

17th March 2016

SN15 Leisure Ltd
3 Northumberland Buildings
Bath
BA1 2JB

Public Protection Services
Licensing Team
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref : LN/9448

Dear Mr Shayegan,

**Re: Licensing Act 2003 – Formal Warning – Breaches of Premises Licence conditions:
SN15, 17a Station Hill, Chippenham, SN15 1EQ**

I am writing further to the visit at the premises on 16th March 2016 and discussion with Mr Robin Puddephatt, DPS. Susan Thurman-Newell, Police Licensing Officer was also in attendance. Unfortunately, we were unable to view many of your documents relating to the premises, as we were informed that they were taken to the Bath office to be copied in preparation for the visit, but were unable to be returned.

On 8th January 2016, we sent a letter to you relaying our concerns of a number of issues including non-compliance of Premises Licence conditions. This included the management plan, which had not been updated to suit the current use of the premises. The premises has been portrayed in applications and hearings as a different venue than first applied for in 2013, however the management plan has not been updated since the one provided for the Provisional Statement hearing in April 2013. Staff should also be made aware of the management plan and be in full understanding of their requirements. Being unable to view the document at the time of my visit I can only conclude that this has still not been actioned. The management plan must be updated for the premises, see the below condition which has therefore been breached:

- *The Premises Licence holder is to develop, maintain and implement a detailed Management Plan which must include the chain of command and responsibilities, risk assessments, procedures, policies (including dispersal policy) to enable the Premises Licence holder to comply with the four licensing objectives. The Licence shall be run in accordance with the Management Plan. Such plan to be available for inspection upon request by the Police and Licensing Authority and to be accessible to staff.*

We have photographic evidence from your Facebook page that glass bottles of spirits have been sold to customers to have on tables and that they are permitted to walk around the premises with them. The DPS was unaware that this was not permitted under your new Premises Licence conditions following the variation hearing. Only bottles of wine and Champagne are permitted, and therefore a condition has been breached. See the below conditions relating to glass/polycarbonate use, following the variation hearing on 19th January 2016:

- **Polycarbonates**

- a) The use of drinking glasses is permitted in the Lower and Front Bar.*
- b) ~~Glass wine and Champagne bottles, will only be allowed in the Ground Floor (Lower Bar, the Front Bar) and the First Floor Cocktail Bar. Door Supervisors will ensure that no Glasses and Bottles are allowed outside of these areas.~~*
- c) Beer to be served in polycarbonates at all times – glass bottles to be decanted, or beer to be served in polycarbonate bottles, or to be on Tap and served in polycarbonate glasses.*
- d) When the premises are operating as a whole, the requirement for additional polycarbonates will be determined by a risk assessment.*

The above polycarbonate conditions to apply whenever trading, whether or not Regulated Entertainment taking place.

Further to being prohibited on the Licence, selling bottles of spirits gives obvious concerns in relation to the safety of both customers and staff. It also allows the customer to pour their own drink, other customers' drinks and to drink out of the bottle. It could also lead to people being unaware of the alcoholic content of their drink. Bar staff are then unable to monitor the measures of drinks, levels of intoxication and check ID as they would when someone is purchasing a drink at the bar. We would expect only to see wine/champagne bottles on a table in a secure monitored area and not being carried around the premises freely by a customer.

The CCTV system is not currently able to download to disc. I spoke with the DPS on 9th March after Police Licensing had informed the Licensing Authority that the system was not working. The Police visited the premises on 7th February requesting CCTV footage covering a vehicle incident outside, and were informed that the system was not working. We would have an expectation that any fault would be repaired as soon as practically possible. The system is still unable to download, now (at least) 5 weeks after you were first aware of the problem. The following conditions relating to CCTV have been breached:

- CCTV

- a) A CCTV system with recording or monitoring capability shall be installed to cover all floors of the premises used under the terms of the Licence and shall also cover all entrances, exits and external areas immediately around entrances. Recordings shall be kept for 28 days and be made readily available to any authorised Officer of the Council or Police Officer.*
- b) The CCTV system shall be maintained in full functioning order and used at all times when the premises are open.*

During the visit, we also discussed the security signing in sheets and incident recording. Currently two SIA security personnel hold 'Temporary Licences' whilst their SIA licence is being renewed. This is to be checked with the company and Police Licensing need to be informed of the details relating to this. Incidents/refusals/ejections should be recorded in a bound book with sequentially marked pages to ensure that loose leaf pages are not lost/damaged. During a visit by two Licensing Officers, an ejection on the morning of Sunday 13th March was witnessed but not recorded. Also, we were informed that drugs were found and flushed down a toilet the same night. Any drugs found should be securely held and the Police should be informed prior to collection (by Police). You should also be following your drugs policy, which should be included in the management plan, previously mentioned. Records of the incident should also be kept. Please see the below conditions relating to security staff and incident recording.

- *Accurate and up to date incident and refusal logs are to be maintained at all times. Incident logs should include ejections and be signed by relevant security staff.*
- *Security Incident Register to be maintained, with Security Operatives signing on & off duty with full 16 digit SIA licence number.*
- *All refusals & incidents to be recorded in the security incident book, which is to be signed off by the Duty Manager at the end of each day's trading.*

During the visit we discussed the door staff dress code. The security staff must have their SIA licences on display. The entrance security could have a different dress code, however this must be previously agreed with Wiltshire Police. Please see the below conditions following the variation hearing on 19th January 2016.

- **Entrance Security = dress code to be agreed in consultation with Wiltshire Police, SIA Licence to be on the operative at all times.*
- *All other areas = Door Supervisors to be in traditional Security dress with SIA licences on display.*

Staff training records should be maintained and kept on the premises. All 'in-house' training records should be kept on file at the premises along with external training information. This was also previously mentioned in the letter dated 8th January 2016.

The DPS brought to our attention an incident in which a customer entered the premises with a cut. The staff were unable to treat this due to not having a First Aider on site, therefore another customer who was First Aid trained provided treatment. Although a First Aid provision for customers is recommended and not mandatory; as an Employer, you must ensure that you have completed a First Aid Needs Assessment to assess the requirement for First Aid provisions at the premises. The Health and Safety (First Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work. More information can be found on the HSE (Health and Safety Executive) website.

