

EXAMPLE OF AN IMPACT ASSESSMENT





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Introduction and Overview

Terms of Reference

This document and associated recommendations has been prepared following the completion of an Impact Assessment and Operational Review for the proposed [REDACTED]. These were commissioned by the developers/owners of the site as the land falls within the [REDACTED] Cumulative Impact Policy area (CIP) and is therefore subject to restrictions on development in line with the [REDACTED] CIP Policy.

The following terms of reference were agreed prior to completion of the impact assessment and operational review:

- Examine the likely impact of the development on the wider [REDACTED] night time economy
- Assess the specific impact within the [REDACTED] Cumulative Impact Policy area
- Explore whether the proposed development accords with the aims and objectives of the [REDACTED] CIP, specifically around delivering a wider cultural night time offer to the City
- Conduct a review of the proposed operational practices for the venue and make recommendations, paying particular attention to the prevention of crime and disorder and public nuisance ([REDACTED] CIP priority Licensing Act objectives)
- Complete a full Clubsafe Assessment during operating hours. (Subject to the premises being granted planning permission and a license to sell alcohol) once the premises are operating
- Assess any training need and deliver such training prior to trading
- Carry out a progress assessment on a quarterly basis until all recommendations have been implemented

Methodology

Clubsafe is an independent licensing and violence reduction consultancy with the primary objective of assisting licensed premises in creating safe, crime free and legally compliant environments within their venues. Clubsafe seeks to ensure, through its assessment, review and training methodologies, that duties under the Licensing Act 2003 are discharged and the potential for violence is reduced or eliminated.

This Impact Assessment/Operational review was informed by the following:

- > Review of all relevant academic literature/industry research relating to these types of premises
- > Interviews with all Directors
- > Interview with the proposed Designated Premises Supervisor (DPS)
- > Dialogue with other Licensing Industry experts
- > Site visit
- > Assessment of approved site plans
- > Environmental visual audit within 200 meters of the venue
- > Benchmarking of the proposal against the Liverpool Cumulative Impact Policy
- > Application of the Clubsafe violence reduction 'Toolkit'

All recommendations within this report are made with cognizance of the requirements of the Licensing Act to demonstrate due diligence and it has been agreed by the owners that these will inform the development of a premises Standard Operating Procedures manual (SOP) which will enable the venue to operate with high levels of public safety.

Recommendation One: Introduce a new Standard Operating Procedures manual (SOP) to assist in the safe and compliant operation of the business.

All recommendations made by Clubsafe are evidence based, relying on both academic and action based research. Clubsafe guards its independent credentials and confirms that all findings and



recommendations are made exclusively with public health and protection in mind irrespective of the commissioning body's commercial motives.

This impact assessment/operational review covers eight key areas. These are:

1	Impact factors relevant to the ██████████ Cumulative Impact Policy area
2	Leadership and accountability
3	Assessment of proposed governance, policies and procedures
4	Training Needs Analysis (TNA)
5	Planned measures to prevent 'Triggers for Violence'©
6	Discharge of duties under the Licensing Act 2003
7	Emergency procedures
8	Partnerships and community engagement

Below is a breakdown of the areas considered during the assessment:

Impact factors relevant to the ██████████ Cumulative Impact Policy area	
1	Relevance to CIP dispensations
2	Prevention of crime and disorder (Policy priority within ██████████ CIP)
3	Prevention of public nuisance (Policy priority within ██████████ CIP)
4	Terminal hour proposals
5	Impact on change of use

Leadership and accountability	
1	Company history and trading reputation
2	Role and experience of Directors
3	Designated Premises Supervisor experience
4	Support provided by other organisations/professional bodies
5	Consultancy support

Governance, policies and procedures	
1	Governance arrangements
2	Support documentation
3	Company policies and procedures relating to violence and disorder reduction
4	Roles and responsibilities of staff
5	Evaluation and review processes
6	Internal and external communication

Training Needs Analysis	
1	'Triggers for Violence'©
2	Licensing Act 2003
3	Conflict management
4	Crime scene and post incident management
5	Under-age sales
6	Health and safety



'Triggers for Violence'© management arrangements	
1	Client Group selection and management
2	Under-age sales systems
3	Overcrowding - Prevention and intervention
4	Management of the use and supply of illegal drugs
5	Management of the internal and external environment including queues and dispersal
6	Irresponsible promotions and client intoxication

Discharge of duties under the Licensing Act 2003	
1	Licence application
2	Adherence to licensing objectives
3	Drinks promotions

Emergency Procedures	
1	First aid provision
2	Crime scene management arrangements
3	Incident management
4	Ejections protocols
5	Evacuation procedures

Partnerships	
1	Active management of Police and Local Authority relationships
2	Contact with local Ward Councillors
3	Involvement and influence within industry representative groups
4	Engagement with local community and residential population



Section One

Impact factors relevant to the [REDACTED] Cumulative Impact Policy area

The following areas have been considered within Section One:

Impact factors relevant to the [REDACTED] Cumulative Impact Policy area	
1	Relevance to CIP dispensations
2	Prevention of crime and disorder (Policy priority within [REDACTED] CIP)
3	Prevention of public nuisance (Policy priority within [REDACTED] CIP)
4	Terminal hour proposals
5	Impact on change of use

Relevance to CIP dispensations

The geographic location of the premises is significant insofar as it sits near to the western boundary of the [REDACTED] CIP. This is included in, and forms part of [REDACTED] Council's licensing policy.

The [REDACTED] CIP areas were introduced on 19th January 2012 following representations made by [REDACTED] Police to the Local Authority relating to increased levels of violence and anti-social behaviour. Following local consultation, the authority was satisfied that there was a link between the actual number of licensed premises and the identified increase in alcohol related violence. The policy was therefore approved and operates to this day. Research indicates that vertical drinking establishments (VDEs) are by far the most problematic venues and the CIP seeks to limit any further expansion in this type of venue.

The CIP contains dispensations under four categories:

- Restaurants where alcohol is only sold with a meal
- Hotels
- Venues specially designed to host cultural activities
- Premises licence for the sale of alcohol for consumption off the premises

Premises falling outside the above exemptions will potentially be affected by the CIP. There will therefore be a presumption against granting a new premises licence or any variation of the same. In order for this presumption to have any effect there will need to be a representation made by one of the Responsible Authorities (RA) or any other person who is likely to be affected by the application. In the absence of such a representation the authority must grant an application in its original form in accordance with particulars given in the operating schedule.

If such a representation is made, then the licensing sub-committee will engage their judgement and decide whether or not the presumption against granting should apply. It would be incumbent upon [REDACTED] to demonstrate that the application will not add to the cumulative impact on the area or offend against either of the licensing objectives specified in the policy.

