

APPLICATION FOR PREMISES LICENCE  
PALM ISLAND LOUNGE, 1 CRAVEN PARK ROAD

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SUBMISSIONS BY APPLICANT

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1. The Applicant, Palm Island Lounge Ltd, has applied for a premises licence under s17 Licensing Act 2003. The application has received representations and as such, the application is to proceed to a hearing under s18 of the Act. These submissions are prepared in support of this application.
2. The proposed Designated Premises Supervisor on the application is Kingsley Adjei. He is the sole director of the Applicant company.

**Background**

3. The premises concerned is 1 Craven Park Road, London. The premises used to trade as a nightclub called Vybz. The Applicant understands that Vybz was a magnet for anti-social behaviour, crime and disorder was the subject of a Closure Order in the summer of 2022. The premises subsequently had its licence revoked. The Applicant had no connection or involvement with Vybz nightclub.
4. The Applicant took over the lease for the premises In December 2022 intending to reopen the premises as a restaurant with shisha. The Applicant prepared and submitted an application for a premises licence in April 2023. The application was prepared by Kingsley Adjei and it is accepted that this application left a lot to be desired.
5. The application proposed, amongst other things a terminal hour for the sale of alcohol of 4 am 7 days per week. The application received representations and proceeded to a hearing on 7<sup>th</sup> June 2023. At that hearing, the application was refused.
6. The Applicant accepts that the original application was entirely disproportionate with his vision of creating a restaurant with occasional entertainment. It was adventurous and showed misplaced optimism as to what is suitable for the premises; especially having regard to its chequered past.
7. The Applicant instructed a solicitor to assist him with the subsequent application which the sub-committee are now dealing with. The application has attracted a number of representations. As a result of this, the Applicant seeks to heavily modify the proposed operating schedule in a manner which we believe the sub-committee can be confident will adequately promote the licensing objectives.

8. The Applicant intends to operate the premises as a *bone fide* restaurant and to run the premises in a manner which is not only conducive to promoting the licensing objectives as well as being a positive contributor to the locality. In a bid to achieve this, as part of their preparations, they have prepared a number of policies to demonstrate their resolve to run the business properly. A list of these policies can be seen at Appendix 4.

## **Commentary on Representations**

### Metropolitan Police

9. A representation has been submitted by PC Brendon McInnes on behalf of the Metropolitan Police. The representation advocates the refusal of the application or, in the alternative, the imposition of conditions. Discussions have taken place with PC McInnes and a number of conditions have been agreed. This agreement was communicated to the Licensing Authority on 24<sup>th</sup> January 2024 and the Police's representation was withdrawn.
10. Those conditions which have been agreed are incorporated into the proposed conditions in Annex 1.

### Licensing Authority

11. The Licensing Authority has, through their email to the applicant on 3<sup>rd</sup> January 2024<sup>1</sup> raised a representation subject to satisfactory answers being given to a number of concerns raised. The applicant responded to those questions on 15<sup>th</sup> January 2024<sup>2</sup>.
12. A discussion with Esther Chan from the Licensing Authority was held on 24<sup>th</sup> January and a number of concerns were discussed. We were able to confirm responses to her pertinent concerns. These were confirmed in writing on the same day but in essence were:
  - a. The outdoor area is intended to be used (subject to weather) for diners. The applicant would agree to this being restricted after 22:00.
  - b. The applicant would agree to a condition requiring a personal licence holder to be on duty when the premises were open for licensable activities.
  - c. There will be no shisha at the premises.
  - d. The application for Regulated Entertainment in the form of recorded music is withdrawn.
  - e. The use of ID scan would be limited to circumstances where the premises do not trade under a restaurant condition.
13. The Licensing Authority provided their revised representation on 25<sup>th</sup> January proposing 21 conditions. Some of these conditions are similar to those agreed with the

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<sup>1</sup> See page 9 of Public Document Pack

<sup>2</sup> See document 3.11 of Supporting Documents

police. Conditions 1-8, 10-12, and 16-18 are conditions which are equivalent or identical to those agreed with the police and the conditions proposed in Annex 1 are, we believe faithful to those agreements.

