



Alcohol and Entertainment Licensing Sub-Committee - Supplementary

Tuesday 28 March 2023 at 10.00 am

This will be held as an online virtual meeting

Membership:

Members

Councillors:

Ahmed (Chair)
Long (Vice-Chair)
Bajwa

Substitute Members

Councillors:

Chohan, Chappell, Collymore, Ethapemi, Georgiou,
Mahmood, Rubin

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public will be welcome to attend the open parts of this meeting by following the proceedings via the webcast available [HERE](#)

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

| Item | Page |
|---|--------|
| 3 Application for the Review a Premises Licence by Member of the Public for the premises known as OVO Arena, Engineers Way, Wembley, HA9 0AA, pursuant to the provisions of the Licensing Act 2003 | 1 - 60 |

Members are asked to note that part of the representations to be considered in relation to the above application may involve the disclosure of exempt information (as detailed in 4 below). If required, the Sub Committee will therefore be asked to exclude the press and public from the meeting whilst these representations are considered.

4 Exclusion of the Press & Public

Part of the consideration of Agenda Item 3 above may involve the disclosure of information classified as exempt under Paragraph 2 of Part 1 Schedule 12A of the Local Government Act 1972, namely: "Information which is likely to reveal the identity of an individual".

Members will therefore be asked to agree to the exclusion of the press and public at the relevant stage when considering the representations being made

Date of the next meeting: Wednesday 29 March 2023



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

This page is intentionally left blank

Internal investigation report- Privileged and confidential

CONTENTS

CLAUSE

| | |
|--|--------------|
| <u>1. EXECUTIVE SUMMARY.....</u> | <u>pg 2</u> |
| <u>2. BACKGROUND.....</u> | <u>pg 4</u> |
| <u>3. INVESTIGATIVE ACTIVITIES.....</u> | <u>pg 5</u> |
| <u>4. FACTUAL FINDINGS.....</u> | <u>pg 10</u> |
| <u>5. CONCLUSIONS.....</u> | <u>pg 11</u> |
| <u>6. RECOMMENDATIONS.....</u> | <u>pg 13</u> |
| <u>7. APPENDIX 1- STATEMENTS AND POLICIES.....</u> | <u>pg 15</u> |

To: ASM Global Management

From: Ms S [REDACTED] & Ms Sy [REDACTED] ("Investigators")

Date: 17th March 2023

Re: Investigation into an incident at the *Blackstone Cherry & The Darkness* concert on Saturday 4th February 2023 at the OVO Arena Wembley.

EXECUTIVE SUMMARY

The OVO Arena Wembley is managed by AEG Facilities (UK) Limited (trading as ASM Global). The OVO Arena Wembley ("the Venue") was made aware of a complaint that went directly to Brent Council in relation to its security staff (a subcontracted service provided by Centre Circle Event Management Limited ("Centre Circle")). At no point has a complaint been made by Mr J [REDACTED] directly to the Venue, either by email to our customer services inbox or by written letter to the venue. Mr J [REDACTED] did, however, make a Subject Access Request in writing to the venue.

Mr J [REDACTED]'s allegations are that he was physically assaulted by a staff member and that his son (with whom he attended the event and who is a minor) was threatened with violence and there was a breach of safeguarding requirements.

Investigators can find no evidence that Mr J [REDACTED] was physically assaulted by anyone at the Venue, and this is also supported by the fact that Police investigated the alleged assault and subsequently closed their investigation after both speaking with members of staff at the Venue, as well as an independent third-party witness who was at the concert.

Conversely, there is evidence that Mr J [REDACTED] pushed a staff member (a steward from Centre Circle) as he admits to doing this in his correspondence to the Council and this is also corroborated by the independent third-party witness.

Investigators can find no evidence that Mr J [REDACTED]'s son was threatened or that there was any breach of safeguarding requirements. There was no physical contact with Mr J [REDACTED]'s son by any member of security, Mr J [REDACTED]'s son was not subjected to any threatening behaviour or words, and nor was he kept away from or not together with his father for more than a few minutes when the parties are making their way down from the seated area to the concourse to have an audible conversation. Both ASM Global and Centre Circle's safeguarding polices, ensuring the safety of children and vulnerable adults, are complied with.

In light of this, Investigators have rejected the allegations submitted by Mr J [REDACTED].

Once the Venue was made aware of the complaint and allegations, the Operations Director and Venue Security Manager investigated the allegations. The Investigators have concluded that the allegations made by Mr J [REDACTED] are not corroborated by the evidence they have obtained. Details of the process, investigation, factual findings and conclusions of the Investigators are detailed in the report.

Notwithstanding this, upon reviewing the evidence, the Investigators have concluded that improvements could be made in relation to interactions between security staff and guests of the venue when allegations are raised. For example, the Venue already requires that SIA staff have their

identification badges on display so they are visible to everyone. This is checked at sign in, but it is evident that badges are sometimes obscured by coats when staff are deployed externally, and subsequently remain obscured when staff are re-deployed internally.

The Venue has reviewed its Safeguarding policy and whilst staff adhered to the policy on the date in question, the Venue has taken the decision to refresh or arrange (as appropriate) staff training in relation to safeguarding.

The Investigators have also recommended that the member of the security contractor's staff (who was not allowed to work at the Venue during this investigation) can be rostered back onto the Venue, further to the findings of the investigation.

BACKGROUND

Ms S■■■■ and Ms Sy■■■■ were asked by ASM Global management to conduct an internal investigation into an incident at the *Blackstone Cherry & The Darkness* concert on Saturday 4th February 2023. The investigation concerns an alleged physical assault by a staff member on a customer and alleged threat of violence to a minor. The purpose of the internal investigation was for ASM Global to investigate the allegations internally in order to assess their validity. It is anticipated that there could be further litigation in relation to this incident. For the purposes of this Report, references to 'Venue staff' includes ASM Global's subcontracted security providers, Centre Circle.

Ms S■■■■ – Experience and Qualifications

Ms S■■■■, Operations Director at the Venue, has worked in the events industry for over 30 years. The last 22 years were spent in Operations at Wembley and the last 6 years as Operations Director where she heads up a team of Event and Security Managers. Ms S■■■■ has a BA (hons) degree in Business Studies and has both attended and lectured on courses at the Emergency Planning college at Easingworld. Specialist subjects include Security and Safety planning, Crowd Dynamics and then Event Management for a wide variety of shows from sporting events to concerts. Ms S■■■■ holds the IOSH certificate and was also a Special Constable in the Metropolitan Police for 6 years. She is a member of the National Arenas Association where best practice is shared across Arena members nationally. Ms S■■■■ has also written and executed a number of training plans for Security and Stewarding personnel focusing on emergency plans, incident reporting, venue operating and customer service.

Ms Sy■■■■ – Experience and Qualifications

Ms Sy■■■■ is the Venue Security Manager and has worked at the Venue for 7 years. Ms Sy■■■■ joined the team as an Operations Manager and has recently been appointed Venue Security Manager (June 2022). Before this, Ms Sy■■■■ worked as the Operations Manager at Wembley Stadium, reporting directly to the Safety Officer, where her role included planning and executing safe events at a wide range of concerts for artists such as One Direction and Eminem. Ms Sy■■■■ is the Venue's contract manager for Centre Circle, the Venue's external security providers, and she works closely with them to ensure training records, licences and general standards adhere to ASM Global's requirements. Within Ms Sy■■■■'s daily role, she investigates customer concerns, reviewing CCTV and gathering evidence to review and resolve any issues. She is also the point of contact for the Police in order to share any evidence relating to and assist with any investigations within their jurisdiction.

INVESTIGATIVE ACTIVITIES

SCOPE OF INVESTIGATION

ASM Global management instructed Ms S [REDACTED] and Ms Sy [REDACTED] to conduct an internal investigation relating to the incident at the *Blackstone Cherry & The Darkness* concert which took place on Saturday 4th February 2023. Ms S [REDACTED] and Ms Sy [REDACTED] can confirm that this report is true and factual to the best of their knowledge. The report represents the independent opinions of Ms S [REDACTED] and Ms Sy [REDACTED]. The team spent approximately 45 hours conducting the investigation.

Ms S [REDACTED] and Ms Sy [REDACTED] reached the conclusions set out in this report at the end of an extensive and thorough investigation and based those conclusions on the totality of the evidence collected and reviewed. Ms S [REDACTED] and Ms Sy [REDACTED] investigated all matters they believe were relevant to reaching their conclusions.

ASM Global Legal implemented a document preservation protocol on 24th February 2023, in relation to CCTV footage and incident reports. Venue CCTV was downloaded to preserve evidence of the incident. SIA bodycam footage as a protocol was downloaded immediately post event and this was reviewed and filed accordingly. Ms Sy [REDACTED] had a copy of one incident report that had been completed on the night of the event and then collated further reports from all members of staff that were involved.

