

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Dispersal Policy

This policy details the actions which need to be taken with regard to compliance with the licensing act 2003. It is also designed to improve the wider management of the late night economy by detailing the steps which need to be taken to reduce the potential for disorder and disturbance.

It is considered by the company that the majority of disturbance and disorder is likely to occur as a result of a poorly thought out approach to managing the end of night period. The following policy sets out the steps which should be taken at the end of the trading session to minimise the potential for disorder and disturbance as customers leave the premises. This includes measures to disperse customers over an extended period and also to ensure customer leave the venue in an orderly fashion and without bottles or glasses.

It is recognised that the company has no direct jurisdiction outside of the boundaries of company premises although we will continue to use our best endeavours to encourage customers to leave the immediate area in an appropriate fashion.

Key control measures for all sites

1. Progressive winding down

In all instances the premises should ensure that the playing of music, which includes recorded music, live music and DJ music (where provided) is progressively wound down over the last half hour of the trading session, or immediately after the service of alcohol ceases. During this period it is the responsibility of the general or duty manager to ensure music is played which is of a quieter nature and a lower BPM.

Lighting levels throughout the premises should be gradually increased over the same period and not raised in a single step just prior to closure.

2. Announcements and signage

Towards the end of the night announcements should be made, if possible, which include the following: -

- a) All customers are reminded that they must not take alcohol off the premises and this should be enforced by the provision signage at the exit points of the venue and also all door supervisors must ensure that bottles and glasses are removed from any customers who are attempting to leave the premises with them.
- b) Customers should be asked to leave the premises in an orderly manner. Again, signage should be erected at appropriate exit points thanking them for their custom and requesting in addition that customers are considerate when they leave the premises.
- c) Details of local public transport and/ or a taxi services should be easily available to customers to enable them to disperse easily. This can be achieved by means of signage or by the availability of business cards for local taxi companies.

3. Door supervisors role

Where utilised, it is the responsibility of the door team, in conjunction with the site management team, to use their best endeavours to ensure:

- a) Customers who are leaving the premises do so in a quiet and orderly manner.

- b) If groups of customers are found to be loitering outside the premises after leaving they should be politely asked to move on.
- c) No bottles or glasses are permitted to be taken outside the site.
- d) Customers should be encouraged to leave gradually over the permitted period of “drinking up time”.
- e) The practise of “herding out” customers as soon as service of alcohol has ceased should be discouraged and customers should be encouraged to leave gradually over the course of “drinking up” time.
- f) Members of the door team should be visible outside the unit for a period of time after closing until all groups of customers have left the vicinity.

4. General / duty managers role

It is the ultimate responsibility of the general or duty manager to ensure that: -

- a) The door team are acting effectively and responsibility in line with their responsibilities detailed above.
- b) Customers are not causing any disturbance or nuisance within the vicinity of the unit. If any disturbances is occurring then customers should be asked politely to move on, if safe to do so, or authorities should be called to assist if situation becomes hostile.
- c) a member of the management team should be visible with the door team until all groups of the customers have dispersed.

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Drug Action Awareness Plan

This action plan has been devised in addition to the Drug policy located in the Licensing Manual and should be read in conjunction with it.

It details the actions to be taken to detect and prevent consumption of illegal drugs on Lakeside Collection Ltd's venues. Not every action will be relevant for every site, however consideration should be given to the measures below where applicable and each premise should maintain their own robust management and procedures.

The plan also covers the use of New Psychoactive Substances (NPS), commonly called 'Legal Highs'. Lakeside Collection Ltd makes no distinction between the use of NPS and illegal drugs, and therefore both should be managed in the same manner.

- Ensure all staff and management have taken the Drugs Awareness ELearning Module. Refresh this regularly, and in light of any serious incidents that may occur.
- Ensure all staff and management take responsibility for keeping a watchful eye for signs of Drug/ NPS dealing and use. Any suspicions by staff must be reported to the Duty Manager immediately and discretely. (E. g. Frequent trips to the toilet, erratic movement, aggressive behaviour, excessive consumption of soft drinks, in the company of many different persons, all of which stay with the individual for a short period of time).
- Signs of NPS use may be similar to that of the use of illegal drugs. As NPS cannot illegally be sold for human consumption they are often sold as incense, salts or plant food. Product names have started to emerge such as Clockwork Orange, Bliss and Mary Jane.
- A common type of NPS is the inhalation of Nitrous Oxide, more commonly known as "laughing gas". Users often buy it in small gas canisters, or "whippets", which are finger length steel cartridges. A small gadget, known as "the cracker" is used to release the gas from the canister into a balloon. Littering of canisters or balloons inside/outside the premises is a sign of the use of this particular NPS.
- Whilst serving the customer and making eye contacts look at their nostrils for signs of white powder. Also check for the payment with notes that have been tightly rolled.
- Ensure checks are carried out around the premises for tell-tale signs e.g. torn up beer mats, drinking straws or spoons left in toilets, small packets made of folded paper, card or foil.
- Frequent glass collecting, emptying outside ash trays and wiping down of tables can all be used as a "cover for surveillance".
- Encourage staff to "get to know" customers and make sure "they know you".
- Regular checks car park and garden areas should made.
- Hourly (at least) checks of the toilets by staff to include checking of cisterns for discarded bags. Ensure checks are logged.
- Ultraviolet lights on the outside of toilets and on the bar.
- Door staff checks 1 in 10 people for a drug/ NPS search.
- If venue has multiple floors then lock toilets on upper floors unless they are open for business.