14. We have provided the police with a copy of Annex 1 prior to the submission of these submissions and confirmed that some of the conditions which were agreed have slightly different wording. At the time of writing, the Police have not confirmed that any new wording is unacceptable. However, we would suggest that the licensing objectives are not going to be best served by having multiple conditions which achieve the same thing.

#### Councillor Kelcher

15. Councillor Kelcher has raised a number of concerns on behalf of himself and other local councillors. We emailed Councillor Kelcher on 19<sup>th</sup> January 2024<sup>3</sup> with a view to commencing a conversation where his concerns could be discussed.
16. Following the agreement with the police on 24<sup>th</sup> January 2024, we wrote to Councillor Kelcher again<sup>4</sup> seeking a dialogue. At the time of writing, the invitation to have these discussions has not been accepted although we are mindful of the fact that there has not been much time to do so.
17. In respect of those concerns raised by Councillor Kelcher, it is fair to say that some of these concerns are as a result of the application not explaining itself properly and have, hopefully, been allayed by those conditions agreed to with the police and the Licensing Authority:
  - a. *Anti-social behaviour strategy* – there is no obligation for such a strategy to be provided with the application. The premises will adopt such a policy despite one not being requested by the police and this has been included in the proposed conditions. This can be seen at Appendix 4.
  - b. *SIA Security* – The premises will operate as a restaurant and it would be most unusual of have security at a restaurant. The premises proposes a condition whereby the need for SIA Security is subject to a risk assessment<sup>5</sup> is offered if the sub-committee feel that this is the difference between a grant and refusal. However, the suggestion that this should be at a ratio of 1:10 is excessive. Industry standards are 1:100. For example, Fabric, an infamous nightclub in Islington has a condition of 1:100 for SIA security.
  - c. *Dispersal Policy* – The premises does have such a policy despite one not being requested by any of the Responsible Authorities.
  - d. *Lack of nighttime economy* – The premises are only seeking to operate until 23:00 and is not a late-night offering. A well ran premises will be a boon to the local area and its evening economy.
  - e. *Premises operating as a night club* – The premises will be a restaurant and cannot operate as a night club due to the proposed conditions, hours and activities.
  - f. *Number of Patrons* – the suggestion of 60-80 patrons is based on the maximum capacity of the premises. It is an error for the Applicant to suggest that the

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<sup>3</sup> See Appendix 2

<sup>4</sup> See Appendix 2

<sup>5</sup> See Appendix 1, condition 20

premises will have that many covers. The committee may, if it wishes, impose a capacity on the venue although, a proposed agreed condition with the Licensing Authority would require the premises to have a professional risk assessment carried out.

- g. *Lack of seating plan* – in order to comply with regulation 23 Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005, moveable furniture is not included on then plan. As such, a seating plan is not required. All patrons will be seated and have an ‘at table’ service irrespective of whether they are inside or outside.
- h. *Fire Risk Assessment* – The Fire Authority are considered the statutory experts on such matters and have not submitted a representation. In order to comply with Fire Safety Order 2005, the premises will undertake a Fire Risk Assessment. The provision of one is not a pre-cursor to an application being granted. Likewise with policy D12 of the London Plan which does not trump the Fire Safety Order 2005.
- i. *Presence of speakers* – The only amplified music will be background music.
- j. *Lack of personal licence* – The proposed DPS does hold a personal licence issued by Havering Borough Council. It is a requirement of the application to provide details of the licence. Furthermore, the proposed deputy manager is a personal licence holder and we have agreed a condition with the Licensing Authority that a personal licence holder will be on duty at all times.