No party influenced Ms S [REDACTED] and Ms Sy [REDACTED] in forming their opinion

WITNESS STATEMENTS

Ms N [REDACTED], Operations Manager for the concert, was requested by Ms Sy [REDACTED] to obtain statements from the following individuals:

| No. | Name | Job Title and Employer |
|-----|---------------------------|---|
| 1. | R [REDACTED] S [REDACTED] | Steward, Centre Circle |
| 2. | S [REDACTED] M [REDACTED] | Steward Contract Mgr. Centre Circle |
| 3. | B [REDACTED] H [REDACTED] | Security Supervisor, Centre Circle |
| 4. | C [REDACTED] B [REDACTED] | Security Personnel / Body Cam Operator, Centre Circle |
| 5. | S [REDACTED] B [REDACTED] | Front of House Mgr, ASM Global |
| 6. | L [REDACTED] L [REDACTED] | Security 4 Supervisor on the night and Head of Safeguarding for Centre Circle |

MATERIALS REVIEWED

Ms S [REDACTED] and Ms Sy [REDACTED] collected and reviewed a broad range of materials during the course of the investigation, including the following:

- a) CCTV and Bodycam footage

b) Witness Statements detailed at clause 2.1

c) ASM Global's policies on safeguarding and relevant venue policies.

a) CCTV and Bodycam Footage Review

Footage 1

This piece of footage starts with Mr H [REDACTED] (Security Supervisor, Centre Circle) on the inside of the auditorium at the bottom of the S3 stairs with Mr J [REDACTED]'s son. The auditorium is noisy, but Mr H [REDACTED] and Ms B [REDACTED] (Security Personnel and Body Cam Operator, Centre Circle) can be heard asking the individual to make their way outside to have a conversation on the concourse. As they make their way outside onto the concourse, staff request Mr J [REDACTED] to make his way out onto the concourse as well. The piece of footage concludes with Mr H [REDACTED] and Mr J [REDACTED]'s son making their way onto the concourse at 21:11:45. Whilst Mr H [REDACTED] requests a conversation on the concourse, Mr J [REDACTED] is in view of his son and Venue staff and it appears that Mr J [REDACTED]'s son waves his arm to his father, gesturing for him to come down.

Footage 2

This piece of footage starts with Mr J [REDACTED] coming down from his seat. As he exits the bay, Mr J [REDACTED] approaches the steward and appears to invade his personal space. Unfortunately, due to the noise within the auditorium his comments to the steward are inaudible. Mr J [REDACTED] is at the top of the stairs at 21:12:24 while his son is positioned at the bottom. Mr J [REDACTED] joins his son very shortly after this and at no time is he separated from his son for an extended period.

Footage 3

This piece of footage starts at 21:13:45 with Mr J [REDACTED] and his son at the bottom of the S3 staircase. They and security are shown waiting for venue management. Mr M [REDACTED] (Steward Contract Mgr. Centre Circle) approaches to check the welfare of his steward and engages with Mr J [REDACTED]. It is difficult to hear the full conversation but from 21:15 it is evident that they are discussing the alleged assaults with Mr M [REDACTED] stating that, at present, it is one word against the other. Ms B [REDACTED] (Front of House Mgr, ASM Global) arrives on scene at 21:16 and Ms B [REDACTED] (Security Personnel and Body Cam Operator, Centre Circle) briefs her on the incident to the best of her knowledge. She observes the conversation for a couple of minutes and engages with Mr J [REDACTED] at 21:17:16 to explain how the process of seated vs standing is managed at the venue. It was decided that Mr J [REDACTED] and his son were not to go back to their seats and the Venue team considered the option of putting Mr J [REDACTED] and his son on the standing floor. It is concluded that the son is too young (due to the Venue's policy that under 14s cannot enter the standing area) and this option is therefore discarded. Further discussions are had regarding reseating, but these do not resolve matters. As a result, Mr J [REDACTED] and his son were asked to leave the Venue and no force was used. As they leave, Mr J [REDACTED] can be seen taking a photo of Mr M [REDACTED] on his mobile phone.

Footage 4 – External CCTV group exiting

This shows Mr J [REDACTED] and his son exiting the venue with Mr J [REDACTED] going first, followed by his son. 33 seconds into the footage the son can be seen holding his hands up towards the door, but from the footage it is difficult to make out any clear hand gestures. The footage then continues to see Mr J [REDACTED] and son walk down Lakeside Way towards the front of the building.

Footage 5 – Police enter – talk to steward

Police enter the building and wait in the main foyer area. They initially speak to Security 10 (Mr H [REDACTED]) and the Operations Manager on the night (Ms N [REDACTED]). Mr S [REDACTED] arrives to answer questions from the police and gives his account, including demonstrating to the police officer how he was pushed by Mr J [REDACTED]. Mr M [REDACTED] provides witness details to the police 10 minutes into the footage and the police leave.

b) Witness Statements review

Ms S [REDACTED] and Ms Sy [REDACTED] not only reviewed the statements but also asked for clarification of areas which were not covered.

An initial statement was provided on the night by Ms L [REDACTED] (statement 6), via the reporting system, *iauditor*, which was submitted at 22:05. Ms L [REDACTED] was the Supervisor for the area and spoke to the steward on the night to compile her report. Ms L [REDACTED] is the Head of Safeguarding at Centre Circle. This is the report that Mr S [REDACTED] refers to within his statement.

OVO Arena Wembley management was further notified of the incident through the premises licence review request. They requested Centre Circle to contact the relevant staff members to obtain an incident report from all those involved and for this investigation to begin. No information was given to the staff members regarding the complaint linked to the premises review.

Statement 1

Mr S [REDACTED] provided his initial statement on 22nd February and was subsequently asked to respond to allegations within Mr J [REDACTED]'s letter to Brent Council. A list of direct questions was sent to Mr S [REDACTED] to answer on 22nd February. Mr S [REDACTED] replied on 23rd February stating 'no' in answer to each question. These documents are supplied within the appendices. Mr S [REDACTED] was not able to sign his final statement in person so this was signed electronically via DocuSign on 16 March 2023.

Statement 2

Mr M [REDACTED] received an email (from M [REDACTED] D [REDACTED] Senior Trading Coordinator at Centre Circle) requesting his account and gave his initial statement on 21st February. Further questions were asked by Ms N [REDACTED], Operations Manager, regarding the alleged assault and his final statement was signed and submitted on 4th March 2023.

Statement 3

Mr H [REDACTED] was asked for his account verbally by Ms N [REDACTED] during the Arenacross event at the Venue on 18th February and Mr H [REDACTED]'s initial statement was sent via email on 21st February. Once Ms Sy [REDACTED] had reviewed the statement, she asked Mr H [REDACTED] to clarify how the circumstances around the bodycam footage arose and this needed to be included in his report. Mr H [REDACTED] submitted his final report on the incident and signed this on 26th February. A further amendment was made to include the legal paragraph confirming that Mr H [REDACTED] is happy for his account to be used in the Premises Licence Review hearing (if required) after completion of the investigation. This is signed and dated 4th March 2023.

Statement 4

Ms B [REDACTED] was working on Mr H [REDACTED]'s team during the Arenacross event on 18th February and while working at this event, Mr H [REDACTED] requested that she submit a report about the incident on 4th February. Ms B [REDACTED] submitted her report to Centre Circle on 20th February and it was forwarded to the venue on 21st February. Ms B [REDACTED] was then not present at the Venue until her final statement was printed and signed on 4th March 2023.

Statement 5

Ms B [REDACTED] was called into the office to write down her report on Thursday 23rd February. She initially submitted the report via email as the Investigators had been collating all initial statements via email. Ms B [REDACTED]'s report was signed and dated on 4th March 2023.

The initial reports/statements were then submitted to ASM Global Legal who advised the Investigators to put each report into the same standard formatting. This slightly delayed the final versions being produced and signatures being obtained.

At no point did any staff member decline to provide their account of the incident. The Investigators do not believe that the writers of the statements colluded in any way. The initial statements were all provided within three weeks of the incident and the incident would have been relatively fresh in the minds of the security personnel. No security personnel or contractors were allowed or able to view any of the CCTV or bodycam footage of the incident while writing their statements. This footage was held on a secure server to which none of the parties are allowed access. The Investigators also believe that the statements align with the CCTV and bodycam footage for the incident

c) ASM Global Safeguarding Policies

ASM Global has an overarching safeguarding policy which is localised for the Venue to include Venue specific policies and procedures. Within the document it states that ASM Global is committed to ensuring that its venues offer a safe and secure environment for children and young people to come and enjoy shows, concerts, performances and other events.

To support the above statement the Venue has various policies and procedures in place:

- Age Policy – no under 14s in the venue without an adult and no under 14s on the standing floor.
- Lost child(ren)/Vulnerable adults procedure
- Ejection SOP – no child to be ejected from the venue (without their guardian)

The Venue's policy has been updated to state that the Venue has a certified safeguarding officer and both of the Venue's security contract providers have certified personnel.

Centre Circle also have their own vulnerable Adult and Child (safeguarding policy). Centre Circle also provide initial training on safeguarding to their staff, which is held on each employee's individual file.

Other materials

Police correspondence - 33315

On 20th February 2023 a Subject Access Request was made by the Met Police for the incident. On 1st March, Ms Sy [REDACTED] replied to the contact at the Police stating the footage that is available and

held by the Venue, but also informing them that officers attended the Venue on the night of 4th February and took witness details. A response was received by Ms Sy [REDACTED] from the Police on 2nd March stating that the investigating officer had found the other report and the matter had been closed after the officers in attendance spoke to the security guard and a third-party witness who explained that the security guard had not acted inappropriately. As such, the investigating officer has confirmed to the Venue that the Police have closed their report and that they have also spoken to Mr J [REDACTED].

Mr J [REDACTED]'s letter to the Licensing Department, Brent Council

Whilst a complaint has not been received directly to the Venue, Mr J [REDACTED] sent a copy of his application and letter to Brent Council to the Venue's General Manager, Mr D [REDACTED] (along with his Subject Access Request) and the Investigators have been provided with a copy of the same. This letter has been used as the basis of what the Investigators believe is Mr J [REDACTED]'s complaint. Mr J [REDACTED] cites violence and safeguarding concerns. By his own admission he states that his young son leaves the auditorium unaccompanied a few times to go to the concourse. He believes the steward is 'over the top' by telling people to sit down when the majority were standing: '*He was clearly acting well above and beyond any normal actions of an event steward*'. Mr J [REDACTED] states that the steward aggressively pushed and shoved him as he was standing up and alleges that he retaliates to this and pushes the steward back. Mr J [REDACTED] believes that his son was held away from him and threatened with '*extreme violence*'. He also alleges that Venue staff did not de-escalate the situation, resulting in Mr J [REDACTED] and his son being evicted from the venue.