Following your previous variation (of plans) in November 2015 and subsequent works, you should have undertaken a new Fire Risk Assessment of the premises. You may wish to consider the capacity, exits, positioning of fire equipment etc, following the changes of layout and materials used in the refurbishment/changes to the premises. A Fire Risk Assessment is a requirement under the Regulatory Reform (Fire Safety) Order 2005. This should now be completed urgently. You should also keep records relating to fire as per the below condition:

- *A log book shall be provided in which to record details of all tests, i.e. fire-fighting equipment, safety/emergency lighting, fire drills, etc. and other details as required by the Licensing Authority and kept available for inspection at all times. The logbook shall not be in loose-leaf and shall have numbered pages. The person carrying out the test must record his/her details in the logbook.*

The current Premises Licence Summary (following the variation hearing on 19th January 2016) was not on display in the premises, and we were informed that this has only just been received at the premises. The Premises Licence and Summary was sent to TLT LLP on 28th January 2016.

Police Licensing will be revisiting the premises to view the paperwork unavailable on 16th March, revisit some of the points raised and to check the CCTV system.

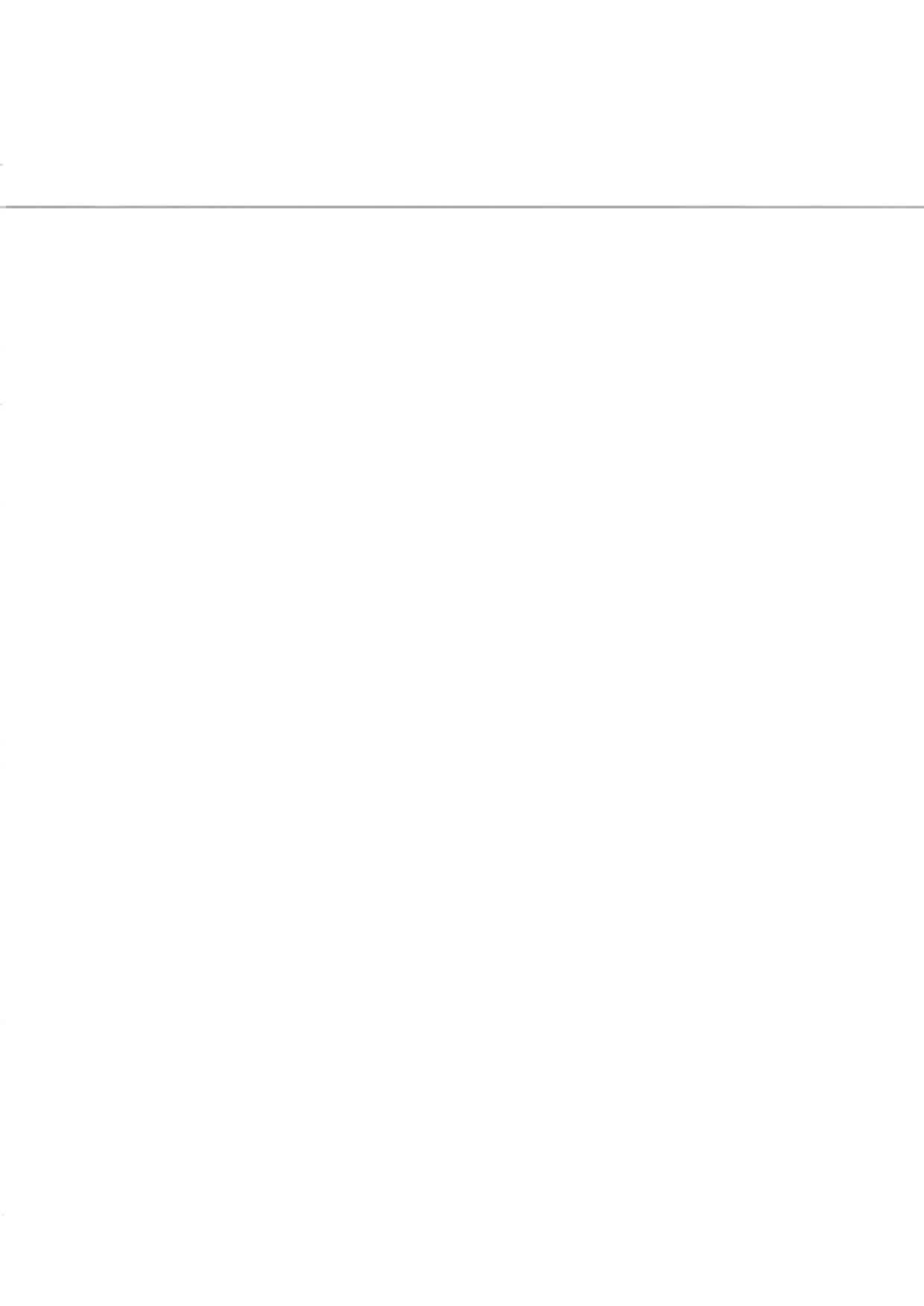
I trust that these issues will now be resolved immediately, please contact in writing to confirm.

Yours sincerely,



Roy Bahadoor
Public Protection Officer (Licensing)
Tel. 01249 706555
Email. publicprotectionnorth@wiltshire.gov.uk

Cc: Mr Robin Puddephatt, SN15, 17 Station Hill, Chippenham, SN15 1EQ.
Wiltshire Police Licensing, Trowbridge Police Station, Polebarn Road, Trowbridge, BA14 7EP.
Mrs Linda Holland, Licensing Authority, Wiltshire Council, County Hall, Bythesea Road,
Trowbridge, BA14 8JN.



Management plan

Site: SN15, Station hill, Chippenham SN15 1EQ

The main focus for the management plan is to ascertain how the venue and management will uphold the licensing conditions based on a series of policies and procedures that must be carried out at all times.

Hierarchy Roles and Responsibility:

Policy:

D.P.S.

General Manager

Security

Bar Supervisor

Bar staff

Bottlers/Glass collectors

Cleaners

Photographer

DJ/s

Everyone needs to know what the exact roles and responsibilities of their position entails. In order to have a safe working environment the correct person/s need to be made aware of any issue/s pertaining to their roles. There are a wide variety of issues or tasks that need to be either made aware of by the correct person, or dealt with the correct person. All staff will be fully informed of their roles and responsibility when commencing work and if needed, training given and signed for and records kept. This will be, but not limited to, an induction before the job commences.

As well as having an understanding of the job role for each department, each member of staff must follow our strict health and safety policies and our fire safety policies. All staff are to undertake

regular training and to sign off that they understand all policies and procedures thereof. All copies of these will be in separate documents – but all must be kept at all times.

Hierarchy Roles and Responsibility

Procedure:

D.P.S.

