
- The Licensing Objectives - Measures to address Crime and Disorder Risks
- Public Nuisance

## 5. OBSERVATIONS

Thursday 6<sup>th</sup> July 2023 18:30 to 02:30 hours

The weather was fine, dry and sunny, the area was busy with people going about their business and the atmosphere was relaxed. The large 'Outernet' screens as described above, were in operation and attracting people to watch the light shows and background music was being played.

St Giles High Street itself, had a steady stream of people walking towards Tottenham Court Road. Additionally, there were also small groups of people sitting on the provided static seating and benches, enjoying the warm evening. They were not engaged in any anti-social behaviour but were chatting with friends or on their mobile devices. This was the case throughout my observation period.

### **HERE - St Giles Circus, Denmark Place, London WC2H 8LH**

I attended HERE and spoke to Tristian Hoffman (DPS), Joe Richards (Venue Manager) and Robbie Nash (Director of Security) to establish what events were on that evening. It was explained to me that it was a ticketed event for a DJ Called James Blake and the capacity for the evening was 1,300 persons.

#### **(a) Venue/Event Security**

At 18:45 hours when I observed the management team, Robbie Nash begins to brief the security team regarding the statement of expectations and how the event was to be run. I also witnessed the check of the SIA badges making sure they were in order and displayed correctly. Additionally, high visibility jackets were being worn and all personnel were equipped with radio Link. The venues 'Event Management Plan' was in operation.

I was provided a copy of the venues 'upcoming events', which are risked assessed in advance by the security director, allowing for appropriate staffing levels to be implemented. This also allows for the effective and proportionate management of the event including ingress and egress from the venue, for each event.

The staffing numbers on this event were as follows:

Head of Security (HOS) =1

Security Supervisors =2

SIA Operatives = 18

CCTV-Command & Control

operator =1 Medic = 1

23 in total.

This is in excess of the accepted industry standard of the ratio 1-100 customers, and in excess of condition shown at Annex 1- Mandatory conditions no 4,5 and 6 within the premises licence.

Additionally, the venue / event security team is supplemented by the landlord's district Outernet security team who are on site 24/7. The site, which contains HERE

and the Lower Third has extensive CCTV coverage and a dedicated control room, and is compliant to the CCTV conditions within its premises licence.

At around 19:00 hrs I saw the ingress operation being set up as follows:

### **(b) Event Ingress**

The venues standard ingress route is via Denmark Street, running through the 'Arcade' and along Denmark Place to the front doors of the venue. It is demarked by pedestrian (PED) barriers and has a section of what I refer to as 'Snake' barriers, to slow down any queuing and allow further monitoring, this is managed by a team of security operatives. A supervisor monitors the length and movement of the queue, deploying staff where necessary to ensure an organised and swift ingress.

Additionally, I witnessed the ground teams, both from the venue and the district security CCTV operators monitoring the crowd dynamics from independent security operations control centre (SOC).

All attendees are physically engaged at three separate points before entering the venue:

### **(i) Screening**

Guests are 'screened' at the entrance to the 'Arcade' on Denmark St, where age verification checks and suitability checks are performed. Guests who are intoxicated or present themselves in a way not conducive to the standards of the venue, will not be admitted.

I found this system to be effective. This would be the first point of contact/risk and it would be at this point that the licensing objectives of 'Protection of children from harm' and 'The Prevention of Crime and disorder' would be implemented. Any associated risk would be mitigated at this point.

### **(ii) Accreditation**

Upon completing the initial screening, guests move forward to have their tickets scanned before entering the secure section of the queue through the 'Arcade', to the front doors, which is patrolled by venue and district security team to assess crowd dynamics and mood of those within the queue.

Again, I observed the tickets being physically scanned into hand-held devices by venue staff to ensure the tickets were purchased through the approved site. This along with the continued monitoring of persons, by the venue security as to conduct, in my view were supporting the Licensing objectives, namely "Prevention of crime and Disorder" and "Protection of children from harm" via the age verification scheme operated by the venue.



### (iii) Search

At the door entrance to the venue, the guests are processed through a security search, where all bags are checked as standard, and a personal search process is followed, depending on the risk assessment of the crowd.

Searching is NOT conditioned within the premises license, however it has been adopted by the venue as best practice. Attendees are therefore subject to search as a condition of entry. There are clear signs displayed at the entrance to the search area of prohibited items and the fact the venue operates a zero-drug policy.

I consider the adopted searching system, as well as the signage to be proactive measures in the promotion of the Licensing Objective  
“Prevention of Crime and

Disorder.” Please see the

diagram below.



I monitored the ingress process continuously and found it to be highly effective. The checks being conducted during points a-c, in my opinion promote the Licensing objectives. Whilst monitoring, there were no issues, no signs of intoxication, the customer mood was good humoured and there was no formation of queues.



### **(c) Noise**

Whilst the event was in operation I walked the circumference of the building line, to check for noise escape from the venues. I could not hear anything from Denmark Street in the South, St Giles High Street to the East, or Charing Cross Road to the West. The venue is “Cocooned” within the building line and this appears to form a noise barrier.

Additionally, I saw that the venue management team were deploying a noise monitoring machine. I spoke to the venue Manager, Joe Richardson who stated they had a noise policy, and that every 30 minutes from midnight to 0230hrs they conduct checks using an approved noise checking device. These checks are video recorded as well as called into the control room, who log them.

I also observed that the venue was displaying “Please respect our neighbours and leave quietly” signage.

### **(d) Smoking area**

This barriered smoking area is located directly outside the front doors to the venue and no drinks are allowed outside. The area is monitored by Security. There was some noise from this, however when I checked outside the building line as previously described regarding noise, it diminished significantly.

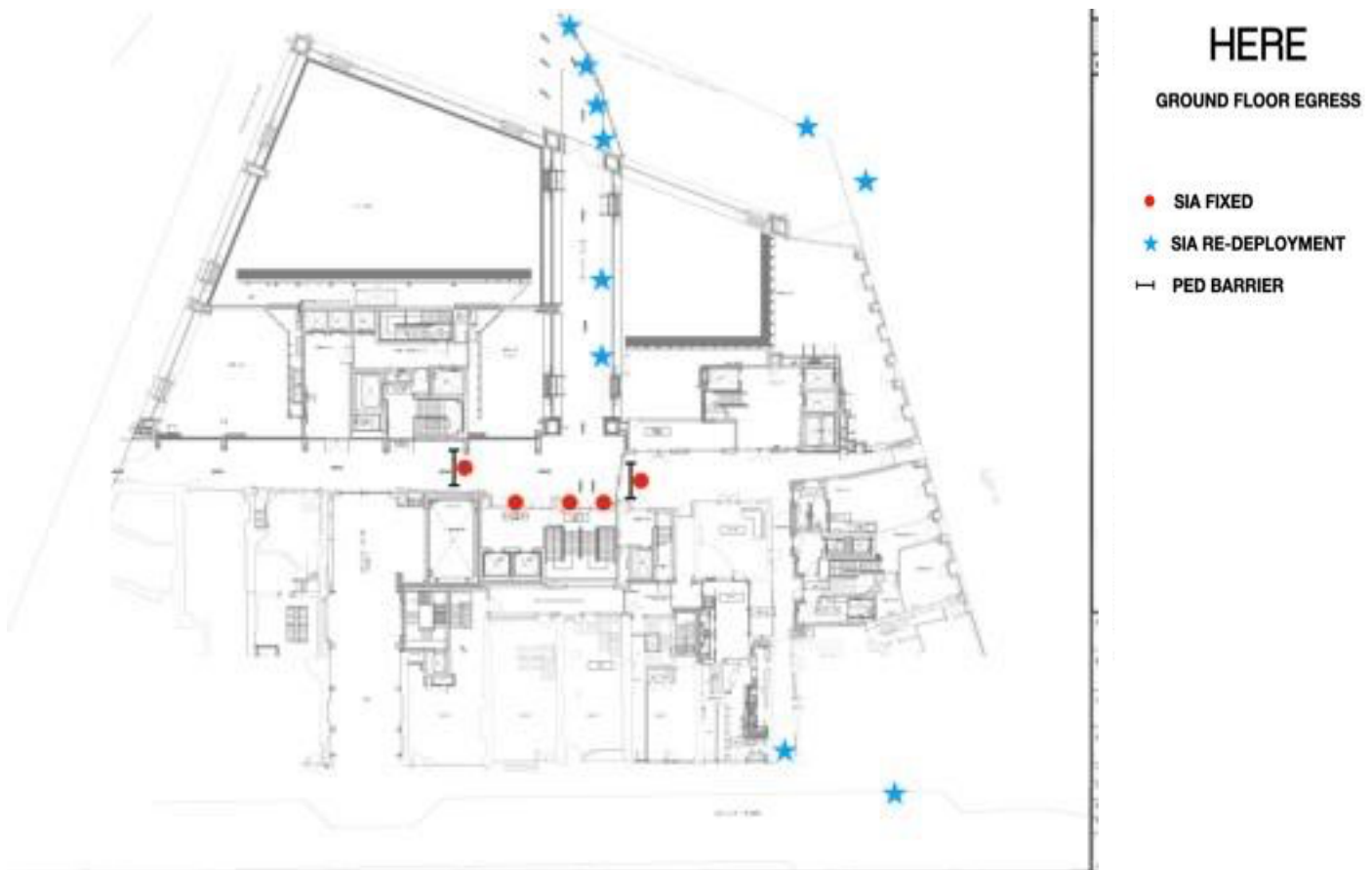
### **(e) Egress**

Late-Night events currently disperse a crowd on egress towards Tottenham Court Road tube station and Oxford Street between 02:00-02:30 hours.

Prior to the event finish time, a series of pedestrian barriers (PED) were placed at the Northern end of Denmark Place, creating a directional crowd flow towards Tottenham Court Road Tube and Oxford Street, away from the residences in St Giles Square comprising Centre Point and Centre Point House.

A team of operatives are deployed from the front doors of the venue, along Denmark Place and around the PED barrier outside of the station, to proactively direct the crowd towards the tube station or towards Oxford Street for night buses and the Elizabeth Line.

In addition, a roaming team is deployed to patrol St Giles Square where there are neighbouring residents, to ensure where possible that patrons of the venue are not congregating, by politely asking them to move on or keep noise to a minimum. The district security team also aid in encouraging the dispersal of guests, coordinating with the venue team and the night manager from local residences at Centre Point to minimise public nuisance and engaging with local authorities’ where necessary.



At 01:00hrs I positioned myself to the North of the venue in order to observe the Egress of customers as described in the venue management plan above. I observed that the building line created a natural walkway, with the only direction of travel being North away from the venue. PED barriers had been placed out as shown on the diagram.

During dispersal times I noticed the group comprised of a diverse mix of male and females, in the age range I believe to be late twenties to mid-thirties. They were well behaved and engaging with the security in a good-natured manner, which was replicated in return.

The Security team had two body worn cameras deployed at the exit point, as well as Security from the venue and Outernet security and they were asking persons to leave quietly, as per the plan above.

The entrance to Tottenham Court Road underground, on the East side and directly opposite the venue was closed for maintenance, but this appeared to have negligible impact on persons leaving the area. I noticed there was a small group of street drinkers present who were not associated to the venue, but they were chatting and not behaving in an anti-social manner.

The persons who had been at the venue, in the main dispersed towards Oxford Street with no anti-social behaviour or excessive noise that I witnessed.

**The Lower Third Cocktail Bar & Venue - 26 Denmark Street, London WC2H 8LH****(f) Event Ingress**

The venues standard ingress route is along Denmark Street, running through 'Hanks Alley' by the side of the Cocktail Bar, and left along Denmark Place to the front doors of the venue. It is demarked by PED barrier and managed by a security team.

A supervisor monitors the length and movement of the queue, deploying staff where necessary to ensure an organised and swift ingress. The Lower Third Cocktail bar operates ingress and egress from its front doors on Denmark St. In addition to the ground teams, both the Venue and the district security CCTV operators monitor the crowd dynamics from independent SOC rooms when in operation.

All guests are physically engaged at three separate points before entering the venue:

**(i) Screening**

Guests are 'screened' at the entrance to TLT club entrance on Denmark Place where age verification checks and suitability checks are performed. Guests that are intoxicated or present themselves in a way not conducive to the standards of the venue will not be admitted.

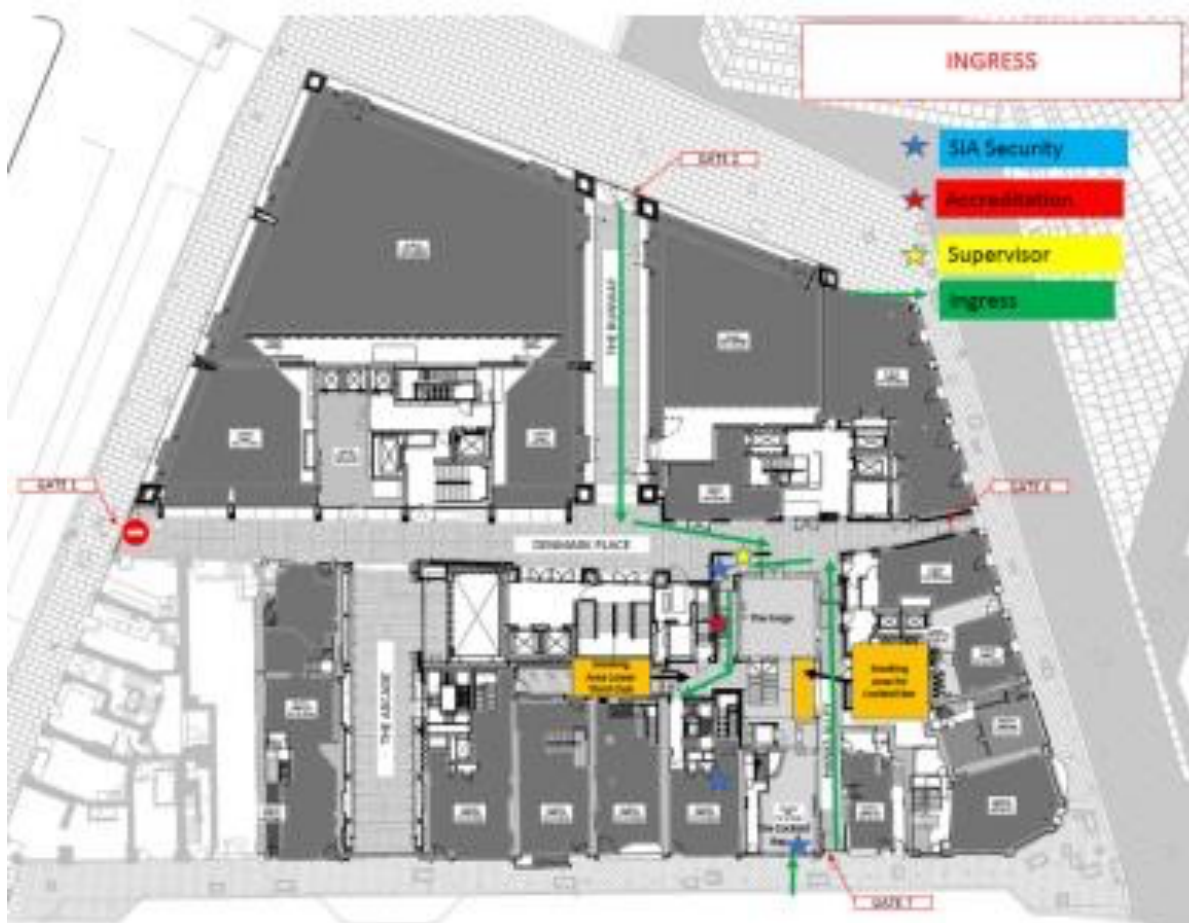
**(ii) Accreditation.**

Upon completion of the initial screening, guest checks are scanned before entering the secure section of the queue through the entry point to the Club Room entrance, which is patrolled by venue security to assess crowd dynamics in the queue.

**(iii) Search**

At entrance doors, guests are processed through a security search, where all bags are checked as standard, and a personal search process is followed depending on the risk assessment of the crowd.

This operation in effect replicates that of HERE.



Again, I observed the ingress to the venue, as described above, security wear wearing body worn video, for the reasons I give at point 11 above this actively promotes the licensing objectives of “Prevention of crime and disorder” and “Protection of children from harm”.

I observed that the Cocktail Bar closed just before midnight, there was no impact from this venue as numbers in attendance were very low, The Lower Third itself was low in numbers and certainly below 80 persons, the dispersal was via “Hanks Alley”, this again did not impact on the community in terms of noise or any anti-social behaviour/noise.

### **Egress Observation conducted on Saturday 8<sup>th</sup> July 2023 23:00 to 02:30 hours**

As I walked to the venue, I noticed the West End was much busier with a noticeable increase in footfall, than on Thursday. People were walking between locations, including the underground stations.

I arrived just after 22:30 hours and saw the same ingress barrier system in place as I observed on Thursday, described above at point 11. There was no queuing, but small numbers were still arriving and going through the same ingress procedures as previously described from Thursday.

The “Outernet” screens and recorded music were again in operation, with a steady flow of people within the attractions of the Now and Now Trending buildings.

The weather was fine, dry and warm with a breeze. The street lighting was in operation providing clear visibility.

I was asked to observe the Egress from the venue between the times shown, the event was ticketed for an artist called “Hitty” a house music event, with a capacity of 1,600.

The staffing numbers on this event were as follows:

Head of Security (HOS) =1  
 Security Supervisors =3  
 Security - Private SIA =2  
 SIA Operatives = 18  
 CCTV-Command & Control  
 operator = 1 Medic = 1

26 in total.

I spoke to The Head of Security Robbie Nash and requested a capacity check at 22:55hrs, this was recorded as 823.

At 23:30 hours I saw the Now and Now Trending venues being closed for the night and those in attendance self-dispersed towards Tottenham Court Road and Charing Cross Road.

The Lower Third cocktail bar closed at 23:45 hours. I did not witness any anti-social behaviour when the low numbers of customers left the venue via Denmark Street.

The basement venue within the Lower third was in operation until 02:00 hours, at the time of my visit around midnight there were about fifteen persons inside.

At the **HERE** venue and as previously described from Thursday’s observation, the smoking area was in operation with no drinks witnessed outside. There were about 60 persons inside the barriered area which was monitored by security from the venue. There was noise emanating from it, but again I checked from outside the building line, and this was barely audible.

From Midnight, I observed the same sound checks being conducted, by the venue management, as described at point 12 from Thursday's observations.

At around 00:20 hours, I returned to the front of the venue and again spoke to Robbie Nash regarding capacity numbers and was informed there was now 1,212 inside and that the last entry would be 01:00 hours. I conducted a walk of the building perimeter and noticed there were small mixed groups of males and females standing chatting and some sitting on the static seating in St Giles High Street/Square, these persons were not associated with the venue. I also saw that cars were parked on both sides of Denmark Street, but I could not state if they were attributable to any person attending the venue. I spoke to the district security supervisor, who was standing on Denmark Street at the junction with St Giles High Street who was observing the parking. He stated that they normally inform Camden Council Parking unit who would normally attend to ticket the vehicles, if appropriate.

The area around Tottenham Court Road underground by Centre Point was busy with pedestrians using the underground network. Additionally, there were people standing chatting or sat on the concrete seating eating takeaway food. Some street drinking was taking place, but these activities were not associated with the venue.

At 01:00 hours the venue began to set up the egress barrier system as shown in the diagram as previously mentioned at 14. From around 01:45 hours small numbers of customers began to leave the venue, travelling North towards Tottenham Court Road, these were good natured.

I spoke to Joe Richards, the venue manager, who pointed to a large screen at the top of the venue staircase, this I would say measured about 3 x 5 metres and is well positioned for those leaving to see, it displayed the following message:

**HERE**

**"THANK YOU FOR ATTENDING HERE AT OUTERNET. WE HOPE YOU HAVE  
ENJOYED YOUR EVENING.**

**PLEASE MAKE YOUR WAY TO THE NEAREST EXIT**

**PLEASE LEAVE THE AREA QUIETLY AND RESPECT OUR NEARBY  
RESIDENTS"**

From 01:45 hours, I saw several males NOT associated with the venue appear in Denmark Street from the direction of Charing Cross Road with nitrous oxide cannisters and balloons. They attempted to gain entry to the site via Denmark street "Arcade" entrance but were denied entry and directed away from the venue by the site security team.

At about 01:30 hours at the front of Tottenham Court Road entrance and opposite the exit to the venue, a male began to set up a sound system, again he came from the direction of Charing Cross Road (Soho). I saw the head of Security Robbie Nash approach him; a conversation took place which I could not hear, and the male packed up and moved back towards Soho.

There was now a steady stream of persons leaving the venue, the demographic I would describe as an 80/20 split of black males and females aged between early twenties to thirties. The venue and site security were asking them to leave quietly which they did, whilst in conversation with each other.

The security set up was as described in the venue's Egress Dispersal plan, which was further enhanced by the Outernet security team. The security was engaging with those leaving and pointing them away from the venue towards the underground station. I saw several nitrous oxide balloon sellers on the St Giles Square Side of the barriers and a small number of venue attendees managed to go through a small gap in the barrier line and went over to them, security acted quickly and managed to bring them back towards the barriered area.

As described in the Egress plan the security team formed a line and walked forward encouraging some people to move away North from the exit and away from St Giles Square towards the underground network and main arterial roads. They stopped roughly 40 metres from the exit point of the venue. They continued to monitor the location to ensure there were no incidents and dispersal was completed.

## **(6) CONCLUSION**

I found that overall, the premises were bright, modern and operating to a good standard. The cohesive working of the venue and staff and supported by the Outernet security team and control rooms, provided a safe relaxed atmosphere within a controlled area.

In addition to the premises licence conditions, the premises have an extensive venue management plan in place with its purpose to promote the four licensing objectives. The Dispersal Policy, specifically in relation to the ingress/egress I believe to be effective in the management and movement of persons to and from the venues.