18. In general terms, we would submit that many of the concerns raised by Councillor Kelcher are out of an entirely understandable abundance of caution or otherwise dealt with by conditions agreed with the Responsible Authorities. We would hope that, in the time between submitting these submissions and the hearing, Councillor Kelcher would have been able to accept our invitation to discuss the application.

#### Anonymous Representations

- 19. Two representations have been received from members of the public who live in the local area and who are concerned about the impact that granting this application could have on the local community.
- 20. With a view to seeking to alleviate these concerns and invite a dialogue, a ‘to whom it may concern’ letter was sent to both representors via the Licensing Authority on 23<sup>rd</sup> January 2024<sup>6</sup>. At the time of writing, we have received no confirmation that the letter has been forwarded or any acceptance of our invitation although fully appreciate that not much time has been afforded for this.
- 21. A representation has been received from a member of the public on 10/1/24. The details of the sender have been redacted.
  - a. *Potential as a nightclub* – The application is for a restaurant with restaurant conditions and not a nightclub.
  - b. *Planning permission* – the Applicant received and relied upon incorrect advice that the shelter built would not need planning permission. The suggestion that this was to “house the club” is wrong.
  - c. *Turning premises in to nightclub* – Any attempt to turn the premises in to a nightclub would require a significant alteration to the sought after licence and

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<sup>6</sup> See Appendix 3

is not only not within the contemplation of the Applicant but would be difficult to achieve.

- d. *No children* – The Applicant wants the restaurant to be open to children and would be possible under a condition<sup>7</sup> agreed with the police.
- e. *Amplified music* – the Applicant only intends to have background music and has withdrawn recorded music from the application.
- f. *Nonstandard timings* – The Applicant no longer seeks non-standard timings and requests uniform timings.
- g. *Illegal Parking* – the photo attached is not of the Applicant's car. The Applicant does not know to whom this car belongs.
- h. *Company Activity* – the company in question is no longer subject to compulsory strike off.
- i. *Capacity* – The capacity of the premises will be determined through a Fire Risk Assessment.

22. A representation has been received from a member of the public on 1/1/24. The details of the sender have been redacted.

- a. *Noise from amplified music* -The premises only intends to have background music. There will be no noise nuisance from amplified music. The application for Regulated Entertainment by way of recorded music is withdrawn.
- b. *Crime and Disorder* – We understand from the Police's representation that matters have improved by the closure of Vybz. The proposed operation is very different and we would hope that the conditions agreed with the police will only enhance this.
- c. *Unsafe operation* – The representor suggests that the premises has traded in an unsafe manner. The premises has not traded since it was Vybz nightclub so it is unclear how they believe this to be the case.
- d. *Access to alcohol for local residence in HMOs and Hostels* – under the proposals, there will be no off sales and on sales will be ancillary to taking a meal. It is highly unlikely that those concerned would choose to Palm Island Lounge as the place to get their drink.

### **Brent's Statement of Licensing Policy**

23. The Applicant has had regard to the London Borough of Brent's Statement of Licensing Policy and believes that this supports the granting of this application. The Council's policy is to support businesses with a commercial food offering<sup>8</sup>.

24. It is also Brent's Policy that Harlesden town centre's retail and evening economy offer will be enhanced<sup>9</sup> as this would retain a greater spend locally<sup>10</sup>.

### **Statutory Guidance**

25. Under s182 Licensing Act 2003, the Home Office has issued guidance to assist Local Authorities in determining applications such as these. The Sub-Committee's attention is drawn to paragraph 9.43 which emphasises that the approach to be taken is an evidence based one.

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<sup>7</sup> See condition 25 agreed with Police.

<sup>8</sup> Page 4, paragraph 4

<sup>9</sup> See policy BP5 South

<sup>10</sup> See para 5.5.18 Brent Local Plan

26. We would respectfully suggest that, on the balance of probabilities, that whilst there is historical evidence that this premises has been associated with crime and disorder, there is no evidence that the proposed operation would have the same association. The previous difficulties were when the premises operated as a wet led night club. If the application is granted as sought by these submissions, the premises will trade as a restaurant and not a late-night venue. The police, as statutory experts<sup>11</sup> in matters of crime and disorder have helped shape these submissions to ensure that the licensing objectives are promoted.