The role of the D.P.S. is to firstly uphold the four licencing objectives;

- Prevent crime and disorder
- Ensure public safety
- Prevent public nuisance
- Prevent harm to children

It is to be solely responsible for everything pertaining to the premises. Any incident/accident in the club although possibly dealt with by members of staff, the D.P.S. has to ensure all procedures are in place to account for any incident/accident and to ensure these are upheld. As well as ensuring these procedures are followed correctly and records kept regularly and kept up to date.

The role though is not limited to incident/accident procedures; it is to ensure the safety of staff and customers and members of the public in the premises and within the vicinity of the premises.

The D.P.S is the person identified on the premises Licence as the person who supervises the premises. Any premises where alcohol is supplied under a premises licence must have a DPS. They will be named in the premises licence, a summary of which must be displayed on the premise. The Act and Guidance requires DPS and personal licence holders to have responsibility for the sale and supply of alcohol because of its impact on the wider community and on crime and disorder and anti-social behaviour, as this carries with it greater responsibility than that associated with the provision of regulated entertainment and late night refreshment. A personal licence holder can supervise the sale of and authorise such sales and supplies. The D.P.S. must be informed of all issues, and must therefore be in constant communication with security and staff during operation.

The D.P.S must undergo adequate training; the recommend course is the BIIAB Award for Designated Premises Supervisor, as well as both on going training in house and out.

General Manager

The General manager's main function is to supervise the bars and staff in the premises. Recruiting, training and motivating the rest of the staff, and to ensure all the policies and procedures laid out in this document and agreed by D.P.S. are all up to date. Doing regular stock-takes and ordering as necessary, along with handling deliveries. It's to also maintain the condition of all the stock. Keeping up to date with licensing legislation, and along with D.P.S, liaising with the authorities. Enforcing health and safety rules to all members of staff and ensure procedures are being adhered to ensuring safety of public and staff. Adhering to budgets, increasing profits and managing cash flow. Dealing with difficult customers and reporting incidents/accidents. Also to verify age of patrons and monitor the behaviour and conditions of patrons as well as knowing when to call for help either from D.P.S. or from security. Every incident the General manager has been involved with must be recorded. The General manager must be in constant communication with either security or D.P.S.

Security

All security must be SIA registered, they must have their badges on their persons clearly visible, by wearing a high visibility arm band. Licensed door security supervisors provide a safe environment for people who enter the premises and people in the vicinity of. They also reduce the incidences of under-age drinking. The Association of Chief Police Officers' policy lists three pieces of acceptable I.D. for proof of age. The acceptable forms of proof are a passport, photo card driving licence or a proof-of-age card. Door security supervisors are taught about this Proof of Age Standard Scheme (PASS) during their training. They are to Adopt the Challenge 25 policy and are therefore to ask for identification from anyone looking or seeming to be under this age.

They are to either resolve any issues or problems pertaining to the safety or well-being of members of the public or staff. This can be through conversation or removal of anyone concerned of causing harm to themselves, members of the public, staff or the premises itself, this removal must not be excessive and must be in line with current legislation and training. Security are to sign in and out with their names and badge numbers on every shift worked. They are also to ensure incident logging is carried out correctly, And to ensure they remain on the front door for no less than half an hour after the last customer has left to act as a deterrent for any trouble in the vicinity of the premises.

Bar Supervisor

There must be a bar supervisor positioned on every bar during operating hours of the venue. This is a responsible person supervising the staff and those customers to which they are selling to – so assessing everyone at the bars, as well as behaviour and attitude. It is to also be linked up directly to General manager and to security and inform the appropriate person of any issues or concerns. They are also to ensure the correct serving of the bars are carried out, and all systems set by management are achieved as well as serving the bars the same ways as bar staff.

Bar Staff

The main duty will involve serving drinks to customers. They must also adopt the Challenge 25 policy and therefore be able to verify age of patrons. They must at all times keep the bar area clean and tidy, and with the aid of bottle collectors, keeping the bar stocked up and cash handling.

They are to have constant communication with the General manager, and report any incident straight away. Bar staff must be vigilant when assessing the intoxication levels of the people they are serving, and should never serve anyone intoxicated. If they believe someone is intoxicated they are to contact either the General manager or security to assess and deal with the situation. Anyone seemingly to be intoxicated will be given water, and security will then assess the correct course of action. They are therefore also to report straight away any incident pertaining to the safety or well being of customers, or staff.

Bar staff are to have cellar duties which will involve but not be limited to changing barrels, changing gas and changing post mix. Therefore correct training must be given and signed for.

All staff are to undergo regular in house training sessions. They are to be trained on a number of bar procedures, as well as regular health and safety procedures, and fire safety/evacuation procedures. All procedures are to be kept in individual staff documents, illustrating individual training achievements and are to be signed off and kept filled. As well as regular in house training sessions, all staff are to undergo external training, at minimum all staff at the earliest convenience must undergo the BIIAB Level 1 Alcohol Awareness Course. As well as all appropriate staff to be encouraged to undertake the Level 2 NVQ hospitality course.

Cleaners

The cleaners are to work throughout the day, whilst the premises isn't open, they are to ensure the cleanliness of the bars, dance floor, toilets, V.I.P. Area, and any other duties requested by D.P.S. Or General manager. They are to follow basic health and safety guidelines and must use protective equipment if the duty states to that effect. They won't have to incident report in the same way as the club will be closed during cleaning, however if anything is found, which could be but not limited to lost property, narcotics etc. the D.P.S. Must be informed and a report must be made.

Photographer

The photographer is to be solely concerned with taking photos of the club whilst open, and uploading them. However as a member of staff any incident seen must be reported to either General manager, security or D.P.S. Straight away - according to the nature of the incident, and must be recorded at the time. The photographer is also responsible for their own health and safety whilst working and must follow the premises basic health and safety procedures.

DJ/s

The DJ/s are to be solely concerned with the running of the DJ booth. All equipment must be understood, and a good knowledge of our systems must be present before attempting to use anything in the DJ booth. The DJ is also responsible for their own health safety whilst working and therefore must be versed in basic health and safety policies, but also health and safety of the equipment used. Whether they are a member of staff, or out sourced, any incident seen must be reported to either General manager, security or D.P.S. Straight away - according to the nature of the incident, and must be recorded at the time.

Front door/Reception/Security

Policy

The front door/reception area is the main entrance and exit for the premises. Although there are side exits, these are primarily emergency exits. A lot of issues are raised at the front door, due in part to the volume using it, and to the nature of it. We must ensure certain procedures are followed for a number of reasons;

- The front door is the first assessment of people's ages.
- The front door is the first assessment of people's intoxication levels and potential behaviour.
- The front door is the defensive line stopping potential trouble from entering the premises.
- The front door must keep live records for the premises in operation.
- It is the location for the fire alarm control unit.