The system deployed for ingress namely:

1. Screening
2. Accreditation
3. Search - see 11(c) comments from Thursday's observation.

This allows for the four licensing objectives to be implemented at the beginning of the event, and any mitigation put in place then to minimise any risk to the event.

The venue is proactive in monitoring noise escape and its possible effects on the local community by conducting its own sound checks on an approved sound device

and is conducted every 30 minutes from midnight to close. These checks are visually recorded and written logs contained within the control room.

The sites have extensive signage at the entrance/exits regarding age verification, no drinks are allowed outside and to respect the venue's neighbours when leaving. In addition, the large LED signage at the exit as described above would be seen by persons leaving due to its position at the top of the staircase on exit.

With reference to the nitrous oxide/balloon sellers and portable sound system, these elements were outside of the venues control, but they acted quickly and decisively in their dispersal and protection of the event attendees.

I acknowledge that the venues are located within the Cumulative Impact Zone (CIZ) and therefore there is a presumption contained within the Camden Statement of Licensing Policy that almost all new or variation applications will be refused if there are representations, because of cumulative impact. However, I acknowledge there are considerations as shown at reference points 6.20, 6.22 & 6.24 Camden Statement of Licensing Policy.

I hope from contents of this report, detailing my observations of the implementation of the venue's extensive proactive management plan and implementation of risk mitigation measures, regarding ingress/egress will assist all interested parties in this application.

Whilst compiling this report, I also considered the Licensing objectives and associated concerns/advice contained within Camden's Statement of Licensing Policy at pages 24 to 31 covering:

- Prevention of Crime and Disorder
- Measures to address Crime and Disorder
- Public Safety
- Public Nuisance and causes/Measures to address.
- Protection of children from harm



Respectfully submitted,

Brian Hunter



Independent Licensing Consultant -  
Patriot Licensing Tuesday 18th July  
2023.



**Brian Hunter**





6 Denmark Street, London, United Kingdom WC2H 8LX

Tel; [REDACTED]

**Letter of Support for Local Traders**  
**Here @ Outernet & The Lower Third**

06/07/23

To whom it may concern,

This letter looks to support the application for an extension of the licensing hours for both Here @ Outernet and The Lower Third.

Any measures that would allow these venues to continue to make the area more of a cultural and social hub can only stand to contribute to the long standing reputation of Denmark St. as a centre for music, arts and culture in London. As a local business in the music retail sector, we would hope that this would only have positive effects for ourselves and fellow music retailers over time.

With thanks,

No.Tom Guitars

Licensing Authority  
 London Borough of Camden  
 5 Pancras Square  
 London  
 N1C 4AG

Email: [REDACTED]

**Letter in Support of Premises Licence Variation Applications**

**PREM-LIC\110306 – The Lower Third, 26 Denmark Street, WC2H 8NL**

**PREM-LIC\110349 – HERE, St Giles Circus Site, Denmark Place, WC2H 8LH**

Dear Camden Licensing Authority,

I, Jamie Franklin from Roland Europe Group, write to you in support of the applications to extend the operating hours on the premises licences for The Lower Third and HERE at the Outernet venue.

Specifically, the applications seek:

- **to extend the hours for licensable activities on The Lower Third premises licence from 02:00am to 04:00am on Thursdays, Fridays and Saturdays;**
- **to extend the hours for licensable activities on the HERE premises licence on 154 occasions per year until 04:00am.**

We understand that additional conditions are being offered concerning security and safety measures and welfare and vulnerability engagement. We, at Roland, support all this as they will promote the licensing objectives of prevention of crime and disorder and prevention of public nuisance.

We strongly contend that the applicant upholds the following licensing objectives and will continue to do so if these applications are granted:

1. The prevention of crime and disorder;
2. Public safety;
3. Prevention of public nuisance; and
4. Protection of children from harm.

Late night venues have always been a cornerstone of the UK music and cultural scene. The loss of late night and live music venues across London in recent years has been well publicised and it is tragic to see so many premises, including those in Camden, to be closing or at serious risk following the pandemic and significantly increased costs.

What Outernet have created here is state-of-the-art venues that provide a platform for an incredible breadth of cultural public events. As well as hosting world-renowned musical acts and club nights, the venue provides an important platform for grassroots talent and non-profitable programming across the creative and cultural spectrum. There are few venues in Camden that can offer the kind of cultural richness that these venues can.

We also believe that it is important for well-run venues like this to have the backing and necessary resources for them to continue offering incredible opportunities to grassroots musicians and artists, and marginalised groups in the creative sphere.

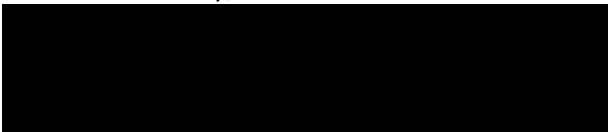
Attending events at HERE and The Lower Third have always been an amazing atmosphere in a safe and well-managed environment. We understand that for venues like these to remain successful that they need to be flexible and to be able to offer certain events that require a late licence.

We have every confidence that the operators of these two venues can operate licensable activities until 04:00am whilst continuing to successfully promote the licensing objectives referred to above.

We, at Roland, support both applications for later licences to provide an excellent, culture-focused late-night hub.

I have been to several events at HERE and The Lower Third and have been blown away by the professionalism, safety measures and attention to providing the best experience for the customer, as well as making sure the neighbours, like Roland, are also fully looked after. I hope we can see more!

Yours sincerely,



Jamie Franklin  
AR manager  
Roland Europe Group

**Sarah Williams**

---

**From:** Lisa Sharkey [REDACTED]  
**Sent:** 07 July 2023 16:56  
**To:** Sue Deacon  
**Subject:** FW: The Lower Third PREM-LIC\110306 - PREM-LIC\110349

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**From:** Tristan Hoffman [REDACTED] >  
**Sent:** Thursday, July 6, 2023 11:33 PM  
**To:** [REDACTED]  
**Subject:** Fwd: The Lower Third PREM-LIC\110306 - PREM-LIC\110349

Westside Sounds

Sent from [Outlook for iOS](#)

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**From:** Hotmail [REDACTED]  
**Sent:** Thursday, July 6, 2023 10:23:16 PM  
**To:** [REDACTED]  
**Subject:** RE: The Lower Third PREM-LIC\110306 - PREM-LIC\110349

**Letter in Support of Premises Licence Variation Applications**

**PREM-LIC\110306 – The Lower Third, 26 Denmark Street, WC2H 8NL**

**PREM-LIC\110349 – HERE, St Giles Circus Site, Denmark Place, WC2H 8LH**

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□

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We also believe that it is important for well-run venues like this to have the backing and necessary resources for them to continue offering incredible opportunities to grassroots musicians and artists, and marginalised groups in the creative sphere.

Attending events at HERE and The Lower Third have always been an amazing atmosphere in a safe and well-managed environment. We understand that for venues like these to remain successful that they need to be flexible and to be able to offer certain events that require a late licence.

We have every confidence that the operators of these two venues can operate licensable activities until 04:00am whilst continuing to successfully promote the licensing objectives referred to above.

We support both applications for later licences to provide an excellent, culture-focused late-night hub.

Yours sincerely,

Andy Rowberry

Westside Mi

Sent from my iPhone

## HERE

### **Annex 2 - Conditions consistent with the operating schedule**

19. The sale of alcohol at the premises shall be at all times ancillary to the use of the [premises](#) as a multi-purpose auditorium space. The sale shall be restricted to such occasions as exhibitions; retail events; live pre-recorded music; product launches; fashion shows; film screening; events and conferences, and the like kind.
20. Although the HERE and The Now Building and Now Trending are separate, they shall work in tandem in accordance with the Venue Management Plan and the Event Management Plan to maintain the operational integrity of the site.
21. An event management plan will be prepared for each event and shall be served upon the Police and Environmental Health a minimum of 14 working days ahead of an event for information.
22. The Event Management Plan will include the provision of a designated smoking area and management thereof; provision of a dispersal policy to ensure the safe and quiet movement of people from the area; the provision of additional pop-up toilets (when necessary); provision of a queue management strategy; public safety and security arrangements.
23. The Premises Licence Holder shall provide the Licensing Authority and Police with a list of upcoming events each quarter (or as otherwise agreed with the Licensing Authority and Police) and shall provide such information as is requested by the Licensing Authority and/or Police to assess the potential impact of specific events upon the Licensing Objectives.
24. There shall be no off-sales of alcohol, with the exception of alcohol sold during an exhibition event held at the premises, which is packaged to take home and which is not intended for immediate consumption off the premises.
25. The premises Licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.
26. The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access (**except toilets and changing areas**).
27. The CCTV camera views are not to be obstructed.
28. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the exits in order to capture clear facial images of all persons leaving the premises.
29. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority ~~upon~~ **within 48 hours of** request.

30. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the Police or an authorised officer in obtaining the CCTV footage.
31. The facility to transfer the images to a compatible, removable format shall be held on the premises.
32. Notices shall be displayed within the premises warning customers about personal thefts; and to be vigilant.
33. The venue shall supply and fit to every static table or counter, suitable anti-theft devices, such as table/counter clips, in order that customers may secure their bags.
34. When the venue is open for licensable activities, the toilets are to be checked by staff at least every two (2) hours and these checks are to be documented on each visit.
35. All flat surfaces in toilet cubicles, including any toilet roll holder eclipses, are to be 'designed-out' in order to prevent drug misuse.
36. At least one member of the management team on duty whilst the premises remain open for the sale of alcohol is to hold a personal license under the Licensing Act 2003.
37. A management document is to be drawn up, maintained, and amended as required which will deal with the following:
  - a) Definition of promotions, events and bookings;
  - b) Procedure for the management of each category;
  - c) Security procedures including the reporting of incident;
  - d) Procedure for ensuring promoters are informed of and are managed in such a way as to promote the Licensing Objectives and ensure compliance with the conditions on the premises Licence;
  - e) Response plan and management structure in the event of an emergency.
38. In relation to any event involving a promoter, their associates, DJ(s) or artists(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit then:
  - a) The licensee shall complete a full risk assessment via open source material reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least ~~7 days~~ 14 days before the event occurs on email [EK-Licensing@met.police.uk](mailto:EK-Licensing@met.police.uk).
  - b) The licensee shall notify Camden Police Licensing Team via the same email if there are any high risk events or any unusual or large scale events (due to occur within less than ~~7 days~~ 14 days as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.



- c) Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determined that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.
39. In relation to all other musical events, the Local Camden Police Licensing Team shall be contacted no less than 14 days prior to the event to request if, a full Search Policy is required of all customers.
  40. No persons carrying visibly open alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activity.
  41. No patron shall be allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle whether empty or containing any beverage, other than permitted off-sales.
  42. A challenge 25 policy will be enforced, where any person reasonably looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of identity will be those with photographic identification documents recognised in the Home Office guidance, including passports, photo-card driving licence, military ID cards or proof of age card bearing the PASS hologram.
  43. A sign shall be displayed at the point of sale stating No Proof of Age - No Sale.
  44. The venue shall not engage the service of street promoters to encourage clientele to attend the venue.
  45. Regular glass collection shall be undertaken by staff where the sale of alcohol is occurring at the premises.
  46. Police must be called to incidents of violence and /or disorder.
  47. Signage shall be displayed in a prominent position on the premises requesting that customers leave quietly.
  48. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
  49. Where the sale of alcohol is occurring after 20:00 hours then door staff shall be present at least 1 hour prior to the commencement of the event.

The door staff shall be employed to a ratio of 1:100. The following additional requirements apply in relation to those door staff:

a) There will be a minimum of one (1) female SIA-registered door supervisor on duty when security are required.

b) A door supervisors register shall be updated on occasions when door supervisors are employed. The Register is to be made available for Inspection by the Police and/or Licensing Authority. Details to show:

- Full Name.
- Date of Birth.
- SIA Registration Number.
- Date and Hours Worked; and
- Contact telephone number and email address.

c) A coloured photocopy of each door supervisors' SIA badge shall be taken by the DPS and retained at the premises.

d) They will wear high visibility jackets or vests or high visibility arm bands whilst working at entry/exit points and around the exterior of the building.

e) They shall remain on duty for half an hour after the close of the venue to ensure all patrons are dispersed peacefully from the area.

50. Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept **and maintained** clear.
51. Where the premises is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary, **and to ensure that customers do not bring drinks into the smoking area.**
52. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.
53. Details of instances of disorder, damage to property or personal injury shall be recorded in an incident book kept at the premises. Such details shall be made available for inspection by the Police and other Responsible Authorities upon request.
54. The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other Responsible Authorities upon request.
55. The licensee shall ensure that staff are trained as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons underage. This training is to be clearly documented **and signed** and any training for future staff must also be organised at the appropriate time. **Refresher training shall be carried out every 6 months.** Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.
56. Where any illegal substance is found within the premises then a record shall be made in the incident book **by a duty manager.** Any illegal substance shall be stored securely pending collection by the Police unless they are present on site and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book **by a duty manager.**

57. Where available, a responsible member of staff shall join the local pubwatch or other such local crime reduction scheme approved by the Police.
58. All security staff, stewards and management will be connected by a secure channel hand-held radio system.
59. Staff shall be fully trained on safety issues, including fire safety and management shall carry out regular inspections of the premises.

**Informative:** The below is for information purposes and is not intended to form a condition of the licence):

If a planned event in the here is likely to result in a maximum attendance event then (following risk assessment) The Now Building and Now Trending may be closed off in order that it may operate as a ticket hall and audience holding area.

60. On completion of the works and before the public are admitted, the premises must comply with the requirements of the District Surveyors Association and the Association of British Theatre Technicians 'Technical standard for Places of Public Entertainment' (if applicable)
61. Patrons wishing to smoke will not be permitted to take drinks outside with them.
62. Amplified sound shall not be audible at 1 meter from the facade of any noise sensitive premises.
63. That an Events Noise Management Plan is developed to the satisfaction of the Noise Team to cover any occasion where there is potential for sound breakout beyond the premises boundary, and where sound equipment is added to the existing in-house equipment for a particular event or function. The Noise Management Plan required by virtue of planning shall be updated by the Premises Licence Holder from time to time as appropriate and the Premises Licence Holder shall be bound by the plan. A copy of the Events Noise Management Plan and the Noise Management Plan shall be retained at the premises and made available for inspection by the relevant authorities.
64. That if deemed appropriate by the Environmental Health Team prior to the premises trading under this licence then a noise limiter be installed, located in a separate and remote lockable cabinet from the volume column must be fitted to any musical amplification system and set at a level determined by and to the satisfaction of the Noise Team. The limiter shall not be altered without prior agreement.
65. A Notice shall be fixed in a prominent position near exits reminding [customers](#) that this is a residential area and requesting patrons to leave quickly and quietly.
66. The Event Management Plan sets out measures to be taken to ensure effective communication with surrounding residents and businesses concerning planned events.
67. The premises will use the central waste collection point provided as part of the development.

68. There is a lost children's policy contained within the Event venue Management Plan.
69. A proof of age scheme shall operate at the premises and staff shall be trained in its use, e.g. Challenge 25.
70. The premises will implement a dispersal policy and all relevant staff will be trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the ~~gallery~~ venue after 23:30 ~~until close of business~~ to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or East/West on Oxford Street/New Oxford Street. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The Policy will be reviewed regularly and whenever the Licensee becomes aware of issues associated with dispersal. **To support effective and swift dispersal of customers away from the premises, the head of security and venue's CCTV operatives shall liaise and consult with the CCTV operatives within the Outernet central control room.**
71. Servicing will take place between 08:00 and 20:00 hours Monday to Sunday and Public/Bank Holidays and will be from the Denmark Street loading bays. (This shall not apply to event equipment and refuse storage and collection which is dealt with by the Service Management Plan approved as part of the S106 agreement and developed to the satisfaction of the Environment Health Team).
72. That a 'Service Management Plan' be developed to the satisfaction of the Environmental Health Team, detailing the management of deliveries and servicing which shall include arrangements for the collection and delivery of event equipment, and refuse storage and collection; that the Service Management Plan be updated by the Premises Licence Holder from time to time as appropriate. The Premises Licence Holder shall be bound by the Service Management Plan. A copy of the plan shall be retained at the premises and made available for inspection by the relevant authorities.
73. ~~At least 2 (two) SIA door supervisors (to include the door supervisor working on the main entrance) who are on duty as required by the licence conditions shall wear body worn cameras. Management of the venue to ensure these cameras are working before deployment. In the event of an incident, the footage must be made available to Police or Local Authority upon request. The licence holder shall ensure that a suitable, expeditious playback/downloading system is in place to enable the Police to obtain any evidential footage. In the event of an incident, body worn camera footage will be stored for a minimum of 44 days~~ **31 days** ~~and must be made available to Police upon request.~~
74. ~~All permanent staff working in the evening and security staff to undertake welfare of and vulnerability engagement (WAVE) training and a record to be kept of this.~~
75. ~~On any occasion the premises operate licensable activities beyond midnight relying upon the seasonal variations permitted then there shall be no new admissions to the premises after 02:30~~ **02:00** ~~hours with the exception of VIPs, guest list and / or pre-sold ticket holders. A record of such entries after 02:30~~ **02:00** ~~hours shall be maintained and made available for inspection by responsible authorities.~~ **There shall**

be no new admissions to the premises after 02:00 hours with the exception of VIPs. A record of such entries after 02:00 hours shall be maintained and made available for inspection by responsible authorities.

76. The premises shall maintain a complaints log detailing the nature of the complaint, complainant (if known), and any action taken. The log to be made available for inspection by Environmental Health upon reasonable request.
77. Safety Inspection Certificates (which shall be maintained up to date) shall be available on site for inspection by Authorised Officers.
78. The premises shall ensure that an enhanced Risk Assessment shall be carried out to determine how many disabled customers they can safely accommodate and vacate in the event of an emergency.

**The Lower Third**

**Amended 18.7.2023**

**Annex 2 - Conditions consistent with the operating schedule**

15. The premises licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police. **CCTV to cover all areas where the public have access to (except toilets and changing areas).**
16. The CCTV system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
17. The CCTV camera views are not to be obstructed.
18. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the exits to capture clear facial images of all persons leaving the premises.
19. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority ~~upon~~ **within 48 hours of** request.
20. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the Police or an authorised officer in obtaining the CCTV footage.
21. The facility to transfer the images to a compatible, removable format shall be held on the premises.
22. Notices shall be displayed within the premises warning customers about personal thefts; and to be vigilant.
23. The venue shall supply and fit to every static table or counter, suitable anti-theft devices, such as table/counter clips, in order that customers may secure their bags.

24. When the venue is open for licensable activities, the toilets are to be checked by staff at least every two (2) hours and these checks are to be documented on each visit.
25. All flat surfaces in toilet cubicles, including any toilet roll holder eclipses, are to be 'designed out' in order to prevent drug misuse.
26. In relation to any event involving a promoter, their associates, DJ(s) or artist(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for a profit then:
  - a. The licensee shall complete a full risk assessment via open source material, reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least 7 days before the event occurs on email [EK-Licensing](#) [REDACTED].
  - b. The licensee shall notify Camden Police Licensing Team via the same email if there are any high-risk events or any unusual or large scale events (due to occur within less than 7 days) as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.
  - c. Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determines that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.
27. No persons carrying visibly open alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activity.
28. "A Challenge 25 policy will be enforced, where any person reasonably looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of Identity will be those with photographic identification documents recognised in the Home Office guidance, including passports, photo-card driving licence, military ID cards or proof of age card bearing the PASS hologram."
29. A sign shall be displayed at the point of sale stating No Proof of Age - No Sale.

30. The venue shall not engage the service of street promoters to encourage clientele to attend the venue.-
31. Regular glass collection shall be undertaken by staff where the sale of alcohol is occurring at the premises.
32. Police must be called to incidents of violence and /or disorder.
33. Signage shall be displayed in a prominent position on the premises requesting that customers leave quietly.
34. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
35. The need for door supervisors shall be risk assessed taking cognizance of Police advice. Where door supervisors are employed then a register shall be maintained which shall be available for inspection by the Police and/or Licensing Authority. Details to show: • Full Name. • Date of Birth. • SIA Registration Number. • Date and Hours Worked; and • Contact telephone number and email address. A colour photocopy of each door supervisors SIA badge shall be taken by the DPS and retained at the premises. Door supervisors will wear high visibility jackets or vests or high visibility arm bands whilst working at entry/exit points and around the exterior of the building.
36. Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept clear.
37. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff to ensure that there is no public nuisance or obstruction to the public highway.
38. Details of instances of disorder, damage to property or personal injury shall be recorded in an incident book kept at the premises. Such details shall be made available for inspection by the Police and other responsible authorities upon request.



39. The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other responsible authorities upon request.
40. The licensee shall ensure that staff are trained as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons underage. This training is to be clearly documented [and signed](#) and any training for future staff must also be organised at the appropriate time. [Refresher training shall be carried out every 6 months](#) and details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.
41. Where any illegal substance is found within the premises then a record shall be made in the incident book by a [duty manager](#). Any illegal substance shall be stored securely pending collection by the Police unless they are present on site, and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book [by a duty manager](#).
42. Where available, a responsible member of staff shall join the local pub watch or other such local crime reduction scheme approved by the Police.
43. All security staff and management will be connected by a secure-channel handheld radio system or similar communications device.
44. Staff shall be fully trained on safety issues, including fire safety and management shall carry out regular [safety](#) inspections of the premises [before members of the public are allowed on to the premises and after close of business](#).
45. Amplified sound shall not be audible at 1 metre from the facade of any noise sensitive premises.
46. That if deemed appropriate by the Environmental Health Team prior to the premises trading under this licence then a noise limiter be installed, located in a separate and remote lockable cabinet from the volume column must be fitted to any musical amplification system and set at a level determined by and to the satisfaction of the Noise Team. The limiter shall not be altered without prior agreement.
47. A Notice shall be fixed in a prominent position near exits reminding customers that this is a residential area and requesting patrons to leave quickly and quietly.