- Grease down flat surfaces in the toilets with vegetable oil (NOT WD40). Or if this is not possible then eradicate any flat surfaces in your toilets by blocking cisterns, creating a 45 degree angle on top of the cisterns, removing toilet lids etc.
- Consider putting a lock and key on the disabled toilets, with a sign asking a customer to ask at the bar for the key if required.
- Where practicable replace full length toilet cubicle doors with doors that allow inspection of cubicles when occupied.
- Invite local licensing police to come and run a drugs/ NPS awareness session with the staff.
- Make sure the lighting above the toilet cubicles is bright as this dissuades drug use.
- Place toilet roll dispensers on upside down.
- Consider toilet attendants on busy nights as these dissuade drug/ NPS activity. Consider adding extra cameras if required. Make sure CCTV is recording good quality images and is regularly maintained.
- Any drugs/NPS found on a customer in venue, then they will be detained and police will be called and customer arrested, and permanent ban for the venue.
- Any drugs/ NPS found in the venue will be put into an evidence bag and logged with Police.
- Consider the use of a drugs/ NPS amnesty box if appropriate for the premises.

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Drugs Policy

This policy details the actions and processes which must be followed by Lakeside Collection Ltd employees with regard to the prevention of drug taking in areas under the control of the Lakeside Collection Ltd

The policy also covers the use of NPS (legal highs). Lakeside Collection Ltd makes no distinction between the use of NPS and illegal drugs and therefore both should be managed in the same manner.

Lakeside Collection Ltd operates a zero tolerance policy towards the consumption or use of all illegal drugs/NPS across all company sites. We will use our best endeavours to ensure that we take reasonable steps to prevent this taking place in any Lakeside Collection Ltd site. In any case where customers or employees are found to be in possession of illegal drugs/NPS the involvement of the police will be sought.

All employees must be familiar with and adhere to the drug/NPS awareness action plan.

Key Control Measures

All staff will receive relevant training on how to recognise the signs and effects of intoxication due to drug/NPS use. This will be carried out on a regular basis and will form part of the induction training for all new employees.

Signage will be displayed in public areas warning customers of Lakeside Collection Ltd operating a zero tolerance approach towards this activity, and that anyone found to be engaging in this will be ejected from the premises and reported to the police.

Where a customer or employee is suspected of being in possession of illegal substances/NPS the Company reserve the right to ask to search the person concerned. Any search will be carried out in line with the Company's customer search policy.

In the event that any person appears to have been adversely affected by consumption of illegal drugs/NPS the GM/DM/DPS will be responsible for ensuring that they receive attention from the relevant emergency services. In the event that the customer refuses this assistance this must be recorded in the incident log.

In accordance with best practice the GM/DM/DPS must ensure that in any case where the substance appearing to be either of an illegal or NPS nature is found on site it is retained in a secure place for possible analysis by the relevant authority.

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Crime Scene Preservation Policy

It is the policy of Lakeside Collection to ensure that where crimes occur on our premises, robust measures are out in place to ensure effective management and reporting of the incident.

Initial Action

Following a criminal offense the General / Duty Manager must be made aware and the Police should be called.

Minor Offenses – call 101

Serious Offenses – call 999

Irrespective of the victim's wishes the Police must be called whenever a criminal offense has been committed.

Where a suspect is detained, the Police must be informed and the call should be graded as an immediate response.

Details of the incident should be recorded in the Incident Due Diligence.

When contacting the Police a name and reference number must be requested and recorded down.

Crime Scene Preservation

In serious offenses such as victims injuries require medical attention or a weapon has been used the scene must be preserved for forensic examination. The scene should be cordoned off with tape and the access strictly prohibited, by placing a member of staff at the scene to prevent any one tampering with it.

Attempt must also be made to secure the victim / suspect for the Police.

CCTV should be made available, as well any contact details for witnesses.

Look for articles and the suspect may have used / picked up prior to the offense being committed, including what they touched / drank from.

If items need to be picked up such as weapons / glassware for safety reasons, staff must wear two pairs of disposal gloves to prevent cross contamination. Items should be placed in a box, in a safe place.