Therefore we must ensure that all procedures are correct, understood, and recorded throughout operation of the premises.

Front Door/Reception/Security

Procedure

- ❖ Firstly we must ensure there is at least two member of security on the front door during required times, wearing suitable, identifiable clothing and registered SIA badge visible.
- ❖ During required hours once security has arrived, they must sign in, in the security sign in sheets with name, time, date and badge number. These documents, once completed to be filled and kept for record. The Premises must not open before this has been completed.
- ❖ We operate a Challenge 25 scheme, therefore every patron seeking entry to the premises must either be assessed by security to be over 25, or identification must be produced. The only forms of identification we use will be driving licence,

passport, proof-of age. Security must assess as to the authenticity of each identification based on training provided by relevant body.

- ❖ If an individual's identification is believed to be fraudulent security will then ask the individual some personal details stated on the form of identification. If further information is required, security may ask an individual to give an example of their signature to see if it corresponds to that of the identification. If it is still at this point deemed fraudulent, security will ask the individual to surrender the identification to be passed onto the police for further inspection. A record of this must be made at the time, with the security members name, badge number, and as much detail from the individual as possible. The record must hold the information of the surrendered card, and once it has been handed into the police – the record must be updated and signed off by a police officer.
- ❖ If ejection is warranted, a report must be made at time of occurrence with as much detail as possible, including securities name, badge no. and date and time as well as information about the ejection. This must be filled and kept as reference.
- ❖ Security must also assess the intoxication levels of persons seeking entrance to the club and persons already in the club. Assessment must be made on the person's appearance, behaviour, ability to hold a conversation, the way he/she holds themselves etc... If entrance is refused or removal is necessary a record must be made, filled and kept as reference including securities name, badge no. date and time.
- ❖ If removal is deemed necessary either by management or security, security with registered S.I.A. badges must be the ones to remove – no member of staff are allowed to do this. It is to be done as appropriately and calm as possible and in line with governing bodies and correct training. Every action is to be recorded immediately with time, date, incident details and security details.

- ❖ Security along with management is to ensure the capacity of the premises is kept. Security is to use hand held clickers to count the number of people entering and leaving the premises. Also to ensure that the numbers of customers in the premises are recorded every half an hour, this document is to be kept on the door and filled and stored after every night.
- ❖ The duty manager is to sign off each incident by the end of each shift at the latest.

Drugs Policy

This Venue runs a zero tolerance on drugs. No drugs are to be brought onto the premises at all.

Procedure

- ❖ If a person on the premises is believed to be in the possession of illegal drugs, a drugs search may be requested by security, the D.P.S./General Manager must accompany the security whilst doing this.
- ❖ The individual will be asked to come to a private room which will be in front of CCTV. They will then be asked to empty everything from their pockets, asked for anything they may have that could cause a threat to security or themselves. Pockets will then be searched along with all items, wallets, bags etc... The individual will then be patted down to ensure nothing else is hidden, all carried out by security and done within accordance to correct training, Males will search males and females will search females only.
- ❖ If illegal items are found or anything indicating drug use or selling i.e. inexplicably large amounts of money, two responsible members of staff (i.e. General Manager and security) are to record what happened and what was found, and to both witness the found items are locked in a security safe within a sealed envelope. As soon as possible they are to be given to the police, and a police signature has recorded the collection of the items. The individual will remain in the custody of the security until police arrival. All items found are

to be recorded on the official found items documents – signed in by responsible persons and signed out by a police officer. It must also be written up in the incident report with as much information as possible as well as any CCTV turned off to be handed to Police Officers.

- ❖ To ensure as little drug use happens, as possible; door staff are to do routine and agreed walk a rounds, and surveillance of all areas of the premises. This can be aided by bottle collectors keeping a close eye out on movements of patrons, and constant disturbance of all secluded areas will help move any unwanted behaviour on. Any members of staff that notice anything are strictly not to intervene and to go straight to security or D.P.S. and they are to remain away from the incident so as to not put them in any dangerous positions. Security must also fill in area check sheets – to ensure these areas are being regularly checked, and these documents must be kept on file.
- ❖ Anyone refusing to be searched should either be detained for the police, or ejected and barred from the premises at the management's discretion.

Lighting, Projector Policy

Lighting in the premises needs to be taken into careful consideration. All badly lit and difficult to see areas can cause a number of issues;

- Could create a health and safety issue, trip hazards, slip hazards etc.
- If there are black spots in the club, this can encourage drug use/dealing
- Posters with clear warning are to be put up detailing the use of special lighting and/or effects.

The Projectors are less of a safety issue. But a dispersal procedure will be in place – and the projectors, will aid with that.

Lighting Procedure

The illumination of the premises should try to reduce all dark spots as much as possible. Careful consideration needs to go into the placement of all flashing lights, to ensure maximum illumination. As much of the premises need to be clear and illuminated during opening hours.

All emergency exits need to have clear indication, emergency must be checked once a week a logged in the fire manual as to working correctly. There must not be too much smoke from the smoke machine at any point during the night so as emergency exits become unclear. Regular checks through the night must ensure this is the case.

As well as ensuring through operational hours all lighting is correctly working, to stop regular black spots in the premises, and comfort zones for drug dealing or hidden bad behaviour main lighting must be regularly moved around. This should help to stop a safe environment for those wanting to misbehave.

During closing, the lights are to be turned on in sections so as to move customers in groups through the exit, but not allow them all to leave in bulk right at the end.

Dispersal Policy

It is acknowledged by This Venue that there may be a conflict between entertainment and other services provided by the premises, and the right of neighbours to enjoy their homes and businesses without disturbance.

This Venue also acknowledges that popular venues are potential sources of nuisances, antisocial behaviour and crime which may create concern for the immediate neighbourhood, its residents and relevant authorities.

Therefore we operate a dispersal policy; this is not to be confused with the evacuation procedure. It's purely a system policed by This Venue to ensure as little nuisance to neighbours is caused at the time of close of business.

Dispersal Procedure

We will consider usage of volume levels, type of music played and usage of lighting levels to encourage the gradual dispersal of customers during the last part of trading and during the drink up period.

Highly visible notices are placed in the foyer and all across this venue, requesting exiting customers to leave quietly and to respect our

neighbours and their property, they will also be greeted by the message from security while exiting this venue.

Security will remain on duty on the front door until the last customer has left the premises to ensure customers leave the area in a quiet and orderly manner, and to act as a deterrent for any bad behaviour.

Security will encourage customers to drink up and progress to the exit throughout drink up time.