The Investigators have not spoken to Mr J [REDACTED] directly as they were not on site on the date of the incident. Mr J [REDACTED] has also not raised a formal complaint directly with the Venue or intimated that he would want to be involved in this investigation, therefore the Investigators have not contacted him in relation to queries or further input.

The Investigators have not spoken to the witness who confirmed the steward's version of events to the Police. The witness' details were passed over to the Police on the night of the event, as this appeared to be a police investigation, and a copy of the details was not retained by Security personnel at the Venue. The Investigators have relied on the information provided to the Police by the witness and what was told to staff by the witness on the night, as detailed in the statements.

No external experts or consultants were instructed, all information was gathered and assessed by Ms S [REDACTED] and Ms Sy [REDACTED] given their industry knowledge

3. FACTUAL FINDINGS

3.1 Alleged physical assault by a staff member

This allegation is not supported by the evidence obtained by the Investigators.

3.2 Alleged threat of violence to a minor/ Breach of Safeguarding Requirements

These allegations are not supported by the evidence obtained by the Investigators.

4.CONCLUSIONS

4.1 Alleged physical assault by a staff member

We can find no evidence that Mr J [REDACTED] was assaulted by the staff member. This view is further supported by the Police correspondence and involvement in this matter. The Police investigated the alleged assault and have since closed the investigation after speaking to relevant members of staff at the Venue and speaking to the third-party independent witness present on the night. The Police have apparently notified Mr J [REDACTED] of the fact that they have closed their case.

There is no CCTV footage of the alleged assault. In fact, the steward's version of events (that he was pushed by Mr J [REDACTED]) is supported by an independent witness, who spoke to the police. Mr J [REDACTED] has admitted pushing the steward in his letter to the Council. Mr S [REDACTED] has always denied pushing Mr J [REDACTED] and continues to do so, as shown in statement 1.

The Investigators reviewed Mr S [REDACTED]'s work history at the Venue as part of the investigation. Mr S [REDACTED] works at the OVO Arena Wembley, Wembley Stadium, London Stadium, Charlton Athletic and Brentford as part of his employment with Centre Circle. He holds an NVQ Level 2 in Spectator Safety and has also completed his ACT training. He works at the Venue regularly. Mr S [REDACTED] has worked approximately 30 shifts at the Venue. Ms Sy [REDACTED] searched the Venue's customer complaints spreadsheet for where and when Mr S [REDACTED] tends to work most of his shifts. There are no complaints relating to these areas, similarly, there is no evidence to suggest the Venue has received negative feedback relating to Mr S [REDACTED] previously. Ms Sy [REDACTED] has also spoken to Centre Circle (Mr S [REDACTED]'s employer) and they have not received any negative feedback relating to Mr S [REDACTED]'s work ethic or behaviors displayed whilst at other venues.

Taking into account the above Materials Reviewed and Factual Findings for this investigation we cannot find any evidence in support of Mr J [REDACTED]'s allegation. There is evidence in direct contradiction to the allegation, which we find persuasive.

Therefore, on the current information we have, we have no alternative but to reject the allegation of Mr J [REDACTED].

4.2 Alleged threat of violence to a minor/ Breach of Safeguarding Requirements

We can find no evidence that Mr J [REDACTED]'s son was threatened or that there was any breach of safeguarding requirements. The time between Mr J [REDACTED]'s son going down the stairs and Mr J [REDACTED] being shown with his son is two minutes. This delay seems to have been caused by Mr J [REDACTED] being reluctant to follow his son and instead speak to staff members. The details contained in Statements 3 and 4 show that the allegation is not supported by the evidence that the Investigators have obtained. The security officers involved requested Mr J [REDACTED]'s son to come outside onto the concourse, to which he initially refused and he can therefore be seen waiting for his father.

The evidence contained in the footage shows the allegation is again not supported by the evidence that the Investigators have obtained. Footage 1 shows security personnel speaking to the minor asking them to come to speak on the concourse. There was no physical contact with Mr J [REDACTED]'s son by any member of security, and no threatening behaviour or words towards Mr J [REDACTED]'s son. It can be heard that security officers say they are not having a conversation inside the auditorium but will talk at the bottom of the stairs. Once an issue at an event has been logged it is standard practice to

ask customers to discuss the issue on the concourse. This is due to the noise in the Venue and the ability to both speak and hear conversations which are better on the concourse. It also allows security staff to try and diffuse the situation away from where an issue arose.

Footage 2 confirms that Mr J [REDACTED] is leaving the auditorium seconds after his son. Footage 3 confirms that Mr J [REDACTED] is always with his son after this.

The staff involved in the incident appear to comply with both our safeguarding policy and Centre Circle's policy to ensure the safety of children and vulnerable adults. Whilst there is a period of less than two minutes where Mr J [REDACTED] and his son were not together, the allegation that staff kept the individuals apart is not accurate based on the evidence available. There is no evidence on bodycam footage that any staff were abusive to the minor or acted in a way which was either threatening or in breach of ASM Global's policies. Having reviewed the above statements including CCTV and bodycam footage (as well as ASM Global's safeguarding policies) the Investigators believe that there has been no breach of safeguarding obligations. The Investigators also cannot find any evidence of threats of violence in the footage or detailed in the statements. The alleged occurrences which Mr J [REDACTED] stated took place does not correlate to the evidence which the Investigators have viewed.

Therefore, on the current information we have, we have no option but to reject these allegations of Mr J [REDACTED].

5 RECOMMENDATIONS

5.1 ORGANISATIONAL RECOMMENDATIONS

Having completed this internal investigation, the Investigators propose that the following recommendations are adopted by the Venue:

Formal incident reports recorded by Front of House Managers on duty to provide their accounts of incidents. If the Operations Manager is in attendance or witnesses an incident, they are also required to complete the incident form with their account. This has been implemented and staff have been informed. For the avoidance of doubt, this is recommended as a supplement to the existing requirement, which is that security staff members are instructed to and are aware of their obligation to complete formal incident reports where they have been involved with an incident.

- Venue Management to confirm with contractor that all incident reports are completed on the evening of the event and not emailed in the following day.
- All members of the Operations team to complete and/or refresh online safeguarding training.
- An appointed safeguarding officer on duty for any event either employed directly to ASM Global or through our security contractors. (Centre Circle, Front of House Security provider and SB Security Solutions, Back of House Security Provider both have safeguarding reps)
- Dedicated time for venue specific training on policies and SOPs with contractor staff in addition to annual workshops with Supervisors and core staff members (which already takes place).
- Applying for SAVI - Licensing Security and Vulnerability Initiative. An accreditation scheme for licensed premises providing a safe and secure environment for their managers, staff, customers and local communities. This is an ASM Global initiative which applies to all venues and was already underway before the complaint was raised.

5.2 PERSONNEL RECOMMENDATIONS

- SIA Staff

More comprehensive and frequent checks throughout the duration of the event to ensure identification badges are on display at all times. These are checked at sign/check but staff may not always have them on display (under zipped jackets).

- Event Security

CC1 roles and responsibilities: CC1 (which stands for Centre Circle 1) is the shorthand for the role of Contract Manager for stewarding. The responsibility of CC1 is to be on site to sign staff in and out and to ensure the welfare of the stewards on behalf of Centre Circle. As such, in relation to this matter, once the Front of House Manager arrived at the scene, CC1 should have handed the incident over to be managed by ASM Global's staff. Investigators understand that the individual currently in the position of CC1 (namely: Mr M [REDACTED]) has been spoken to about the extent of his responsibilities and reminded of Venue protocol.

Engagement of Mr S [REDACTED] at the Venue

On receipt of the application to review the premises license, Venue Management requested that Mr S [REDACTED] was not scheduled to work at the Venue until the internal investigation had been concluded on the validity of the allegations made against him. Based on the evidence supplied to the Venue, which is detailed in this report, there is no factual evidence supporting the allegation of physical assault by Mr S [REDACTED]. Mr S [REDACTED] was able to provide an independent witness at the time of the incident who confirmed no assault by Mr S [REDACTED] had taken place and the Police have closed their investigation. The only physical contact that can be corroborated is that of Mr J [REDACTED] on Mr S [REDACTED], which has been admitted in Mr J [REDACTED]'s letter to the Council. As a result, Venue Management have concluded that the allegations are unfounded and Mr S [REDACTED] should be permitted to work at the Venue on future events.

Appendix 1 – Statements and Policies

Report 1



Incident Report

DATE: 4th February 2023
EVENT: Blackstone Cherry and The Darkness
PERSON REPORTING: [Redacted]
ROLE/POSITION: Steward on bay S3

LOCATION OF INCIDENT: S3

I was working at the Wembley Arena on the 4th of February on position S3. There was two gentlemen a boy and an adult man I believe to be father and son. About half way through the concert the boy was standing up and dancing and waving his hands for about 3-5 mins I saw the people behind him getting frustrated as he was blocking their view (and it was only the son standing up and dancing the father stayed seated). I made my way up the stairs to ask him if he could please sit down as he was obstructing the view of the people behind him, which he did immediately I then went back downstairs to the vomitory area.