Do not tidy up until the Police have given consent.

If the incident is a sexual offense, do not allow the victim to have a drink if possible. Take them to a quiet room and have a member of the same sex sit with them until the Police arrive.

If the offense is life threatening or worse, the venue must be closed and customers escorted from the venue. Police will order this if not conducted by management.

The Duty Manager is responsible for the management of the crime scene and any evacuation of the customers.

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Door Staff Policy

It is of critical importance that Lakeside Collection Ltd complies with all aspects of the Licensing Act 2003. Our door teams provide a front line of defence in ensuring that we meet those licensing objectives in preventing under age/drunk customers from entering our premises, thereby ensuring that we meet our legal obligations.

Key Control Measures

Lakeside Collection Ltd is committed to operating the Challenge 25 initiative. This means that any customer seeking to enter the premises who appears to be under 25 years of age must be challenged to provide suitable ID to show that they are over 18. There are to be no exceptions to this rule. Forms of ID accepted are:

10 year passport

PASS approved ID card

UK photo driving license

Her majesty's forces warrant card

It is possible from time to time that you may be presented with some form of overseas identification. In these cases you should use your judgement as to the validity of the ID. If you are in any doubt refuse entry.

As well as seeking to exclude under age customers it is also the policy of the customer to ensure the safety and wellbeing of our customers by refusing to access those who have already consumed too much alcohol. It is kept to the discretion of the door supervisors in conjunction with the site management to define what constitutes "too much" although any customer who appears drunk shall be refused access.

The company operates a zero tolerance policy towards drugs/NPS. Any person who in the opinion of the door team is under the influence of illegal substances/NPS should be refused entry. Where there is a suspicion that an individual is in possession of drugs/NPS the door team may ask them to submit to a search before being allowed access. Any search carried out must be done in accordance with the Company Search Policy.

In order to be able to demonstrate that we operate due diligence in our admission policy it is vital that the number of people refused entry are recorded in a register with the reason for their refusal.

It is also vital that our due diligence records are maintained. All Lakeside Collection Ltd's are issued with an incident and due diligence log. During times when door teams are on duty it is their responsibility to ensure that these are completed in full detail.

Door supervisors are asked to take notes of any observations that they make about any incidents within the vicinity of the site and these are to be recorded in the security book. They are not necessarily required to be involved in these incidents but a record of the observations made can be submitted to the police in the event of a request.

Door Supervisors should be aware of what is happening inside the premises as well as on the door and patrols around the premises may be necessary. Consideration must be given to site specific conditions relating to the site:

Park Plaza

Minimum of 2 from opening for the first 100 customers and 1 additional for every 100 customers

Lakeside Collection Ltd T/As Lavender Hotels

Park Hall Hotel

Park Plaza

Search Policy

The searching of any person or their property is an extremely sensitive issue. It is therefore essential that this procedure be carried out with integrity, impartiality and fairness.

It is vital that there is protection for all parties involved in order to prevent any allegations that items found (especially drugs/NPS/legal highs) went missing, or that the quantity involved was increased, decreased or switched.

Lakeside Collections Ltd operates a zero tolerance policy with regard to any form of illegal substances/NPS and weapons and reserves the right to search any customer in order to ensure that no items of this nature are carried into or remain within company premises.

Key Control Measures

Should the need occur to search a customer whether this be prior to entry or whilst on the premises this should be conducted with the full cooperation of the customer concerned, must be conducted with at least two persons present and should ideally be done under the direct supervision of the GM/DM and DPS

The individual should be advised of the reasons for the search and these should be noted in the log. The consequences of non compliance should be pointed out which is no entry to the Club.

Should the customer refuse then its advisable to ask the customer to leave however if your suspicions are of a serious nature, for example that the customer is breaking the law by being in possession of drugs/NPS or weapons then Police assistance/attendance should be requested and wherever possible the person be detained in the presence of the GM/DM and DPS.

The search must only ever be carried out by a person of the same sex as the customer being searched.

Wherever possible the search must be carried out in a well lit area that is also covered by the CCTV system. This area should be identified prior to the search being carried out.

Ask the individual to empty their pockets/bag on to a clean surface and verbally confirm all objects present as far as possible.

In the event of any suspicious items being found the local police should be informed and the items secured. Items should be kept in view of all parties at all times until sealed in a tamper proof evidence bag and placed in the safe/drugs box. All information (date/time) should be recorded on the bag or on the seals of hard containers.

If an individual remains on the premises and is proven to have possession of the item, stay with them at all times without compromising your own or another individuals safety.

If an individual is proven to, or suspected to have possession of any item has moved away from the premises and is aggressive or acts in threatening manner do not try to restrain or contain. Note any direction, mode of transport and report to the police.