Bar staff will give out free tap water to customers during the drink up time allocated.

Customers will be given taxi company details whilst exiting and will be asked politely to take notice of all signs pertaining to the manner in which we expect them to behave as they leave.

Security will ensure no drinks are carried out of the front door, at any time during operation but particularly at the end of the night.

Staff will go out as a rubbish patrol and ensure all flyers, cigarette butts, and rubbish in and around our vicinity is cleaned up including any sick or spills and staff will ensure no bottles, glasses or bins are emptied on a night but the morning after – to ensure no excessive volume is caused.

DJ Booth Policy

As one of the main focal points for customers as well as physically having one of the best views the DJ must keep watch over the dance floor whilst the premises is operational. They are responsible for monitoring the sounds levels along with management. They must play music responsibly, and adhere to the closing procedures for the club. They are the ones creating the atmosphere on the night, so this needs to be regularly checked to ensure a good, fun, lively atmosphere, rather than anything negative.

DJ Booth Procedure

During operational hours the DJ must make regular checks on the dance floor and around the club, as having one of the best viewing points in the club – he must ensure no inappropriate behaviour is going on – and if it is, they are to alert management or security immediately.

The Dj must not play music that will encourage inappropriate behaviour or encourage it any way through speaking on the microphone or playing anything on the projectors that directly go against the Licensing objectives, or wellbeing of staff and customers.

The Dj, as much as appropriate must try to play in session throughout the night, therefore trying to stop a certain type of negative behaviour being encouraged. If a particularly heavier set has been played – the DJ must ensure this is followed by a much mellower, softer session therefore bringing all the hype, excitement and adrenaline people may feel throughout the session to calm down. This is especially potent at the end of the night. Half an hour before the main lights on the dance floor are turned on, the DJ must start playing “happier”, mainstream music with a soft baseline, again calming customers down, so they are not leaving the club all hyped up.

The DJ booth is to be manned constantly throughout the night, so should the DJ need to leave for a short time, either management or security must be present. Also whilst the DJ is playing, the barrier must be up, stopping customers getting too close to the equipment, they are allowed to talk to DJ, and put requests down – but this must be monitored, and they must not step beyond the boundaries.

Only the DJ may touch the equipment, and they are completely responsible for it during the night, if anything damage happens to it – they could be liable. So DJ's must illustrate a good knowledge and must read this document, sections concerning DJ's/Booths.

Bars Policy

The Bar policy will encompass all aspects of the bar, staff, bottlers, training, health and safety, cashing up, stock control and much more. Due to all the separate documents that must be constantly filed in it will be to mainly ensure these are understood and done regularly.

Bars Procedure

Firstly; All Staff must go through induction training before even stepping behind the bar to work they must also go through NVQ level 2; hospitality and Alcohol awareness level 1. There are inductions check sheets to go through which must be checked off, and filled in and signed off as well as the Staff Induction training folder signed and gone through. This is to give all staff the necessary information for safety, responsible serving, all relevant information on the club as well as evacuation procedures and anything else that would be relating to their role in the company. All Refresher Training to be done on a 6 monthly basis unless otherwise required.

Every bar in the venue will always have a supervisor present during operation – this will be a person of responsibility and must be

radio linked to general manager and to security. Any problems or issues bar staff have – the supervisor of the particular bar must be informed and inform that of either management or security depending on particular issue or concern.

They are then to undertake regular training every 6 months done by management and signed off on the refresher check sheets.

As well as regular training regular meetings are to take place generally after each shift to update bar staff of any relevant information.

Staff must fill in relevant Health and Safety documents and be trained fully by management on all practices and any special equipment needed. These will be checked off on separate check lists and all evidence illustrated and fully signed off.

Staff are to ensure they are versed with all fire precautions, all alert alarms, all fire extinguishers and what to do in the instance of a fire or emergency and this is to be done regularly and checked and signed off in the relevant fire safety booklet.

Staff are to ensure responsible serving, so no one under the influence of alcohol is to be served an alcoholic drink – and free tap water must be provided. Should staff suspect a customer of being intoxicated they are to alert security or management immediately, and staff are to also ensure, once a refusal for service has occurred, it is entered immediately into the Refusal Log behind the bar with as much detail as possible.

Staff are to be trained in all policies and procedures relating to their roles, and signed forms are to be regularly maintained.

Staff are to ensure hourly checks are carried out of the premises, looking for any health and safety issues or hazards. They are to check all toilets and ensure everything is cleaned to their best ability and any issues whilst doing these checks are to be brought to either the managements or securities attention immediately. When only the lower floor is open additional checks are to be carried out upstairs to ensure customers are not roaming to other areas of the venue. These checks are to be signed on the sheets kept every night behind the main bar.

The majority of the cleaning of the bars are to be undertaken by the staff, however there are certain things that need cleaning,

maintenance which will only be done by management during closed times of the premises. Such things as the beer lines will be done once every month by Heineken as part of our Smart Dispense contract. Cleaning out the ice machine will be done once a month, again by management.

Also stock deliveries will be done by management; all items are to be double checked as they are received, the condition of the items are to be checked as well as the quantity. Stock taking is to be done once a month using the till system to upload and check off all inventory. On delivery days, stock is to be inputted into the till system by management only. Regular checks on the till counts can be done live through the back office of the till system during operation.

All staff will sign in when they start work, and sign out when they finish.

Cashing Up And Cash Drops

Cashing up and cash drops will be performed only by members of management to reduce risk, when part closing the establishment i.e. Closing the lower floor bar while the club is open, a member of security shall accompany anyone carrying a till. The same will also be true for any cash drops that are done throughout the night.

CCTV Policy

The CCTV of the premises needs to cover approximately 80%. It needs to be in fully working order every time the premises are in operation.

CCTV Procedure

To ensure the CCTV is constantly 100% operational, it is to be checked daily. Every camera is to give a good clear image with no obstructions. They are to be in focus at all times during operation of the premises. The hard drive must be regularly checked once a week to ensure its operation. All extractor fans must be checked as well as operation of hard drive must be ensured to be in full working order as well as the recording facility.

All cameras are to be positioned throughout the club so maximum coverage is achieved and all known "hot spots" are covered.

Incident reporting Policy

All incidents that happen on the premises must be recorded immediately either in the log book or straight into the main incident report log located in the office. Although these are mainly for the clubs benefit, it should be clear and help local authorities with any information they may require.

Incident reporting Procedure

At the time of the incident on the premises a log should be made with as much detail as possible. It should include everything about what physically happened, a description of those involved, time and date, door staffs name and badge number, what action was taken and if any emergencies were called. All this must be logged clearly and correctly in the incident log book kept in the manager's office.