## Executive Summary

27. The applicant recognises that the premises has a historical association with trouble and that an application for a premises licence would be a source of anxiety to the local community. The application is for a *bona fide* restaurant and would be unable to trade as a night club with the proposed conditions and hours. The proposed terminal hour for licensable activities is 23:00 on Sundays to Thursdays and 23:30 on Fridays and Saturdays. All patrons are required to be seated at a table and will be served by a waiter/waitress. The sale of alcohol will be ancillary to the service of a main meal.
28. The application for Regulated Entertainment in the form of recorded music is withdrawn.
29. The Applicant has demonstrated sufficient measures in the operating schedule to promote of the licensing objectives to the satisfaction of the Police and the Licensing Authority.
30. The granting of such a premises licence is in keeping with Brent's Licensing Policy and the Brent Local Plan.
31. The Applicant has been able to agree conditions with the Metropolitan Police which have been able to abate their concerns as statutory experts on Crime and Disorder.
32. The restriction on access for children and the use of ID scan are conditions which do not appear to be necessary or desirable to promote the licensing objectives and have created anxieties about the intended use of the premises. Suitable alternatives have been proposed<sup>12</sup>.
33. The Sub-Committee are invited to grant the licence subject to the conditions which are consistent with those agreed with the police and Annex 1.

Joe Harvey  
Associate Solicitor-Advocate  
Poppleston Allen Solicitors

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<sup>11</sup> See para 9.12 s182 Guidance.

<sup>12</sup> See Annex 1, conditions 18 and 35.

# Appendix 1: Proposed Operating Schedule - Conditions

[Note that the numbering of the conditions as agreed with the police and Licensing Authority are different as the conditions have been categorised according to their respective licensing objective]

## General

1. A copy of the premises licence shall be kept inside the venue and made available on demand for inspection by the police or local authority.
2. Any staff directly involved in selling alcohol for retail to consumers and managers shall undergo basic training of Licensing Act 2003 legislation. This shall be documented and signed for by the DPS and the member of staff receiving the training. This training log shall be kept on the premises and made available for inspection by police and relevant authorities upon request.
3. An incident log shall be kept at the premises, and made available for Inspection on request to an authorised officer of Brent Council or the Police, which will record the following:
  - a. all crimes reported to the venue
  - b. all ejections of patrons
  - c. any complaints received
  - d. any incidents of disorder
  - e. any faults in the CCTV system
  - f. any refusal of the sale of alcohol
  - g. any visit by a relevant authority or emergency service.
4. A personal licence holder is to be on duty whenever the premises is open for licensable activities.

## Prevention of Crime and Disorder

5. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.
6. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises.
7. A CCTV camera shall be installed to cover the entrance of the premises, the main restaurant, bar area, entrance to the toilets and the external areas.

8. The CCTV system shall display on any recordings the correct date and time of the recordings.
9. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premise is open. This staff member must be able to provide Police or Authorised Council Officer copies of recent CCTV images or data with the absolute minimum of delay when requested.
10. The Licence holder/DPS/Manager shall inspect and test that the CCTV is operational and working correctly on a weekly basis. A signed and dated record of the CCTV examination and any findings shall be kept on the premises and made available to the police and authorised officers of the Local Authority on request.
11. Alcohol shall only be provided as an accompaniment to a main meal and seated at a table and served by waiter/waitress.
12. No vertical drinking.
13. No bottles of spirits to be served to or bought by customers.
14. No customer shall be permitted to drink at the bar.
15. No high strength beers, lagers and ciders above 6.0% ABV shall be stocked or sold at the premises.
16. All alcohol must be kept behind the counter/bar area at all times with the exception of alcohol which has already been purchased/sold/supplied to the public or alcohol which is in storage rooms on the premises.
17. There shall be a zero-tolerance policy in relation to drugs at the premises and there shall be regular checks by management to prevent the use of drugs by patrons. Drugs seized shall be stored securely and handed to police.
18. Where the premises do not trade under the restaurant conditions imposed by this licence, the premises shall use ID Scan for all patrons over the age of 18.
19. The premises shall have an Anti-Social Behaviour Policy which shall be made available to the police or authorised officer of the Licensing Authority upon request.