Despite the existence of the CIP all licensing applications must be considered on their own merits. This is reinforced in Para 1.17 of the revised Section 182 guidance, which states:



“Each application must be considered on its own merits and in accordance with the licensing authority’s statement of licensing policy; for example, if the application falls within the scope of a Cumulative Impact Policy. Conditions attached to licences and certificates must be tailored to the individual type, location and characteristics of the premises and events concerned. This is essential to avoid the imposition of disproportionate and overly burdensome conditions on premises where there is no need for such conditions. Standardised conditions should be avoided and indeed may be unlawful where they cannot be shown to be appropriate for the promotion of the licensing objectives in an individual case”

Any licensing sub-committee should therefore, look at the proposal in the wider context of the likely impact (or otherwise), on the night time economy within the relevant CIP. They may take anything into consideration that they think is appropriate in assisting them in reaching a sensible and considered judgement in relation to that which is being asked for. This will include the details of any representation that has been submitted. The Local Authority is obliged to consider the guidance but may depart from it if they can give reasons for doing so.

In relation to the CIP, the committee is able to consider incidents of violence, disorder and statutory nuisance that have occurred at the premises or can be attributed to the venue in relation to any of the licensable activities within. This is not relevant for [REDACTED] as it is a new development.

It is the contention of [REDACTED] Police that since the introduction of the CIP it has proved supportive in reducing violent crime and public nuisance in the designated areas. From Clubsafe’s perspective, the advent of the CIP has attracted a more diverse style of premises by forcing operators to be more considered with their applications as well as giving more thought to the general operation of their venues. This has had the effect of producing an all-round concept that is not solely based on alcohol consumption but wider musical, artistic, sporting and cultural activities broadening the City’s night time ‘offer’. This can only add value to the City by introducing a broader community and economic benefit.

The promotion of a wider night time offer is essential in enhancing [REDACTED] (and indeed, any City’s reputation) as a visitor destination of choice. Clubsafe is involved in a number of developments nationally, most notably within London’s night time economy which are relevant in this case.

The London Mayor has established a Night Time Commission and appointed a Night Tsar (Amy Lamé) with the aim of creating a 24-hour City for music, entertainment and night time sports and cultural activities that don’t rely exclusively on vertical drinking establishments. The Commission reports its consultation findings in November 2018 but it is already clear that the broad based London night time offer in place and also planned for 2019 will make the Capital a more attractive night time destination potentially to the detriment of other UK cities (including [REDACTED].)

A broader City offer is to be encouraged and the Clubsafe assessment processes has revealed that the [REDACTED] proposal provides a low risk alternative offer to the City with the opportunity to engage up to 450 visitors in activities other than vertical drinking prior to further engagement in the night time economy later in the evening/early hours of the morning.

Bowling has been part of the UKs night time offer since at least the 1960s. Since the development of a broader range of activities within a single venue was piloted in the 1990s such as bowling alongside, table tennis, pool, karaoke, indoor golf, rodeo etc. venues have grown in number across the UK. Bowling is currently one of the fastest growing national leisure activities with 1/3rd of all Britons having participated in bowling in 2017. This represents a 7% growth year on year since 2010.



A recent Mintel report (international Market Research company), revealed that the activity now has broader appeal with white collar workers as an alternative to post-work visits to VDEs. The same report indicates that the family focus of the activity is clearly growing in popularity and it accounts for 27% of all office nights out in the Metropolitan area.

Waiter service, provision of mobile phone charging points and provision of instant video replays of the activity all enhance the attractiveness of the activity.

Recommendation Two: Consider the introduction of mobile charging points, instant video replay and waiter service to enhance the customer experience.

An international academic literature search on bowling and its links to crimes of violence returned a negative result. The logical conclusion is that this activity has not presented as a pre-cursor to violent acts across the globe and has therefore not received attention from the research community. The only published research on the efficacy of bowling as a commercially viable activity is a Masters publication from one of the Directors of the company wishing to pursue this endeavour. This research has been peer reviewed by the Founding Director of Clubsafe, (himself a post graduate researcher in Public Health relating to the night time economy.) The research has structural and construct validity and as such, the proposal is accepted as a commercially viable, low risk proposition.

Clubsafe has conducted a national scan to ascertain whether bowling as a physical activity could be considered in any other context. There are a large number of precedents which indicate that bowling is indeed a cultural activity within the United Kingdom. Clubsafe cites four such examples to illustrate the point but this activity is widely accepted as having an enduring history across the UK and is part of its popular culture.

1. **Doncaster Cultural and Leisure Trust:** A registered charity, backed by Doncaster Council aiming to achieve a healthier community through bowling centres and other alternative sports and recreational facilities
2. **Crawley Town centre bowling facility:** Listed as a cultural activity within the Crawley Town Council's directory. This facility is also widely used by a range of groups with varying disabilities
3. **Active Northumberland:** Northumberland Council have developed bowling as a popular cultural activity across the County and list this as such on the 'Netfind' search facility
4. **British Tenpin Bowling Association (BTBA):** This bowling membership organisation has a number of resources dedicated to engaging with diverse communities through bowling as a popular cultural activity

Key judgement One: Bowling in the format proposed within the [REDACTED] business plan can be qualified as a national popular culture activity and therefore should receive cultural dispensation within the Ropewalks CIP.

Recommendation Three: Ensure that all facilities are Equality Act compliant.

Recommendation Four: Develop partnerships with [REDACTED] disability groups and ensure that sufficient adjustments are made to encourage their involvement.

Recommendation Five: Venue to explore membership and close partnership with the BTBA focussing particularly on becoming a national disability centre of excellence for bowling.



The proposed site for this venture is close to other iconic Liverpool cultural and academic institutions. Opportunities exist to further broaden the offer by making the venue space available for alternative cultural activities such as pop up galleries, performance space etc.

Recommendation Six: Establish new partnerships with local cultural and performance organisations (e.g. the Bluecoat, Liverpool Institute for Performing Arts, Liverpool catering College etc.), to extend the offer made as a responsible premises upholding the core tenets of the CIP

Prevention of crime and disorder (Policy priority within [REDACTED] CIP)

The existence of a CIP does not mean that there is a blanket ban on any new premises or variations. The defining case for the interpretation of CIPs is Brewdog: Leeds 6th September 2012. Presided upon by Judge Anderson who stated that the CIP should not be considered as an 'Iron Curtain'. He determined that Brewdog, by the very nature of its operation, was unlikely to contribute to any current or future alcohol related violence or noise nuisance. This was a view that was also adopted by the judge in Bournemouth in the Orange Rooms hearing earlier in October 2011.

There are many direct comparisons to be made between the Brewdog determination and the operation of [REDACTED]. The premises are to be managed by an experienced, mature and competent team with a knowledgeable group of companies behind them providing excellent levels of strategic and operational support. (Cited elsewhere in this report.) This activity is also a low risk in terms of the likelihood of violence and this will be further reduced with the implementation of recommendations made in Section Five.

Prevention of public nuisance (Policy priority within [REDACTED] CIP)

Public nuisance is a feature of the [REDACTED] CIP, particularly for local residents, road users and nearby business premises. Recommendations have been made within Section Five to ameliorate nuisance caused by rowdy behaviour, dispersal and controlled ejections. Once implemented, it is the judgement of Clubsafe that the likelihood of public nuisance emanating from the core client group of the venue will be much lower than for surrounding VDE venues due to the reduced levels of alcohol consumption associated with engaging in the physical activity of bowling.