If an incident takes place that causes harm to someone, someone gets injured be it accidental or through the actions of another; a separate log should be made on the log report sheets and CCTV footage should be burned off immediately, all referencing one another. Should the authorities need it – it will be ready to be handed over and signed for – in the log book, as well as updated on the RIDDOR system.

Noise Policy

It is This Venue's responsibility to avoid any nuisance through noise escaping the premises vicinity to any neighbours. Care and consideration should be given during operation of the premises.

Noise Procedure

To ensure This Venue reduces the amount of nuisance caused by noise appropriate sound proofing must be done of the club. This can be through many ways; multiple doors through exiting, or sound proofing material etc.

Noise levels from the DJ need to be checked and the limiter set to an appropriate level so this cannot be exceeded throughout the night.

~~Also the noise level needs to be checked at regular intervals~~
throughout the night. Checks are done at hourly intervals throughout operation of the premises at various locations stated on the Noise check database. These must be updated after every night of operation. Through this we are able to keep under the HSE set guidelines for noise levels.

Holland, Linda

From: Rachel Kelly <Rachel.Kelly@TLTsolicitors.com>
Sent: 10 August 2016 11:26
To: Holland, Linda
Subject: RE: Variation application : SN15 [TLT-TLT.FID4050663]

Dear Linda,

Please accept my apologies for the delay in responding to you.

We have contacted our client and will be in touch with new plans as soon as we are in receipt of them. Hopefully I will get back to you by the end of the week, but if not, early next week.

In the mean time, if you have any further queries, please do not hesitate to get in touch.

Kind regards,

Rachel

Rachel Kelly
Legal Assistant
for TLT LLP
D: +44 (0)333 006 0283
F: +44 (0)333 006 1492
www.TLTsolicitors.com

From: Holland, Linda [mailto:Linda.Holland@wiltshire.gov.uk]
Sent: 08 August 2016 14:24
To: Rachel Kelly
Subject: Variation application : SN15

Good Afternoon Rachel

On behalf of the Wiltshire Council's Licensing Authority, I am being consulted with regard to the variation application for SN15 and I have the following request to make at this point in the consultation period to enable me to give due consideration to the application.

The variation application requests a reduction in the provision of door stewards, the use of the patio area in a different format to its current permitted use and polycarbonates by risk assessment.

Can I have sight of the:

- Proposed / revised risk assessment for the use of polycarbonate to support the application and to put the proposed use into context.
- Proposed / revised management plan outlining how the premises will operate with the change to the SIA provision.

I would have expected the revised documentation to form part of the application to explain how the premises expects to promote the four licensing objectives going forward, bearing in mind that if no relevant representations are received then the premises could operate under its new licence and conditions from 27th August, so no doubt the new management plan, policies and procedures have already being compiled.

I await your response.

Regards

Linda

Linda Holland

Licensing Manager

Public Health & Public Protection

Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN

T. 01249 706410 | Email: linda.holland@wiltshire.gov.uk | www.wiltshire.gov.uk

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17th August 2016

SN15 Leisure Ltd
3 Northumberland Buildings
Bath
BA1 2JB

Public Protection Services
Licensing Team
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our ref : LN/9448

Dear Mr Shayegan,

Re: Licensing Act 2003 – Section 136 and 137: Unauthorised licensable activities and Exposing alcohol for unauthorised sale - SN15, 17a Station Hill, Chippenham, SN15 1EQ

We have been informed that the current Designated Premises Supervisor, Mr Robin Puddephatt, no longer works at the premises and departed on 31st July 2016. Any sale of alcohol that has taken place since the departure of the DPS has been undertaken other than in accordance with the Licence and it is strongly advised that no further sales of alcohol take place until the Licensing Authority has received a variation of DPS application. Please also refer to S19, 2(a) of the Licensing Act 2003 below:

19 Mandatory conditions where licence authorises supply of alcohol

- 1) Where a premises licence authorises the supply of alcohol, the licence must include the following conditions.
- 2) The first condition is that no supply of alcohol may be made under the premises licence—
 - a) at a time when there is no designated premises supervisor in respect of the premises licence, or
 - b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended
- 3) The second condition is that every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.

We are disappointed that a high profile premises is in breach of a mandatory condition and the Licence Holder has not attempted to inform us or process an application to date. The Licensing Authority is now considering what action will be taken.

We will be in further contact in due course.

Yours sincerely,



Roy Bahadoor
Public Protection Officer (Licensing)
Tel. 01249 706555
Email. publicprotectionnorth@wiltshire.gov.uk

Cc: TLT LLP, One Redcliff Street, Bristol, BS1 6TP
Wiltshire Police Licensing, Trowbridge Police Station, Polebarn Road, Trowbridge, BA14 7EP.
Mrs Linda Holland, Licensing Authority, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, BA14 8JN.

Holland, Linda

From: Holland, Linda
Sent: 18 August 2016 14:37
To: 'Rachel.Kelly@TLTsolicitors.com'
Subject: SN15 Variation Application - concerns

Good Afternoon Rachel

Thank you for sending me the revised Management Plan, Polycarbonate Risk Assessment, and SIA Door Supervisor Management Plan for SN15 submitted to support the new variation application.

Having considered the documents I have these initial comments to make.

The Management Plan:

This is original management plan submitted at the time of the provisional statement some **three years ago** and does not in my opinion address the proposed variation.

The Polycarbonate Risk Assessment:

The risk assessment requires more detail to identify the breakdown of risk (rating) associated for each category or sub category and should be formally documented to aid competition of risk assessment and to ensure consistency.

The Application:

There is significant ambiguity about the new proposed door steward provision which needs clarifying. (Ie: additional 100 persons to what ?)

The Patio area:

This area will be appropriately managed ? (what does appropriately mean – ?, difficult to understand how the applicant believes this is an enforceable or compliant condition).

Currently the area is restricted to, manage noise breakout and limit the impact on nearby residential properties there is no mention how this will be achieved.

I look forward to your response

Regards

Linda

Linda Holland
Licensing Manager
Public Health & Public Protection

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T. 01249 706410 | Email: linda.holland@wiltshire.gov.uk | www.wiltshire.gov.uk
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SN15 Leisure Ltd

Polycarbonate Risk Assessment

In determining whether or not polycarbonate drinking vessels are to be used at SN15 (The Premises) the premises licence holder/DPS will make a determination based on the following factors and criteria:

1. Event type

- Event date/timings
- Music genre
- Customer age group
- Whether or not the event is a "promoted event"
- Whether any previous glass related incidents have occurred at that particular event type

2. Nature of the event

- The types of drinks to be served at the event e.g. cocktails
- The event dress code
- The proposed number of attendees
- Whether or not the event is a ticketed event

3. Security provision

- The number of SIA registered door supervisors to be on duty at the event

Having conducted a risk assessment based on the above criteria, the premises licence holder/DPS will determine whether the event is High Risk, Medium Risk, or Low Risk as appropriate.