20. SIA door supervisors of a suitable number, gender mix and other suitable measures shall be put in place after undertaking a sufficient and suitable risk assessment based on the proposed event at the premises.
21. SIA security shall wear high visibility armbands to ensure that they are easily identifiable on CCTV.
22. A register/log containing the names, badge number, dates & times of duty of security staff and any incidents that occur shall be kept at the premises and made available to the Police and Licensing Authority.

### **Public Safety**

23. Customers shall not be permitted to take any open drink container outside the premises as defined on the plan submitted to and approved by the Licensing Authority.
24. The locks and flush latches on the exit doors shall be unlocked and kept free from fastenings other than push bars or pads whilst the public are on the premises.
25. No person shall be permitted to sit on the floor, on stairs or in gangways and passageways.
26. All roller shutters that are operational as exit points must be fixed/locked up in the open position whilst the public/staff are on the premises.

### **Prevention of Public Nuisance**

27. No noise or vibration shall be detectable at any neighbouring noise sensitive premises.
28. Notices asking customers to leave quietly shall be conspicuously displayed at all exits.
29. The playing of recorded music shall not be permitted in any external area.
30. All deliveries shall take place during normal working hours (i.e. 08.00hrs to 18.00hrs daily).
31. The placing of bottles into receptacles outside the building shall not be permitted between 22:00 hours and 08:00 hours the following morning.
32. The rear garden shall cease to be used at 22:00.

### **Protection of Children From Harm**

33. A "Challenge 25" policy shall be adopted and adhered to at all times.

34. A sign stating "No proof of age -- no sale" shall be displayed at the point of sale.

35. No children shall be permitted on the premises unless accompanied by a responsible adult.

## Appendix 2: Emails to Councillor Kelcher

**From:** Joe Harvey  
**Sent:** 19 January 2024 16:55  
**To:** cllr.matt.kelcher@brent.gov.uk  
**Subject:** Palm Island Lounge Premises Licence Application  
PCX:000106000001401

Good afternoon Councillor Kelcher.

My name is Joe Harvey. I am a licensing solicitor at Poppleston Allen Solicitors in Nottingham. I have been instructed by Palm Island Lounge Limited to assist them in relation to the application for the premises licence and the hearing which is due to take place on 31<sup>st</sup> January.

I would very much welcome the opportunity to discuss this application with you. I am aware that you have submitted a representation against this application and have raised a number of very understandable concerns. I feel that I may be in a position to assuage some of those concerns, and I wonder if you would be agreeable to a conversation next week over telephone or Teams?

It is clear to me that this application has left a lot to be desired and has created a significant amount of anxiety about what exactly is being asked for. Neither me or my firm have been involved in this matter until recently and in the process of taking instructions and advising our client, I think we are in a position to better explain his case that had been done on paper. I would be most grateful if you could spare me some time for a chat.

I look forward to hearing from you.

Best wishes,

Joe

**From:** Joe Harvey  
**Sent:** 24 January 2024 11:36  
**To:** cllr.matt.kelcher@brent.gov.uk  
**Subject:** Palm Island Lounge PCX:000106000001413  
**Attachments:** Palm Island Lounge Conditions agreed 30411.pdf

Good morning Councillor Kelcher.

Further to my e-mail of 19<sup>th</sup> January 2024, I wanted to confirm that I would still welcome an opportunity to discuss this application with you to see if I can assuage your concerns.

