



TERRITORIAL POLICING

Brent Police Licensing Unit

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HA9 0FJ

Your ref: 223630357

Our ref: 01QK/384/16/157

Brent Borough Licensing Department

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Date: 19th July 2016

Police representation to the Premises Licence application for Sudbury Primary School, Watford Road, Wembley, HA0 3EY

I certify that I have considered the application shown above and I wish to make representations that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

I am of the opinion that the risk to the Council's objectives can be mitigated by removing the requested variations or attaching conditions to the Licence as shown below.

If these conditions were accepted in full I would withdraw my representation.

Officer: **Nicola McDonald**
Licensing Constable PC 157QK

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a premises licence under section 17 of the act.

The Police representations are primarily concerned with crime and disorder and prevention of public nuisance.

Police require the following points should be included in the operating schedule or added as conditions on the premises licence.

Seasonal Variations

There is no requirement for these with the extension of the hours applied for on Friday, Saturday and Sundays'. However seasonal variations would be deemed proportionate on Mondays to Thursdays when licensable activities cease at midnight.

Noise nuisance from customers

In order to prevent nuisance and disturbance to local residents Police require all doors and windows to be closed after 2200 hours to closing of the premises when licensable activity is taking place.

The operating schedule gives no indication as to the location of a designated smoking area. Police welcome suggestions from the applicant however consider off of the school premises probably on the main road. Smokers should be limited to maximum

of 10 at anyone time and those smokers should be supervised by Security Industry Authorised door supervisors. A decision must be added to the premises licence as a condition.

The operating schedule gives no indication as to where the customers will park vehicles. Police welcome suggestions from the applicant however consider the emergency vehicle gate leading from Watford Road in to the playground be opened. All customers park their vehicles on the playground and this is managed by a delegated Parking Steward wearing appropriate high visibility identifiable clothing. A decision must be added to the premises licence as a condition.

Drinking up time

The application indicates the time that licensable activities cease and the time the premises close to the public be the same. This is not workable. Customers need a wind down period when music and entertainment has stopped, and a time to consume beverages. This also allows for orderly dispersal from the venue. **Police recommend a thirty minute time difference between when licensable activities cease and when the premises close to the public** I.E. on a Monday night licensable activities cease at 2330 hours and the premises close to the public at midnight.

Personal Licence Holder

The sale of alcohol to drunken people and children is a major cause of concern to police and highlighted in the Governments Alcohol Harm Reduction Strategy. Those who sell alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard.

Closed Circuit Television (CCTV)

Good quality CCTV is essential as a deterrent for the prevention of crime and the detection of offenders. It allows for both covert and overt monitoring of the premises. With proper signage, this reassures both staff and clientele, that this is a safe environment where illegal activities are not tolerated.

All cameras and recording equipment will be installed and maintained in accordance with Home Office Guidance and the manufacturers instructions and will be fully operational when the premises are open to the public.

Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the premises, advising that CCTV is in operation.

Door Supervisors

Door Supervisors must be employed after 9pm on any day when the premises are open for licensable activities past midnight.

They will ensure compliance with licensing and security guidance.

A register /log containing the names, badge number, dates & times of duty of security staff and any incidents that occur shall be kept and made available to the Police and Licensing authority on request.

Door Supervisors shall wear clothing that can be clearly and easily identified on CCTV. Ensure that there are a sufficient number and gender mix of door supervisors to monitor and control the numbers and behaviour of persons present.

The premises will be operated in line with search procedures, the confiscation, storage and ultimate disposal of suspected illegal drugs and weapons.

Operating Hours to be displayed on Premises

A notice displaying the opening hours, the type of licensing activity and licence conditions should be clearly displayed and visible to anyone outside the premises. This may be incorporated in the summary of the licence, which must be displayed, or take the form of a separate item. Likewise the name of the Designated Premises Supervisor (D.P.S.) should be similarly displayed. This will allow the Police and other responsible authorities to readily identify the licence details. Clearly displayed opening hours will also reduce any confusion for

customers prior to entering the premises and possible conflict when the premises close/stop selling alcohol.

A Summary of the Premises Licence will be displayed at each public entrance to the premises.

Capacity Limit for Premises

Proper control of the numbers of people in the premises is essential to prevent overcrowding and the risk of disorder. It is impossible to conduct any meaningful risk assessment, without knowing the maximum number of people that may be safely accommodated at any one time. There must also be adequate facilities to monitor and control the number of people present. The capacity limit will be set by Officers from the Local Authority.

Police require the following points should be added as conditions on the premises licence as below.

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.

CCTV cameras shall be installed to cover the entrance of the premises.

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.

Door supervisors shall wear clothing that can be clearly and easily identified on CCTV.

Door supervisors of a sufficient number and gender mix, shall be employed from 2100 hours on any day when the premises are open past midnight.

A register/log containing the names, badge number, dates & times of duty of security staff and any incidents that occur shall be kept and made available to the Police and Licensing Authority.

A copy of the premises licence summary including the hours which licensable activities are permitted shall be visible from the outside of each entrance to the premises.

The total number of people permitted on the premises including staff and performers shall not exceed (number set by Local Authority)

A "Challenge 25" policy shall be adopted and adhered to.

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

Customers shall not be permitted to take open vessels outside the premises as defined on the plan submitted to and approved by the Licensing Authority.

The consumption of alcohol will be restricted to those parts of the premises identified on the plan submitted with the operating schedule and approved by the licensing authority.

A suitable intruder alarm complete with panic button shall be fitted and maintained.

Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training of Licensing Act 2003 legislation. This will 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.

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:

- All crimes reported to the venue
- Any complaints received
- Any faults in the CCTV system
- Any refusal of the sale of alcohol
- Any visit by a relevant authority or emergency service.

No alcohol shall be available for any customer when the premises are open for primarily for use by persons under the age of 18.

Nudity, striptease and other entertainment of an adult nature shall not be permitted on the premises.

Risk Assessments

The DPS shall ensure that a risk assessment is undertaken of any promotion or event using the MPS promotion/Event Risk Assessment (Form 696) or an equivalent and provide a copy* to the Metropolitan Police Service (MPS) and the licensing authority not less than 14 days before the event is due to take place.

2. Where an event has taken place the DPS shall complete a MPS Debrief Promotion/Risk Assessment (Form 696A) and submit this * to the Metropolitan Police and Licensing authority, within 3 days of the conclusion of the event.

- Submission of electronic documents by E-Mail is preferred.

Metropolitan Police definition of an Event

An event will be deemed to be: any occasion in a licensed premises, or other venue under a Temporary Event Notice, where there will be a performance (meaning musicians, DJ's, MC's, or other artists, that is promoted in some form by either the venue or an outside promoter, where entry is either free, by invitation, payment either on the door or by ticket.

Yours Sincerely,

**Nicola McDonald PC 157QK
Licensing Constable Brent Police**