Where the premises licence holder/DPS is unsure whether the event is High, Medium or Low Risk or borderline, the premises licence holder/DPS may seek advice from the police licensing team and/or the council licensing team as appropriate.

As a guideline, the use of polycarbonate drinking vessels will be as follows:

Category	Polycarbonates to be used?
High	Yes
Medium/High	Yes
Medium	Yes
Low/Medium	No
Low	No

The premises licence holder will keep appropriate records detailing the criteria considered and the reasons for the decision. A template record form is set out below:

Example:

Event name:

Event date:

	Risk/Action	Outcome
Event Type		
Event date/timings		
Music genre		
Customer age group		
Promoted event?		
Previous glass related incidents?		
Nature of Event		
Drinks to be served		
Dress code		
Number of attendees		
Capacity		
Security provision		
No. of SIA on duty		

Further recommended action:

.....

Actions applied:

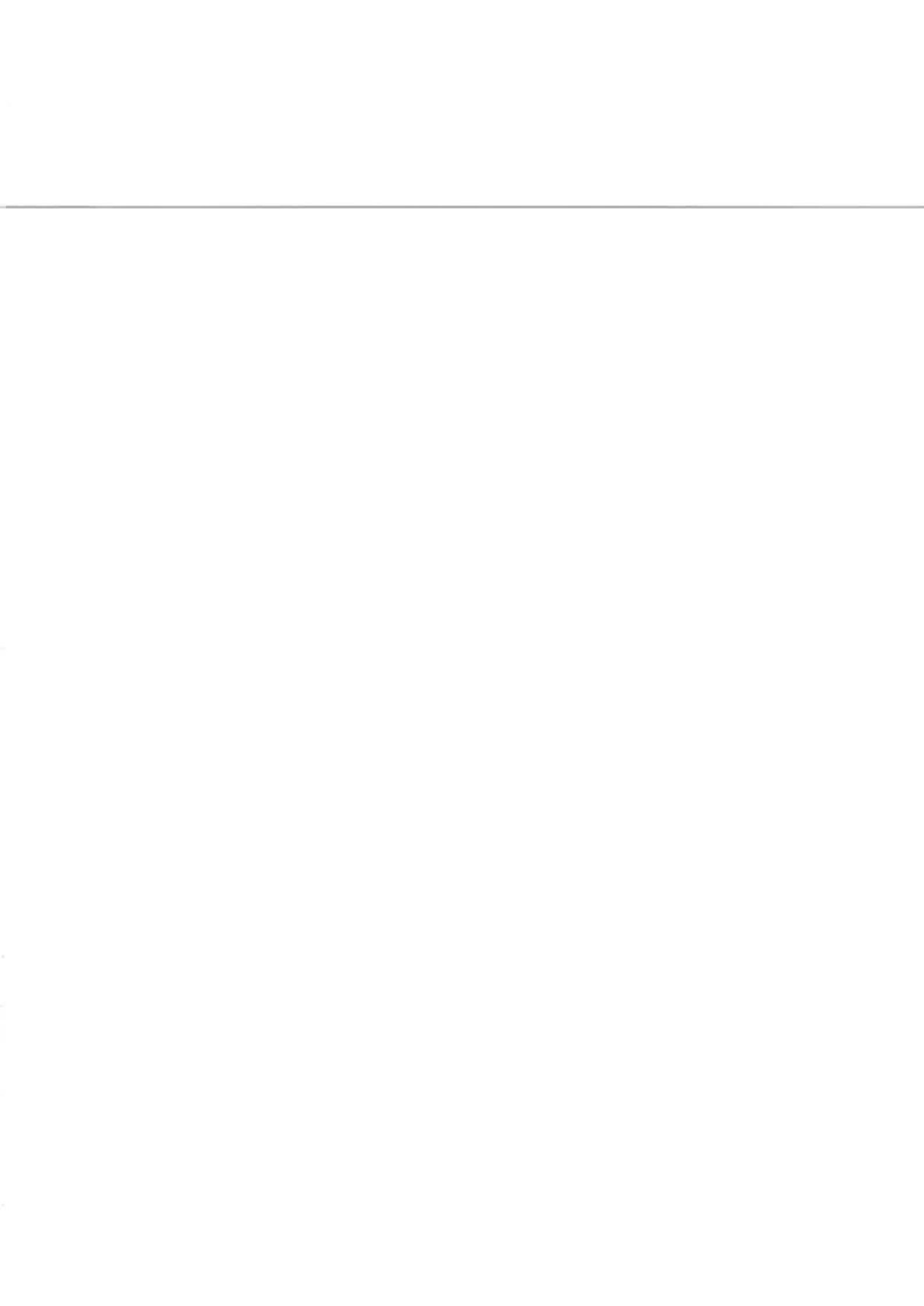
.....

.....
.....

Signed:

Name (PRINT):

Date:



SN15 Leisure Ltd
SIA Door Supervisor Management Plan

Event chain of command:

Please refer to the 'Premises Management Plan' annexed to this plan.

Door staff responsibilities:

- SIA trained
- To defuse any situations and proactively identify any trouble makers and to remove them from the premises
- To be aware of the venues procedures around queuing, searches, re-entry and dispersals
- To be aware of all exits and fire safety procedures
- To update the incident report as soon as possible
- To wear appropriate attire and to display SIA registration
- To remain diligent throughout duties and to act with integrity
- To remain calm and to deal with customers and situations with confidence and courtesy
- To use the Chippenham pubwatch scheme and adhere to banning orders made by the committee
- To help with the dispersal of people from Station Hill and the surrounding takeaways at the end of the night
- To accompany staff members tidying Station Hill for safety
- To record entry numbers and exits every hour

Pre-event:

- SIA door supervisors to be briefed regarding event type and duties
- SIA door supervisors to sign SIA door supervisors register
- Event chain of command to be identified and confirmed

During event:

- All SIA door staff to report any incidents or issues as per chain of command
- All SIA door staff to keep a record of any incidents
- To use clickers to record numbers of patrons entering/exiting the premises