48. The premises will use the central waste collection point provided as part of the development.
49. The premises will implement a dispersal policy and all relevant staff will be trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the club after 23:00 to disperse West along Denmark St towards Charing Cross Road and / or towards Tottenham Court Road tube and Oxford Street and then to disperse North or South. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The policy will be reviewed regularly and whenever the licensee becomes aware of issues associated with dispersal.
50. Servicing will take place between 08:00 and 20:00 hours Monday to Sunday and Public/Bank Holidays and will be from the Denmark Street loading bays. (This shall not apply to event equipment and refuse storage and collection which is dealt with by the Service Management Plan approved as part of the S106 agreement and developed to the satisfaction of the Environment Health Team).
51. That a 'Service Management Plan' be developed to the satisfaction of the Environmental Health Team and detail the management of deliveries and servicing which shall include arrangements for the collection and delivery of event equipment, refuse storage and collection; that the Service Management Plan be updated by the Premises Licence Holder from time to time as appropriate. The Premises Licence Holder shall be bound by the Service Management Plan. A copy of the plan shall be retained at the premises and made available for inspection by the relevant authorities.
52. Maximum capacity shall not exceed 350 persons (excluding staff).
53. **A minimum of 2 SIA shall be on duty from 22:00 hours on all nights where both floors are open for licensable activities beyond midnight. SIA shall ensure all patrons are dispersed from the immediate area outside the venue at the end of operating hours and, to aid the swift and effective dispersal of customers away from the venue, the head of security will communicate and liaise with CCTV operatives within the Outernet central security control room.**

54. A duty manager, head door and core staff working on said night or event shall stay 30 minutes after close to actively help with dispersal and to ensure that the premises is completely devoid of members of the public.
55. When door supervisors are required, there will be a minimum of 1 (one) SIA registered door supervisor permanently working on the main entrance. There will be a minimum of 1 (one) female SIA registered door supervisor on duty when security is required.
56. From 22:00 hours, no drinks shall be allowed in the smoking area and the area shall be monitored by premises staff and/or an SIA registered door supervisor to monitor capacity and restrict access when necessary.
57. At least 2 (two) SIA door supervisors (to include the door supervisor working on the main entrance) who are on duty as required by the licence conditions shall wear body worn cameras. Management of the venue to ensure these cameras are working before deployment. In the event of an incident, body worn camera footage shall be stored for a minimum of ~~14~~ 31 days and must be made available to police upon request. The licence holder shall ensure that a suitable, expeditious playback/downloading system is in place to enable the police to obtain any evidential footage.
58. All permanent staff working in the evening and security staff to undertake welfare of and vulnerability engagement (WAVE) training and a record to be kept of this. The premises to ensure this before operating under this new licence if granted.
59. The premises will in the late evenings operate predominantly as an entertainment venue, providing a mix of musical entertainment; performances; events and screenings linked to music and/or artists; and entertainment of a similar nature, (which could include products launches; exhibitions; fashion shows; retail events, and the like kind).
60. There shall be no new admissions to the premises after ~~02:30~~ 02:00 hours.
61. No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises which gives rise to a nuisance.

62. The premises shall maintain a complaints log detailing the nature of the complaint, complainant (if known) and any action taken. The log to be made available for inspection by Environmental Health upon reasonable request.
63. The premises shall ensure that an enhanced Risk Assessment shall be carried out to determine how many disabled customers they can safely accommodate and vacate in the event of an emergency.
64. Safety Inspection Certificates (which shall be maintained up to date) shall be available on site for inspection by Authorised Officers.

HERE, St Giles Circus Site, Denmark Place, London, WC2H 8LH  
The Lower Third, 26 Denmark Street, London WC2H 8NL.

Link to petition in support of the variation applications for HERE and The Lower Third to extend hours:-

[https://www.change.org/p/here-at-outernet-the-lower-third-licence-extension?recruiter=1311731244&recruited\\_by\\_id=4dc85140-1b3e-11ee-a3c2-79c1ea52dc43&utm\\_source=share\\_petition&utm\\_medium=copylink&utm\\_campaign=petition\\_dashboard&fbclid=IwAR10G5ClrVgkr5rzVZzR6MlhF2ve4cmCrWmysdWVnc3uA615whFI45bUz6Y](https://www.change.org/p/here-at-outernet-the-lower-third-licence-extension?recruiter=1311731244&recruited_by_id=4dc85140-1b3e-11ee-a3c2-79c1ea52dc43&utm_source=share_petition&utm_medium=copylink&utm_campaign=petition_dashboard&fbclid=IwAR10G5ClrVgkr5rzVZzR6MlhF2ve4cmCrWmysdWVnc3uA615whFI45bUz6Y)

**Schedule of Late Night Entertainment Venues  
which have ceased trading in the locality due  
to the Crossrail Development.**

<p>Sin 144 Charing Cross Road London WC2H 0LB</p> <p>Capacity - 800</p>	<p><u>Alcohol:-</u> Sunday to Wednesday 11:00 to 05:00 Thursday to Saturday – 11:00 to 06:00</p> <p><u>Recorded Music; Live Music; Performance of Dance (also had Facilities for Making Music and Dancing):-</u> Sunday to Thursday 09:00 to 06:00 Friday and Saturday 09:00 to 07:00</p> <p><u>Similar (Burlesque &amp; Nude Dancing):-</u> Monday to Thursday 17:00 to 04:00 Friday and Saturday 17:00 to 07:00 Sunday 21:00 to 04:00</p> <p><u>Opening Hours:-</u> Unrestricted</p>
<p>Austoria Theatre 157 Charing Cross Road London WC2H 0EN</p> <p>Capacity - 2000</p>	<p><u>Alcohol:-</u> Monday to Saturday 10:00 to 03:00 Sunday 12:00 to 22:30</p> <p><u>Performance of Dance, Live Music, Recorded Music, Anything of a Similar Description (also had Facilities for Making Music and Dancing):-</u> Monday to Friday 09:00 to 06:00 Saturday 06:00 to 06:00 Sunday 06:00 to 22:30</p> <p><u>Exhibition of Films:-</u> Monday to Saturday 00:00 to 00:00 Sunday 06:00 to 22:30</p> <p><u>Late Night Refreshment:-</u> Monday to Saturday 23:00 to 05:00</p>

## Schedule of Late Night Entertainment Venues.

	<u>Opening Hours:-</u> Monday to Friday 09:00 to 06:00 Saturday 06:00 to 06:00 Sunday 06:00 to 22:50
Astoria 2 165 Charing Cross Road London WC2H 0HR  Capacity - in Basement - 1000	Performance of Dance, Live Music, Recorded Music, Anything of a Similar Description, <u>(also had Facilities for Making Music and Dancing):-</u>  Saturday to Sunday 06:00 to 06:00 Monday to Friday 09:00 to 06:00  <u>Exhibition of Films:-</u> Monday to Sunday 06:00 to 06:00  <u>Late Night Refreshment:-</u> Monday to Sunday 23:00 to 05:00  <u>Opening Hours:-</u> Saturday to Sunday 06:00 to 06:00 Monday to Friday 09:00 to 06:00



**Robbie Naish**

**Consultant/ Practitioner**

**Outernet Venues London Ltd**

[REDACTED]

[REDACTED]

## **Risk Management & Event Security Solutions**

### **Education & Qualifications**

- FdA Crowd Management and Risk Analysis Bucks University.
- Level 4 Award in Education and Training.
- Qualified SIA Close Protection operative.
- Level 3 Award in First Aid.
- Level 5 diploma in crowd science and risk analysis.
- CSAS Traffic Management Award.
- Risk Management certificate, West Sussex Fire Brigade.
- Counter terrorism certificate – PROTECT.
- Currently Studying for a NEBOSH International Diploma.

### **Professional Profile**

- An international crowd management consultant specializing in large and small-scale gatherings, in built venues and green field site environments.
- Recognized internationally as an authority in crowd safety management.
- An accomplished crowd management and risk teacher and lecturer.
- Senior manager for security and crowd management teams at major events and nighttime economy venues.
- Senior teacher assessor and IQA Security Portfolio.
- Lecturer at the European Safety Advisory Group.
- Former British and UK Firefighter.



Currently, I am the Director of Security and Crowd Management for Outernet Venues London Ltd. My role is to oversee and implement security and crowd management plans and procedures for the safe operation of HERE & The Lower Third, overseeing the deployments, liaising with clients and stakeholders, providing detailed crowd management plans and security reports, when requested. I am also responsible for developing site surveys and dealing with the everyday operational requirements.

My experience started over 20 years ago with my first task working as a Close Protection Operative looking after A list music celebrities. This role involved carrying out site surveys of small and large venues and entertainment spaces globally, carrying out risk assessments and putting in place crowd and security management plans that ensured that each event ran smoothly and that all the stake holders involved were kept up to date with any intrusions and disruption expected.

Traveling around the world allowed me to master my skills and understanding of event spaces big and small. In 2004, I took up the role as training director for Show and Event Security, who are a London based security events company which had contracts with Somerset House, The Royal Albert Hall, Alexandra Palace, Wembley Stadium to name a few. My role stretched to senior operations manager for some of the UK's biggest events that included, London New Years Eve Fireworks, The IOW, V festival and many other events, such as Royal Weddings and large and small events within Central London. These roles involved me carrying out crowd and security management plans that worked for all those involved or affected by the events.

In 2016, I was employed by the Square Metre Group to deliver the Level 5 Diploma in Crowd Science and Risk Analysis. This role involved me traveling around the world delivering all the aspects of Crowd Science including, site surveys, crowd risk profiling and the implementation of crowd security risk management plans for different clients. They included police forces, festivals and venue event management teams and councils in the UK and abroad. During the Covid lock downs I continued to deliver these courses online for students from the UK and abroad.

I am currently working on developing a new course for operating music venues. This will provide a more in-depth understanding of how these venues should operate to deliver safe and secure performances, and understanding how these affect the local communities where they take place.

Operationally, I work as the Security Director for Outernet Venues London Ltd. I am also involved in two festivals. I am a Bronze/ Silver sector manager for Glastonbury Festival. My role is to oversee and advise 12 different venues within the Southeast Corner sector of the event. I am Security Director for the Green Man Festival, and my role is working closely with the festival organisers to oversee the security and crowd management operation.

Crowd Profiling every event is one of my most important roles. Profiling allows me to develop an in-depth understanding of each event which I can then use to develop a risk assessment for each event. My risk assessment is broken down into 6 phases that include:

**Arrival** - Understanding how an audience will arrive to a venue, i.e., public transport, car, on foot etc.

**Last Mile** - The route from arrival to venue.

**Ingress** - How the audience enters the venue.

**Circulation** - How the audience moves around the different spaces of an event.

**Egress** - How an audience leaves a venue.

**Dispersal** - What happens and how an audience disperses away from a venue.

## **Experience & Overview of Major Projects and Current positions**

- Outernet Venues London (Current)
- Glastonbury Festival Venues (Current)
- The Green Man Festival (Current)
- Level 5 Crowd Science and Risk Analysis Lecturer (Current)
- Security and Crowd Management auditor (Current)
- The IOW Festival (Current)
- Splendour Venue and Festival Events Australia (Current)
- Tour De France UK (2006 & 2012)
- London New Years Eve Fireworks (2003-2017)
- Fall Festival Byron Bay/ Perth Australia (Current)
- Major Events Coordinator Hong Kong (2016-2017)
- Queens Royal Events Buckingham Palace (2004- 2017)
- Commonwealth Games Scotland
- Personal Security Close Protection Music Industry A lists Advance and venue specialist.
- Back Stage Security for UK and international events advisor (current)

## **Summary**

My knowledge backed up with years of operational experience makes me one of the leaders in the security and crowd management industry. Working with venue and event organisers as their eyes and ears for security & crowd management operations to ensure that licensing law is adhered to on all levels of operations of the venue.

## **Specialities:**

Crowd Dynamics and Risk Analysis, Leadership and Management and Quality assurance.





London Borough of Camden, 5 Pancras Square, London N1C 4AG

### Premises Licence

London Borough of Camden Licensing Authority

**Premises licence number**  
PREM-LIC\110349

#### Part 1 – Premises details

##### Postal address of premises, or if none, ordnance survey map reference or description

HERE  
St Giles Circus Site  
Denmark Place  
London  
WC2H 8LH

**Telephone number** N/A

##### Where the licence is time limited the dates

The licence variation for Sunday 2nd July 2023 from 00.00 – 04.00 only

##### Licensable activities authorised by the licence

Retail of Alcohol:	Yes
Late Night Refreshment:	Yes
Plays	Yes
Films	Yes
Indoor Sporting Events	Yes
Boxing or Wrestling Entertainment	Yes
Live Music:	Yes
Recorded Music:	Yes
Performance of Dance:	Yes

##### The times the licence authorises the carrying out of licensable activities

Retail of Alcohol:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Late Night Refreshment:	
Monday - Thursday	23:00 - 23:30
Friday - Saturday	23:00 - 00:00

Plays:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Films:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Indoor Sporting Events:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Boxing or Wrestling Entertainment:	
Monday - Thursday	
Friday - Saturday	10:00 - 23:30
Sunday	10:00 - 00:00
	11:00 - 22:30
Live Music:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Recorded Music:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Performance of Dance:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30

### Seasonal Variations

On 104 occasion per calendar year, the terminal hour shall be extended Until 02:00 the following morning. Such occasions to be notified to the Police and the Licensing Authority 14 days prior. (if the premises elect to trade beyond 01:00 hours on the commencement of British Summertime The permitted hours shall be permitted for a further 1 hour.)



**For Supporting Communities, on behalf of the Licensing Authority**



**Date Licence Amended: 30/06/2023 - APP\PREMISES-VARY\114910**  
**Date Licence Amended: 06/09/2022 - APP\PREMISES-MVARY\111502**  
**Date Licence Amended: 10/05/2022 - APP\PREMISES-TRANS\109984**  
**Date Licence Granted: 15/04/2021 - APP\PREMISES-NEW\104249**

## Annex 1 - Mandatory conditions

1. The supply of alcohol is prohibited at a time when there is no designated premises supervisor in respect of the premises.
2. The supply of alcohol is prohibited at a time when the designated premises supervisor does not hold a personal licence or his/her licence is suspended.
3. Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.
4. Where a premises licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, the licence must include a condition that each such individual must
  - (a) be authorised to carry out that activity by a licence granted under the Private Security Industry Act 2001; or
  - (b) be entitled to carry out that activity by virtue of section 4 of that Act.
5. But nothing in subsection (4) requires such a condition to be imposed -
  - (a) in respect of premises within paragraph 8(3)(a) of Schedule 2 to the Private Security Industry Act 2001 (c. 12) (premises with premises licences authorising plays or films), or
  - (b) in respect of premises in relation to -
    - (i) any occasion mentioned in paragraph 8(3)(b) or (c) of that Schedule (premises being used exclusively by club with club premises certificate, under a temporary event notice authorising plays or films or under a gaming licence), or
    - (ii) any occasion within paragraph 8(3)(d) of that Schedule (occasions prescribed by regulations under that Act).
6. For the purposes of this section
  - (a) "security activity" means an activity to which paragraph 2(1)(a) of that Schedule applies[ and which is licensable conduct for the purposes of that Act (see section 3(2) of that Act)], and
  - (b) paragraph 8(5) of that Schedule (interpretation of references to an occasion) applies as it applies in relation to paragraph 8 of that Schedule.
7.
  - (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.
  - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the



premises

(a) games or other activities which require or encourage, or are designed to require or encourage, individuals to

(i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or

(ii) drink as much alcohol as possible (whether within a time limit or otherwise);

(b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

(c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;

(d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;

(e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability).

8. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.
9.
  - (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.
10. The responsible person must ensure that
  - (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed

container) it is available to customers in the following measures

- (i) beer or cider: ½ pint;
- (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
- (iii) still wine in a glass: 125 ml;
- (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and
- (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.

11. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
12. For the purposes of the condition set out in paragraph 11
  - (a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979
  - (b) “permitted price” is the price found by applying the formula
 
$$P = D + (D \times V)$$
 where
    - (i) P is the permitted price,
    - (ii) D is the rate of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
    - (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
  - (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence
    - (i) the holder of the premises licence,
    - (ii) the designated premises supervisor (if any) in respect of such a licence, or
    - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;
  - (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and
  - (e) “valued added tax” means value added tax charged in accordance with the Value Added Tax Act 1994.
13. Where the permitted price given by Paragraph (b) of 12 above would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-

paragraph rounded up to the nearest penny.

14. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day ("the first day") would be different from the permitted price on the next day ("the second day") as a result of a change to the rate of duty or value added tax.  
 (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.
15. Where a premises licence authorises the exhibition of films, the licence must include a condition requiring the admission of children to the exhibition of any film to be restricted in accordance with this section.
16. Where the film classification body is specified in the licence, unless subsection (3) (b) applies, admission of children is must be restricted in accordance with any recommendation made by that body.
17. Where -  
 (a) the film classification body is not specified in the licence, or  
 (b) the relevant licensing authority has notified the holder of the licence that this subsection applies to the film in question, admission of children must be restricted in accordance with any recommendation made by that licensing authority.
18. In this section -  
 "children" means persons aged under 18; and "film classification body" means the person or persons designated as the authority under section 4 of the Video Recordings Act 1984 (c.39) (authority to determine suitability of video works for classification).

## **Annex 2 - Conditions consistent with the operating schedule**

19. The sale of alcohol at the premises shall be at all times ancillary to the use of the Gallery as a multi-purpose auditorium space. The sale shall be restricted to such occasions as exhibitions; retail events; live pre-recorded music; product launches; fashion shows; film screening; events and conferences, and the like kind.
20. Although the HERE and The Now Building and Now Trending are separate, they shall work in tandem in accordance with the Venue Management Plan and the Event Management Plan to maintain the operational integrity of the site.

21. An event management plan will be prepared for each event and shall be served upon the Police and Environmental Health a minimum of 14 working days ahead of an event for information.
22. The Event Management Plan will include the provision of a designated smoking area and management thereof; provision of a dispersal policy to ensure the safe and quiet movement of people from the area; the provision of additional pop-up toilets (when necessary); provision of a queue management strategy; public safety and security arrangements.
23. The Premises Licence Holder shall provide the Licensing Authority and Police with a list of upcoming events each quarter (or as otherwise agreed with the Licensing Authority and Police) and shall provide such information as is requested by the Licensing Authority and/or Police to assess the potential impact of specific events upon the Licensing Objectives.
24. There shall be no off-sales of alcohol, with the exception of alcohol sold during an exhibition event held at the premises, which is packaged to take home and which is not intended for immediate consumption off the premises.
25. The premises Licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.
26. The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
27. The CCTV camera views are not to be obstructed.
28. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the exits in order to capture clear facial images of all persons leaving the premises.
29. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority upon request.
30. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the Police or an authorised officer in obtaining the CCTV footage.

31. The facility to transfer the images to a compatible, removable format shall be held on the premises.
32. Notices shall be displayed within the premises warning customers about personal thefts; and to be vigilant.
33. The venue shall supply and fit to every static table or counter, suitable anti-theft devices, such as table/counter clips, in order that customers may secure their bags.
34. When the venue is open for licensable activities, the toilets are to be checked by staff at least every two (2) hours and these checks are to be documented on each visit.
35. All flat surfaces in toilet cubicles, including any toilet roll holder eclipses, are to be 'designed-out' in order to prevent drug misuse.
36. At least one member of the management team on duty whilst the premises remain open for the sale of alcohol is to hold a personal license under the Licensing Act 2003.
37. A management document is to be drawn up, maintained and amended as required which will deal with the following:
  - a) Definition of promotions, events and bookings;
  - b) Procedure for the management of each category;
  - c) Security procedures including the reporting of incident;
  - d) Procedure for ensuring promoters are informed of and are managed in such a way as to promote the Licensing Objectives and ensure compliance with the conditions on the premises License;
  - e) Response plan and management structure in the event of an emergency.
38. For any event involving:
  - 1) a promoter, their associates, DJ or artiste, or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit, and
  - 2) live amplified or recorded music is the main attraction, the licensee shall complete a full risk assessment via open source material, reference checks from previous venues and if there are concerns following all these checks, to inform [www.safersounds.org.uk](http://www.safersounds.org.uk) and Camden Police Licensing Team at least 14 days before the event occurs"

39. In relation to all other musical events, the Local Camden Police Licensing Team shall be contacted no less than 14 days prior to the event to request if, a full Search Policy is required of all customers.
40. No persons carrying visibly open alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activity.
41. No patron shall be allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle whether empty or containing any beverage, other than permitted off-sales.
42. A challenge 21 policy will be enforced, where any person reasonably looking under the age of 21 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of identity will be those with photographic identification documents recognised in the Home Office guidance; including passports, photo-card driving licence, military ID cards or proof of age card bearing the PASS hologram.
43. A sign shall be displayed at the point of sale stating No Proof of Age - No Sale.
44. The venue shall not engage the service of street promoters to encourage clientele to attend the venue.
45. Regular glass collection shall be undertaken by staff where the sale of alcohol is occurring at the premises.
46. Police must be called to incidents of violence and /or disorder.
47. Signage shall be displayed in a prominent position on the premises requesting that customers leave quietly.
48. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
49. Where the sale of alcohol is occurring after 20:00 hours then door staff shall be present at least 1 hour prior to the commencement of the event. The door staff shall be employed to a ratio of 1:100. The following

additional requirements apply in relation to those door staff:

a) There will be a minimum of one (1) female SIA-registered door supervisor on duty when security are required.

b) A door supervisors register shall be updated on occasions when door supervisors are employed. The Register is to be made available for inspection by the Police and/or Licensing Authority. Details to show:

- Full Name.
- Date of Birth.
- SIA Registration Number.
- Date and Hours Worked; and
- Contact telephone number and email address.

c) A coloured photocopy of each door supervisors' SIA badge shall be taken by the DPS and retained at the premises.

d) They will wear high visibility jackets or vests or high visibility arm bands whilst working at entry/exit points and around the exterior of the building.

e) They shall remain on duty for half an hour after the close of the venue to ensure all patrons are dispersed peacefully from the area.

50. Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept clear.
51. The Gallery is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.
52. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.
53. Details of instances of disorder, damage to property or personal injury shall be recorded in an incident book kept at the premises. Such details

shall be made available for inspection by the Police and other Responsible Authorities upon request.

54. The premises shall operate a system whereby a record is maintained of refusals to serve alcohol. Details to be produced for inspection to the Police and other Responsible Authorities upon request.
55. The licensee shall ensure that staff are trained as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons underage. This training is to be clearly documented and any training for future staff must also be organised at the appropriate time. Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.
56. Where any illegal substance is found within the premises then a record shall be made in the incident book. Any illegal substance shall be stored securely pending collection by the Police unless they are present on site and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book.
57. Where available, a responsible member of staff shall join the local pubwatch or other such local crime reduction scheme approved by the Police.
58. All security staff, stewards and management will be connected by a secure channel hand-held radio system.
59. Staff shall be fully trained on safety issues, including fire safety and management shall carry out regular inspections of the premises.

**Informative:** The below is for information purposes and is not intended to form a condition of the licence):

If a planned event in the here is likely to result in a maximum attendance event then (following risk assessment) The Now Building and Now Trending may be closed off in order that it may operate as a ticket hall and audience holding area.

60. On completion of the works and before the public are admitted, the premises must comply with the requirements of the District Surveyors Association and the Association of British Theatre Technicians 'Technical standard for Places of Public Entertainment' (if applicable)



61. Patrons wishing to smoke will not be permitted to take drinks outside with them.
62. Amplified sound shall not be audible at 1 meter from the facade of any noise sensitive premises.
63. That an Events Noise Management Plan is developed to the satisfaction of the Noise Team to cover any occasion where there is potential for sound breakout beyond the premises boundary, and where sound equipment is added to the existing in-house equipment for a particular event or function. The Noise Management Plan required by virtue of planning shall be updated by the Premises Licence Holder from time to time as appropriate and the Premises Licence Holder shall be bound by the plan. A copy of the Events Noise Management Plan and the Noise Management Plan shall be retained at the premises and made available for inspection by the relevant authorities.
64. That if deemed appropriate by the Environmental Health Team prior to the premises trading under this licence then a noise limiter be installed, located in a separate and remote lockable cabinet from the volume column must be fitted to any musical amplification system and set at a level determined by and to the satisfaction of the Noise Team. The limiter shall not be altered without prior agreement.
65. A Notice shall be fixed in a prominent position near exits reminding stomers that this is a residential area and requesting patrons to leave quickly and quietly.
66. The Event Management Plan sets out measures to be taken to ensure effective communication with surrounding residents and businesses concerning planned events.
67. The premises will use the central waste collection point provided as part of the development.
68. There is a lost children's policy contained within the Event venue Management Plan.
69. A proof of age scheme shall operate at the premises and staff shall be trained in its use, e.g. Challenge 21.

### **Annex 3 - Conditions attached after a hearing by the licensing authority**

70. The premises will implement a dispersal policy and all relevant staff will be

trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the gallery after 23:30 to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or East/West on Oxford Street/New Oxford Street. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The Policy will be reviewed regularly and whenever the Licensee becomes aware of issues associated with dispersal.

#### **Additional conditions agreed with the CGCA Event Gallery**

71. Servicing will take place between 08:00 and 20:00 hours Monday to Sunday and Public/Bank Holidays and will be from the Denmark Street loading bays. (This shall not apply to event equipment and refuse storage and collection which is dealt with by the Service Management Plan approved as part of the S106 agreement and developed to the satisfaction of the Environment Health Team).
72. That a 'Service Management Plan' be developed to the satisfaction of the Environmental Health Team, detailing the management of deliveries and servicing which shall include arrangements for the collection and delivery of event equipment, and refuse storage and collection; that the Service Management Plan be updated by the Premises Licence Holder from time to time as appropriate. The Premises Licence Holder shall be bound by the Service Management Plan. A copy of the plan shall be retained at the premises and made available for inspection by the relevant authorities.

#### **APP\PREMISES-VARY\114910 – Conditions Agreed with Licensing Authority**

73. The premises licence holder shall work in tandem with the council's noise/pollution officers to ensure that the music being provided at the event, be it live and or recorded are not a source of disturbance to residents in neighbouring premises and or a reduction of the hours for the provision of live and recorded music.
74. Suitable and sufficient refuse receptacles shall be provided to the premises such that it can contain all refuse that may generated by the premises during the event.
75. That refuse is collected, stored, and disposed off in a manner that will not attract vermin or be a source of nuisance to residents.

#### **Annex 4 - Plans**





Copyright: All rights reserved. The drawing must not be reproduced without permission.  
Copyrighted drawings should be sold as per. Contractors, subcontractors and suppliers must verify all dimensions on site before commencing any work or making any shop drawings.  
All shop drawings to be submitted to the architect for comment prior to fabrication.  
This drawing is to be read in conjunction with the Architect's specification, bills of quantities / schedules, structural, mechanical & electrical drawings and all discrepancies are to be reported to the architect.

revision / date / amendments

- LEGEND**
- The content of this legend is intended to be used as a guide only and is not intended to be a substitute for the relevant building code.
- PROPOSED
  - EXISTING
  - ACTING CHAIRMAN
  - FIRE EXTINGUISHER
  - CITY CAMERA
  - LOCAL STORAGE
  - SMALL INJECTION SPARKS HEAVY
  - WALL MOUNTED SOUNDPROOF
  - FIRE ALARM CALL POINT
  - INTERCOMMERCE
  - SMALL INJECTION
  - FIRE ALARM PANEL



For Information  
Archer Humphreys Architects

Background

Project title	ST GILES OUTERNET
Client	ST GILES OUTERNET
Design team	1125 GILLES OUTERNET
Design number	AHA-STG-GA-088-04









London Borough of Camden, 5 Pancras Square, London N1C 4AG

### Premises Licence Summary

London Borough of Camden Licensing Authority

#### Premises licence number

PREM-LIC\110349

#### Part 1 – Premises details

##### Postal address of premises, or if none, ordnance survey map reference or description

HERE  
St Giles Circus Site  
Denmark Place  
London  
WC2H 8LH

Telephone number N/A

##### Where the licence is time limited the dates

The licence variation for Sunday 2nd July 2023 from 00.00 – 04.00 only.

##### Licensable activities authorised by the licence

Retail of Alcohol:	Yes
Late Night Refreshment:	Yes
Plays	Yes
Films	Yes
Indoor Sporting Events	Yes
Boxing or Wrestling Entertainment	Yes
Live Music:	Yes
Recorded Music:	Yes
Performance of Dance:	Yes

##### The times the licence authorises the carrying out of licensable activities

Retail of Alcohol:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Late Night Refreshment:	
Monday - Thursday	23:00 - 23:30
Friday - Saturday	23:00 - 00:00
Plays:	

Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Films:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Indoor Sporting Events:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
Boxing or Wrestling Entertainment:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
e)Live Music:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
f)Recorded Music:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30
g)Performance of Dance:	
Monday - Thursday	10:00 - 23:30
Friday - Saturday	10:00 - 00:00
Sunday	11:00 - 22:30

### Seasonal Variations

On 104 occasion per calendar year, the terminal hour shall be extended Until 02:00 the following morning. Such occasions to be notified to the Police and the Licensing Authority 14 days prior. (if the premises elect to trade beyond 01:00 hours on the commencement of British Summertime The permitted hours shall be permitted for a further 1 hour.)



**Pride Variation**

The licence variation for Sunday 2nd July 2023 from 00.00 – 04.00 only.

In respect of the following licensable activities:

- Sale of alcohol (on only)
- Late night refreshments
- Films
- Live music
- Recorded music
- Performance of dance

**The opening hours of the premises**

Monday – Sunday: 00:00 - 00:00

**Where the licence authorises supplies of alcohol whether these are on and/or off supplies**

ON & OFF

**Part 2****Name, (registered) address of holder of premises licence**

Outernet Venue Limited  
3<sup>rd</sup> Floor  
114a Cromwell Road  
London  
SW7 4AG

**Registered number of holder, for example company number, charity number (where applicable)**

13381794

**Name of designated premises supervisor where the premises licence authorises the supply of alcohol**

Tristan John Howard Hoffman

**State whether access to the premises by children is restricted or prohibited**

N/A



**METROPOLITAN  
POLICE**

**TOTAL POLICING**

Camden Licensing Authority

Town Hall Extension  
Argyle St  
London

WC1H 8EQ

PC Korbinian Cox [REDACTED]  
EK - Camden Borough

Licensing Unit

Your ref: **VARY\115502**

Thursday 06<sup>th</sup> July 2023

Dear Sir/Madam,

**RE: Application VARY\115502**

**HERE, St Giles Circus Site, Denmark Place, WC2H 8LH**

**With reference to the above Application, the Metropolitan Police Service (MPS) wishes to make a Representation.**

Within the Licensing Act 2003, and contained in the notes for guidance for the Licensing Act 2003, it is the responsibility of the Police and Local Authority to promote the Prevention of Crime and Disorder, Promote Public Safety, Prevent Public Nuisance and Protect Children from Harm.

I certify that I have considered the application above on its own merit, and my Representation is based on the likely effect of the grant of the application being detrimental to Camden Council's Licensing Objectives.

This Application is based within the Seven Dials Cumulative Impact Zone (CIZ) and therefore there is a presumption, based on the Borough Council's own Licensing Policy, that any New or Variation Application will be refused; due to the effects of cumulative impact. The MPS supports the Policy, especially in respect of the impact to Alcohol Harm.

Case law arising from the Daniel Thwaites PLC v Wirral Magistrates' Court and Others, resulted in The Honourable Mrs Justice Black saying:

**"Drawing on local knowledge, at least the local knowledge of local licensing authorities, is an important feature of the Act's approach. There can be little doubt that local magistrates are also entitled to take into account their own knowledge but, in my judgment, they must measure their own views against the evidence presented to them. In some cases, the evidence presented will require them to adjust their own impression. This is particularly likely to be so where it is given by a Responsible Authority such as the police."**

This case is sometimes misconstrued as requiring decisions to be based on 'real evidence', and that conditions cannot be imposed until problems have actually occurred. This is wrong.

The purpose of the Act is to prevent problems from happening. Decisions can and should be based on well-informed common sense. The case recognises that Responsible Authorities are experts in their fields, and that weight should be attached to their representations.

Source: [www.gov.uk/government/publications/alcohol-licensing-using-case-law](http://www.gov.uk/government/publications/alcohol-licensing-using-case-law)

### **Health, Crime and Social Impacts**

The Institute of Alcohol Studies 'Impacts of Alcohol Factsheet 2015' has brought together evidence and policy to promote an informed debate on alcohol's impact on society. The research found 75% of Police Officers and 50% of Paramedics have been injured in alcohol related incidents. Furthermore, 43% of service personnel have suffered sexual harassment or abuse at the hands of intoxicated members of the public.

### **Policing Challenges in Camden**

The London Borough of Camden is an intense area of crime and anti-social behaviour, particularly in relation to the Night Time Economy. Police resources become heavily drained during the relevant times. There is an increment of violence in Camden during later hours. For clarity, the MPS supports Camden Council's Licensing Policy with regards to Recommended Framework Hours and the Special Policy Areas (also referred to as the Cumulative Impact Areas).

### **Unique Application Issues:**

This establishment is situated within the Outernet Estate, which is located in the Seven Dials Cumulative Impact Area. This particular area is known for its wide array of restaurants, event spaces, bars, and clubs, making it a popular destination for tourists and late-night revellers. Although the venue falls under the jurisdiction of the Camden borough, it shares proximity with the vibrant nightlife of the West End and borders the Westminster area. The Venue is conveniently positioned next to one of the entrances to Tottenham Court Road Tube Station, which serves as a useful exit route for individuals seeking to leave the vicinity. The station typically provides a 24-hour night service on Fridays and Saturdays, assisting late-night revellers to get home.

The venue itself has a maximum capacity of 1850 people and hosts a variety of events, ranging from live music performances to club nights. The Metropolitan Police acknowledge that the venue is well-managed, with minimal crime originating from within its premises. However, due to the presence of the nearby tube station and various other licenced premises, it is challenging to discern the full extent of the venue's impact on crime in the area, as the station effectively diverts criminal activity away from its immediate vicinity. Consequently, intoxicated revellers who might otherwise engage in or become victims of crime within the area may now do so in other parts of London.

Presently, the venue operates within the recommended framework hours set by Camden Council, closing at 23:30 from Monday to Thursday, 00:00 on Friday and Saturday, and 22:30 on Sunday. Additionally, their current licence permits an additional 104 occasions per calendar year during which the venue can remain open until 02:00. However, this proposed variation seeks to extend the number of such occasions to 154 and extend the closing time to 04:00.

Given that the venue falls within the Cumulative Impact Zone, it is crucial to consider how the proposed extension of operating hours, coupled with the increased frequency of such occasions, will impact the local community. Under the proposed variation, the venue would potentially host events until 04:00 on an average of three times per week. This extension in hours is likely to attract individuals who would have otherwise concluded their evening early, as well as draw people to the area with the venue acting as their final destination for the night. Considering the venue's substantial capacity, it can be anticipated that there will be a significant influx of inebriated revellers within the Cumulative Impact Zone at 04:00.

At present, the Euston Town Centre Teams responsible for policing this area on Friday and Saturday nights are operating below the required staffing levels. By 04:00, these teams have already been policing the area for several hours and are likely to be addressing incidents that occurred earlier in the night. Consequently, unless additional resources are allocated to the area, the burden of responding to additional crimes and anti-social behaviour will fall upon the already overburdened Emergency Response Policing Teams. It is important to note that the area primarily relies on officers from the Kentish Town Police Station, which is situated 2.8 miles away or a 16-minute car journey, as indicated by Google Maps. Given these circumstances, the potential for increased police calls in the area raises concerns, as granting the variation could further strain police resources.

Furthermore, this issue is exacerbated on Sundays through Thursdays, as there is no night tube service available and the Euston Town Centre Teams are not present. During these weekdays, the number of police officers on duty is reduced. Consequently, a substantial increase in the number of people within the Cumulative Impact Zone on a weekday would have an adverse effect on the community, residents, and the police force as a whole.

### **Mediation & Discussion**

Police have been in discussion with the applicant's legal representative and will continue to do so throughout the application process.

### **Research and Intelligence**

Crime statistics in the area reveal a high incidence of theft and robbery, primarily targeting intoxicated individuals during the night-time economy. This situation significantly raises the risk of anti-social behaviour and criminal activities in the area, which could be further exacerbated by the substantial increase in footfall resulting from extended operating hours on both weekends and weekdays.

Notably, the current trend of late-night crime in Camden primarily involves thefts and robberies targeting late-night revellers in the early hours. Criminals posing as nitrous oxide sellers strategically wait outside late-night venues at closing time, taking advantage of overly intoxicated individuals. This initial engagement often progresses to acts of violence or the use of distraction techniques, leading to the theft of phones, wallets, and significant amounts of money from online wallets. This issue is particularly prevalent along Tottenham Court Road and other large capacity venues that close around the same time. It is suspected that

the proposed extension of operating hours will result in a clear spike in thefts and violent crimes in this area.

Furthermore, after consultation with the neighbouring police borough, it became evident that this venue is within a 3-minute walking distance from Greek Street and Soho Gardens, which are the main crime hotspots within Westminster's Cumulative Impact Zone. Consequently, the anticipated later hours are likely to contribute to an increase in crimes, not only in Camden but also in Westminster.

**Any Licensing Hearing held as a result of this Representation may be supplied with further, specific, crime figures and intelligence reports relating to the venue or the area in which it is located.**

### **Conditions Proposed By Police Licensing**

While the applicant has proposed several additional conditions and variations, the Police Licensing team has raised a few concerns that they would like the applicant to consider. The parties are currently engaged in discussions aimed at reaching a mutually acceptable agreement that will address some of these concerns.

Police Licensing support the conditions proposed by the applicant however would like the below variations to be considered:

#### **Proposed Variation to Condition 70**

*"The premises will implement a dispersal policy and all relevant staff will be trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the gallery after 23:30 until close of business to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or East/West on Oxford Street/New Oxford Street. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The Policy will be reviewed regularly and whenever the Licensee becomes aware of issues associated with dispersal. The beginning of condition 6 as offered by the applicant which reads as "An Incident Book shall be kept at the premises for at least 12 months, and made available on request to Police." To be changed to "An Incident Book shall be kept at the premises and made available on request to Police."*

The police object to the addition of "until close of business" and would hope the venue continue to encourage patrons leaving to disperse until they are satisfied that an efficient dispersal has been implemented.

#### **Proposed Additional Condition 73**

*"At least 2 (two) SIA door supervisors (to include the door supervisor working on the main entrance) who are on duty as required by the licence conditions shall wear body worn cameras. Management of the venue to ensure these cameras are working before deployment. In the event of an incident, the footage must be made available to Police upon request. The licence holder shall ensure that a suitable, expeditious playback/downloading system is in place to enable the Police to obtain any evidential footage. In the event of an incident, body worn camera footage will be stored for a minimum of 14 days and must be made available to Police upon request."*

#### **Police would recommend that this instead be:**

*"At least 2 (two) SIA door supervisors (to include the door supervisor working on the main entrance) who are on duty as required by the licence conditions shall wear body worn cameras. Management of*

the venue to ensure these cameras are working before deployment. In the event of an incident, the footage must be made available to Police or Local Authority upon request. The licence holder shall ensure that a suitable, expeditious playback/downloading system is in place to enable the Police to obtain any evidential footage. In the event of an incident, body worn camera footage will be stored for a minimum of 31 days and must be made available to Police upon request.”

#### **Proposed Additional Condition 75**

*“On any occasion the premises operate licensable activities beyond midnight relying upon the seasonal variations permitted then there shall be no new admissions to the premises after 02:30 hours with the exception of VIPs, guest list and / or pre-sold ticket holders. A record of such entries after 02:30 hours shall be maintained and made available for inspection by responsible authorities.”*

#### **Police would recommend that this be varied to:**

“On any occasion the premises operate licensable activities beyond midnight relying upon the seasonal variations permitted then there shall be no new admissions to the premises after 02:00 hours with the exception of VIPs. A record of such entries after 02:00 hours shall be maintained and made available for inspection by responsible authorities.”

#### **Proposed Variation to Condition 38**

*“In relation to any event involving a promoter, their associates, DJ(s) or artists(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit then:*

- a) The licensee shall complete a full risk assessment via open source material, reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least 7 days before the event occurs on email EK-Licensing@met.police.uk.*
- b) The licensee shall notify Camden Police Licensing Team via the same email if there are any high risk events or any unusual or large scale events (due to occur within less than 7 days) as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.*
- c) Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determined that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.”*

#### **Police would recommend that this be varied to:**

“In relation to any event involving a promoter, their associates, DJ(s) or artists(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit then:

- a) The licensee shall complete a full risk assessment via open source material reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least 14 days before the event occurs on email EK-Licensing@met.police.uk.
- b) The licensee shall notify Camden Police Licensing Team via the same email if there are any high risk events or any unusual or large scale events (due to occur within less than 14 days) as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.
- c) Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determined that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.”

#### **Police would also recommended the following additional conditions:**

-CCTV to be made available for collection within 48 hours.

-No drinks to be allowed in the smoking area.

**Times Proposed By Applicant:**

The flexibility of 154 occasions for which the venue can operate until 04:00 hours causes great concern for the potential disruption to residents during weekdays. The Police would ask that should this variation be approved, the following amendments are made to lessen any negative impact on public nuisance, crime, and disorder.

The Police recommend that instead of the 154 occasions proposed, the venue instead be given the late hours on a Friday and Saturday when the night tube is likely to be running and there are slightly more police resources available. The current licence's additional 104 occasions per calendar year should then be reduced to 50 occasions during which the venue can stay open until 02:00 hours. This in short will mean the venue have 104 occasions they can be open until 04:00 and 50 occasion until 02:00.

It is the police's belief that if the applicant is granted the variation with these amendments, it would still offer the venue the opportunity to host a more diverse variety of events as requested, while also taking into account the significant impact these late hours will have on the Cumulative Impact Zone (CIZ).

**Conclusion**

Based on the comprehensive evaluation of the proposed variation, the Police firmly conclude that granting the application in its current form would have significant adverse effects on the local community and Policing resources. Despite the venue being run well, the substantial increase in operational hours poses a serious risk to public safety and order within the already strained Cumulative Impact Area.

**In summary, the view of the MPS is that this Application should be rejected in its current form.**

If you have any additional questions please contact me.

Yours sincerely,

**PC Korbinian Cox**  
**Licensing Constable**





**Date:** 09/06/2023  
**Application Reference:** APP\PREMISES-VARY\115502  
**Direct Phone Number:**  
**Contact:** Esther Jones  
**E-mail:** [REDACTED]



**Public Protection**  
 Supporting Communities  
 London Borough of Camden  
 5 Pancras Square  
 LONDON  
 N1C 1AG

Tel: 020 7974 4444 (switchboard)

Licensing (Contact Camden)  
 Crowndale Centre  
 218 Eversholt Street  
 London  
 NW1 1BD

DX: 2106 Euston

[www.camden.gov.uk](http://www.camden.gov.uk)

**Licensing Act 2003 -PREM-LIC\110349**

**Re: HERE ST GILES CIRCUS SITE, DENMARK PLACE, LONDON WC2H 8LH**

### **LICENSING AUTHORITY REPRESENTATION**

This representation is made by the Licensing Authority, and it relates to the following licensing objectives: -

- Prevention of public nuisance

### **The Premises and Summary of Application**

The application is to vary a premises licence along the following lines:-

1. To amend the current seasonal variations which permits licensable activities until 02:00 the following morning on 104 occasions per calendar year. To vary this to permit licensable activities until 04:00 on 154 occasions per year.