Terminal hour proposals

The core client group will be a mixture of residents of [REDACTED] and visitors to the City. After 8pm the target age range is to be 18 to 35, the majority of which will be pre-booked groups. Research data is not available for alcohol unit consumption whilst bowling but it is most likely to be fewer units than for VDE only venues.

Each evening is to be managed in three phases with a focus on a high energy customer experience. Proposals have also been made in Section Five for the final hour of each evening to increase the amount of adrenalin and dopamine secreted. The draining of adrenaline associated with high energy activities is directly linked with the creation of a 'false calm' as this is only replaced in the body's system over several hours. The secretion of dopamine gives a natural high and induces a positive mood. These and other final hour protocols will create a safe and compliant client group ready for the next phase of their visit to the City.



The culture of pre-drinking is a problematic issue nationally but in [REDACTED] this is mostly confined to before midnight where users of the night time economy engage in unsupervised and often excessive consumption of alcohol in a home setting. The experience with local responsible authorities is that a large number of these revellers start to arrive within night time economy areas across the City around midnight with high levels of alcohol in their systems.

The bowling and ancillary activities proposed within the business plan focus on alternative activities to alcohol consumption although this is still a feature of the activity, particularly at weekends. It is the judgement of Clubsafe that any delay in dispersal of the core client group to VDEs will result in a corresponding reduction in the units of alcohol consumed by these persons and their levels of intoxication. It is recommended therefore that 2pm be the terminal hour with wind down protocols implemented at least one hour before this time. Phased dispersal should then be implemented in line with the recommendations outline in Section Five. This will ordinarily result in the core client group having lower Levels of Perceived Intoxication (LPI scale) than their contemporaries engaged in pre-drinking activities.

Recommendation Seven: Introduce a terminal hour of 2pm with associated wind down protocols at least one hour prior to this time.

Impact on change of use

The proposed site is currently a large parking facility with ramped access to Duke Street, a busy B-road dissecting the westernmost part of the [REDACTED] CIP. The change of use from carpark to bowling establishment will eliminate all road movements to and from the site and have a net positive impact on vehicle/pedestrian interaction and therefore, public nuisance, a Ropewalks CIP requirement.

***Note:** The author of this report is the former Police Inspector for the City with a responsibility for Licensing and the management of the CIPs from an enforcement perspective.



Section Two

Leadership and accountability

The following areas have been considered within Section Two:

Leadership and accountability	
1	Company history and trading reputation
2	Role and experience of Directors
3	Designated Premises Supervisor experience
4	Support provided by other organisations/professional bodies
5	Consultancy support

Company history and trading reputation

The Group of companies supporting this development operates a range of licenced and commercial premises across [REDACTED]. This Group has been a corporate entity for over 20 years and is considered a responsible operator across the City. The Company accountant, as a senior member of the business, has taken a hands on project management role. Clubsafe has interviewed this individual and has no concerns as to his competence to deliver a project of this size or complexity.

Role and experience of Directors

Two Directors of the company will take an active leadership and management role for the new business. Both are young entrepreneurs, with entrepreneurial support being provided by [REDACTED] University and executives from their wider Group of companies. They have limited experience of the night time economy but both demonstrate a good understanding of what is required to run such a business.

One of the Directors, Mr. [REDACTED] has recently completed a Masters Degree in Entrepreneurship with the subject of his dissertation research project being the concept of opening a bowling venue within [REDACTED]. He has elegantly and appropriately articulated the market and the industry and conducted an impressive feasibility study. This has included a hands on assessment at a number of similar venues in London which has revealed invaluable information on the desired operating practices.

Mr. [REDACTED] dissertation does not give due consideration to the management of crime and disorder and this is an omission. After an initial Clubsafe consultation, the Directors commissioned Clubsafe to deliver a number of 1-1 training sessions on the safe management of nighttime economy venues. Both have each received 12 hours training in all areas subject of this report. The company has also retained Clubsafe as a consulting partner with a 24 hour callout facility.

Recommendation Eight: Retain Clubsafe as a consulting partners for the 1st 12 months trading period and review the requirement for continuation after 9 months.



Designated Premises Supervisor experience

Mr. [REDACTED], the DPS designate has over 20 years' experience as both a Licensing and Designated Premises Supervisor (DPS.) He has an impressive and in depth knowledge of the licensing trade and was able to articulate how he would discharge his legal responsibilities at the new venue.

The proposed DPS is also engaged as a partner in the enterprise and has a vested interest in its success. He currently operates one of the largest Bowling and entertainment venues in London is clearly experienced in this specialist field.

His aspiration is to deliver a premium only offer and as such intends to avoid any drinks promotions or other industry upselling techniques as he believes the experience is everything. He also plans to introduce a free concierge service during the terminal hour to assist with dispersal into the wider night time economy or return to hotels.

An impressive aspect of his delivery plan is to convene a quarterly external consultants meeting covering crime reduction, licensing, health and safety and planning. This will undoubtedly prove useful in ensuring that the premises operates at high levels of safety. Clubsafe are satisfied that Mr. [REDACTED] is eminently qualified for this role.

Support provided by other organisations/professional bodies

The Company has secured the services of Mr. Karl Barry, a local Licensing expert. Mr. Barry is well known and a leader in his field. Clubsafe supports this appointment but recommends that this relationship continue for a minimum of 12 months to ensure that all licensing matters are discharged appropriately.

Recommendation Nine: Retain a specialist licensing consultant for a period of at least 12 months to ensure all licensing matters are managed appropriately.

The company is not yet a member of the British Tenpin Bowling Association (BTBA.) This membership organisation holds a wealth of knowledge and membership should be secured prior to trading.

Recommendation Ten: Directors to join the British Tenpin Bowling Association (BTBA.) and incorporate all current national practise guidance within company policies and procedures.



Section Three

Governance, policies and procedures

The following areas have been considered within Section Three:

Governance, policies and procedures	
1	Governance arrangements
2	Support documentation
3	Company policies and procedures relating to violence and disorder reduction
4	Roles and responsibilities of staff
5	Evaluation and review processes
6	Internal and external communication

Governance arrangements

The current governance arrangements for the venture involve ad hoc business meetings where and when required. This arrangement is fit for purpose while the project is under develop however, a more formally robust system will be required once trading.

Recommendation Eleven: Introduce daily briefings for all staff which should be conducted by the duty manager.

Recommendation Twelve: Introduce a weekly operational meeting chaired by a Company Director with attendance by all available managers.

Recommendation Thirteen: Introduce a monthly strategic meeting to guide the development of the business.

Support documentation

Recommendation Fourteen: Introduce a daily managers shift reporting process and record on the appropriate document. (See Appendix A.)

Recommendation Fifteen: Create standing agendas for the operations and strategy meetings and ensure licensing and crime reduction measures feature as stand-alone items.

Recommendation Sixteen: Maintain written actions logs for all meetings.