About 10-15 mins later I see both the son and the father was standing up dancing and waving their hands again I watch for about 2-3 mins to see if they would both sit down without being asked too as they both knew I was watching them but they didn't sit down. I made my way up the stairs this time to speak to the father to ask them if they can both sit down as they are obstructing the view of the people behind them. The father pulled an angry face and pushed me hard in the chest saying I don't have to do what you say at that moment the man behind him put his arm in-between us and said to the father you don't touch him he's doing his job. I walk away leaving them dancing to get a response I informed them what happened and asked if they can be removed which they did. Then 15 mins later the supervisor came to see me saying the father had made an allegation to the police outside of the venue stating I assaulted him. I told the supervisor I was going to have a word with the man behind who intervened asking for his details as he was an independent witness to what had happened. The man came to see me I told him what happened and gave him his name and phone number. Then me and the supervisor went to the main entrance Door One where the police interviewed me I told them what had happened and the supervisor gave them the independent witness details. As the police took no action I thought this was the end of the matter. I made an incident report on the day. I personally didn't keep a copy of the independent witness details as it was given to the supervisor and the police.

This report is true and accurate to the best of my knowledge.

[Redacted signature]
Center Circle ID [Redacted]

SIGNED:

DATE:



To: [Redacted]

If there are problems with how this message is displayed, click here to view it in a web browser.

CAUTION:EXTERNAL EMAIL

From: [Redacted]
Sent: Thursday, February 23, 2023 4:23 PM
To: [Redacted]
Subject: [Redacted]

The answer to all 4 questions is NO!!!!
The ONLY time the boy was spoken to on his own was by RESPONSE on the Vomitory stairs and the dad remained sitting in his chair. The Response when to get the dad and they both exited the Vomitory.

Center Circle ID [Redacted]

Sent from Outlook for Android



To: [Redacted]

If there are problems with how this message is displayed, click here to view it in a web browser.

From: [Redacted]
Sent: Thursday, February 23, 2023 4:23 PM
To: [Redacted]
Subject: OVO Arena Incident

Please see below some questions [Redacted] has. Please reply to this email ASAP.

- Hi
Just 4 questions for [Redacted] at this stage for some clarification:
- Did you ever put hands on or retaliate when the father pushed you?
- Did you ever speak to the son on his own away from the father?
- Did you ever keep the son separate from the father at any time
- Did you use any words that could be construed as threats etc - even if this was just you can be ejected.

Thanks

Mr S [Redacted] was asked to explain his behaviour when speaking to the Police Officers in the Foyer, to which he replied:



To: [Redacted]

If there are problems with how this message is displayed, click here to view it in a web browser.

From: [Redacted]
Sent: Friday, 10 March 2023 14:44
To: [Redacted]
Subject: Re: Statement for OVO Arena

So after the father and son was removed [Redacted] come to me and said we have to go see the police at Door One as the man made an allegation, I assaulted him. I told [Redacted] of the independent witness and got his details. Then we both went to see the police. They ask me what happened I told them as I stated in all my statements what had happened [Redacted] came back 3 mins later and handed them the independent witness details and the police said ok. I when back to work.

** After I made the statement what had happened the police officer took my details. Name D.O.B Address.

All my statements are true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have willfully stated in it anything which I know to be false or do not believe to be true.

[Redacted]

Final report below:

DocuSign Envelope ID: 0AFEB71E-26F1-4AAD-86A1-780A84308CC5



Incident Report

DATE: 4th February 2023

EVENT: Blackstone Cherry and The Darkness

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Steward on bay S3

LOCATION OF INCIDENT: S3

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

I was working at the Wembley Arena on the 4th of February on position S3. There was two gentlemen a boy and an adult man I believe to be father and son. About half way through the concert the boy was standing up and dancing and waving his hands for about 3-5 mins I saw the people behind him getting frustrated as he was blocking their view (and it was only the son standing up and dancing the father stayed seated). I made my way up the stairs to ask him if he could please sit down as he was obstructing the view of the people behind him, which he did immediately I then went back downstairs to the vomitory area.

About 10-15 mins later I see both the son and the father was standing up dancing and waving their hands again I watch for about 2-3 mins to see if they would both sit down without being asked too as they both knew I was watching them but they didn't sit down. I made my way up the stairs this time to speak to the father to ask them if they can both sit down as they are obstructing the view of the people behind them. The father pulled an angry face and pushed me hard in the chest saying I don't have to do what you say at that moment the man behind him put his arm in-between us and said to the father you don't touch him he's doing his job. I walk away leaving them dancing to get response I informed them what happened and asked if they can be removed which they did. Then 15 mins later [REDACTED] the supervisor come to see me saying the father had made an allegation to the police outside of the venue stating I assaulted him. I told [REDACTED] going to have a word with the man behind who intervened asking for his details as he was an independent witness to what had happened. The man come to see [REDACTED] told him what happened and gave him his name and phone number. Then me and [REDACTED] went to the main entrance Door One where the police interview me I told them what had happened and [REDACTED] gave them the independent witness details. As the police took no action I thought this was the end of the matter. I made an incident report on the day. I personally didn't keep a copy of the independent witness details as it was given to [REDACTED] and the police.

After I made the statement what had happened the police officer took my details. Name D.O.B Address.

This report is true and accurate to the best of my knowledge.

[REDACTED]
Center Circle ID No. [REDACTED]

SIGNED: [REDACTED]

DATE: March 16, 2023

Page | 1



Incident Report

DATE: 4th February

EVENT: Blackstone Cherry and The Darkness

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Company Rep for Centre Circle – Stewarding Manager

LOCATION OF INCIDENT: S3

This statement (consisting of 2 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

The Darkness had just finished their set and I was preparing to sign out my early finishes when I got called on the radio to attend S3 as there was a report that a steward had been assaulted. I quickly looked at my paperwork to find out who the steward was on that bay & saw it was [REDACTED]. I've never had any issues with him in the past and had previous good customer feedback about him on a previous event. I made my way to S3 and asked [REDACTED] if he was assaulted and asked him to explain to me what had happened. While I was doing so, two females mentioned that he hadn't done anything wrong. [REDACTED] then proceeded to tell me that he had tried to get a gentleman and his son to take their seats as other members of the public had complained to him that they were being disruptive and upsetting them with their antics. When he went to ask them, the adult male pushed him backwards. I told [REDACTED] that it would be helpful if he gets a witness to corroborate what he was saying while I went and spoke to the adult male in question who was standing at the bottom of S3 stairs with Security 10, [REDACTED] and his team. I introduced myself to the gentleman and told him I was in charge of the stewards & any issues they have regarding their welfare or if they've done anything untoward and that it had been reported to me that the gentleman up the stairs there had been assaulted by yourself. He then denied this and made a counter allegation of assault against the steward. I then asked on the radio for Ops2 to attend as I could see this was above what I could say or do, but my first impressions, I felt uneasy about the man; he seemed either half intoxicated or under the influence of something and considering he was in charge of a minor, I possibly pre-judged him thinking he was irresponsible. He had an inane grin on his face all the time, which I found either disturbing or distracting. Nevertheless, between myself and [REDACTED] (Ops2) we tried to resolve the situation and hoping to appease the gentleman offered him and his son different seats in better locations and we would investigate the alleged assault. Nothing we said was to the mans satisfaction and we were going back and forth, I was getting a little impatient, it's true as I had lots of things to be getting on with, and there seemed to be no resolving the situation. We finally decided to ask the man to leave if there was nothing else we could do at which he agreed. As he was leaving, he stuck his phone in my face and took a picture. He also stated that they had only come to see The Darkness.

Regarding the independent witness he was brought to me by the steward as I was about to go to the police at reception.

When I came back in, I told [REDACTED] to come and do his report on the iPad and to liaise with Security 10. When he came back he had a gentleman from the crowd who had witnessed the whole thing, he didn't have time to write a report as he didn't want to miss The Black Stone Cherry but happily gave me his name and his phone number and said he would be fine to give a statement to the police, if required.

Approximately 10 minutes later, I was asked to come to reception and bring the steward with me so he could give his version of events to the police. He then explained what happened to the police officer. I then gave the officer the witnesses name and phone number and returned to work.

I brief to every steward before every event the importance of customer service, it's their priority, and unfortunately no matter how hard you try it's never going to be enough for some people.

SIGNED: [REDACTED]

DATE: 06/03/2023



Incident Report

DATE: 4th February

EVENT: Blackstone Cherry and The Darkness

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Security 10 – Security Supervisor

LOCATION OF INCIDENT: S3

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

I [REDACTED] was Security 10 Supervisor; I was doing patrols when myself and the response team were called to s3 on the south concourse at around 21:15.

As I arrived, I went to look in the bay the father was stood up in the bay and his son was stood on the staircase. They were the only people standing.

I had spoken to the steward on the bay [REDACTED] and he had explained to me that there 2 people in the bay who are refusing to sit down and pushed him after he had asked them 3 times to sit down. They point blank refused to sit down and people around them were complaining to [REDACTED]

As a result, myself and the response team made our way up the stairs into S3 and as we entered the bay there was someone body stood at the bottom of the stairs and the steward informed me that it was son and as we looked up the father was stood in front of the seat in the bay dancing.

I asked a member of the team to go up and ask the dad to come down so I could speak to them both about what had happened. The dad refused to come down.

I then went up to the father and asked him to come down and have a conversation with me He refused and when I made my way downstairs, the son who was at the bottom of the stairs, had asked what I said to his dad. I told him I asked his dad to come outside for a conversation and the son said he would come with me. The son started to make his way outside and the father then followed with the other sia that were still up there.