The permitted licensable activities and the hours on all other occasions to remain as existing.

2. As set out in the schedule of conditions submitted with this application and following pre-application advice, the applicant seeks to (a) amend under conditions 19, 42, 50, 51, 55, 56, 65, 69 & 70; (b) remove and replace condition 38, and (c) proposes that the additional conditions be added to the licence.

The current premises licence permits the following licensable activities and entertainment: -

- Alcohol
- Plays
- Films
- Indoor Sports
- Boxing & Wrestling
- Live music



- Recorded music
- Performances of dance
- Similar to e f or g - For example karaoke
- Late night refreshments – Hot food or hot drinks

The operating hours for all of the above activities and entertainment except for late night refreshment are: -

Monday to Thursday	10:00 – 23:30
Friday – Saturday	10:00 – 00:00 (Midnight)
Sunday	11:00 – 22:23

Late Night Refreshment – the operating hours are: -

Monday to Thursday	23:00 23:30
Friday to Saturday	23:00 – 00:00 (Midnight)

The applicant has indicated no change to the standard operational hours for all of the above and they intend to remain the same.

The current seasonal variation is that on 104 occasions per calendar year, the terminal hour shall be extended until 02:00 the following day.

This shall be amended to: -

On 154 occasions per calendar year, the terminal hour shall be extended until 04:00 the following day. If the premises elect to trade beyond 01:00 hours on the commencement of British Summertime, then the permitted hours shall be permitted for a further 1 hour. Such occasions to be notified to the police and licensing authority 14 days prior.

The premises current business hours are as follows: -

Monday to Sunday	08:00 - 00:00 (Midnight)
------------------	--------------------------

### **Framework Hours – Pages 36 of The Licensing Policy**

The framework hours are: -

On- Licence:

- Monday to Thursday 1000 hours until 2330 hours
- Friday and Saturday 1000 hours until midnight
- Sunday 1100 hours until 2230 hours

Off- Licence:

- Monday to Saturday 0800 hours until 2300 hours
- Sunday 1000 hours until 2230 hours

The hours being applied for under the (non-standard) 154 occasions are significantly outside of the framework hours.

**Cumulative Impact Areas**

The premises is situated in the Seven Dials Cumulative Impact Area, where there is a presumption to refuse all new and variation applications in its entirety, as set out in Chapter 6 of the Licensing Policy (Cumulative Impact Policies). While this presumption is rebuttable, this is only in exceptional circumstances where the applicant has successfully demonstrated that the granting of their application would not contribute or exacerbate the existing impact of licensed premises in that area.

**Complaint History**

I have checked the Council's records for the past 2 years and can confirm that no noise complaint has been received against the premises.

**Conclusion**

The application is to vary the non-standard opening hours and increase the number of occasions they may operate outside of their standard hours.

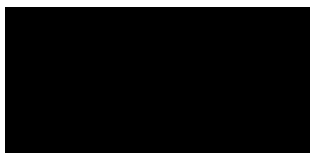
The applicant engaged with the licensing authority by applying for a pre-app and met with officers to determine conditions which the licensing authority would like to see adopted by the varied premises.

The representation is therefore in the main as a result of the premises being within the cumulative impact area and so elicit an automatic representation in line with our policy. However, I am concerned that in the summer they could open for another extra hour after they have sought permission to open till 4 and so open till 5am.

I would therefore require confirmation from the applicant that the measures put in place should ensure that noise from the premises will not be a source of disturbance to residents in neighbouring premises during the extended operating hours.

In the absence of any valid representation from members of the public, I am happy to withdraw my representation should the applicant confirm in writing that activities or entertainment from the premises will not be a source of disturbance to residents in nearby premises.

Yours sincerely



Esther Jones  
Licensing Team Leader

**From:** [REDACTED]  
**Subject:** License applications - APP\PREMISES-VARY\115502 and 115496.  
**Date:** 27 June 2023 15:22:28  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image005.png](#)  
[image007.jpg](#)  
[image009.jpg](#)

Good afternoon Julia and Mohammed,

**APP\PREMISES-VARY\115502 and 115496.**

**Address:** St.Giles Circus site including: site of 138-148 (even) Charing Cross Road 4 6 7 9 10 20-28 (inc) Denmark Street 1-6 (inc) 16-23 (inc) Denmark Place 52-59 (inc) St.Giles High Street 4 Flitcroft Street and 1 Book Mews London WC2

Please be advised that there is a planning condition attached to the planning consent for the above development which limits the operational hours of the urban gallery and basement venue (outernet). The proposed licence hours are beyond those permitted via condition and an application has not been submitted to date to amend the condition.

Condition 34 on the planning permission ref: 2012/6858/P states that:

*None of the Sui Generis uses (the urban gallery and basement venue) hereby permitted shall occur outside of the following times: 09:00 - 23:30 Monday to Wednesday, 09:00- midnight Thursday, Friday and Saturday; and 09:00-22:30 Sunday, and no customers shall be permitted within these premises outside of the approved hours of use. Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policy DP12, DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.*

This was varied in 2016 via application reference [2016/5690/P](#):

*Vary condition 34 to allow the Sui Generis uses (the urban gallery and basement venues) to operate between 09:00-23:30 Monday to Thursday, 09:00 - 00:00 Friday and Saturday and 09:00 - 22:30 on Sundays with the ability to operate until 02:00 on 104 occasions per year.*

If the licence is granted we would request an informative is added to any licence decision notice which informs the applicants that they must obtain the necessary planning consents before the hours are implemented.

I would appreciate if you can please pass on the applicant's details so we can contact them to inform them that a variation to the above permission must be sought.

Please don't hesitate to contact me if you have any questions.

Many thanks,

Elizabeth

Elizabeth Beaumont

Appeals and Enforcement Manager

Pronouns: She/Her/Hers

London Borough of Camden

Telephone: [REDACTED]

Web: [camden.gov.uk](https://camden.gov.uk)

London N1C 4AG



Please consider the environment before printing this email.

From: [REDACTED]  
 To: [REDACTED]  
 Subject: Re: IP letter Ref 115502  
 Date: 18 June 2023 13:08:54

---

Dear Julia

Please lodge a strong objection to this proposed application for 154 occasions until 4am for licensable activities - this amounts to 3 weekly 4am activities directly adjacent to residential homes. The extended number and extended hours would cause considerable noise nuisance and disturbance to neighbouring residential homes.

Please can you send a clear note on the amended conditions, bold in para 2 below. Many thanks.

*Please describe briefly the nature of the proposed variation (Please read guidance note 2)*  
 1. *To amend the current seasonal variations which permits licensable activities until 02:00 the following morning on 104 occasions per calendar year. **To vary this to permit licensable activities until 04:00 on 154 occasions per year.***

*The permitted licensable activities and the hours on all other occasions to remain as existing.*

2. *As set out in the schedule of conditions submitted with this application and following pre- application advice, the applicant seeks to (a) amend under conditions **19, 42, 50, 51, 55, 56, 65, 69 & 70;** (b) **remove and replace condition 38,** and (c) **proposes that the additional conditions be added to the licence.***

Best  
 Sue

Cllr Sue Vincent  
 Holborn & Covent Garden Ward

---

From: Julia Peterson [REDACTED]  
 Sent: Friday, June 9, 2023 1:43:11 PM  
 To: [REDACTED]  
 [REDACTED]  
 [REDACTED]

Subject: IP letter Ref 115502

Dear Councillor

Please find attached details of a full variation application in your ward.

Details of the variation in respect of PREM-LIC\110349:

1. To amend the current seasonal variations which permits licensable activities until 02:00 the following morning on 104 occasions per calendar year. To vary this to permit licensable activities until 04:00 on 154 occasions per year. The permitted licensable activities and the hours on all other occasions to remain as existing.
2. As set out in the schedule of conditions submitted with this application and following pre-application advice, the applicant seeks to (a) amend under conditions 19, 42, 50, 51, 55, 56, 65, 69 & 70; (b) remove and replace condition 38, and (c) proposes that the additional conditions be added to

the licence.

Please be advised the Last Date for Representation is 06/07/2023

Kind Regards

Julia Peterson

Licensing Officer

Place Management

Supporting Communities

London Borough of Camden



Please consider the environment before printing this email.



Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an organisation

**Your details****Organisation name**

Covent Garden Community Association

**First name**

David

**Last name**

Kaner

**Telephone number (optional)**

[REDACTED]

**Email address**

[REDACTED]

**Address**

Offices And Premises At Ground And  
 Mezzanine Floors Seven Dials Warehouse  
 42 Earlham Street  
 London  
 WC2H 9LA

**Remain anonymous**

No

**Grounds of representation**

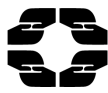
- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

See detailed Rep attached

**Supporting documents (optional)**

- CGCAREp-HERE-APP.PREMISES-VARY.115502.pdf



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## Licensing Representation from the Covent Garden Community Association

**Application No.:** APP\PREMISES-VARY\115502

**Premises:** HERE

**Address:** St. Giles Circus, London

This is an application for 'HERE', a very large venue under the Outernet Complex between Denmark Street and New Oxford Street, within the Seven Dials Special Policy Area.

The premises is licenced currently until the end of Framework Hours but has an extension until 02:00 on 104 occasions per year (so on an average of 2 days per week). **All** of the licensable activities are included on the Licence.

The capacity of the venue does not appear to be stated on the Licence but the VMP document states that it is 1,850. The description in the VMP is that it offers... *Central London an exciting entertainment schedule of Live bands, DJ's, Comedy, Theatre, Film, Cultural and Corporate events.*

The licence conditions state that the sale of alcohol is ancillary, as follows:

*The sale of alcohol at the premises shall be at all times ancillary to the use of the Gallery as a multi-purpose auditorium space. The sale shall be restricted to such occasions as exhibitions; retail events; live pre-recorded music; product launches; fashion shows; film screening; events and conferences, and the like kind.*

We observe that Live Bands and DJ's presumably fall into the "like kind" catch-all of the Licence condition. The emphasis in the original licence application which was granted was on the exhibition and events use. In reality, the types of use which take advantage of the periods after Framework Hours are Live Bands and DJ's – in other words, nightclub style uses. The existing licence therefore effectively permits a 1,850 capacity nightclub to operate until 02:00 every Friday and Saturday night of the year. These hours are also what is advertised on the HERE website. The advantage of running the later hours on Friday and Saturday is that at least the Night Tube is operational on these days, although from the issues with parking seen below there are large number of customers who do not use public transport to travel to and from the venue.

The application is to increase the number of extensions per year from 104 to 154, i.e. 3 days per week on average. They also wish to extend the terminal hour from 02:00 to 04:00. There are also a number of amendments and additions to conditions which have been proposed.

Our first observation is that by adding on any additional days the venue will be open when there is no public transport other than Night buses available. This will, on its own, add to issues in the area.

The CGCA has sought input from residents living in the area as well as other interested parties. The CGCA believes that the operation of the venue to the **current** hours ALREADY gives rise to public nuisance issues. These include:



- Noise from the extensive queues on Denmark Street which mean that residents need to keep their windows closed, even in hot weather.
- Indiscriminate parking on the pavement of Denmark Street by cars, limousines and PHV's for customers attending the venue. We have also had comments of issues caused by the same thing on the Westminster side of Charing Cross Road.
- Noise and ASB associated with customers arriving at, and dispersing from, the venue at the end of events (even those that terminate within Framework Hours)
- Illegal trading (e.g. hot dogs) outside Tottenham Court Road tube because of the number of customers available; this gives rise to odours and mess.

We are also aware that there has been an increase in the level of crime in the area because of the increase in the number of people in the area late at night who are potential victims.

We have provided photographs of some of the issues described above in the attachments. We have also provided a map showing residential property in the vicinity of the application site. Note that only the entrance to HERE is marked on this map. We have included residential property owned by the applicant. This property has planning use class C3 (residential). Other properties in the area are both privately rented and social housing (including on Denmark Street itself.)

The CGCA's view is that **ANY** extension, either to the number of days when the premises operates after Framework Hours, or to the hours on those days, will fail to support the Licensing Objectives related to Public Nuisance and Crime and Disorder. The fact that the venue is open also leads to the parking on the pavement which can lead to Public Safety issues as people have to walk in the road and so this objective is also engaged.

The premises are on the western edge of the Seven Dials SPA and on the Eastern edge of WCC's West End Cumulative Impact Area. This area has some of the highest crime rates in the UK, many associated with the Nighttime Economy. The 2 MPS Town Centre Teams (TCT) covering the area (West End TCT and Euston TCT) between them had 30,584 reported crimes in the 12 months to May 23. This is 77% of the total crime in the **whole** Borough of Camden for the same period (39,981 crimes). This demonstrates that there is already a significant crime and disorder issue in the area, and any additional days and hours that these premises are open will add to this.

The applicant has set out in their application the reason why they would like to have a licence extension. The reason boils down to increase revenue by making the venue more attractive to hire because it can open later, and being able to run combination events (such as live music followed by a DJ). The result will be that they can extend their support of lower income events, employ more people and support more charitable activity. The results are, of course, positive. However it is the promotion of the Licensing Objectives that are the paramount consideration. If opening later provides the results whilst supporting the Licensing Objectives then it can be considered. The CGCA's view is that this cannot be achieved and so the application should be refused.

The applicant has also said that they are operating under robust licensing conditions and also that they believe that later hours can be operated without adding to cumulative impact and whilst promoting the licensing objectives. We completely disagree with this assertion.

The applicant had a pre-application discussion with the CGCA. They stated that their reason for wanting to have an extension of is that later hours would make it more attractive for people renting the venue for events, and at these hours these will be night-club style events. This is consistent with the statement in their application. This suggests that the venue is not actually operating the full 104 occasions permitted under the current licence. This would imply that the current issues are arising even though the premises are not operating to the full extent of their current licence. Therefore the potential impact of the grant of the licence would be even greater than the additional 901 hours of operation after Framework Hours being applied for.

We are aware that the premises operated until the hours proposed on the 2023 Pride Weekend under a time limited licence (as the venue is too large for a TEN). The observation of local residents was that the area was busier and noisier than usual, but it was not clear if this was related to the late hours of the venue, or to Pride activity more generally. It would be helpful to see data on how many people were in the venue, and at what time during the extended period of operation, in order to understand the actual usage during this period. However we do not regard later operation for Pride as indicative of the likely impact if the application was to be granted.

Our position is that in order for the application to be granted the applicant has to be able to demonstrate that the grant of the variation **will not add** to the cumulative impact of licenced premises already being experienced in the Seven Dials SPA. As noted above, the grant of the existing licence has **already** added to the impact of licensed premises in the area. Additional days and hours will increase the impact and so the licence should be refused, as the presumption has not been rebutted.

Even if the view were to be taken that the presumption is rebutted then the application should be refused because it does not promote the Licensing Objectives. The applicant needs to be able to:

Demonstrate that they will not *unreasonably interfere with the personal comfort or amenity of immediate neighbours or the nearby community (Public Nuisance -Camden SoLP Para 4.39)*  
50 additional days of operation until 02:00 will interfere with the comfort and amenity of both immediate neighbours and the nearby community. The same will happen with any extension beyond 02:00. In fact the existing 104 extensions already interfere with this. This may be subject to a Review Application at a later date.

Demonstrate that they will *promote the Licensing Objective of the prevention of crime and disorder (LA2003 Para 4)*. Later operation and additional days will very likely give rise to more crime and disorder and certainly not less.

Demonstrate that *visitors and performers will be kept safe (Public Safety – Camden SoLP Para 4.36)*. This includes consideration of the blocking of public areas (Para 4.38), which is demonstrably happening at the moment in the case of the pavement and car/PHV use.

**The CGCA therefore, in support of local residents, takes the view that this application should be refused outright.**

We hope that this representation is clear and ask that you advise us well in advance of any meeting at which this application will be discussed.

Yours faithfully,

David Kaner  
CGCA Licensing Sub-Committee

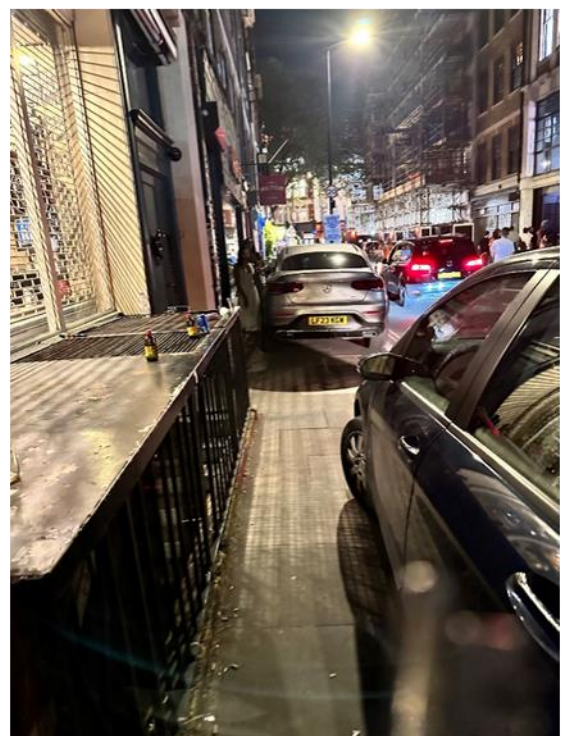
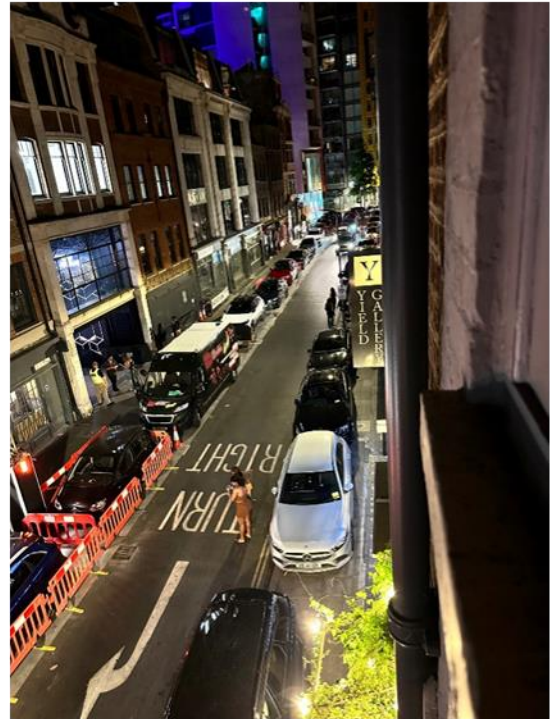
[REDACTED]

*The CGCA is recognised by both Camden and Westminster as the Amenity Society for the Covent Garden area (defined as the area bounded by High Holborn, New Oxford Street, Charing Cross Road, St. Martin's Place, Northumberland Avenue, Victoria Embankment, Lancaster Place, Aldwych and Kingsway) and so represents the interests of those who live and work in this area. The CGCA's Licensing Subcommittee is authorised by the Association to make Representations on any Licensing Applications which the Subcommittee believes may have an effect on local residents or other members of the community through likely impact on one or more of the Licensing Objectives. This authorisation was last renewed at a meeting of the Executive Committee of the CGCA on 5th December 2017.*

Stated opening hours

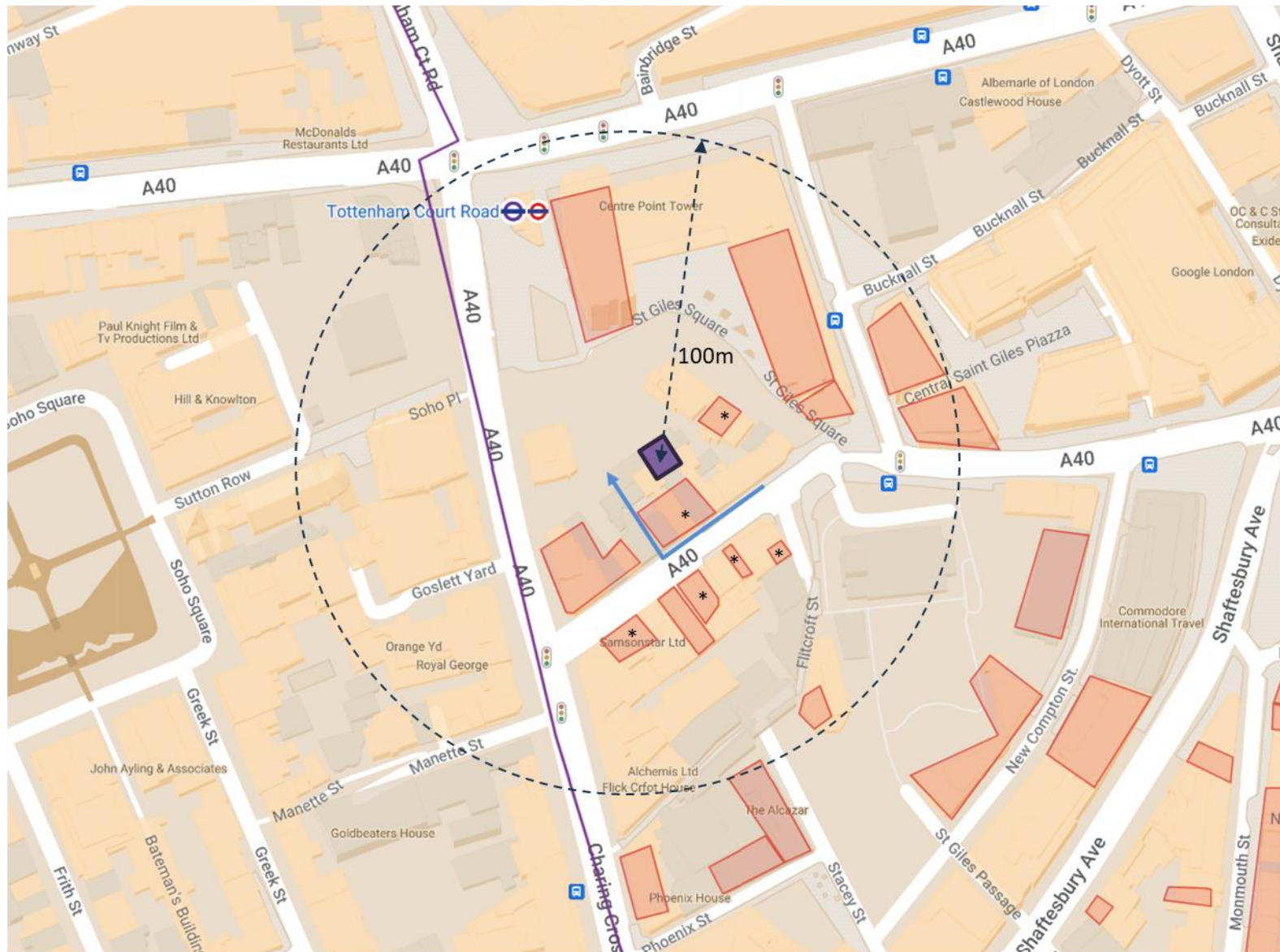
OPENING HOURS	
Monday	4PM-11PM
Tuesday	4PM-11PM
Wednesday	4PM-11PM
Thursday	4PM-11PM
Friday	4PM-2AM
Saturday	4PM-2AM
Sunday	4PM-11PM

Photos of existing issues with HERE





## Residential Property in vicinity of HERE (entrance only)



- ← Queuing     
  HERE (entrance ONLY)     
  Residential Properties (Camden only)     
 \* Residential Property owned by Applicant (C3 Residential used as "Serviced Apartments")



Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

## Making a representation as

As an organisation

### Your details

Organisation name

Lindsay House Residents Association

First name

James

Last name

Cannon

Telephone number (optional)

[REDACTED]

Email address

[REDACTED]

Address

Flat 5  
30 New Compton Street  
London  
WC2H 8DN

Remain anonymous

No

Grounds of representation

- prevention of crime and disorder
- prevention of public nuisance

Details of representation

See attached document

Supporting documents (optional)

- LHRAHereobjection.docx

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To Whom it may Concern

**‘HERE’**

**APP\PREMISES-VARY\115502**

I am writing on behalf on Lindsay House Residents’ Association (30 New Compton Street) concerning the following application. We are concerned that an extension of licence till 04:00 for up to 154 occasions a year will both create more noise late at night which will be heard from our building, and may also contribute to the rise in anti-social behaviour on New Compton Street, which is already problematic and rising.