Company policies and procedures relating to violence and disorder reduction

Policies and procedures have been discussed as part of the project management phase. Informal agreements have been reached on the policies and procedures critical to the success of the business. New policy development has also been discussed within the licensing and crime reduction training delivered thus far to the company Directors.

A new set of policies are required as per the below recommendations. These should be managed via a robust policy review process. A template for this can be found at Appendix D.



Recommendation Seventeen: Introduce a written Client group policy and ensure all staff are conversant with the preferred client group and exemptions.

Recommendation Eighteen: Introduce a written Ejections policy including expectations of all security staff around managing conflict and the use of force. (See Appendix F for this policy in draft form.)

Recommendation Nineteen: Introduce a written drugs policy with associated operating procedures.

Recommendation Twenty: Introduce a written Acceptable conduct policy and include sanctions for non-adherence.

Recommendation Twenty-one: Introduce a written under-age policy explaining expectations of the Challenge 25 system.

Recommendation Twenty-two: Introduce a written music policy including exclusions for high risk genres.

Recommendation Twenty-three: Introduce a written dispersal policy including security staff roles and responsibilities around public nuisance prevention.

Recommendation Twenty-four: Introduce a written CCTV policy and ensure locations are recorded on a formal RAG assessment. (See explanation of RAG assessment later in this report.)

Roles and responsibilities of staff

Directors have given due consideration to the staffing requirement for the venue. Once this is known Clubsafe have been engaged to advise of the deployment of all personnel, particularly the security team. All staff should be provided with full job descriptions outlining their roles, responsibilities and limitations. This should also be prescriptive in setting out their responsibilities around the Licensing Act and the management of crime and disorder.

Recommendation Twenty-five: Ensure all staff job descriptions include the company expectations around Licensing Act requirements and their role during any crime or disorder incident.

Evaluation and review processes

Evaluation and review processes have been discussed with Directors and they have agreed to embed a policy review and incident review system within their operating protocols.

Recommendation Twenty-six: Introduce an annual policy review process to ensure that these are in line with current requirements of Responsible Authorities.

Recommendation Twenty-seven: Introduce an incident review system and ensure that all findings are recorded in a meaningful format. (See appendix B for Incident reporting document.)



Internal and external communication

Directors have plans to manage staff interactions via a Facebook site and guidance on this has been provided from other similar sites operating effectively within the night time economy. Plans are in place to develop an interactive website for the business and this should be expanded to publish personal safety message and promote responsible drinking.

Recommendation Twenty-eight: Use new website to publish personal safety messages and information on responsible drinking.

Interactions and communication with Responsible Authorities and other key partners is covered in Section Eight.



Section Four

Training Needs Analysis

The following areas have been considered within Section Four:

Training Needs Analysis	
1	'Triggers for Violence©'
2	Licensing Act 2003
3	Conflict management
4	Crime scene and post incident management
5	Under-age sales
6	Health and safety

An initial training needs analysis (TNA), was completed on behalf of Pins Bowling including assessments against the below themes:

- Triggers for violence and the presence of impact factors
- Licensing Act 2003
- Conflict management
- Crime scene and post incident management
- Under-age sales

'Triggers for Violence ©'

Triggers for violence is explored in Section Five. Directors have received a training input on these aspects of a venues violence footprint and have agreed to include an input for all staff during their induction training.

Recommendation Twenty-nine: Deliver a 'Triggers for Violence' input on all staff induction training.

Licensing Act 2003

Knowledge of the Licensing Act is critical to the success of the business. Detailed training has been given to both Directors but this will also feature on induction and annual refresher training for all staff.

Recommendation Thirty: Deliver a licensing input on all staff induction training and annual refresher training events.

Conflict management

Conflict management training did not form part of the annual training plan being developed by the new DPS. This has now been remedied and it will be included twice per year.

Recommendation Thirty-one: Deliver conflict management training to all staff twice per year.



Crime scene and post incident management

Crime scene management and post incident management training had not been considered during the project's development. This will now feature twice per year and be delivered by a suitably qualified training provider.

Recommendation Thirty-two: Deliver crime scene management and post incident management to all staff twice per year. This input to be given by a suitably qualified training provider.

Under-age sales

Due to the demographic of the core client group and in line with the national 'Safer clubbing guidance' the Challenge 25 system will be introduced and all training given prior to trading. The Alcohol and Tobacco Unit (ATU will be approached to deliver this training.)

Recommendation Thirty-three: Deliver Challenge 25 training for all staff on an annual basis.

Health and safety

The company has engaged a Health and Safety specialist and he will deliver an annual input on this subject as well as preparing a full Health and Safety Risk assessment.

Recommendation Thirty-four: Deliver Health and Safety training for all staff annually based on the company Health and Safety risk assessment.



Section Five

Presence of 'triggers for violence'©

The following areas have been considered within Section Five:

'Triggers for Violence'© management arrangements	
1	Client Group selection and management
2	Under-age sales systems
3	Overcrowding - Prevention and intervention
4	Management of the use and supply of illegal drugs
5	Management of the internal and external environment including queues and dispersal
6	Irresponsible promotions and client intoxication

Research indicates that six primary 'Triggers for Violence'© exist within licensed premises. When one or more of these triggers are present, there is an increased likelihood of a violent act. All recommendations within this section are configured to reduce to the absolute minimum, the likelihood for violence or conflict at Pins Bowling. The six 'Triggers for Violence'© are as follows:

- Aberrant Client group
- Over-crowding
- Under-age consumption of alcohol
- Use and supply of illegal drugs
- Poor management of the internal environment including management of queues
- Irresponsible promotions and selling to drunken patrons

Client Group selection and management

The core client group of [REDACTED] is anticipated to be low risk patrons. Users of the venue will be mainly pre-booked bowlers, diners and private function participants. The age profile is wide from birth to 80s and beyond but after 8pm will be confined to those 18 and over. Prohibitions are in place at all times for patrons wearing dirty work clothing or tracksuits. A client group policy is under development and this will ensure that non-core groups are barred from entry (drunks, gang affiliates, lone children etc.)

Under-age sales systems

The company has agreed to introduce the Challenge 25 system due to their target demographic. This system is sufficient for their needs. They have agreed to employ a private test purchase company to ensure that their staff adhere to the challenge system and young people are protected from the harms of alcohol consumption.

Recommendation Thirty-five: Introduce a voluntary test purchase scheme to ensure the Challenge 25 system is being operated effectively by all staff



Overcrowding - Prevention and intervention

A capacity of 450 has been agreed which is less than 55% of what could be comfortably accommodated based on the available space. This is a sensible measure due to the nature of the building and the business model. No overcrowding issues are anticipated although numbers will be closely monitored by security staff and managers through the use of patron counters.

Management of the use and supply of illegal drugs

Advice has been given on the management of the use and supply of illegal drugs. This advice is too detailed for this document but the company has engaged Clubsafe to support them in introducing a robust and effective system for this issue with associated policy and procedure development. This will be in place prior to trading.

Recommendation Thirty-six: Introduce drugs management systems with the support of Clubsafe in line with the new drugs policy.