I was then greeted by ops 2 [REDACTED] and then a couple minutes the dad had made his way down stairs and joined the conversation, everything was explained to [REDACTED] and to make things calm down sue had offered them to be reseated and they didn't want to be they both started being rude and abusive to everyone so ops2 decided they would be leavening. I told them that there night at the venue was finished and asked them to walk out after more abuse and swearing they did but while doing this the son thought it was best to put his middle finger up at everyone, Once outside they was greeted by the external security who watched them walk down towards the front so I took my team down toward the foyer as to make sure they don't regain entry they had made their way over to the police who happened to be outside at the time and said they had been assaulted, the police had come over to the main foyer at door and I spoke to them I explained to why they were ejected and that they pushed a member of staff the police asked if they could speak to that member of staff and he [REDACTED] was then brought down to the foyer explained to the police what had happened.

The police were made aware there was a witness to this and given the details of the person.

SIGNED: [REDACTED]

DATE: 04/03/23



Incident Report

DATE: 4th February 2023
PERSON REPORTING: [REDACTED]
ROLE/POSITION: Body Cam

EVENT: Blackstone Cherry and the Darkness

LOCATION OF INCIDENT: S3

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

On 04/02/2023 Black Stone Cherry, at 21:15.

My supervisor [REDACTED] Security10 had been called to an incident at s3. There were complaints from people to the steward that was working in that area that a man and his son were persistently standing and were refusing to sit down when being asked to.

As it was the third time the man and son had been asked to take their seat and refused, we attended to the situation. Upon arrival, we located the man and child, spoke to the steward [REDACTED] for more information. As we were on our way back into the section, we had seen the man's son had made his way to the bottom of the stairs to watch the show, we then asked the boy to step outside so we could have a word with him to which he refused, meanwhile his dad is sitting in the seat watching what is going on and not moving. My colleague [REDACTED] had tried to get the dad to come down the stairs where he sat with his arms folded and simply refused.

After about 7 minutes, the boy eventually followed my supervisor [REDACTED] outside of the bay area, I went up to my colleague [REDACTED] as the man still didn't come out of his seat, upon this he ended up coming down but, on the way, out he got into the steward's face and said something to him. I was unable to hear what was said as it was very loud, but the steward felt very intimidated and upset by this action. We were then met by [REDACTED] who was opps2, manager on this event, she offered the man multiple times seats but he wasn't really interested.

In the end, we were getting nowhere so he and his son were both asked to leave the building to which they walked out. On the way out, his son began to abuse the staff including myself at the door, by sticking his middle fingers up at us and the dad also took a picture of [REDACTED] on his way out.

SIGNED: [REDACTED]

DATE: 04/02/2023



Incident Report

DATE: 4th February

EVENT: Blackstone Cherry and The Darkness

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Front of House Manager

LOCATION OF INCIDENT: S3

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

I was called to an incident on the South side by control. Where a gentleman had been removed from his seats due to complaints from other patrons. I took tickets with me so I was forearmed as it seemed to be a seating issue and that we could minimise any loss of show time or to diffuse the situation.

On arrival the customer was in a heated discussion with CC1 [REDACTED] plus the response team and Security 10. I spoke to the gentleman away from the staff and asked if he and his son would like to be moved to either the floor (son too young) or to a suite, he then laughed in my face and declined my offer of an upgrade. We tried everything to diffuse the situation and offered every opportunity for him to stay. The gentleman was extremely rude to anyone who was trying to find a solution, he was agitated, abusive and would not accept any solution offered.

There was nothing anyone else could do, either accept the upgrade as that was unacceptable he was asked to leave. Security held the door open and the gentleman and his son left.

As the doors were shut security said to me "you were so worried about the son yet he just gestured abusively with his hands"

At no time did I witness any assault verbal or physical on the customers. We did everything to diffuse the situation.

SIGNED: [REDACTED]

DATE: 4-3-23



Ejection/Walk Out Report Form - 2022

Complete

Score **100%** Flagged items **0** Actions **0**

Site conducted **Unanswered**

OVO Arena Wembley **Unanswered**

Conducted on **04.02.2023 21:56 GMT**

Powered by 

Inspection **100%**

Date & Time of Incident **04.02.2023 22:05 GMT**

Event

Black stone cherry and the darkness

Name of Reporter & Role

[Redacted]

Security Company

Event Control Informed

Body Cam Footage Taken

Handed over from Floor Security

Name of Security handing over to you - (Name of security officer/bib number/call sign etc - as much info as possible)

[Redacted]

Name of Ops Team Reported to

[Redacted]

Centre Circle

| |
|-----|
| Yes |
| Yes |
| No |

INCIDENT:

LOCATION OF INCIDENT: (Note your nearest bay/location & keep as brief as possible)

S3

DETAILS: (Provide a detailed account of the incident. Details of any conversation/interaction with the person.) (Story of how we got here)

Steward reported that he asked a male to sit down. Five minutes later him and his dad were standing again people behind were complaining. He asked him again to sit down and the father pushed him. The steward reported this to a member of staff and security 10 got them down the stairs and met with [Redacted] there. He was walked out of the door.

ACTION TAKEN & OUTCOME: (Details of any actions taken, for instance person's informed (Police Officers Name/Collar Number, Medical etc. or any force used - ejection/walk out/other etc)

Police were informed of what happened by the steward

Signature of person completing form

Signature

[Redacted Signature] 04.02.2023 22:05 GMT

Police correspondence

RE: URGENT - FW: Data Protection Act - Request for Data - Ref: 33315

 [Redacted Name]

⏪ ⏩ → 📎 ⋮
Wed 01/03

 You replied to this message on 07/03/2023 09:47

Good afternoon,

I have sent through the evidence.com link for you to attach the footage on.

I have found the other report and it has been closed after the officers in attendance have spoken to the security guard and a third party witness who has explained that the security guard was in the right on this occasion.

I have closed the report that I have and have spoken to the victim in this instance.

If the footage can be sent over just in case we need it down the line.

Regards

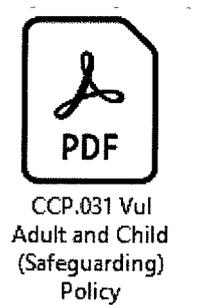
NW NORTH WEST BCU
Barnet • Brent • Harrow

[Redacted] ERPT A – North West BCU
Wembley Police Station, 603 Harrow Road, Wembley, Middlesex, HA0
2HH Web www.met.police.uk [Redacted]

ASM Global Safeguarding Policy



Centre Circle Safeguarding Policy



Excerpt of Ticketing T&Cs from the Venue's website:



6 AGE RESTRICTIONS AND YOUNG PERSONS

6.1 All children must have a Ticket in order to attend an Event.

6.2 Subject to any additional age restrictions that may apply to individual Events:

- (a) children under 15 must be accompanied by an adult aged 18 or over; and
- (b) children under 16 cannot enter the standing area and may only enter the Event with seated Tickets. We will not be liable to refund any standing Tickets which have been purchased for use by children under 16 in relation to such Events.

6.3 Events may be age restricted and it is the responsibility of the person who purchases the Tickets to check that s/he and persons on whose behalf s/he purchases the Tickets comply with such age restrictions before purchasing the Tickets. If you attend an Event where age restrictions apply and/or if you are claiming a concession, you must be able to provide photographic proof of identity and age or entitlement, as appropriate (e.g. student pass). We reserve the right to refuse entry, without refund, to any person who is unable to provide such photographic proof.

6.4 It is your responsibility to check the suitability of an Event for any children in your party regardless of official age restrictions, this includes considering the type of audience the Event is likely to attract and whether such an audience is a suitable environment for children in your party. Refunds will not be issued if any aspect of an Event, including the behaviour of other audience members, causes offence to you or any children on whose behalf you have purchased Tickets.

6.5 We do not recommend subjecting children to loud music over a sustained period of time. Hearing protection is advised for Events taking place at OVO Arena Wembley where loud music is involved. A concert environment is not suitable for very young children.

6.6 Except for shows specifically aimed at children, accompanying adults should be confident that children within their party will not cause disruption to other audience members. Any disruption may result in you and your children being removed from the OVO Arena Wembley.

This page is intentionally left blank

Statement of John Drury, VP & General Manager, OVO Arena Wembley

Introduction

The OVO Arena Wembley is managed by ASM Global, the world's leading venue management company and producer of live entertainment experiences, with over 350 venues worldwide, welcoming over 164 million guests annually from over 20,000 live events across music, entertainment, sport and business.

The OVO Arena Wembley is one of the UK's most legendary and iconic concert and events venues. With a rich history that goes back to its days as the Empire Pool and Sports Arena, the building has played host to thousands of events including the 1948 and 2012 Olympics and for over 60 years, the 12,000 capacity Arena, which is a listed building, has seen some of the biggest names in music walk through its doors from Queen, The Rolling Stones and The Beatles to David Bowie, Madonna and ABBA.

Now refurbished and reborn following a £35 million renovation program, the venue continues to host a wide range of concerts, sport, comedy, family entertainment, conferences and other special events and retains its legendary status. It has seen several years of X Factor Finals, Strictly Come Dancing TV shows (and live shows), Britain's Got Talent Champions shows and the MTV Europe Music Awards in 2017 (the first time in London for 21 years).

Hosting over 100 shows a year, the venue welcomes up to 1 million guests annually. Pre-lockdown, 2019 saw 131 performances and 822,000 guests through the doors. Coming back after lockdowns, in 2022 the venue hosted 574,000 guests with 103 performances. For 2023 we're forecasting a guest attendance of 747,000 and 134 performances.

The venue has picked up various awards over the years, including Best Venue Teamwork Arena award at the last Live UK Music Business awards in 2019, voted across all UK arenas. A series of photographs of the venue can be found at **Exhibit JD1**.