Yours faithfully

Dr James Cannon  
Hon. Secretary, Lindsay House Residents’ Association  
Flat 5, 30 New Compton Street



Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an organisation

**Your details****Organisation name**

Soho Housing Association

**First name**

John

**Last name**

Wallace

**Telephone number (optional)**

[REDACTED]

**Email address**

[REDACTED]

**Address**

18 Hanway Street  
 London  
 W1T 1UF

**Remain anonymous**

No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

On behalf of Soho Housing Association I would like to lodge our objection to the proposed premises license application 115596 . We have a significant number of our residents in close proximity and the proposed license extension of trading hours will have a significant negative impact on their lives. Whist we accept that commercial activity and residential residents form part

of the mixed community that reflects life in Soho and Covent Garden and in central London generally, however the proposed use and extended hours of operation, are unacceptable in maintaining the balance of residents living on the upper parts and whose lives will be materially affected, detrimentally, if the application were to be granted. Not only through the extended hours of operation but the associated 'servicing' of the commercial premises with deliveries, refuse and cleaning, and the impact through noise and the potential impact of crime related activity and on public safety all of which would impact hugely on residents and the residential community. With a number of elderly and vulnerable residents this application is of serious concern to the welfare of all residents but particularly older and more vulnerable residents. On the application as proposed, Soho Housing Association strongly object to the application. John Wallace Commercial Director Soho Housing Association

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

### Data protection

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an organisation

**Your details****Organisation name**

Centre Point House Residents Association

**First name**

S Ogilvie

**Last name**

Chair

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 1 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

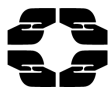
No

**Grounds of representation**

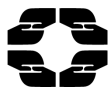
- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance
- protection of children from harm

**Details of representation**

I am Chair of the Centre Point House Residents Association representing 36 residential apartments in our block since July 2001 (so 23 years and counting). However my residency in the block and the neighbourhood begun even earlier when I



started renting at the building in 1996 before then buying a flat in 1998. This makes me a resident / owner of some 27 years and counting. Camden Council - give us a break! Anti-social behaviour, demolition works and construction works have blighted our lives now to breaking point since 2009 and it is ongoing. You know this - I have been besieged with planning application and planning application. All have come at a massive cost to our health and well-being and affect our finances and our sleep. I am suffering physical exhaustion and have had two strokes in the past year due to the stress of lack of sleep. I can even hear the Elizabeth line trains start early AM from my bedroom since works were done by our Freeholder cutting out floors below our flats in recent years - none of which we got our voices heard for. It is time to stop this endless permitting of licences around our postcode area and give us a break for A MINIMUM OF 5 YEARS, preferably 10 years. OUTERNET has already received DAYTIME noise complaints from my tenants who say they are unable to use their balcony in the spring and summer months. I know just how loud they are as when I first heard them it was deafening at the top of Charing Cross Road at 7pm of an evening. The fact that 4am closing is even being considered is total madness. Those same tenants who have been at the block 2 years and were about to renew have pulled out and changed their minds late June also citing that drug addicts are regularly now seen in the immediate area between Outernet and our main front entrance and



keep blocking our entrance and exit. I heard at a residents meeting that another female tenant of some 20 years could not get in our building recently and had to get police /security - this should NOT be happening! Conditions on the licences were agreed at the outset to try to enable things to remain liveable. Yet problems with noise, chaotic parking, antisocial behaviour, queues, litter etc. from the customers of these venues, late at night, have already been reported to us by people who live in Charing Cross Road, Denmark Street and the St. Giles area. If the council were to allow more events go on, even later, we do not believe that it could do anything but make things worse. Far from trying to extend things, we believe that the venues should be working with us to make things better, or pull back their existing hours. I own Flats 1, 14, 26 and 30 - so would also like to make additional but duplicate representations for those flats. I very much doubt I will have time to meet the deadline to do it separately as it is 23:51 and I am exhausted having done a 15 hour day with no breaks.

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Richard

**Last name**

Cohen

**Telephone number (optional)**

[REDACTED]

**Email address**

[REDACTED]

**Address**

Flat 1st And 2nd Floor  
 63 St Giles High Street  
 London  
 WC2H 8LE

**Remain anonymous**

No

**Grounds of representation**

- prevention of public nuisance

**Details of representation**

I am very concerned that extending the opening hours of 'Here' until 4.00 am on up to 154 occasions a year will increase the amount of noise and disturbance on the streets in a residential area and lead to more people smoking on the streets and indulging in anti-social behaviour. This area where I have lived for 28 years will become even busier and noisier later into the night with people arriving and leaving 'Here'.



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WC1H 9JE

**Contact phone**

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Laura

**Last name**

Stedman

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 11 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

No

**Grounds of representation**

- prevention of public nuisance

**Details of representation**

I am writing to express my strong objection to the proposed extension of hours till 4am, which is currently under consideration. My concerns primarily revolve around the potential for public nuisance and the negative impact it may have on our block, Centre Point House and the surrounding community. I kindly request that you carefully consider the points outlined below in your decision-making process. Noise Pollution: The proposed development, if approved, could potentially generate excessive noise levels that would disrupt



the peace and tranquility of the area. This disturbance would not only affect the immediate neighbours but also impact the quality of life for the entire community. The increased noise levels from music and crowds would be detrimental to the well-being of local residents, including young families and working people who would suffer from lack of sleep. Many people in our block are key workers who need protection from the late night revellers.

### About this form

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

garrard

**Last name**

knowles

**Telephone number (optional)**

[REDACTED]

**Email address**

[REDACTED]

**Address**

Flat 6 The Alcazar  
 Phoenix Street  
 London  
 WC2H 8BS

**Remain anonymous**

No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

I wish to make an objection to the 115502 application for the venue Here. Application for licencing were extensively examined here at the time of planning and the current restriction were applied. This small pocket of an area has a diverse usage with both entertainment, retail, food outlet & residential. My home and many of the residential units are in the public sector housing & we did not choose to live in this



area, but were allocated our homes here. A Camden extension will irrevocably change the balance of this area and change the charter, nearly all lost due to the staggering changes to this area over the last five years. Sadly there has been absolutely zero community engagement. from this company, not even tickets to a soft opening, even though we suffered years of disruption during the building works. This demonstrated that they have no interest in contributing to the fragile community. St Giles is on the corner of four police areas: Charring Cross, Holborn, Savile Row & City of London Police, but ironically have poor cover from all as we are at their extremities of their areas. This has led to years of extreme antisocial & criminal behaviour which has left the community feeling under siege. Already in the last eighteen months St Giles Pizza has become a no-go area for local at night due to the unfettered & chaotic behaviour of night users, which has attracted the local homeless & drug using community as they are able to take advantage of these users. A further increase in users & time will encourage further illegal and anti-social behaviour & other criminal behaviour as there is no supervision of the venue's users outside of their immediate premises. The company has not managed the areas outside their venues so far. A change of time will mean that the disturbance of people leaving venue, will disturbed me though out the night till five rather than it being capped at its current time. Also, sundry services such as taxis will be further attracted to the area in the small hours of the morning leading to

more noise & detritus. All these factors are secondary to the fact that I can hear the venue at night from my home, which is just acceptable with an earlier close, but any increase in time is unacceptable.

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

David

**Last name**

Ferris

**Telephone number (optional)**

[REDACTED]

**Email address**

[REDACTED]

**Address**

Flat 11  
 45 New Compton Street  
 London  
 WC2H 8DF

**Remain anonymous**

No

**Grounds of representation**

- prevention of crime and disorder
- prevention of public nuisance

**Details of representation**

NIGHT-TIME NOISE. Currently, night time sound levels at 45 New Compton Street, where I live, are low. To illustrate, I normally leave my windows open during the summer. Since New Compton Street is adjacent to Denmark Street, night-time noise levels may increase significantly when the venue comes into full swing. If so, the extension to 4am will make an already deteriorating situation even worse. INCREASE IN CRIME. The number of vulnerable people

who congregate on New Compton Street appears to have increased recently. Later hours may add to public nuisance around me, and increase their numbers. Due to their vulnerability, that will aggravate already high levels of crime and disorder.

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London  
WC1H 9JE

### Contact phone

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

## Making a representation as

As an individual

## Your details

First name

Adrian

Last name

OBrien

Telephone number (optional)

Email address

[REDACTED]

Address

Flat 10 Shaldon Mansions  
132 Charing Cross Road  
London  
WC2H 0LA

Remain anonymous

No

Grounds of representation

- prevention of public nuisance

Details of representation

Objection as a resident on the grounds of  
public nuisance

Supporting documents (optional)

- 20230702APPPREMISESVARY115502Camd  
pdf

## About this form

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London

WC1H 9JE

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Dear Sirs

I write in connection with the following license application submitted by Consolidated Developments for a license extension to 4am on up to 154 occasions per year.

Application Number	Address
APP\PREMISES-VARY\115502	Denmark Street / Outernet

I object on the grounds of public nuisance to the above applications for any extension to the opening hours and increase in occasions allowed per year.

Being a resident in the area for many years I am very concerned that the nuisance caused will negatively impact further on our wellbeing than it does currently.

What was once a quiet street is already congested with private taxis and limousines blocking the reduced parking bays. In my opinion Outernet already seem to believe they own the street and block the areas with metal barriers and intimidating personnel. We sometimes have waiting taxis lined on both sides of the street blocking regular transport.

We endure the street smokers, queues of people gathering in groups shouting, singing, and talking loudly with a crescendo of noise as the evening progresses. When venues close, we undergo the drunken screeches and increased noise level again which carries in the night air.

This is the situation NOW, with extended hours and on more occasions, it will be even more intolerable and there will be no turning back if this was granted. I would support a reduction in hours, but I most certainly and respectfully ask the licensing committee to **reject** the above application on the grounds of public nuisance for the reasons stated.

Kind regards

Adrian O'Brien  
10 Shaldon Mansion  
132 Charing Cross Road  
London WC2H 0LA

Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

John

**Last name**

Stedman

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 11 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

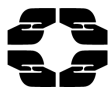
No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

I am writing to formally object to the proposed planning application referenced above on the grounds of the prevention of crime and disorder. As a concerned resident and member of the local community, I strongly believe that this late night application poses significant risks and may contribute to an increase in crime and disorder in the area. It will become a target for street crime, vandalism, or other forms



of illicit activities that could negatively impact the safety and well-being of the surrounding community and Centre Point House in particular. This could place an additional burden on law enforcement agencies and have a detrimental effect on the quality of life for us residents. It will foster a sense of fear, unease, and social disintegration among local residents, undermining the overall harmony and well-being of the community. The noise of the music and the crowds will reverberate through and around the many hard-surface buildings in the square and funnel upward to high levels into our flats where we have many families, workers and students who need a good night's sleep.

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Sarah

**Last name**

Herriot

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Flat 3  
 10 Denmark Street  
 London  
 WC2H 8LS

**Remain anonymous**

No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

See attached document, this replace  
 previous submission

**Supporting documents (optional)**

- Outernetlicensing.docx

**About this form**

**Issued by**

Camden Town Hall

Judd Street

London

WC1H 9JE

**Contact phone**

020 7974 4444

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**‘HERE’**

**APP\PREMISES-VARY\115502**

1850 capacity

Current licence Mon-Thurs 23:30, Fri-Sat 00:00 and Sun 22:30. Permitted to operate until 02:00 on up to 104 occasions per year.

The application is to allow this **extension to be until 04:00 on up to 154 occasions per year.**

As a resident to Denmark Street, I am objecting to this variation to the licence for the follow reasons, public nuisance, crime and disorder.

There are already problems in Denmark street from the Outernet venue. The noisy queue, which currently on event nights can last til around 12, and buses and traffic unable to get down the narrow Denmark Street as it is blocked by visitors dropping off/picking up/deliveries to the Outernet venue and consequent horn blowing, exhaust fumes in a narrow street.

Increasing the last admission (I assume it's 2:30am?), will mean the noisy queue and the traffic blocking the street to go on beyond the current midnight til 2:30. I have videos that illustrate this, and the noise created by the Outernet venue queue, blocked street, cars parked all along the pavement through the night. Then will we get it again at 4:30 when transport arrives to collect the punters?

154 occasions per year is near half of the year, this is a massive impact on residents.

The acoustics of a narrow street such as Denmark Street means that noise bounces off the buildings and amplifying up all the late night/early morning noise/antisocial behaviour.

Denmark Street is now a very noisy street, but it generally quietens down after 12 when all the guests have entered the building, so residents are able to sleep at that point. With the introduction of this licence that will all change. The cumulative impact on the area will adversely affect all residents in the vicinity, and those staying with the 50 Chateau Denmark apartments in the street. I worry if the street becomes too noisy, the only people who will want to rent the Chateau Denmark apartments will be hen night and stag dos, and those wanting to party all night long.

Having over 2000 people (potentially HERE and Lower Third), coming out at that time of the night in the same area is going to contribute to noise for residents. How are they doing to disperse as there are no tubes running on a Thursday through the night? Drunk/out of it people are loud, there is no getting away from that.

In combination with the application for 4:00 licence (closing at 4:30) for Lower Third Denmark Street and the already existing 24hour licence for Thirteen at 1 Denmark Street the cumulative impact will be huge on residents who will have no peace.

I can find no phone number on the HERE website as per the complaints procedure.

When people are 'ejected', where will they be ejected to?





Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

### Making a representation as

As an individual

### Your details

First name

Andrew

Last name

Hunt

Telephone number (optional)

[REDACTED]

Email address

[REDACTED]

Address

Flat 10 Shaldon Mansions  
132 Charing Cross Road  
London  
WC2H 0LA

Remain anonymous

No

Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

Details of representation

Having lived in this building for over ten years now I am well aware of the high levels of crime and disorder in the area. Extending the late night license of this premises until four in the morning will only exacerbate both the levels of drunken behaviour and rowdiness that lead to fighting and general public nuisance. It's bad enough as it currently is with the bicycle taxis / tut tuts that roam the area



late into the night with their incredibly loud sound systems. This will only encourage more of them to the area and they park up underneath our bedroom windows. Given the size of the venue the out pouring of such large numbers en masse can only lead to issues of public safety. I often have to leave early in the morning for my job and to encounter such large numbers of inevitably drunken people is a harrowing experience. The underground station is only open at that time on Friday and Saturday evenings so there is no infrastructure to cope with the evacuation of these numbers of people safely from the area. As it is Denmark Street has been taken over by Consolidated and this venue. There is now no permit parking for residents left on the street since their development of the area, and the number of vehicles servicing this venue takes over both sides of a relatively narrow one way street which is also a bus route.

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Simon

**Last name**

Ogilvie

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 14 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

No

**Grounds of representation**

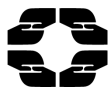
- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance
- protection of children from harm

**Details of representation**

I am Chair of the Centre Point House Residents Association representing 36 residential apartments in our block since July 2001 (so 23 years and counting). However my residency in the block and the neighbourhood begun even earlier when I started renting at the building in 1996 before then buying a flat in 1998. This



makes me a resident / owner of some 27 years and counting. Camden Council - give us a break! Anti-social behaviour, demolition works and construction works have blighted our lives now to breaking point since 2009 and it is ongoing. You know this - I have been besieged with planning application and planning application. All have come at a massive cost to our health and well-being and affect our finances and our sleep. I am suffering physical exhaustion and have had two strokes in the past year due to the stress of lack of sleep. I can even hear the Elizabeth line trains start early AM from my bedroom since works were done by our Freeholder cutting out floors below our flats in recent years - none of which we got our voices heard for. It is time to stop this endless permitting of licences around our postcode area and give us a break for A MINIMUM OF 5 YEARS, preferably 10 years. OUTERNET has already received DAYTIME noise complaints from my tenants who say they are unable to use their balcony in the spring and summer months. I know just how loud they are as when I first heard them it was deafening at the top of Charing Cross Road at 7pm of an evening. The fact that 4am closing is even being considered is total madness. Those same tenants who have been at the block 2 years and were about to renew have pulled out and changed their minds late June also citing that drug addicts are regularly now seen in the immediate area between Outernet and our main front entrance and keep blocking our entrance and exit. I heard at a residents meeting that another female



tenant of some 20 years could not get in our building recently and had to get police /security - this should NOT be happening! Conditions on the licences were agreed at the outset to try to enable things to remain liveable. Yet problems with noise, chaotic parking, antisocial behaviour, queues, litter etc. from the customers of these venues, late at night, have already been reported to us by people who live in Charing Cross Road, Denmark Street and the St. Giles area. If the council were to allow more events go on, even later, we do not believe that it could do anything but make things worse. Far from trying to extend things, we believe that the venues should be working with us to make things better, or pull back their existing hours. I own Flats 1, 14, 26 and 30 - so would also like to make additional but duplicate representations for those flats. I very much doubt I will have time to meet the deadline to do it separately as it is 23:51 and I am exhausted having done a 15 hour day with no breaks.

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London  
WC1H 9JE

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

stella

**Last name**

meadows

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 33 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance
- protection of children from harm

**Details of representation**

Multiple recent anti-social behavioural incidents have occurred meaning residents cannot get in or out of our block steps from Outernet Drugs-related crimes have increased substantially The area has a long history of problems, they get cleared up and then come back - Outernet's hours will encourage an increase yet again The noise





coming from Outernet is already causing day time complaints, residents cannot enjoy their balconies or open windows in spring /summer Long-term tenants have given notice to quit citing both Outernet noise ruining their enjoyment of their flat AND druggies blocking entrance

**Supporting documents (optional)**

- ObjectionPlanningapplication.docx

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WC1H 9JE

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I am writing to formally object to the proposed planning application referenced above on the grounds of the prevention of crime and disorder. As a concerned resident and member of the local community, I strongly believe that this late night application poses significant risks and may contribute to an increase in crime and disorder in the area. It will become a target for street crime, vandalism, or other forms of illicit activities that could negatively impact the safety and well-being of the surrounding community and Centre Point House in particular. This could place an additional burden on law enforcement agencies and have a detrimental effect on the quality of life for us residents. It will foster a sense of fear, unease, and social disintegration among local residents, undermining the overall harmony and wellbeing of the community. The noise of the music and the crowds will reverberate through and around the many hard-surface buildings in the square and funnel upward to high levels into our flats where we have many families, workers and students who need a good night's sleep

Late-night / very early morning clubbing often involves alcohol consumption, smoking and can lead to rowdy behaviour, fights, and altercations amongst patrons. Such incidents not only disturb the peace but also raise serious safety concerns for both club-goers and residents in the vicinity. Additionally, the potential for increased criminal activity, such as theft or drug-related offences, cannot be overlooked. I therefore strongly object to the extended hours!

Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Vivien

**Last name**

Godfrey

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Flat 14  
 45 New Compton Street  
 London  
 WC2H 8DF

**Remain anonymous**

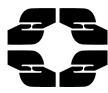
No

**Grounds of representation**

- prevention of crime and disorder
- prevention of public nuisance

**Details of representation**

My flat on New Compton Street faces St Giles. Since the opening of the Elizabeth line stop at Tottenham Court Road and the opening of the Outernet noise and antisocial behaviour have greatly increased. The noise in particular is very disturbing and seems to get worse the later at night and in the earlier morning hours. I do think that allowing venues to remain open until 4am will make the currently bad situation worse. Part of the reason I will be leaving



my current flat after 5.5 years is the growth in noise, litter and use of the pavements as public toilets over the past 2 years. I oppose granting a license until 4am.