Management of the internal and external environment including queues and dispersal

The internal environment in this venue will operate across two floors with two entrances front and rear. Clubsafe have assessed the plans for design flaws relating to crime and violence issues, making some minor recommendations to the floor space design around the placement of furniture.

Recommendation Thirty-seven: Modify the siting of furniture and other portable fittings in line with the plan feedback already provided.

The venue is well designed from a crime reduction perspective but would benefit from a R.A.G. assessment to remove zones of invisibility and manage medium to high risk areas. The Directors have been updated on how to complete this straightforward process and Clubsafe guidance is available as part of the retained status of the company.

Recommendation Thirty-eight: Complete a R.A.G. assessment and introduce appropriate control measures to reduce or eliminate risk.

Negotiation is ongoing with a number of security companies and a shortlist is currently being produced. Clubsafe will offer guidance once this list is finalised. All security companies considered must be registered with the Security Industry Authority.

Recommendation Thirty-nine: Employ only SIA registered security personnel via an SIA approved company.

A written patrol plan is desirable as a delivery template for whichever security contractor is secured. Clubsafe will advise on the development of this plan once a contractor is in place. Each area should utilise proactive tactics, avoiding Pragnanz wherever possible. (Perceptual screening out by patrons due to lack of movement.) Clubsafe will also advise on CUEs (Creation of Unique Events) protocols once the contractor has been appointed.

Recommendation Forty: Develop a security patrol plan and agree roles and responsibilities and channels of communication between security operatives and premises managers.



A low risk venue such as bowling will require security support on a minimum ratio of 100:1 after 10pm on peak evenings which is an industry standard. The premises will therefore require a minimum of five security operatives at peak times and they should remain operational until at least 30 minutes after the terminal hour. Once the premises build is complete a more accurate assessment will be made by Clubsafe and agreed with the operator and security contractor.

Recommendation Forty-one: A minimum of five security operatives to be employed during peak hours.

Recommendation Forty-two: All internal security staff to be given specific instructions to actively manage the internal environment within their area of responsibility. This to include:

- a. Regular movement away from static positions
- b. Challenge unruly patrons on every occasion
- c. Regular monitoring of toilets
- d. Frequent but irregular perimeter checks, particular around any smoking areas
- e. Eye contact and greeting/acknowledgement of patrons at every opportunity
- f. Frequent contact with the DPS/Head Doorman to highlight potential problematic clients

All security staff to scan for:

- i. Drunkenness
- ii. Drugs use
- iii. Sexual touching

Communication between security personnel and premises managers is critical in adopting a prevention through early intervention approach. It is therefore recommended that all security staff and managers are issued with a two channel radio with earpiece attachments. The venue should use one channel for general operations radio traffic and the remainder as a command channel for when dealing with spontaneous incidents.

Recommendation Forty-three: All security personnel to be issued with radios and earpieces.

Recommendation Forty-four: Ensure all radios are two channel enabled and allocate Command Channel and Operations channel functions for each.

CCTV will undoubtedly be a requirement of the premises licence. A full CCTV assessment should be completed prior to trading. Clubsafe can assist with this if required. All CCTV should have the facility for instant burn-off if required in line with the General Data Protection Regulations (GDPR) 2016.

Recommendation Forty-five: Complete a full CCTV assessment prior to trading.

The final operating hour is the most critical in terms of propensity for risky behaviour from clients. To enable the security team to focus their efforts on active management of the internal environment a bar to entry system should be implemented at this time.

Recommendation Forty-six: Lock down premises one hour before closing barring any entry to new clients.



During a spontaneous incident it is important that security staff are visible to their colleagues and patrons. Every effort should be made to keep this clothing low key and pastel colours are preferred.

Recommendation Forty-seven: Introduce low-viz clothing for all security personnel deployed inside of the premises.

During an incident it is important that command protocols are adhered to. The allocation of a different low-viz garment colour for the head doorman will signify who is in charge as there is only one person wearing a tabard in that colour.

Recommendation: Forty-eight Head doorman to wear low-viz clothing in an alternative colour to his/her colleagues with his/her designation as Head doorman clearly marked on the garment.

The Head doorman's function is one of leadership. The post holder is to be intrusive in their expectations of their team in terms of the active management of the internal environment making every effort to remove any issues that create a permissive social environment.

Recommendation Forty-nine: Head doorman to have a roving brief with at least 40% of his/her time spent checking internal security arrangements and active management of the internal environment is taking place with his team.

Eighty-nine decibels is the maximum legal music volume for all public entertainment spaces. Exceeding this can have a direct effect on mood and levels of anxiety. Long term exposure exceeding this level can lead to hearing impairment. Establishing the level at 85 Db will ensure that all music does not exceed legal levels during changes in pitch.

Recommendation Fifty: Introduce music volume controls in all venue areas to a maximum of 85 decibels.

A pre-vetted queueing system should be employed after midnight. A pre-vetted queue is the second safest system (after single sex queueing), for this type of venue and should be implemented when the core client group exhibits signs of intoxication and by the latest, midnight. This should be put in place irrespective of the number of clients waiting to enter and should always be established outside of the venue.

Recommendation Fifty-one: Introduce a pre-vetted queue by midnight at the latest.

During any incident lighting should not be turned to maximum nor should music be turned off completely. These both increase anxiety and can lead to secondary incidents. Small changes, sufficient to deal with the incident are all that are required.

Recommendation Fifty-two: Ensure plans for management of an incident consider a reduction in music volume and increase in lighting.



Irresponsible promotions and client intoxication

Directors have agreed that all planned drinks promotions will be ratified by Clubsafe prior to introduction. Clubsafe will assess each promotion on its own merits and advise on its legality or otherwise. If disagreement ensues the Alcohol and Tobacco Unit will be consulted for a final determination.

Recommendation Fifty-three: All drinks promotions to be ratified by Clubsafe before introduction.

Challenge 25 and 'Knock Back' training have been provisionally agreed with the ATU and will take place every six months. Staff will be assessed during test purchases and one to one interviews during every Clubsafe assessment visit.



Section Six

Discharge of duties under the Licensing Act 2003

The following areas have been considered within Section Six:

Discharge of duties under the Licensing Act 2003	
1	Licence application
2	Adherence to licensing objectives
3	Drinks promotions

Licence application

The Licence has been prepared by a Licensing practitioner and Clubsafe has offered guidance around crime reduction measures.

Adherence to licensing objectives

Clubsafe understand that the Licence application will accompany this document. Once any licence is granted Clubsafe will assess compliance during the 1st inspection visit and advise on any remedial action required.

Drinks promotions

Drinks promotion will be ratified by Clubsafe prior to introduction as previously discussed in Section Five.



Section Seven

Emergency Procedures

The following areas have been considered within Section Seven:

Emergency Procedures	
1	First aid provision
2	Crime scene management arrangements
3	Incident management
4	Ejections protocols
5	Evacuation procedures

First aid provision

First aid provision is recommended at a ratio of 1:250 patrons.

Recommendation Fifty-four: Ensure that a minimum of two 1st aid trained members of staff are on duty at any one time.