I am currently chair of the NAA (National Arenas Association), representing all 23 UK (plus Dublin) Arenas, and am also on the board for LIVE (Live music Industry Venues & Entertainment), the voice of the UK's live music and entertainment business. LIVE members are a federation of 14 live music industry associations representing 3,150 businesses, over 4,000 artists and 2,000 backstage workers.

With environmental issues a current industry priority, the OVO Arena Wembley was the third arena in the UK to achieve Greener Arena Certification, thanks to its work towards a sustainable future. It was the first ASM Global venue worldwide to achieve this status, which demonstrates independent external verification that carbon reduction strategies are at the heart of all venue operations, as the Arena continues its journey towards reducing its environmental impact.

Operational Procedures

As part of standard procedures, each event which is due to take place at the Arena is risk assessed by members of the highly experienced and respected Operations team. They will look at all aspects of an event and take into account similar events which have previously taken place at the OVO Arena Wembley and in other venues. As a result of this risk assessment, a staffing plan will be produced to cover all Front of House security, stewards, medical cover, fire officers and backstage security for the event. The number of staff deployed will vary from event to event according to each risk assessment and will be based on guidance from the *A Guide* (produced by the National Arenas Association) and the *Purple Guide for Events* (written by The Events Industry Forum in consultation with the events industry).

For every show at the venue, our Operations team will also hold briefings to run through details of each event, which will be cascaded to the security teams. The usual process is that the Operations Manager, head of backstage security and anyone else needed will attend a promoter/security briefing to run through details of each event and to highlight any specific activity which will need particular attention from our teams (such as an artist walking through part of the auditorium or members of the audience being called up on stage as part of the show). Any relevant information will then be relayed to Front of House supervisors at their briefing and the supervisors will brief their stewards as necessary. The supervisors' briefing also features key team members for the venue, medical staff, fire officers and naming rights partner staff on duty.

For completeness, a *Compliance with Conditions* document is attached at **Exhibit JD2** setting out the (non-mandatory) conditions on the venue's premises licence with comments included in bold text detailing how we demonstrate compliance with these conditions.

Centre Circle

Centre Circle are the venue's chosen contractor for security and stewarding services and have provided Front of House security since January 2019 and stewarding for the OVO Arena Wembley since May 2017. This is an important relationship as their staff are very often the first (and sometimes only) venue team members that guests meet during their visit to the venue. Before being awarded these contracts for the OVO Arena Wembley, Centre Circle held successful contracts at a number of Stadiums including Wembley, Brentford & Charlton. They have since been appointed as SIA approved contractors who provide security services at the Spurs stadium and also provide these services to the London Stadium for sport and entertainment.

Centre Circle have been operating since 2005 and are members of schemes and associations such as The Approved Contractor Scheme, UK Crowd Managers Association, Disability Confident and also hold ISO 9001 Quality Management System Certification. They are an approved Highfield trainer where they offer in house training on NVQ Level 2 and First Aid. All staff have obtained or are working towards their NVQ Level 2 and supervisors have obtained or are working towards their NVQ Level 3.

Centre Circle management have a wealth of experience in crowd management and have assisted the venue Operations team in ways to improve the customer journey and manage audiences. They

overbook staffing numbers and therefore never provide fewer staff than required, even if there is an event clash with another venue. Centre Circle have built up a good working relationship with the venue and, following the success of their stewarding services at the venue, were selected as security services provider when the venue's contract with its previous provider had expired. Their KPIs are consistently over 70% and they make every effort to ensure their key staff attend venue training and development opportunities. They will also work closely with the venue to ensure business continuity, especially in supervisory roles.

We are continuously working with Centre Circle to evaluate customer feedback and any shortfalls are addressed. For example, when some staff members were recently unaware of where the venue's VIP entrance was, venue maps were provided and staff were reminded to revise these to ensure that they are able to direct customers correctly. We also ensure that all search staff know which items are prohibited in the venue and why, so that customers are always kept informed.

In relation to reporting and evidence gathering, we introduced an iPad-based reporting system at the venue in 2018, to ensure that staff are equipped to easily and efficiently record and report any incidents which occur. The venue has carried out extra training with staff in how to operate this system and has adapted the form to make it easier for those who do not write reports every day. Bodycams have always been used to cover areas where we have no CCTV at the venue and this number was increased recently.

Venue Layout

The ability to transform an arena space means that the layout of the audience at events can vary greatly, from fully seated to all standing (or part-standing/seated) and formats can include end stage, in-the-round, open floor in full hall, short hall (Ballroom), draped or fully open formats, all of which will also be considered when creating risk assessments and staffing plans for an event.

On shows with a standing floor audience as well as seating in lower and upper seating bays, staff will often be asked by seated guests if they are able to be moved to the standing floor. Staff will also be asked if we can move standing guests into the seated area. As a matter of course we will move guests to other areas if we have space available.

Complaints

Of course, all venues occasionally receive complaints, and we aim to always close off any complaints received in relation to the OVO Arena Wembley to the satisfaction of the guest wherever possible. Each complaint will be investigated by the relevant person/team, depending on the type of complaint – for example: it could be related to food and beverage services, Front of House staff, artist behaviour etc - and after a thorough investigation into the source of the complaint, a substantive response will be provided to the complainant by our Customer Services team as soon as possible.

In 2022, the venue received a total of 498 complaints/comments (plus 121 thank you emails). To put this number into context, 498 represents 0.09% of total attendance at the venue in 2022, illustrating that 99.91% of guests did not make a written complaint.

Conclusion

ASM Global is the preeminent venue and live experiences company, and this is all the more reason to ensure that any complaint received at any of our venues is taken seriously and thoroughly investigated. Our policies, practices and procedures are reviewed and evaluated as necessary, being amended and updated to consistently create a better guest experience whilst at our venues in any way we can.

We take great pride in our contribution to the communities in which we operate, both via the world-renowned entertainment we provide and the substantial employment opportunities for local people.

This statement (consisting of 4 pages and Exhibits JD1 and JD2) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.


Signed:
John Drury

17 MARCH 2023
Date:

EXHIBIT JD1



Above: External view of the OVO Arena Wembley

Below: Visual displayed inside the venue detailing key historical milestones





Performances at OVO Arena Wembley
Above: American rock supergroup Hollywood Vampires
Below: Canadian indie rock band Arcade Fire





Above: Inside the American Express Lounge at OVO Arena Wembley

EXHIBIT JD2

Compliance with Conditions

OVO ARENA (formerly SSE ARENA) Wembley

Agreed conditions for new Premises Licence

Planning and Operations at Events

1. *The Premises Licence Holder (acting by the DPS or his nominated deputy) will invite the Police, Health and Safety and Licensing Authority Officer (“the Authorities”) on a bi-monthly basis to a meeting to discuss forthcoming Events at the Arena and any issues relating to the licensing objectives and will provide them with a copy of any relevant risk assessments a minimum of 10 working days before the Event. In exceptional circumstances, (for example where strenuous efforts to obtain the necessary information from the promoters have been made but the promoters have been tardy in providing such information to the Premises Licence Holder, or where the event is a last-minute booking), the Authorities will accept a reduction in this timescale. - Bimonthly meetings are held with Brent Council, Police & Fire and minutes recorded by the venue. In relation to the risk assessment, they are submitted as close to the 10 days as possible but there are occasions when the Operations Manager is waiting on information, any delays are communicated.*
2. *The Premises Licence Holder (acting by the DPS or his nominated deputy) will ensure that a copy of any Event Synopsis issued pursuant to the Operations Manual in relation to an Event at the Arena, is sent to the Authorities for their consideration a minimum of 10 working days before the Event. In exceptional circumstances, (some examples of which are given in condition 1), the Authorities will accept a reduction in this timescale. - They are submitted as close to the deadline as information affords. The venue hosts a lot of ‘one-off’ shows or first-time promoters and events where information is sent in late, reducing the deadline of the synopsis. At the very least the local authority is aware of the event format, date and sales.*
3. *The Premises Licence Holder (acting by the DPS or nominated deputy) shall follow the recommendations where applicable, in the publications set out in this condition (and any updated versions, where appropriate), in relation to Events, so far as it is reasonably practicable and appropriate to do so. - Guidance and policies are followed in relation to the below publications:*

1. The Purple Guide to Health, Safety and Welfare at Music and Other
 2. The 'A' Guide issued by the National Arenas Association
 3. Managing Crowds Safely (2nd edition, 2000) ISBN 978 0 7176 1834 7
 4. Risk assessment: A brief guide to controlling risks in the workplace (2014 and Case Studies on Risk Management)
 5. The Association of British Theatre Technicians, The Chartered Institute of Environmental Health, The District Surveyors Association and The Institute of Licensing's "Technical Standards for Places of Entertainment" (2015) ISBN 1904031838;
 6. BS 9999: 2017 (Fire safety in the design, management and use of buildings. Code of practice);
 7. BS 5839 (fire detection, fire alarm systems and buildings) and
 8. BS 5266 (emergency lighting systems);
 9. Crowded Places Guidance June 2017
 10. BS 13200 (Spectator Facilities).
4. *The Premises Licence Holder (acting by its DPS, nominated deputy and operational staff) shall ensure that:*
- a. *Exits are not obstructed (including by curtains, hangings or temporary decorations), and accessible via non-slippery and even surfaces, free of trip hazards and clearly identified. – The venue's Fire & Safety team have recorded checklists to inspect for this and the Steward Supervisor checklists pre-event record and report any issues to rectify before an event. Exits are illuminated in the bowl and concourses. Chains are removed and recorded on a chain board*
 - b. *The socket outlets (or other power supplies used for DJ equipment, band equipment and other portable equipment) that are accessible to performers, staff or the public shall be suitably protected by a residual current device (RCD having a rated residual operating current not exceeding 30 milliamps). - Venue Electrician and Fire & Safety officer inspects all temporary connections to our power.*
 - c. *Where chairs and tables are provided, internal gangways are kept unobstructed. - Pre event checks from the Fire & Safety officer and then Supervisors are recorded and cover this.*