## About this form

### Issued by

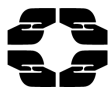
Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

## Data protection

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Ali

**Last name**

Negyal

**Telephone number (optional)****Email address****Address**

Apartment 17 Centre Point House  
15 A St Giles High Street  
London  
WC2H 8LW

**Remain anonymous**

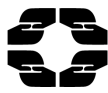
No

**Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

**Details of representation**

#1. Prevention of Crime and Disorder. The Applicant says "More activity in the area creating a feel of safety and vibrancy." This is not what I have experienced over the last ten years as a resident in Centre Point House. As more and more music and licensed entertainment and drinking venues open, I have seen an intensification of activity, with much greater incivility (people urinating and even defaecating on the



street), antisocial behaviour and crime. From my balcony and at my front door, people deal drugs openly in St Giles Square – someone even tried to sell crack to my elderly female relative when she visited me recently. People leaving the applicant's venue can be inebriated, and I have seen young people leaving this venue and then having physical brawls in St Giles Square. Sometimes they film each other fighting and they scream to egg each other on. Note that the applicant wants to host wrestling and boxing – these are not calm pursuits, and the audience is often “hyped up” after watching these combative sports. It's not possible to sleep in my flat without the windows open in the summer months (this week the indoor temperature has exceeded 35 degrees C, for example), and it's a shocking way to wake up in the middle of the night to people screaming because they've been excluded from the venue by a bouncer, and similar situations. #2.

Ensuring Public Safety. The reality is that the rate of crime in the area is much higher as a result of higher footfall. People feel more anonymous in a crowd, and it seems to have emboldened people. We have had tailgating people intruding into our residential block, who sometimes threaten us with violence, and some of whom take drugs on our staircase. When we phone 999 the police do not always have the resources to come. Extending this licence to 4am on so many occasions is not going to create more police resources. On the contrary, we can expect more threats to our personal safety. #3. Prevention of Public Nuisance. The noise nuisance that we

experience in my residential block is unbelievable. I believe that I am at breaking point with the noise nuisance, and I fear for my mental wellbeing if this license is extended to 4am on over 150 occasions in the year. I am already overwhelmed. When am I supposed to rest? I work in the charity sector, and the post-pandemic reality is that I work from home 3 or 4 days a week. But the constant intrusion of noise from nearby venues (including music from a rooftop bar about 5 metres from my bedroom, on a similar level and noise from drunk patrons leaving venues) limit my ability to feel at home in my home. Prior to the opening of this venue, when the large-scale plans for redeveloping our area were discussed at length in the Planning and Licensing processes, Camden Councillors told us that we local residents would be protected from “creeping” and persistent challenges to licensing conditions. But we have seen local businesses chip away at the already generous licences they’ve got, asking for more and more. The balance is already too far in favour of commercial interests, and the processes don’t seem to listen to local residents like myself. The situation is already not sustainable, yet the businesses ask for the opportunity to create more noise nuisance.. I humbly ask that if you extend this license you fund and assign a social worker to deal with fallout to local residents from lack of rest. I am not being facetious with this request: under the Care Act 2014, as a public body you have the responsibility to consider the wellbeing of local people in all local decision-making. The Applicant says there is a loss of late music/live music



venues in the area. That is not accurate. The number of live music venues within metres of my home is more than what it was prior to 2012. The cumulative impact from all of the local licensed venues chips away at our peaceful lives. The Local Authority already cannot cope with the volume of noise disturbance in my area. This has disinhibited me from submitting most noise nuisance complaints – it is a hopeless situation. I overcame my habitual lack of hope in the situation by contacting Licensing, Environmental Health (Noise Nuisance Team) and my Ward Councillors last week. There was noise from 6am until after midnight the following day. After contacting no fewer than 7 officers, and phoning 999 due to the extreme and worsening noise nuisance, I learned after 13 hours that the Events Team at Camden Council saw fit to approve 21 hours of activity just outside my bedroom. To set up an impromptu red carpet venue, to host a Netflix premiere with amplified music and amplified interviews and 500 cheering fans, and also to allow de-rig up to 3 am. This is just a failure of understanding of what it's like to live where we do, and our homes predate the existence of this venue by over half a century. The Council have still not answered Members queries from Cllr Fulbrook about \*why\* this level of noise nuisance was allowed – one week later. So the prospect of getting real time help when people leaving this venue before or at 4am is not realistic. Sometimes people leave this venue singing the songs they've heard their favourite artists sing or play. Sometimes, customers on the way in or out of the venue



even bring along portable speakers to play backing tracks which they sing along to, in St Giles's Square. I've been woken up in this way multiple times this year already. If this could happen any later, even up to 4am, I don't think I'll be able to maintain my employment because I'm not going to get adequate rest.

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

## Data protection

No personal information you have given us will be passed on to third parties for commercial purposes. The Council's policy is that all information will be shared among officers and other agencies where the legal framework allows it, if this will help to improve the service you receive and to develop other services. If you do not wish certain information about you to be exchanged within the Council, you can request that this does not happen.

Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Shelley

**Last name**

Stedman

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 11 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

No

**Grounds of representation**

- prevention of public nuisance

**Details of representation**

I am writing to officially submit a planning objection regarding the aforementioned planning application. My objection is based on the grounds of public nuisance, as I believe the proposed application for extended hours will have a detrimental impact on the local community and surrounding area. The extended operation hours of a late-night venue can result in excessive noise levels, disrupting the peace and tranquility of the surrounding residential areas. This can greatly impact the quality of life for us residents who require



uninterrupted rest during the night. Additionally, the increased foot traffic, honking, and loud music associated with late-night clubbing can lead to a rise in disturbances and potentially compromise public safety. Late-night club operations tend to attract large crowds, leading to increased vehicular traffic in the vicinity. This influx of uber and unlicensed minicabs can exacerbate existing traffic congestion issues, potentially causing danger to the public. Late-night clubbing often involves alcohol consumption, smoking and can lead to rowdy behaviour, fights, and altercations amongst patrons. Such incidents not only disturb the peace but also raise serious safety concerns for both club-goers and residents in the vicinity. Additionally, the potential for increased criminal activity, such as theft or drug-related offences, cannot be overlooked. I therefore strongly object to the extended hours! Community Impact: The operation of a late-night club can have adverse effects on the local community. The reputation of the neighbourhood will be negatively affected by the association with a rowdy nightlife scene, potentially disturbing families who live in Centre Point House. The sense of community and the well-being of residents should be prioritized over the profitability of a late-night establishment.

### About this form

Issued by

Camden Town Hall  
Judd Street

London  
WC1H 9JE

**Contact phone**

020 7974 4444

**Data protection**

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**From:** [REDACTED]  
**Subject:** Representation 115502  
**Date:** 03 July 2023 10:47:49

---

**From:** Howard Jameson [REDACTED]  
**Date:** 27 June 2023 at 3:07:45 pm BST  
**To:** [REDACTED]

Dear David Kaner

Chair – Licensing Sub-Committee

**Subject: objection to the application Outernet/Denmark Street extension of hours to trade**

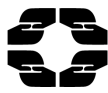
I live at flat 25 , 45 New Compton street London WC2H8DF I AM FORMALLY OBJECTING TO THE Application to extended Outernet extension of trading hours on the following points

1. NIGHT-TIME NOISE. Currently, night time sound levels at 45 New Compton Street, where I live, are low. To illustrate, I normally leave my windows open during the summer. Since New Compton Street is adjacent to Denmark Street, night-time noise levels may increase significantly when the venue comes into full swing. If so, the extension to 4am will make an already deteriorating situation even worse.
2. INCREASE IN CRIME. The number of vulnerable people who congregate on New Compton Street appears to have increased recently. Later hours may add to public nuisance around me, and increase their numbers. Due to their vulnerability, that will aggravate already high levels of crime and disorder.

This application should be no granted as it will adversely effect the neighbourhood and the community if this application was approved under no conditions their hours are more then adequate for the purposes of trade

Howard Jameson  
Sent from my iPad

---



Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

## Making a representation as

As an individual

## Your details

First name

Penny

Last name

de Valk

Telephone number (optional)

Email address

[REDACTED]

Address

Apartment 5 Centre Point House  
15 A St Giles High Street  
London  
WC2H 8LW

Remain anonymous

No

Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

Details of representation

I live on St Giles Square and my front door is on the Piazza. Extending the license and having events go until 4am only adds to public nuisance and noise we already experience

Supporting documents (optional)

- representation.docx

## About this form

**Issued by**

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

**Contact phone**

020 7974 4444

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

**Making a representation as**

As an individual

**Your details****First name**

Edward

**Last name**

Laws

**Telephone number (optional)****Email address**

[REDACTED]

**Address**

Apartment 31 Centre Point House  
 15 A St Giles High Street  
 London  
 WC2H 8LW

**Remain anonymous**

Yes

**Detail the exceptional circumstances****Grounds of representation**

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance
- protection of children from harm

**Details of representation**

STRONGLY OBJECT #1 Very obvious that at 4am there will be more people who have drunk for longer and crowds of drunk people then attract criminal activity. This area is already witnessing a very serious rise in crime, drugs, abusive/threatening





behaviour and attacks, noise pollution, people urinating, has become homelessness - hub - extending license to 4am just extends the opportunity for criminality and anti social behaviour - its is totally nonsensical for what is now a mixed use residential/commercial area - this is NOT an entertainment zone. If you want 4am license then relocate your business to an area that is zoned accordingly away from residents. #2 Crime activity goes up with later licensing - this area is already becoming VERY UNSAFE to live in due to incompetence of regulating authorities who have the left the area turn into an area of criminality - anyone living here is regularly threatened and accosted by strangers either drunk and disorderly or with mental health issues - do NOT make this even worse by approving any change in the current overly liberal licensing. Camden is notorious for siding with business interests over residents and always falls for the creeping incremental asks of corporates to have more music, outdoor seating, later alcohol licenses - stop doing this and represent the council tax paying residents you have failed so badly in the last 10 years. #3 the Outernet events venue is already a public nuisance - their interests are ultimately to make profit which means more people buying more alcohol - this is totally at odds with residents interests who want the right to a quiet and safe life. More alcohol directly leads to more public disorders, attracts criminality to come into the area and is a massive public threats #4 Children live in this area and late licences are totally incompatible for their well being.

The fact the we are forced to have to protest these repeated attempts to get late licenses is an intrusion - camden please once and for shut the door on these drip drip requests to stay open later and serve more alcohol - its not rocket science. The kind of people who want to be out partying after midnight is not a cohort of people that is suitable for a residential area with children, elderly and families- that should be a different zoning. We need to make this area safe and pleasant and not do thinks to make it yet worse which extending opening hours would clearly do.

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

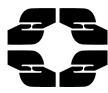
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**‘HERE’  
LOWER THIRD**

**APP\PREMISES-VARY\115502  
APP\PREMISES-VARY\115496**

I live on St Giles Square and my front door is on the Piazza. Extending the licenses for the above and having events go until 4am only adds to the public nuisance and noise we already experience. Allowing another 2000 people to come in and out of the square until 4am is absurd and unreasonable in a residential area already so noisy and heaving until midnight because of this development. I strongly object to the extension of both of these licenses as I believe it will not only contravene my right to quiet enjoyment of my home but will be a risk to my own safety as I come and go to my home. Not to mention the noise and congestion we are already experiencing with events held in both venues.



Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

### Making a representation as

As an individual

#### Your details

First name

[REDACTED]

Last name

[REDACTED]

Telephone number (optional)

Email address

[REDACTED]

Address

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Remain anonymous

Yes

Detail the exceptional circumstances

[REDACTED]

[REDACTED]

Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

Details of representation

Outernet is in one of Camden's Special Policy Areas and therefore the presumption should be to refuse their license. Since it has opened we have had major issues with noise and nuisance when they have events. Their security staff can't be found and when I've tried to call the venue it has been impossible to speak with anyone. This



application would essentially tear up Camden's licensing policy - enabling the venue to open till 4 am three nights a week or more. There has been no engagement with neighbours. We have seen people head out from the venue and urinate and be sick close to the entrance of our building. As a single woman I've had men verbally abuse me queuing to get in the venue. I urge Camden to reject this application in full and ask the venue to work with the community on how they can integrate.

## About this form

### Issued by

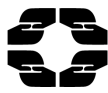
Camden Town Hall  
Judd Street  
London  
WC1H 9JE

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020 7974 4444

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

## Making a representation as

As an individual

## Your details

First name

Innes

Last name

Catto

Telephone number (optional)

Email address

[REDACTED]

Address

Apartment 17 Centre Point House  
15 A St Giles High Street  
London  
WC2H 8LW

Remain anonymous

No

## Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

## Details of representation

1. Prevention of Crime and Disorder. There are too many licensed venues and events in the immediate locality already. The intensity of activity in the area is too much. I've been here for over 3 decades, and it's a choice by Camden Council to allow all of these licensed venues and events right on my doorstep - literally metres from my door. The level of antisocial behaviour in the last year or two is so much higher than it ever

was before. People even go to the toilet in the square. People just aren't public-minded, and a 4am extension isn't going to encourage people to behave in a public-spirited way when they've already had something to drink or even taken some drugs. We see drug dealers in the square from our balcony quite regularly. And the increasing footfall makes this a more and more attractive place to sell drugs. 2.

Ensuring Public Safety. We have seen more crime in the area since the pandemic ended and local entertainment venues started up. The police are overstretched and they do not always attend even when you phone 999, e.g. when we get intruders in the building. 3. Prevention of Public Nuisance. An extension until 4am is too much. It will disturb my sleep. I am 72 years old and I have less good health than I did in my younger years. For example, I will have an operation in a few weeks and I will need my rest to recover. We already experience too much noise from closing time when local venues close, including the venue in this application. People do not go straight to the tube, and they linger in St Giles Square. They talk loudly, they sometimes play music and even if they are moved on by security, the disturbance is already done, and my rest has already been disturbed. I do not regularly complain about the noise because Camden Council does not take action. For example, there was an event taking place in St Giles Square last week, and the workers were setting up from 6am. They were erecting a fence for some celebrity thing. They made a lot of noise, which woke me up at once. We complained to the Council,

and they didn't reply until the evening - some 11 or 12 hours after the noise nuisance started. It's just not an effective service, and they will be even more overwhelmed if you extend the hours.

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

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Representation	
Premises name	HERE
Application reference number	APP\PREMISES-VARY\115502
Last date for representation	06/07/2023

## Making a representation as

As a business

## Your details

### Business name

Harmon Properties

### First name

Paul

### Last name

Harmon

### Telephone number (optional)

### Email address

[REDACTED]

### Address

8 FIELD CLOSE  
BUCKHURST HILL  
IG9 5AQ

### Remain anonymous

No

## Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

## Details of representation

We feel that this proposal could negatively impact all three of the selected options. Allowing venues to operate even longer than they already do will only lead to an increased window of public nuisance, crime and disorder and risk to public safety. The consumption of alcohol and potentially other substances associated with late night activity could be a catalyst for anti-social



behaviour in the area. It will attract more people to the area at un-social times increasing noise, litter and generally detracting from the general feel. There have been multiple noise complaints as there are already too many late night licences in the area and this establishment already has one! There can not be a justifiable reason to grant a business with a late licence an even later licence just to see it negatively impact the area.

## About this form

### Issued by

Camden Town Hall  
Judd Street  
London  
WC1H 9JE

### Contact phone

020 7974 4444

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**From:** [licensing inbox](#)  
**To:** [REDACTED]  
**Subject:** FW: PREM-LIC\110306 – The Lower Third and PREM-LIC\110349 – HERE  
**Date:** 06 July 2023 14:50:06  
**Attachments:** [Letter from the Night Czar, re HERE and \[REDACTED\]](#)  
[REDACTED]  
**Importance:** High

---

With attachment

Paru Bhudia  
Licensing Officer

Telephone: [REDACTED]



---

[REDACTED] Amy Lamé [REDACTED]

**Sent:** 06 July 2023 14:34

**To:** licensing inbox [REDACTED]

[REDACTED]  
[REDACTED]

**Subject:** RE: PREM-LIC\110306 – The Lower Third and PREM-LIC\110349 – HERE

**Importance:** High

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Please find attached a letter for the attention of Camden Licensing

With thanks

Amy

**Amy Lamé**

**Night Czar**

**Office of the Mayor of London**

[REDACTED]

Find out what we're doing to make London a fair, sustainable and prosperous [24hr city](#)

**NHS health information and advice about coronavirus can be found at**

[nhs.uk/coronavirus](https://www.nhs.uk/coronavirus)

**The GLA stands against racism. Black Lives Matter.**

**GREATER LONDON AUTHORITY NOTICE:**

The information in this email may contain confidential or privileged materials. For more information see <https://www.london.gov.uk/about-us/email-notice/>

# MAYOR OF LONDON

6<sup>th</sup> July 2023

[REDACTED]  
BY EMAIL

[REDACTED]

**RE: PREM-LIC\110306 – The Lower Third and PREM-LIC\110349 – HERE**

I am writing in support of the applications to extend the operating hours on the premises licences for The Lower Third and HERE at the Outernet venue.

London's live music venues and nightclubs are a vital part of what makes London a liveable, attractive and vibrant city. They don't just attract visitors from around the world, boosting our economy and providing vital jobs; they improve the health and wellbeing of Londoners, supporting social interaction and reducing isolation.

COVID-19 had a severe impact on nightlife venues – wiping out cash reserves and putting many of them into debt. Despite wanting to trade their way back to financial health, venues are now suffering an even harsher financial landscape, with unsustainable energy bills, high inflation and increasing supply costs.

Extending business trading hours is a priority for the Mayor. Additional night time trading hours can help businesses trade successfully and survive the additional costs pressures that they are under. Extended hours make more effective use of London's places and spaces around the clock, making them more sustainable and improving quality of life for Londoners.

It is vital that we all play our part in supporting venues and do what we can to help maximise opportunities for them to thrive. Without help, London faces the loss of many late night venues, reducing the number of spaces where diverse communities can come together and risking increased social isolation. Ensuring a healthy late night offer is vital to maintaining London's position as a global leader in culture, creativity, business, tourism and education.

Since opening, the venues at Outernet have brought significant benefits to London, attracting visitors to the London borough of Camden and its array of local businesses. Outernet venues have showcased both established and emerging talent on their stages while providing audiences with a state-of-the-art viewing experience. They have also showed a commitment to supporting London's diverse communities, including the successful running of a late night event during Pride in London.

The team at Outernet has considerable experience in venue and event management and management of the public realm around the venue, including through their own security team. They have a track record of hosting late night events successfully and safely. I am confident that this depth and breadth of experience will ensure the safe and successful running of the venue to later operating hours, without any undue negative impact on their responsibility to prevent crime and disorder, ensure the safety of the public, prevent public nuisance and protect children from harm.

[REDACTED]

## MAYOR OF LONDON

As a borough that has a global and local reputation for culture and creativity, I encourage Camden Council to support this- and all- vital cultural infrastructure and look favourably on these two applications, which I wholeheartedly support.

Best wishes,



**Amy Lamé**  
**Night Czar**



**From:** [REDACTED]  
**Subject:** RE: Letter of support Outernet Venues  
**Date:** 07 July 2023 09:56:30

---

Dear Rodney

Thank you for your comments, they will be noted by the case officer.

Kind regards

Paru Bhudia  
Licensing Officer

-----Original Message-----

**From:** Rodney Birrell [REDACTED]  
**Sent:** 06 July 2023 19:03  
**To:** licensing inbox [REDACTED]  
**Subject:** Letter of support Outernet Venues

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom it may concern

Re: HERE Denmark Place and The Lower Third Denmark Street

Please accept this email as my expression of strong support to extend the licensing hours to 4am for all the Outernet venues. These venues provide tremendous scope for the LGBTQI+ community activities and for other diverse communities whose spaces have been decimated recently.

I understand there is charitable aspect to their outreach which as chairman of Troubadour Theatres operating theatres on brownfield sites, I strongly support their ambitions.

Yours sincerely,

Rodney Birrell

Chairman Troubadour Theatres  
[REDACTED]

**From:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Support for Extension of Licensing Hours for Outernet Ventures  
**Date:** 05 July 2023 09:28:03  
**Attachments:** [image006.png](#)  
[image001.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.jpg](#)

---

Dear Steve

Thank you for your email.

I have forwarded your support to the case officer who will make note of your support.

Kind regards

Paru Bhudia  
 Licensing Officer

Telephone: [REDACTED]




---

**From:** Steve Wardlaw [REDACTED]  
**Sent:** 04 July 2023 13:26  
**To:** licensing inbox [REDACTED]  
**Subject:** Support for Extension of Licensing Hours for Outernet Ventures

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom it may concern

I am writing to express my strong support for an extension of licensing hours for the Outernet venues.

There are a number of reasons why I support this – having been to a number of events at HERE (part of the complex).

Firstly, there is a strong element of LGBTQ+ content. I have been a strong campaigner for LGBTQ+ rights since the late 1980s, and I think it is important for major venues to have a stream of appropriate content to counter some of the homogenisation of the entertainment sector in central London – as high prices force smaller venues to close.

Historically, the area around TCR always had a very gay-friendly vibe with suitably late hours to match. I am a great fan of the revamp of the area, but it is important culturally that this is not lost. The team at Outernet have been strong on this and I would support them being able to extend this and bring back some of the fun that made Soho and the area a popular and successful destination for tourists and locals alike.

Secondly, I have been to a number of events there. As part of my work on LGBT issues I help to organise a number of events at big venues for charity (I am on the board of Terrence Higgins Trust). With that background, every time I have been to HERE, the security is visible but polite, entry is well managed, and it feels like a well-run space.