I am pleased to confirm that I have been able to discuss this application with the police and having agreed some conditions with them, they now feel that they are able to support this application. I attach a copy of their letter which has been sent to the Licensing Authority this morning which lists those conditions which have been agreed.

You will see that through its conditions, the premises is to trade as a restaurant. All patrons will be seated and served via waiter/waitress service. The sale of alcohol will be ancillary to taking a meal. The hours for licensable activities will be as per the application with a terminal hour of 23:00 on Sundays to Thursdays and 23:30 on Fridays and Sundays.

Please do let me know if I can provide you with any further information which may permit you to have more confidence in this application.

Best wishes,

Joe

## Appendix 3: Letter to Residents

23 January 2024

Ref: 017729/00001

Doc Ref: 302048

To Whom it May Concern  
By email only

Dear Sir/madam

**Palm Island Lounge, 1 Craven Park Road, London**

I am writing to you as someone who has submitted a representation in respect of the application for a new premises licence for Palm Island Lounge. My name is Joe Harvey and I am a solicitor with Poppleston Allen Solicitors. We specialise in licensing matters and have been instructed by Palm Island Lounge Limited to assist them with the upcoming hearing for this matter.

I wanted to write to you to invite you to make contact with me to see if I could properly explain the application to you and offer assurances that this application is in no way an attempt to reopen a nightclub at the premises.

I understand that the closure of Vybz nightclub has brought about a much needed period of reduced crime and disorder on Craven Park Road. From my conversation with the Police, it is clear that Vybz had to be visited by the emergency services every 2-3 days or so. Many of the incidents which occurred there were serious assaults which resulted in road closures for days in the interests of evidence preservation. It is no surprise that local residents would want to ensure that this does not happen again.

My client is seeking an application for a premises licence so that he can open a restaurant which is to be called Palm Island Lounge. The restaurant will serve traditional West African and Mediterranean dishes in a relaxed atmosphere. The only patrons will be those who are dining and are seated and served by waiter/waitress service. This means that customers cannot attend for only a drink and the sale of alcohol will be ancillary to taking a meal. The hours which are being sought for the premises licence are consistent with a food led business and licensable activities shall come to an end at 23:00 on Sundays to Thursdays with 23:30 on Fridays and Saturdays. There are to be no variations to this throughout the year despite this being indicated on the application.

The application has also sought regulated entertainment by way of live or recorded music. I am instructed to withdraw this part of the application as the premises only intends to have background music on a regular basis. It is firmly believed that background level music will

not be heard outside of the premises and will not cause a noise nuisance to the neighbourhood.

There is some confusion which has been caused by the suggestion that the premises will not be available to children and that all patrons will have to use an ID scanner. These, along with the requirement of having security, have created the impression that this is not going to be a restaurant but a nightclub instead. I understand from my client that it was originally intended that the premises would be family friendly and that the requirement of an ID scanner and security would deter would be wrongdoers. It is our suggestion that if the licence is granted, it should be granted on the basis that children are only permitted provided that they are accompanied by an adult as well as ID scanning no longer being required.

There are also concerns about how many customers will be able to be present on the premises as the original application suggests that this could be 60-80 people. Before opening for business, my client is required to carry out a fire risk assessment. At the time of writing, this has not yet been done because it is awaiting essential gas works at the premises. However, the assessment, which will be prepared by an expert assessor, will consider important issues such as the capacity of the building having regard to the fact that it will be used as a restaurant where patrons are seated at tables rather than standing up. For this reason, my client envisages that the capacity for the premises will be significantly lower than 60-80.

I am in the process of having discussions with the police to ensure that this application properly recognises the needs to of the local community in making sure that the chaos of Vybz does not visit you once more. I am hoping to agree a number of conditions with the police which will make it absolutely clear to the licensing committee that Palm Island Lounge is going to be a restaurant and not a nightclub. I am sure you will agree that the proposals I have described above are far more consistent with a restaurant and had they been on the original application, you may not have been caused this worry.