- d. *Temporary electrical wiring and distribution systems are not provided by it without notification to the licensing authority at least 10 days before commencement of the work and/or prior inspection by a suitable qualified electrician. In exceptional circumstances, (some examples of which are given in condition 1), the Authorities will accept a reduction in this timescale. - Very rarely provided as installations and if they are, they are communicated via the event synopsis sent to the licensing authority.*
5. *The maximum number of persons permitted on the Premises (not including staff) shall not exceed the maximum arena bowl seating capacity plus standing capacity (subject always to risk assessment) based on calculations of .3/.4/.5 m2 average, for the Arena floor. – This is adhered to in all formats with the exception of the 6k format on the standing floor. This was agreed with the licensing authority and is calculated at a .3/.4 average, extra exit stairs are added to the floor to reach this. Only lower bowl seats are sold in this format.*
6. *The Premises Licence Holder (acting by the DPS or his nominated deputy) agree that when an Event is planned at the Premises to run after 24:00 (00:00), it will give specific consideration during its planning process as to whether a time should be specified after which entry or re-entry to the Event will not be permitted. - Yes, on all overnight events, we offer a last admission time.*
7. *There shall be a minimum of 1:200 stewards at Events to assist patrons generally and to assist in the promotion of the Licensing Objectives. In addition any member of staff who is carrying out a security role shall be SIA licensed by that Authority and shall wear clothing that can be clearly and easily identified on CCTV. The number of SIA licensed staff will be between 3 and 81 depending on (amongst other factors) the nature of the Event; demographics; capacities and/or event intelligence. A risk assessment must be carried out prior to every Event in order to determine this and shall be made available to the Police and authorised officers from Brent Council upon request. The risk assessment shall be kept for a minimum period of 12 months post Event but may then be destroyed at the Premises Licence Holder's choice. - Steward and Security ratios are correct and were recently confirmed with the licensing authority (via Laura Davies). Both an Event and a Security risk assessment will determine actual numbers but they will not fall below the minimum requirements, and both assessments are submitted to the licensing authority & Police. All licensable roles are carried out by SIA staff, they wear high vis vests with identifiable numbered tabards and are instructed to display their badges and CCTV patches.*

At Events involving Regulated Entertainment involving loud amplified music/speech, the Premises Licence Holder (acting by the DPS or nominated deputy) will (as appropriate) comply with the following conditions:

8. *The Noise Council Code of Practice for Environmental Noise Monitoring at Concerts is to be used for target levels at existing noise sensitive premises. – This is adhered to. (Please also note that this is duplicated as condition 9).*

10. *Reasonable efforts should be made by the Premises Licence Holder (DPS, nominated deputy and its staff) to ensure that engines of vehicles loading in and out of the service yard are switched off whilst waiting to enter the covered service yard, to minimise disturbance to nearby residents in compliance with the Operations Manual guideline. - SIA staff on the service yard gates are briefed to ensure that there is no idling and vehicles loading in and out have their engines switched off whilst waiting. We work closely with our residents, particularly in the adjoining Forum House, to ensure that they are not disturbed.*

11. *Sound measurements of a minimum of the following basic measurements LAeq and LAmax levels should be taken in the Auditorium over 15 minute periods throughout the entire Event. This information should be made available to Environmental Health upon request within a reasonable period of time. - The sound level meter is set within the sound room and monitors every show within the venue. Levels are set at 1 minute and 15 minute LAeq's and saved into the technical folder where they can be accessed at any time. Readings are shown on the screen during the event and are monitored within the sound room, when levels raise the Operations or technical team on the night are informed who can then liaise with the liaise with the Promoter to get levels reduced as appropriate.*

12. *No noise from entertainment to be audible in the nearest existing noise sensitive premises after 23:00. - This was an original condition which was with windows open for ventilation and applied only to those buildings that were around the Arena at the time the licence was granted . We are in direct contact with the Local Authority Noise and Nuisance Team and if there are any issues on the night or post event then we are informed by them, and appropriate action is taken.*

13. *Internal noise conditions will be imposed by the Premises Licence Holder (acting by the DPS or nominated deputy) and Environmental Health should be informed of the levels set. - The majority of tours will work to within 96 - 105dB levels, this is monitored internally and externally when required*

and levels changed as appropriate by communication with the promoter representative. We work towards guidance on the HSE website for noise at event safety where the standard limits are 107dB A and peak C weighted sound pressure level should not exceed 140dB C. This is generally when we have special effects which include concussion. We carry out a test and will only allow the product to a certain sound level – i.e. with concussion usually a level 3 or 4 dependent on the product used. Level 5 is for outdoor stadiums and we would not allow this to be used within the venue. We also have a qualified acoustic consultant/expert within the Operations Team who assists with both this and noise at work when required within the venue, as well as our group health and safety team.

At all times that Licensable Activities are conducted at the Premises (at an Event or otherwise):

14. *Any member of staff who is carrying out a licensable role (under the Private Security Act) shall be SIA licensed by that Authority and shall wear clothing that can be clearly and easily identified on CCTV.*

- As above, all staff carrying out licensable roles are SIA licensed and wear hi vis and are instructed to wear CCTV arm bands.

15. *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. - This is provided by the Security companies prior to the commencement of the event and held on file.*

16. *Notices summarising the licensee's policy on admission and searching shall be placed at each entrance. - They are displayed at all entrances to the venue.*

17. *Notices clearly explaining the licensee's drugs and weapons policy shall be displayed at the entrance and at suitable places throughout the premises. - They are displayed at all entrances to the venue.*

18. *Toilets accessible to the public shall be checked every one hour for the use of drugs and other illegal activities. - SIA patrol teams do this.*

19. *A toilet check list shall be displayed on the wall in all toilets accessible by the public. Staff shall use these checklists to record their name and certify the time of the check. Checklists are to be replaced daily and old checklists must be retained (for a month post Event) and made available for inspection by the Police and authorised officers from Brent Council (if requested within that month's period). - Our cleaning contractor Property Support Services does this.*

20. Customers shall not be permitted to take open glass containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority. - **This policy is enforced using SIA staff.**

21. CCTV (of current Home Office Guidance standards) shall be 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. This must comply with the Data Protection Act including signage. - **CCTV faults are recorded for maintenance; recording is 31 days and warning signs are displayed outside all entrances.**

22. CCTV cameras shall cover each of the entrances of the premises and shall operate on the concourses (to cover the bars). – **This requirement is adhered to.**

23. 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.- **This is adhered to: all locks are unchained, and the venue has push bars or release buttons.**

24. Notices asking customers to leave quietly shall be conspicuously displayed at all exits. - **Notices using text and pictures are displayed above all exits.**

25. A telephone complaints line and customer services email address are to operate so that anyone who feels unduly disturbed by the noise can register a complaint. - **Our event control and customer service email monitors this. Security also has a pro forma of questions to ask any complainant such as their location, contact details to call back etc.**

26. The Premises Licence Holder (acting by the DPS or nominated deputy and/or by its Catering Management) shall adopt and operate a “Challenge 25” policy at all times. – **The venue’s current food and beverage supplier, Compass Contract Services (UK) Limited (“Levy”), adopts this policy, and anyone challenged gets recorded using their till function.**

27. Any staff directly involved in selling alcohol for retail to consumers and staff who provide training (including managers) shall undergo regular training relating to the responsible sale of alcohol (including the basic tenets of the Licensing Act 2003) at least every 12 months. The training shall be documented and signed off by the member of staff receiving the training. This training log shall be regularly reviewed by the DPS and shall be kept on the premises and be made available for inspection by police and relevant authorities upon request. - **Levy conducts this training and training is also given at every event briefing and staff sign to that effect.**

28. An incident/control 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. all seizures of drugs or offensive weapons
- f. any faults in the CCTV system or searching equipment or scanning equipment
- g. any refusal of the sale of alcohol any visit by a relevant authority or emergency service

There is a running control log for all incidents that arise, some logs like CCTV faults will lead to other reporting mechanisms. All refusals of sale of alcohol are recorded using till technology.

29. A personal licence holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol. - **There is always a licensee present during permitted hours for the sale of alcohol.**

30. A copy of the Premises Licence Summary including the hours which the licensable activities are permitted shall be visible from outside of the main entrance to the Premises so that members of the general public passing by can read it. - **This is displayed outside the venue.**

If you are in control of any part of a commercial premise, you are under a legal obligation to carry out a detailed fire risk assessment to identify risks and hazards in the premises. A fire risk assessment is essential in keeping your premises safe for everyone. You must keep a written record of your fire risk assessment if your business has five or more people

Definitions

“Event” means any event/occasion/activity when the Auditorium will be in use.

“Existing noise sensitive premises” means those premises in existence as at 31 March 2006.



LOST CHILD PROCEDURE

Lost children should be dealt with in a very calm and gentle manner and no physical contact should be made.

CHILD REPORTED MISSING DURING THE EVENT

Upon receiving a report that a child is missing the staff member must obtain a full description of the child from the parent or responsible adult.

They should then be brought to Reception where the Lost Child form will be completed to gain information on the lost minor.

Control will immediately radio all radio holders using the phrase:
“This is a Code 1 lock down” (Code 1 meaning lost child).