St. John's Ambulance can advise on the standard of 1st aid kit required for a range of night time economy venues. They should be consulted and the appropriate kit purchased and made available prior to opening.

Recommendation Fifty-five: Purchase appropriate 1st aid kit and ensure all 1st aid practitioners are conversant with its use.

Recommendation Fifty-six: In all cases of hospitalisation, ensure that the police are informed as soon as reasonably practicable.

This is an expectation of the police with associated adverse attention if not informed.

Crime scene management arrangements

Crime scene management training has been recommended in Section Four.

Incident management

Incident management training has been recommended in Section Four.

Ejections protocols

All ejections should be facilitated in line with the premises Ejections Policy. (See Appendix F for this policy).

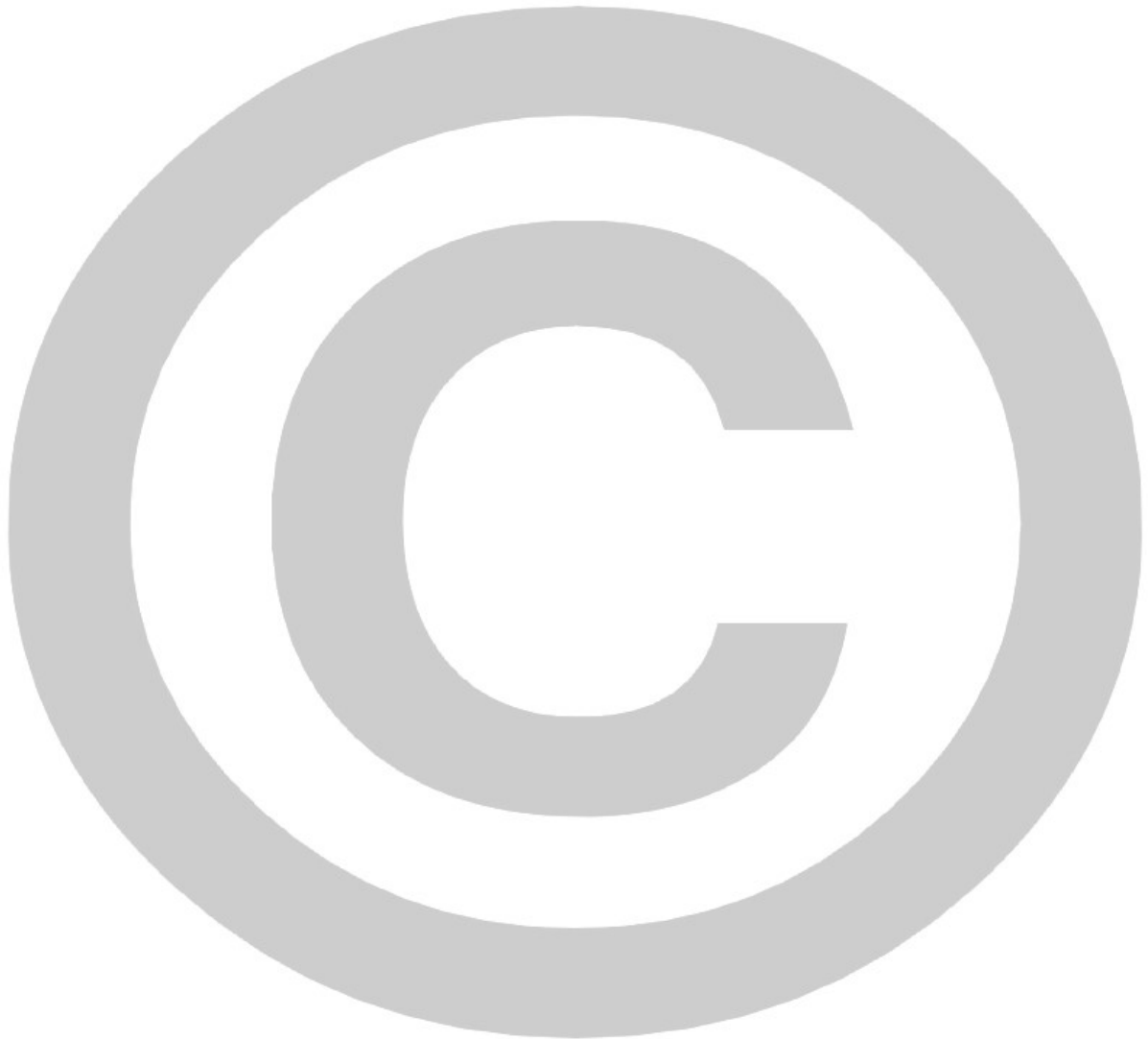
Evacuation procedures

A formal evacuation plan has yet to be developed but is to be commissioned by Directors from a reputable Health and Safety risk management company.



Recommendation Fifty-seven: Develop a written evacuation plan and appraise staff of their duties in relation to this.

Recommendation Fifty-eight: Develop a written Prevent/Griffin (counter-terrorism) action plan and appraise staff of their duties in relation to this.



Section Eight

Partnerships

The following areas have been considered within Section Eight:

Partnerships	
1	Active management of Police and Local Authority relationships
2	Contact with local Ward Councillors
3	Involvement and influence within industry representative groups
4	Engagement with local community and residential population

Active management of Police and Local Authority relationships

Fledgling professional partnerships are emerging between the [REDACTED] management team and other local venues and these have developed as part of the company's local consultation process.

Police and Local Authority dialogue has been regular during the planning process and this should continue once the premises are operating safely. Opportunities should be maximised to use the collective support, advice and guidance of these agencies to scan for new and emerging trends and to communicate key achievements of the company.

Recommendation Fifty-nine: Ensure monthly contact with Police and Local Authority licensing communicating positive information and seeking feedback on any issues. This to be done in email format to ensure an audit trail.

This will ensure that the company is sighted on local community concerns at an early stage and also builds a relationship with this key individual.

Contact with local Ward Councillors and residents

Community and political dialogue is also essential and formal links with these stakeholders should be developed.

Recommendation Sixty: Make contact with the Local Ward Councillor to discuss and act on any relevant community issues or concerns relating to the premises.

Involvement and influence within industry representative groups

Recommendation Sixty-one: Consider active involvement in the [REDACTED] Pubwatch scheme.