With that in mind, I would like to invite you to contact me directly so that I can discuss these or any other concerns I have not addressed.

Yours faithfully

Joe Harvey  
**Poppleston Allen**  
01159538170

## Appendix 4: Anti-Social Behaviour Policy



### Anti-Social Behaviour Policy

According to the Police Reform and Social Responsibility Act of 2011 and the Antisocial behaviour Act of 2003, "behaviour by a person which causes, or is likely to cause, harassment, alarm, or distress to persons not of the same household as the person" is considered antisocial behaviour.

The following antisocial behaviours are reportable:

- People who are intoxicated or unruly in public places.
- People who use or traffic in drugs.
- People who cause damage to cars or other property.
- People those who engage in aggressive begging.
- People who engage in prostitution, kerb crawling, or brothels.
- People who make threats.
- Nuisance properties

Anti-social behaviour: what is it not?

While bothersome, some behaviours are not considered anti-social behaviour (ASB). Additionally, ASB might be hard to define.

- Inability to park outside your own home; DIY and off-road car repairs.
- Arguments-regarding boundary walls, fences, and parking.
- Cooking odours.
- Opening and closing cabinets.
- Children playing in the street or communal areas unless they are causing damage to property.
- Young people gathering socially unless they are rowdy, inconsiderate, and intimidating to individuals.

### **Palm Island Lounge policy**

This Policy has undergone a comprehensive Equalities Analysis and will be carried out in compliance with our obligations under applicable laws, such as the Equalities Act 2010. Our policy is to include the community in the evaluation of how well we are implementing this policy and its accompanying procedures. This will support us in improving our services and achieving our community safety goals. From prevention to rehabilitation, our approach to managing ASB considers a number of factors. Regarding hate crimes, such as sexual or sexual orientation harassment, child sexual exploitation, domestic abuse, modern slavery, racial harassment, and intolerance based on religion or culture, Palm Island Lounge has a fixed policy which is to safeguard the person or people filing the complaint to move swiftly and forcefully.

Since we recognise the benefits of diversionary activities and it is our policy to promote, support, and facilitate these activities when appropriate, we will actively participate in information sharing protocols with the Police and other agencies in order to enable us to have a coordinated and effective response to ASB complaints.

### **Measures Palm Island Lounge will take to prevent ASB.**

Palm Island lounge has allocated this policy to minimise anti-social behaviour in the premises and within the vicinity of the premises which covers neighbouring premises. The company will be fully responsible of any unacceptable anti-social behaviour from patrons and if such individual/persons breach our policy they will be refused entry at any given time at the premises.

An assessment will be carried out annually to assess the potential risk and ways to minimise any form of anti-social behaviour at the premises such as Thefts/robberies, this can occur without the individual or group of people being a part of the business or need to have a relationship with the organisation/employees. In such cases like this we have an alarm system to alert the local authorities and all employees will be trained on how to handle such hostile situations and to call 999.

Cameras are installed to cover every visible angle in both inside the premises and outside the premises to ensure there's a consistent monitoring of the premises and activities of every person to make sure every one within the vicinity is safe.

The DPS/Manager will be responsible for recording anti social behaviours in a logbook.



**Report any antisocial behaviour.**

When in doubt, always dial 999 and report to either the DPS or Manager.  
Examples of emergency situations include active crimes, those suspected of committing crimes close by, threats or use of violence, and risk to life.

## Appendix 5: List of Policies

- Age Verification Training Policy
- Allergens Policy
- Customer Complaints Procedure
- Dispersal Policy
- Dress Code Policy
- Drugs and Alcohol Policy
- Equality and Diversity Policy
- Fire Procedures
- Glass Policy
- Health and Safety Policy
- Training Policy
- Hygiene Policy
- Pest Control Policy