With the renovation of the area, it is important to remember culturally the background of the area and this extension will help with content. I remember when that block had 3 or 4 LGBT venues (GAY, Bang, Milk Bar, Mars etc) – this is what makes London special as a cultural capital. But more – the Marquee is now a Weatherspoons and many venues that had live music are gone, replaced by generic bars. Live spaces are what made that area unique, tied in with a late-night vibe that is in danger of disappearing.

I have talked to the management team before about hosting charity events for us. We haven't done anything as yet but I am impressed by their interest in charity and giveback initiatives. It seems to me that they are correctly thinking of Outernet as a cultural gem in the area. An extension to their licence would assist commercially but also in terms of breadth of offering and I support this move.

I am happy to talk move about my support as you see fit.

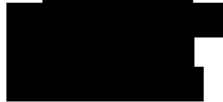
Thank you.

Steve

*Steven A Wardlaw, Chairman*



*M:*



*Photo: [Here](#)*



**From:** [REDACTED]  
**Subject:** RE: Letter of Support - Outernet Venue | LionHeart  
**Date:** 06 July 2023 10:15:12  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.jpg](#)

---

Dear Rhael

Thank you for your comments, they will be noted by the case officer.

Kind regards

Paru Bhudia  
 Licensing Officer

Telephone: [REDACTED]




---

**From:** LionHeartfelt [REDACTED]  
**Sent:** 05 July 2023 23:53  
**To:** licensing inbox [REDACTED]  
**Subject:** Letter of Support - Outernet Venue | LionHeart

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom it may concern,

My name is Rhael 'LionHeart' Cape, an honorary fellow of the Royal Institute of British Architects (RIBA), Associate Artist of the Royal Albert Hall and BBC Radio London Presenter.

I'm writing to you in regards of the remarkable cultural and creative establishment '**The Outernet / HERE, Denmark Place and The Lower Third, Denmark Street**'.

As a prominent figure and artist in London, I've seen the impact and reverberations of interest permeating communities here, particularly ones that galvanise international reach of cultural importance.

From their collaborative openness with diverse artists/creatives and facilitating spaces for artistic (music/poetry/visual arts) endeavours, I feel its paramount that I express my support for their extension of working hours.

The pandemic has shown the need for creativity, diverse artistic endeavours, content, entertainment and recent months have solidified the key significance of venues, but none have demonstrated the capabilities of the outernet.

Tottenham court road has had a renaissance due to the venue and all that's magnetised towards the area since its opening.

--

Positive Vibes

**Rhael 'LionHeart' Cape Hon FRIBA**

[REDACTED]

Pronouns: He/Him

Artist | Visionary Director | TEDx Speaker | BBC Radio Presenter

1st Associate Artist of The Royal Albert Hall (2022-2024) |  
1st Poet in Residence at Grimshaw Architects & the Saatchi Gallery  
Special Participant for The Biennale Architettura 2023 in Venice

**From:** [REDACTED]  
**Subject:** RE: The Lower Third PREM-LIC\110306 - PREM-LIC\110349  
**Date:** 07 July 2023 09:57:37  
**Attachments:** [~WRD1783.jpg](#)

---

Dear Crispin

Thank you for your comments they will be noted by the case officer.

Kind regards

Paru Bhudia  
 Licensing Officer

Telephone: [REDACTED]

---

**From:** Crispin Weir [REDACTED]  
**Sent:** 06 July 2023 22:52  
**To:** licensing inbox [REDACTED]  
**Subject:** RE: The Lower Third PREM-LIC\110306 - PREM-LIC\110349

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

### Applications

**PREM-LIC\110306 – The Lower Third, 26 Denmark Street, WC2H 8NL**

**PREM-LIC\110349 – HERE, St Giles Circus Site, Denmark Place, WC2H 8LH**

Dear Camden Licensing Authority,

We write to you in support of the applications to extend the operating hours on the premises licences for The Lower Third and HERE at the Outernet venue.

Specifically, the applications seek:

- **to extend the hours for licensable activities on The Lower Third premises licence from 02:00am to 04:00am on Thursdays, Fridays and Saturdays;**
- **to extend the hours for licensable activities on the HERE premises licence on 154 occasions per year until 04:00am.**

We understand that additional conditions are being offered concerning security and safety measures and welfare and vulnerability engagement. We support all this as they will promote the licensing objectives of prevention of crime and disorder and prevention of public nuisance.

We strongly contend that the applicant upholds the following licensing objectives and will continue to do so if these applications are granted:

1. The prevention of crime and disorder;
2. Public safety;
3. Prevention of public nuisance; and
4. Protection of children from harm.

Late night venues have always been a cornerstone of the UK music and cultural scene. The loss of late night and live music venues across London in recent years has been well publicised and it is tragic to see so many premises, including those in Camden, to be closing or at serious risk following the pandemic and significantly increased costs.

What Outernet have created here is state-of-the-art venues that provide a platform for an incredible breadth of cultural public events. As well as hosting world-renowned musical acts and club nights, the venue provides an important platform for grassroots talent and non-profitable programming across the creative and cultural spectrum. There are few venues in Camden that can offer the kind of cultural richness that these venues can.

We also believe that it is important for well-run venues like this to have the backing and necessary resources for them to continue offering incredible opportunities to grassroots musicians and artists, and marginalised groups in the creative sphere.

Attending events at HERE and The Lower Third have always been an amazing atmosphere in a safe and well-managed environment. We understand that for venues like these to remain successful that they need to be flexible and to be able to offer certain events that require a late licence.

We have every confidence that the operators of these two venues can operate licensable activities until 04:00am whilst continuing to successfully promote the licensing objectives referred to above.

We support both applications for later licences to provide an excellent, culture-focused late-night hub.

After forty years of living and working in the area and 15 of owning a business in the close facility, I can say with full confidence that I think this application is essential for allowing the nighttime economy of the area to sustain a more natural flow and the ability to Police the otherwise, taken advantage of, long neglected, streets of St Giles.

Given the lack of understanding of the care required for the St Giles area over the years, I would add that any venue that has made an effort and is clearly well managed with

additional positive intentions, should be considered fit for approval on all grounds.

Yours sincerely,

Crispin.

--

Crispin  
Regent Sounds  
4 Denmark Street  
London  
WC2H 8LP



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**From:** [REDACTED]  
**Subject:** RE: HERE - App\Premises-Vary\115502 & The Lower Third -App\Premises-Vary\115496  
**Date:** 05 July 2023 12:27:00  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)

---

Dear Anthony

Thank you for your comments they have been forwarded to the case officer.

Kind regards

Paru Bhudia  
Licensing Officer

Telephone: [REDACTED]



---

**From:** Anthony Rawlinson [REDACTED]  
**Sent:** 05 July 2023 11:28  
**To:** licensing inbox [REDACTED]  
**Subject:** HERE - App\Premises-Vary\115502 & The Lower Third -App\Premises-Vary\115496

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

*To Whom It May Concern - I support the extension of the licensing hours for all venues at the Outernet for the following reasons:*

*The venues are an important addition to the scene, which has seen many venues across London close over the last 5 years.*

*It will bring and help support more diversity and more live music back to central London.*

*Driving more job opportunities in the industry - increasing workforce.*

*Bringing more activity back to the area and therefore making the area feel safer.*

*Allowing up and coming artists a new place to launch their careers.*

*Supporting and promoting the LGBTQI community.*

*Building training and development programs across the live music industry.*

*Helping to support and fund charitable and outreach work.*

*Yours sincerely,*

*Anthony Rawlinson*

**From:** [REDACTED]  
**Subject:** FW: Extension of Licensing Hours for HERE, Denmark Place APP/Premises-Vary/115502 & The Lower Third, Denmark Street APP/Premises-Vary/115496  
**Date:** 04 July 2023 15:05:36  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.jpg](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.jpg](#)

---

FYI

Mohammed Rahman  
Licensing Support Officer

Telephone: [REDACTED]



---

**From:** licensing inbox [REDACTED]  
**Sent:** 04 July 2023 14:17  
**To:** [REDACTED]  
**Subject:** FW: Extension of Licensing Hours for HERE, Denmark Place APP/Premises-Vary/115502 & The Lower Third, Denmark Street APP/Premises-Vary/115496  
FYA

Paru Bhudia  
Licensing Officer

Telephone: [REDACTED]



---

**From:** Adrianna Irvine <[REDACTED]>  
**Sent:** 04 July 2023 12:39  
**To:** licensing inbox [REDACTED]  
**Cc:** Karrie Goldberg [REDACTED]  
**Subject:** Extension of Licensing Hours for HERE, Denmark Place APP/Premises-Vary/115502 & The Lower Third, Denmark Street APP/Premises-Vary/115496

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Camden Council: It seems to me to be counterintuitive NOT to extend the licensing hours for these two places now that they are up & running & SO needed in London. Both applications are currently live, with a deadline of July 6th at midnight so I am immediately requesting that you go ahead & grant these two, relatively minimal extensions for the Lower Third until 04:00 every



Thursday, Friday & Saturday. At HERE the request is to extend the hours to 04:00 on 154 occasions per year, out of 365 to give them the flexibility to operate until then when the business needs it. Why stifle them now that they are up & running?

- *HERE – APP\PREMISES-VARY\115502*
- *The Lower Third - APP\PREMISES-VARY\115496*

Since opening, it's clear that they have delivered. Those events covered vary over such a vast spectrum of programming (half a dozen of which I have attended, from Fashion to DJs, bands, product launches & a wonderful birthday party. But they have big ideas which need to be welcomed back into London which used to be so vibrant & the place to be. Please consider this request.

Yours sincerely,

Adrianna Irvine M.A., M.B.A.C.P. (Accred)

Psychotherapist

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Subject:** RE: Licensing for The Lower Third and HERE at Outernet  
**Date:** 06 July 2023 14:39:24  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.png](#)

---

Dear Traci

Thank you for your comments, they will be noted by the case officer.

Kind regards

Paru Bhudia  
 Licensing Officer

Telephone: [REDACTED]




---

**From:** Traci Coulter [REDACTED]  
**Sent:** 06 July 2023 14:30  
**To:** licensing inbox [REDACTED]  
**Subject:** Licensing for The Lower Third and HERE at Outernet

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom it may concern:

I'm writing in support of the application that is pending with you for the extension of the licensing for The Lower Third and HERE at Outernet. The space is run by some amazing people who want to help restore the economy and bring some amazing acts to the venues. Now that we are out of covid, we are all looking for something amazing to do and these venues are offering that with extended hours. There is a long list of reasons why this should be approved, including the loss of live music in London. The venue is state of the art and can attract (and already does) top tier events, performances and exhibitions. This will in turn give back to the community, which they are also doing with their charity initiatives and programs.

I have known one of the partners for 20+ year and she does not do anything lightly. She has put her heart and soul into this event and follows all the rules, she is someone that you can trust will do this correctly and for the benefit of many!

If you have any questions, please do not hesitate to contact me.

Sincerely,

Traci Coulter



Traci Coulter



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*message and follow with its deletion, so that we can ensure this does not occur in the future.*

**From:** [REDACTED]  
**Subject:** RE: HERE – APP\PREMISES-VARY\115502; The Lower Third - APP\PREMISES-VARY\115496  
**Date:** 06 July 2023 10:17:59  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.jpg](#)  
[image005.png](#)  
[image006.jpg](#)  
[image007.jpg](#)

Dear Lisa

Thank you for your comments, they will be noted by the case officer.

Kind regards

Paru Bhudia  
 Licensing Officer

Telephone: [REDACTED]



**From:** Lisa Lernoux-Dock [REDACTED]  
**Sent:** 06 July 2023 08:44  
**To:** licensing inbox [REDACTED]  
**Subject:** HERE – APP\PREMISES-VARY\115502; The Lower Third - APP\PREMISES-VARY\115496

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To whom it may concern

I am writing this letter in support of Outernet's Planning Application to extend their hours of operation for the following reasons:

- It will bring more live music back to central London, thereby helping to support related businesses
- It will help to support and promote the LGBTQI community and overall diversity
- It will help to fund Outernet's continuing strong support of charitable and outreach work

It is for all these reasons that I support in full the proposed extension. As the Group Sales Director of a hotel group with two London properties I hope you will take these points into consideration.

Sincerely yours,  
 Lisa Lernoux-Dock  
[Lisa Lernoux-Dock](#)  
 ILH Group Sales Director  
 Email: [REDACTED]



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**From:** [REDACTED]  
**Subject:** License variation: HERE, Denmark Place and The Lower Third, Denmark Street 114910  
**Date:** 06 July 2023 14:43:17  
**Attachments:** [image009.png](#)  
[image010.png](#)  
[image011.png](#)

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**From:** Dan Beaumont [REDACTED]  
**Sent:** 04 July 2023 12:10  
**To:** licensing inbox [REDACTED] >  
**Subject:** License variation: HERE, Denmark Place and The Lower Third, Denmark Street

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

To Whom It May Concern:

I am writing in support of the license extension at HERE, Denmark Place and The Lower Third, Denmark Street.

I am the founder of an LGBTQI+ space in Hackney called Dalston Superstore, and a producer of LGBTQI+ events (including three at this venue, the most recent being the Pride event with a 4am extension).

London is in desperate need of *safe* nightlife spaces, and the team at HERE have developed a world class venue that we as Londoners can feel proud of. Working with the team at HERE I have seen first-hand how dedicated they are to the safety of everyone who they welcome into the space. It's rare to work with a venue team so committed to fulfilling the licensing objectives; I have seen how safety and responsibility are core values built into the operational schedule of this venue.

I understand how challenging it is to run late night spaces, but also that later hours can be crucial to the economics of running such a space sustainably, and it's clear that this venue needs the later hours to continue delivering its diverse programme. Our city needs late night spaces that are operated responsibly and effectively.

I urge you to grant these late hours to help secure the future of this amazing venue, and Londoners and visitors alike can enjoy HERE for years to come.

Best

**Dan Beaumont**

[REDACTED]  
Pronouns: he / him / his  
[REDACTED]

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## **LCUK Artists LTD**

To Whom It May Concern

**RE:** Application to extend Premises Licence hours:

HERE (APP\PREMISES-VARY\115502) & The Lower Third (APP\PREMISES-VARY\115496)

I am writing as the Director of LCUK Artists LTD, an independent company which organises and promotes concerts and private events with renowned worldwide artists and DJs as well as manages and develops young and promising talent. I am writing in support of the ongoing applications by 'HERE' and 'The Lower Third' venues to extend their Premises Licence hours.

Since their launch, 'HERE' and 'The Lower Third' have successfully delivered a diverse and broad spectrum of programming ranging from comedy, DJ sets, bands, fashion shows to upfronts, product launches, and more. In partnering with these venues, we have observed first-hand their commitment to enriching the cultural landscape of London.

As a company that values the enrichment of arts and culture, we see the importance of such venues in a city that has witnessed many closures over the last five years. By extending their licence hours, 'HERE' and 'The Lower Third' would not only continue to be a beacon of varied artistic expression but also provide additional job opportunities in the entertainment industry, thereby significantly contributing to the local economy.

In respect to the proposed extension of their licence hours, we trust that both 'HERE' and 'The Lower Third' will adhere to all relevant regulations, including noise control, to continue respecting and benefitting the community.

Allowing the extension of their premises licence hours will undoubtedly contribute to the city's night-time economy and uphold London's international reputation as a thriving cultural capital. It will also ensure the continuation of a diverse and vibrant programming schedule, which is of great importance not only to companies like LCUK Artists LTD, but artists, and audiences alike.

Thank you for your time and consideration.

Yours sincerely,



Lenka Chubuklieva  
Director, LCUK Artists LTD





## Conditions consistent with the operating schedule

Conditions 19, 38, 42, 50, 51, 55, 56, 65, 69 & 70 at Annex 2 and 3 of the existing premises licence

19. The sale of alcohol at the premises shall be at all times ancillary to the use of the premises as a multi-purpose auditorium space. The sale shall be restricted to such occasions as exhibitions; retail events; live pre-recorded music; product launches; fashion shows; film screening; events and conferences, and the like kind.

38. In relation to any event involving a promoter, their associates, DJ(s) or artists(s), or one where the venue has been booked by an outside agent with a view to selling tickets to the public for profit then:

- a) The licensee shall complete a full risk assessment via open source material reference checks from previous venues performed and if there are concerns following all these checks, to inform Camden Police Licensing at least 7 days before the event occurs on email EK-Licensing@met.police.uk.
- b) The licensee shall notify Camden Police Licensing Team via the same email if there are any high risk events or any unusual or large scale events (due to occur within less than 7 days) as soon as reasonably practicable. The Police will have the right of absolute refusal of any such events for reason of late notification.
- c) Where the venue runs a promoted event using a DJ or MC who performs to background music then they should risk assess the need to search every customer upon entry taking cognizance of Police advice. If the risk assessment determined that searching will be conducted, then if a customer refuses to being searched this will result in NO ENTRY.

42. A challenge 25 policy will be enforced, where any person reasonably looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. The only acceptable forms of identity will be those with photographic identification documents recognised in the Home Office guidance; including passports, photo-card driving licence, military ID cards or proof of age card bearing the PASS hologram.

50. Subject to any relevant consents which may be required from the Local Authority, the designated queuing area shall be enclosed within appropriate barriers to ensure that the public footway is kept and maintained clear.

51. Where the premises is in use after 8:00pm and the sale of alcohol is taking place, the smoking area shall be constantly supervised by an SIA registered door supervisor who will monitor the capacity and restrict access when necessary.

55. The licensee shall ensure that staff are trained as appropriate, in respect of relevant licensing law, crime scene best practice and upon the sale of alcohol to drunks and persons underage. This training is to be clearly documented and signed and any training for future staff must also be organised at the appropriate time. Refresher training shall be carried out every 6 months. Details of training are to be made available for inspection by Police or other Responsible Authorities, upon request.

56. Where any illegal substance is found within the premises then a record shall be made in the incident book by a duty manager. Any illegal substance shall be stored

securely pending collection by the Police unless they are present on site and this is handed to them. Any seizure of drugs and weapons shall be recorded in the incident book by a duty manager.

65. A Notice shall be fixed in a prominent position near exits reminding customers that this is a residential area and requesting patrons to leave quickly and quietly.

69. A proof of age scheme shall operate at the premises and staff shall be trained in its use, e.g. Challenge 25.

70. The premises will implement a dispersal policy and all relevant staff will be trained in its implementation. The policy shall contain measures intended to encourage patrons leaving the gallery after 23:30 until close of business to disperse towards Tottenham Court Road Station or by travelling North/South on Charing Cross Road or East/West on Oxford Street/New Oxford Street. It will contain measures actively to discourage patrons from dispersing into the Piazza areas to the North and East of the premises. The Policy will be reviewed regularly and whenever the Licensee becomes aware of issues associated with dispersal.

## Section 1: Background comments of the Borough Solicitor

- 1.1 The purpose of Camden's Statement of Licensing Policy is to make it clear to applicants that wider considerations will be taken into account when determining applications. It is intended to guide the Licensing Panel when considering licence applications. However, the Licensing Panel must always consider each application on its own merits and allow exceptions to the normal policy where the circumstances of the application justify allowing an exception. The burden is on the applicant to show that they comply with the policy.
- 1.2 Members should only address those matters that have formed the subject matter of relevant representations. Matters that arise that are not the subject of relevant representations fall outside the function that the Panel is exercising when it holds a hearing
- 1.3 Members must determine, having regard for the evidence, whether granting the application for a premises licence will impact adversely on the policy criteria listed in paragraph 3 of this report.
- 1.4 In accordance with the provisions of Part 1 of Schedule 5 of the Act, where a Licensing Authority rejects in whole or in part, an application for a new premises licence, the applicant may appeal against the decision, to a magistrate's court within 21 days of being notified of the decision.
- 1.5 Similarly, where a person who made relevant representations in relation to the application contends that the licence ought not to have been granted, or that different or additional conditions should have been imposed on the licence, he may appeal against the decision to a magistrate's court within 21 days of being notified of the decision.
- 1.6 **The Human Rights Act 1998** incorporates the key articles of the European Convention on Human Rights into domestic law. Decisions on licensing matters are actions of a public authority and must be compatible with Convention rights. Consequently, Members of the Panel must be aware of the rights contained in the Convention (particularly those set out below) when making licensing decisions.
  - (a) **Article 6: Right to a fair trial**  
In the determination of his civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
  - (b) **Article 8: Right to respect for private and family life**  
Everyone has a right to respect for his or her private life, his home and correspondence.

**(c) Article 1 of the First Protocol: Protection of property**

Every natural or legal person is entitled to the peaceful enjoyment of his possessions, including a licence. No one shall be deprived of his possession except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

**(d) Article 10: Freedom of Expression**

Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.

The exercise of these freedoms since it carries with it duties and responsibilities may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health and morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.

**(e) Article 14: Prohibition of discrimination**

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

- 1.7 When formulating policy local authorities must have regard to the **Equality Act 2010**. The Act provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including licensing powers. Members of the panel must be mindful of this duty when determining all licensing applications.

**The section 149 Public Sector Equality Duty**

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

- (a) tackle prejudice, and
- (b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

1.8 In determining any application, the Council must comply with the public sector equality duty in s.149 of the 2010 Act. This is a duty to have regard to the need to achieve the statutory goals of s.149, rather than to achieve a particular result. The s149 duty sits alongside and does not override statutory requirements in relation to determining licensing applications, including the duty to consider all evidence on its merits and the legislative criteria listed at paragraphs 3 & 4.

1.9 When members have before them representations or other material on issues relevant to s149, even outside the scope of “standard” licensing considerations such material must still be specifically assessed in the context of s149. However, because s149 creates a requirement to “have regard” the fact a matter raised is relevant to s149 will not automatically translate into a reason for refusing an application that would be sustainable in any subsequent appeal, given the legal requirement to determine applications in compliance with licensing legislation.

**Section 2: Financial Comments**

- 2.1 Following consideration there are no financial implications concerning this application. The Executive Director Corporate Services has been consulted in the preparation of this report and has no further comments to add.