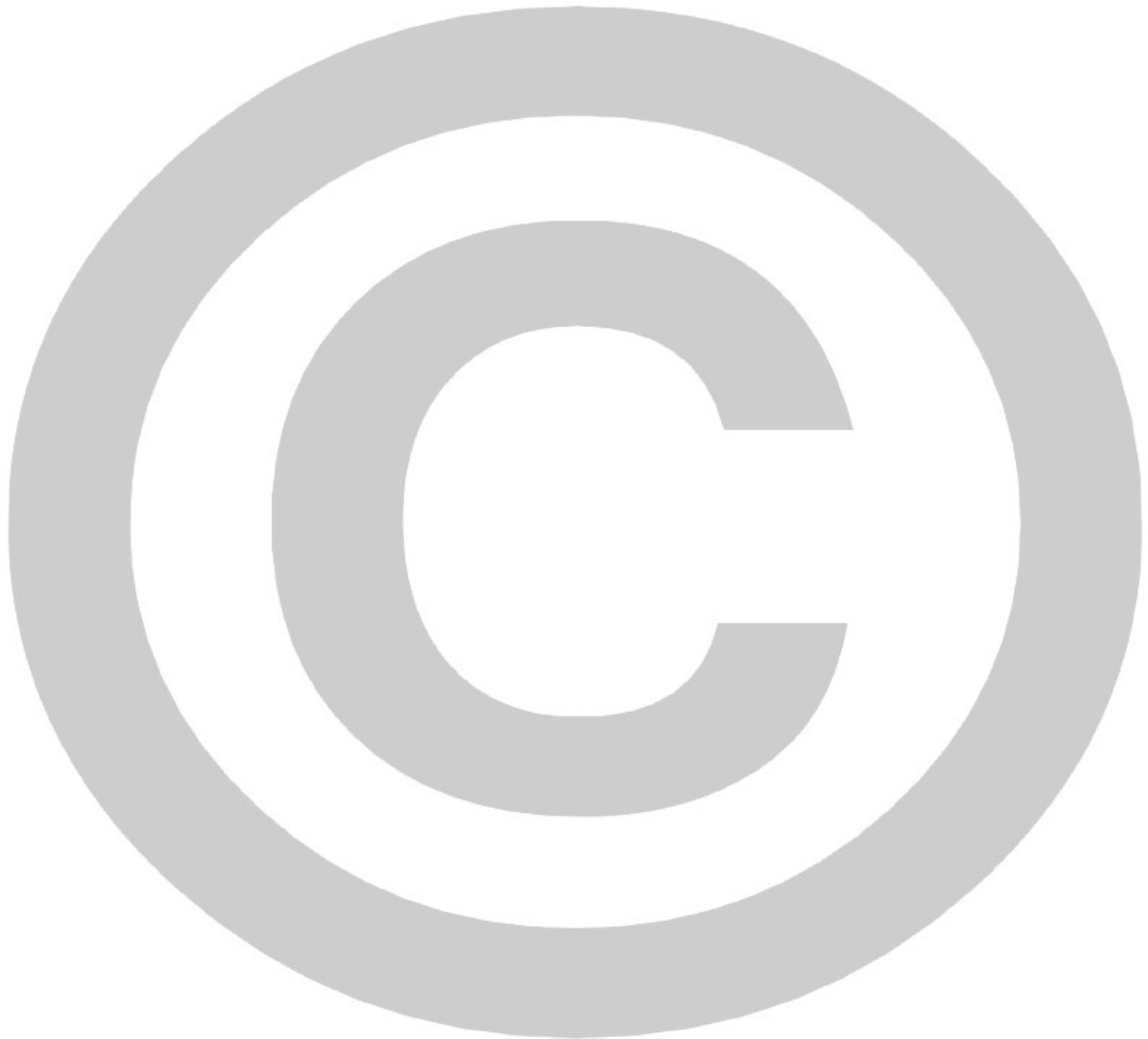
Significant issues exist within the Liverpool night time economy in general and the [REDACTED] CIP in particular. The Pubwatch is well placed to keep operators up to date with changes in local and national policy affecting the industry.



Engagement with local community and residential population

The proposed venue has a significant number of residents located in blocks of apartments to the rear. It is essential that these residents are engaged at every stage to ensure that their views are heard and any reasonable request satisfied.

Recommendation Sixty-two: Introduce a community meeting every 6 weeks to canvass the concerns of local residents acting on their issues wherever possible.



Appendix A

Manager's Shift Report

Day/Date		
Duty Manager		
Handover information	Briefing issues	Special celebrations
	<ul style="list-style-type: none">▪ Previous shift report▪ Functions▪ Duty manager▪ Promotions▪ Health and safety issues	
Security Team (If operating)		
Kitchen staff		
Bar Team		
Customer service team		



Ejections					
Time	Number of clients	Brief Reason	Contact (Ensure incident report)	Non-contact	Incident Reference Number

Manager's Maintenance Checks							
	Insert time carried out						
Toilet checks							
Drugs scanning checks							
Outside area - Front							
Outside area - Rear							
Function space							
Bar area							

Knock Backs									
Reason	11-5	5-6	6-7	7-8	8-9	9-10	10-11	11-12	Total
Under-age									
No I.D.									
False I.D.									
Dress code									
Under the influence of drugs									
Drunkenness									
Disorderly behaviour									
Banned individual									
After last admission time									
Column totals									

Drugs Finds/Seizures				
Time	Brief Description/Location	Found by	Exhibit number	Incident Reference Number



Manager's end of shift summary		
	Y/N	Information/Issues
Found Property		
Handover issues		
Good Work to be recognised		
Duty Manager's comments		
Director's comments		
Remedial actions required before next shift		



Appendix B



Standard Operating Procedures Manual - Proposed Structure

Introduction

Overview of business

Section One:

Governance

Management structure
Meetings structure
Job profiles and key accountabilities

Section Two:

Licensing Act 2003

Licensing conditions relating to premises

Section Three:

Crime Reduction

Client group - Statement of intent
Under-age prevention arrangements
Overcrowding - Monitoring and preventative measures
Drug prevention arrangements
Management of the internal environment - Core activities
Prevention of drunkenness

Section Four:

Training Records and Schedules

Training schedule - All staff
Licensing Act 2003
Under-age sales
Crime scene management
Incident management
Health and safety and associated matters

Section Five:

Emergency Procedures

First aid arrangements
Crime scene management - Roles and responsibilities
Incident management - Procedures
Ejections protocols
Evacuation procedures

Section Six:

Review Systems and Processes

Policy review schedule

Section Seven:

Partnerships

Key contacts list

Appendices

- A Company policies
- B (Appendix for each policy)



Appendix C

Suggested Policy Review Template

Schedule of Policies

All [REDACTED] policies should be inserted as an appendix in the proposed Standard Operating Procedures manual (SOP). When a policy is reviewed the amended copy must also be placed within the SOP with the original retained for one calendar year for audit trail purposes.