- To check ID and ensure that all patrons are of the appropriate age
- To monitor customer behaviour and look for signs of drunkenness, aggression or drug use
- To periodically check the toilets to deter drug use
- To monitor the smoking area

Specific procedures

1. Queuing

- SIA will encourage customers to have IDs and any tickets ready for inspection
- SIA will search customers and check ID and any tickets quickly and effectively
- SIA will pay diligent attention to the behaviour of customers and refuse entry if necessary
- SIA to use clicker system are used to ensure safe capacity isn't exceeded

2. Searching

- Must be conducted in line with SIA training and venue instructions
- Where possible, female and male customers to be searched by female and male door staff respectively
- Seizing, retaining and documenting any unauthorised items (including weapons or illegal drugs).
- Entry to be refused and police to be called where such items are found

3. Dispersal

- Lighting reduced and music levels turned down to encourage customers to leave
- Managing dispersal and encouraging customers to leave
- Reminding customers to leave quietly

Holland, Linda

From: Thurman-Newell, Susan <Susan.Thurman-Newell@wiltshire.pnn.police.uk>
Sent: 23 March 2016 16:22
To: Bahadoor, Roy
Cc: Holland, Linda
Subject: FW: SN15 - cancelled Police Licensing meeting 24/3

Hi Roy,

I have spoken to Robin;

I reminded him that I was on duty last weekend and it was discussed about me paying a visit, however it was agreed to meet tomorrow at 1600hrs, to allow them time to get the CCTV engineers in and the new system installed.

I asked Robin for confirmation that the three breaches identified have being rectified, in an email, due to the fact that he was cancelling the meeting.

This is his response – so it can be evidenced in your meeting on the 30th.

Regards

Sue

Susan Thurman-Newell
Licensing Officer
Wiltshire Police
Extension: 37742
Direct Dial: 01380 861742
Mobile: 07970 701135

From: SN15 Nightclub [<mailto:info@sn15nightclub.co.uk>]
Sent: 23 March 2016 13:45
To: Thurman-Newell, Susan
Subject: Follow Up

Hi Susan,

Following on from our telephone conversation I have compiled a list of corrections that have been made.

The Management Plan has been modified and is now on site.

Staff training logs are now back on site and up to date

C.C.T.V unit is being delivered on Thursday and will be installed by 18:00 on Friday

The issue with vodka bottles has now been addressed following a team meeting.

A Fire Risk Assessment has been booked in for Thursday 31st March 2016.

Many thanks in advance,

Robin Puddephatt


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Holland, Linda

From: Paul <[REDACTED]>
Sent: 23 March 2016 12:14
To: Bahadoor, Roy
Subject: Re: SN15 - Formal Warning Letter

Follow Up Flag: Follow up
Flag Status: Completed

Dear Roy,

Thank you for coming back to me. Wednesday 30th of March at 2:30pm is fine. I am confirming that we are addressing all the issues that was raised in your letter.

Kind Regards

Paul Shayegan
SN15 Leisure Ltd

----- Original Message -----

From: Bahadoor, Roy
To: Paul
Sent: Tuesday, March 22, 2016 11:50 AM
Subject: RE: SN15 - Formal Warning Letter

Dear Paul,

It will be possible to meet at Monkton Park offices on Tuesday 29th March at 10am or on Wednesday 30th March at 2.30pm. Please confirm if one of these dates are possible?

As the Licence Holder, can SN15 Leisure Ltd confirm that the issued raised in the letter dated 17th March have been/are being addressed, to ensure that you are compliant with the conditions on your Premises Licence?

Please be reminded that Police Licensing will be attending the premises on Thursday 24th March at 4pm following on from last week's meeting, as mentioned in the letter. Please ensure that there is a disc available for recording, to evidence that the CCTV footage is now downloadable.

Kind regards,

Roy Bahadoor
Public Protection Officer (Licensing)

Tel: 01249 706439
Internal: 21439
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

From: Paul [REDACTED]
Sent: 19 March 2016 17:08
To: Bahadoor, Roy
Subject: Re: SN15 - Formal Warning Letter

Dear Roy,

[REDACTED]
[REDACTED] and I have been receiving. I was very upset to see your letter. I was confident that Robin had everything ready for you. We have done our very best to comply with all your conditions. I like to remind you that as we have not been very busy, it has been difficult to

decide our direction. I would like to come to see you as soon as possible to talk to you about this. So please let me know when is best for you. We shall go through everything together.

Kind regards
Paul Shayegan
SN 15 Leisure Ltd

----- Original Message -----

From: Bahadoor, Roy

To: Paul

Sent: Thursday, March 17, 2016 5:20 PM

Subject: SN15 - Formal Warning Letter

Dear Mr Shayegan,

Please see the attached Formal Warning Letter following a visit to the premises on Wednesday 16th March 2016.

A hard copy of the letter has been sent to the Licence Holder's address and Mr Robin Puddephatt at the premises address.

Kind regards,

Roy Bahadoor

Public Protection Officer (Licensing)

Tel: 01249 706439

Internal: 21439

Wiltshire Council

Monkton Park

Chippenham

Wiltshire

SN15 1ER

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Holland, Linda

From: Bahadoor, Roy
Sent: 02 September 2016 16:36
To: Adam hatch
Cc: Paul
Subject: SN15 conditions

Good afternoon Adam,

Thank you for your time yesterday. As discussed, please ensure the training is completed for your bar staff as per the below condition on the licence. You informed me that you are now compiling staff records. Please document this training in their files when completed and send confirmation to us.

- ***All bar staff to undertake an alcohol awareness course by a recognised training provider and records of all staff training to be kept on file.***

We are awaiting confirmation from Wiltshire Police Licensing, regarding the approved course for yourself as DPS, as per the below condition. We will forward the information to you when we have been informed.

- ***The Designated Premises Supervisor is to undertake or to have undertaken training as approved by Wiltshire Police.***

As discussed, bottles of spirits are not permitted to be in public areas with customers. It appeared in some Facebook photos, that spirits bottles were in public areas. We discussed the current conditions on the Premises Licence relating to glass/polycarbonate use which only permits the use of Wine and Champagne bottles in certain permitted areas. You informed me that you will be having a meeting to ensure all bar staff understand the current conditions relating to glass.

During our discussion, there appeared to be some confusion regarding the content of the application and the current licence conditions. It is therefore concerning that currently the Licence Holder and the DPS appear to be unsure of what exactly is included in the Variation application.

We will be in contact to confirm the Police approved training. Please contact us to confirm the bar staff training when completed.

Kind regards,

Roy Bahadoor
Public Protection Officer (Licensing)

Tel: 01249 706439
Internal: 21439

Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