	Policy	Reviewed	Reviewed	Last Review	Next Review
1	Client group policy				
2	Ejections policy			010318	280219
3	Drugs policy				
4	Acceptable conduct policy				
5	Crime scene and incident management policy				
6	Under-age policy				
7	Music policy				
8	Dispersal policy				
9	CCTV policy				



Appendix D
[Insert policy issue] Policy

000	Overview of Policy
<p><u>Statement of Intent</u></p> <p>This document defines agreed policy for [REDACTED] in terms of the management of [insert policy issue]</p> <p><u>Related Legislation</u></p> <p><u>Procedures</u></p> <p style="text-align: center;"><u>Insert content of policy once agreed with Directors, DPS and Managers</u></p> <p style="text-align: center;"><u>Ensure that the policy review schedule is updated</u></p>	

Company Lead		
Crime Category if appropriate		
Related Legislation		
Relevant licensing objective (Tick all that apply)	Prevention of crime and disorder	<input type="checkbox"/>
	Public safety	<input type="checkbox"/>
	The prevention of public nuisance	<input type="checkbox"/>
	The protection of children from harm	<input type="checkbox"/>
Linked Policies		
Date Implemented		
Last Review		
Actions Required for implementation		
Next Review		



Appendix E

Part One - Incident Reporting Form

Duty Manager			
Full name		Position	
Contact number		Date/Time completed	

Details of incident

Date of incident	
Time of incident	
1 st observed by	

Type of incident

Contact ejection		Sexual offence		Weapon related	
Assault		Health and safety		Other 'Trigger for Violence'	
Hate crime		Drugs		Other occurrence	

Brief account of 1st staff member on scene

Actions taken to resolve the incident

1 st staff member on scene		
Location of security team at the time of the incident	Name	Location
Location of duty Manager at the time of the incident		



Part Two - Incident Reporting Form - Continuation (Serious incidents only)

Further details of incident

What staff members became DIRECTLY involved?

Statement of facts

This is a summary of the incident based on information received from all members of staff.

In complex incidents this should be compiled after a full debrief has been held by the duty manager.



Contributing Triggers For Violence			
Aberrant client group		Overcrowding	Under age
Drugs		Internal environment issue	Drunkenness
Part Three - Supplementary information			
Were [REDACTED] Police contacted or in attendance?			
Contacted		Attended	
Name of Police Officer		Collar number	Time arrived
Did the CCTV system capture the incident?			
Was a copy burned off for the Police and if so, who was it handed to?			
Are there any recommendations required as a result of the incident?			
Name of Manager completing the report			
Director/s comments			



Ejections Policy Pins Bowling 2018/2019

002	Overview of Policy
<p>This document defines agreed policy for [REDACTED] in terms of the management of both contact and non-contact ejections during operating hours.</p> <p>The policy is relevant for all members of staff but has been specifically developed to support security operatives and managers in their decision making process when managing the safe ejection of patrons who do not adhere to [REDACTED] standards of conduct and behaviour.</p> <p>This policy has been developed with due cognisance to the requirements of UK domestic legislation and specifically:</p> <ul style="list-style-type: none">▪ All criminal law relating to sexual offences, acts of theft and violence offences▪ The Licensing Act 2003▪ The Human Rights Act 1998	
<p><u>Use of Force statement</u></p>	
<p>When a decision is made to eject a patron for a breach of venue standards of behaviour, (e.g. fighting, theft, inappropriate touching etc.), no force is to be used unless absolutely necessary. If force is used the member of staff using such force must be in a position to justify that force to the Police and potentially, the criminal court.</p> <p>If force is resorted to then staff must use the minimum amount of force required to achieve the legitimate aim (ejection). Anything more than this may render them and any assisting colleagues liable for criminal prosecution, loss of employment and/or withdrawal of their SIA authority.</p>	
<p><u>Use of force Continuum</u></p>	
<p>The use of force continuum model (Levels 1 to 3 only), used by UK Police forces has been adopted as the standard by which every member of staff will be measured in terms of their decision making process.</p> <p>When dealing with an ejection each member of staff should choose the lowest appropriate level of force on the continuum before progressing to a higher level of force unless spontaneous violence occurs. The levels are as follows:</p> <ol style="list-style-type: none">1. Physical presence - Stand between persons in conflict and call for additional support if necessary2. Verbal commands - Give warnings and state your intention then escort (non-contact)2a. Verbal commands - Last warning stating will be escorted from premises under control if fail to comply3a. Empty hand tactics - Control and escort from premises maintaining verbal commands3b. Empty hand tactics - Limited restraint and escort from the premises with verbal commands3c. Empty hand tactics - Full restraint to full control then escort from the premises with verbal commands <p>Pre-emptive strikes or physical blows will not be supported as legitimate tactics unless the member of staff is in a strong position to justify their actions to the Police and the court and this justification meets the criminal standard of proof (Beyond all reasonable doubt).</p>	
<p><u>Procedures</u></p>	
<ul style="list-style-type: none">▪ The primary ejection point for non-contact (compliant) ejections is via the nearest exit▪ The primary ejection point for contact ejections (non-compliant) is via the nearest exit▪ All ejections must be managed by at least 2 members of staff, one escort and one cover security officer/manager▪ The cover officer is to scan for external threats such as interference from friends of the ejectee	



- In any event, security staff facilitating the ejection are empowered to choose what they perceive to be the safest ejection point based on the prevailing circumstances at that time of ejection/incident
- No person should be ejected onto the street until under full control and having been afforded every opportunity to calm down. This will prevent immediate escalation once they are outside of the premises

Where two groups/individuals in conflict are ejected every effort should be made to:

1. Move each out of the line of sight of the other
2. **Eject from separate exits if possible**
3. Retain the least combative group/individual until such time as the 1st group/individual has been given the opportunity to walk away (Soak time in excess of 7 minutes recommended)

If at any time a complaint of assault/other criminal offence is received from any party the suspected offender should be detained if possible and the Police called.

Recognised restraints

- Supported arm - Compliant but refusing to leave even after warning
- Transport wrist lock - Non-compliant offering resistance
- Entangled arm lock - Non-compliant offering significant resistance

Ejection protocols

- All non-contact ejections are to be brought to the attention of the manager as soon as reasonably practicable
- A name or brief description of the ejectee will be entered into the daily manager's report and the reason for ejection noted
- All contact ejections where resistance is met will be subject of a **full incident log**
- The manager is to be informed if not already aware
- The manager will note the incident in the daily manager's report
- All ejections are to be reviewed at the Directors weekly Operational meeting
- Any discipline, change in policy or training need identified is to be actioned before the next operating period
- All changes required will be entered into the Pins Bowling SOP manual

Conclusion and desired outcomes

One third of all allegations of assault in the United Kingdom night time economy are made against members of venue security teams. Adherence to this policy will:

- Discharge the venue's and each individual's duty under the Licensing Act 2003
- Reduce/eliminate allegations against venue staff, particularly security personnel
- Provide a robust legal justification for the use of force should it be required
- Enhance the venue's reputation with ██████████ Police and other authorities as a responsible operator
- Create a safe and secure venue environment for the enjoyment of patrons and the safety of staff



Company Lead	Daniel Gillbanks (Director)	
Crime Category if appropriate	Violence and crime reduction measure	
Related Legislation	See body of text	
Relevant licensing objective	Prevention of crime and disorder	X
	Public safety	
	The prevention of public nuisance	X
	The protection of children from harm	
Linked Policies	Dispersal policy, drugs policy, incident management policy	
Date Implemented		
Last Review		
Actions Required for implementation	<p>All staff are to be given a training input prior to implementation with particular emphasis on the security team. A walk through of the recognised control and restrain techniques will be given to security team by Clubsafe Assessment and Training during their assessment of the premises on.</p> <p>This policy is to be placed into the ██████████ SOP manual and listed for review by management on or before the below date.</p>	
Next Review	[Insert date]	





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