All staff are to remain on channel 1 unless it is necessary to discuss any sensitive issues or updates confidentially.

All staff to go onto alert mode (i.e. stopping people from entering the building) unless the show has finished and people are leaving in which case **do not** stop them from exiting, whilst monitoring the crowd with the description of the child in mind.

All entrance staff to close down their doors. Supervisors to confirm this to Control.

A description of the child will be given on Channel 1 and Supervisors must cascade this to staff.

Externals must cover the four corners of the building and the Arena Square. Anyone coming out through Fire Exit doors during the show should be challenged and back up requested from other externals if needed.

Security 10, under instruction from Ops 2 or Ops 1, should then start a search of all concourses and toilets and confirm to Control when this is completed.

If the child is found the “child found” section of this policy will apply.

CHILD REPORTED MISSING AS EVENT FINISHED

If public have already started to leave the building and all exits are open the **lock down message must not be given.**

A full description of the child must be gained from the parent or responsible adult. Information required will be description of the child and the clothes they are wearing, and location last seen. The parent or responsible adult should then be taken to Reception.

Control to radio a "Code 1" message and the child's description will be given over Channel 1 and all staff will remain on this channel unless it is necessary to discuss any sensitive issues or updates confidentially.

Under instruction from Ops 2, Echo 1 & 2 must brief their staff and start an immediate search of the exterior of the building.

Security 10 to brief security to start an immediate search of the interior of the building.

LOST CHILD FOUND IN VENUE

If a member of staff finds a lost child, they should report this to Control immediately and, along with another member of staff of a different sex, should bring the child down to reception area.

The child must not be touched but offer words of comfort. Keep the child within reach of you by walking with arm outstretched behind the child (without making body contact).

The child should be taken to the briefing room where the 2 members of staff (one of each sex) will remain with them. Staff will be designated event by event to fulfil this role and should preferably be SIA badged or CRB checked

Please complete the "Lost Child" form and give to control and this will then be relayed to Ops 2.

CHILD REPORTED AS LOST IS FOUND BY STAFF

If staff find the child, Control must be advised immediately, and they will then issue the stand down message using the phrase "Code 1 is a stand down".

Ops 2 should be deployed to the area to ensure 2 staff members (one of each sex) accompany the child to Reception.

Ops 2 will oversee the hand over of the child.

No child should be handed back to an adult until we are completely happy that this is the parent or responsible adult.



ASM Global Children and Vulnerable Persons Protection Policy – OVO Arena Wembley

| | |
|--|-----------------|
| DCI CODE / SUBJECT AREA REFERENCE | WEMOPSVULN01 |
| LOCATION / UNIQUE NUMBER | CORP SE 15 |
| VERSION / STATUS | 2 |
| DATED | 25 May 2021 |
| DOCUMENT AUTHOR | Freyja Handy |
| APPROVED BY | Marie Lindqvist |
| | |

Revision history

| VERSION | DATE | REVISION AUTHOR | SUMMARY OF CHANGES |
|---------|------|-----------------|--------------------|
| | | | |
| | | | |
| | | | |

Distribution

| NAME | TITLE |
|-----------------------------|---|
| Gary Simpson | Director of Safety, Security & Risk |
| Ian McIntosh | Head of Group Health & Safety |
| Becky Syrett Sean Coogan | Venue Security Manager Senior Operations Manager Operations Managers Front of House Managers |

Approval

| NAME | POSITION | SIGNATURE | DATE |
|------|----------|-----------|------|
| | | | |
| | | | |
| | | | |

ASM Global Children & Vulnerable Persons Protection Policy

| | | |
|-----------|--|----------|
| 1 | Policy Statement | 4 |
| 2 | Scope | 4 |
| 3 | Code of behaviour | 5 |
| 4 | Inappropriate behaviour | 5 |
| 5 | Reporting | 6 |
| 6 | Recruitment and Training | 7 |
| 7 | Lost Children Policy | 7 |
| 8 | Visting Productions | 7 |
| 9 | Safeguarding Officers | 7 |
| 10 | Age policy /Security | 8 |
| 11 | Complaints about compliance with the Policy | 8 |

INTRODUCTION

The European Region of ASM Global (comprising AEG Facilities (UK) Limited, SMG Europe Holdings Limited, SMG (UK) Limited and any associated companies) is committed to ensuring that its venues offer a safe and secure environment for children and young people to come and enjoy shows, concerts, performances and other events. ASM Global acknowledges its responsibility to assist in safeguarding the welfare of every child, young person, and vulnerable person, who attends an event at one of its venues. A child or young person is anyone under the age of 18. Throughout this policy, the term “child” or “children” also includes a young person(s) or vulnerable person(s), of any age.

1 Policy Statement

ASM Global is committed to:

- taking all reasonably practicable steps to protect children and young people from harm at its venues
- creating a safe and welcoming environment where children can have fun
- recognising that safeguarding children is the responsibility of all ASM Global’s staff, not just those who are likely to come into contact with children at events
- promoting events at its venues which are appropriate for children and young people
- carefully recruiting and selecting staff and contractors
- training its staff regarding child safety issues and good practice with children/parents/carers
- providing effective management for staff through clear processes, supervision and support
- reviewing its ways of working to incorporate best practice

2 Scope

This policy applies to all employees, agents, sub-contractors and representatives of ASM Global who come into contact with children, young adults or vulnerable persons in the course of their duties. This policy is kept under review, and we welcome any proposals or comments to improve our policies and practices.

3 Code of behaviour

All staff working at an ASM Global venue should be encouraged to demonstrate exemplary behaviour in order to promote the welfare of children, young adults or vulnerable persons and reduce the likelihood of any complaints or allegations of improper conduct being made. The following are examples of how to create a positive environment at ASM Global's venues:

- Treat everyone with dignity and respect.
- Set an example you would wish others to follow.
- Allow young people to talk about any concerns they may have.
- Encourage others to challenge any attitudes or behaviours they do not like.
- Remember someone else might misinterpret your actions, no matter how well-intentioned.
- Follow all health and safety guidelines and policies.
- Maintain a safe and appropriate distance with any lost children (same gender staff should escort a lost child). Do not give any lost child a consoling hug or any other contact that could be misconstrued.
- Ensure the designated 'lost person' location is manned by staff who have been subject to appropriate DBS (Disclosure and Barring Service) checks (formerly known as CRB checks).
- Maintain comprehensive records of any allegations of child abuse made by a child, young person or vulnerable person and respond appropriately.

4 Inappropriate behaviour

Just as it is important to take proactive steps to promote a positive environment at ASM Global's venues, it is equally important to stress there are certain practices which should never be sanctioned or tolerated at ASM Global's venues.

- **DO NOT** engage in inappropriate behaviour or contact – physical, verbal, sexual
- **DO NOT** engage in rough, physical or sexually provocative games, including horseplay
- **DO NOT** make suggestive remarks or threats, even if meant in jest
- **DO NOT** use inappropriate language – writing, phoning, email, internet or in person

- **DO NOT** do things of a personal nature for a child or vulnerable person which they can do for themselves
- **DO NOT** reduce a child to tears as a form of control

5 Reporting

You must report any inappropriate behaviour as soon as possible to a supervisor or member of the management team who will record the incident. If the child, young person or vulnerable person appears distressed or has misunderstood or misinterpreted something you or another member of staff has done, the responsible adult who accompanied the child, young person or vulnerable person should be informed.

When reporting an incident or concern, you should provide as much information as possible, as the report may be required by the police or social services. The report should, where possible, include:

- The child or vulnerable person's name, age and date of birth
- The child or vulnerable person's address and telephone number
- Whether or not the person making the report is expressing their own concerns, or those of a third party
- The nature of the allegation, including dates times, and any other relevant information
- Make a clear distinction between matters of fact, opinion or hearsay
- A description of any visible physical signs of harm (e.g., cuts or bruising)
- Details of any witnesses to the incident
- The child or vulnerable adult's account of the incident (e.g., how any cuts or bruising occurred)
- Confirmation as to whether the child or vulnerable person's parents or guardian have been contacted. If they have been contacted, what has been said
- Have any allegations been made against a specific person? If so, who and what is alleged
- A referral to the police or social services should be recorded, together with details of when the report was made, who to, and what follow up action (if any) is anticipated.

ASM Global will provide support to any person who in good faith reports any concern he or she has about the behaviour of a colleague. Where a complaint is made against a member of staff it will be investigated internally and may also be subject to:

- criminal investigation
- child protection investigation
- disciplinary or misconduct investigation

ASM Global may also refer allegations to social services and/or police who may advise what further action should be taken.

6 Recruitment and Training

ASM Global takes all reasonable steps to ensure that its staff understand the importance of child safety and the need to protect young adults and vulnerable persons from abuse. ASM Global provides guidance and training to its staff on what constitutes appropriate behaviour and also carries out checks in respect of potential new employees. These checks include:

- All potential new employees are required to fill in an application form which requires that person to disclose information about their past, including any criminal history.
- Those persons who may be working closely with children or vulnerable adults will be subject to a Disclosure and Barring Service (DBS) check.
- References will be taken in respect of new employees
- Evidence of identity (passport or driving license with photo) is required in respect of new employees
- New employees will receive an induction with appropriate training
- In addition, our Medical and security providers also conduct DBS checks.

7 Lost Children Policy

The venue operates a policy for any lost or found children – see appendix 1.

8 Visting Productions

Any visiting productions involving children must comply with government guidelines in regard to the ratio of chaperones to children. Schools attending will conduct their own risk assessment. Young performers will be covered in the production risk assessment.

9 Safeguarding Officers

The venue has one certified safeguarding officer. Both security contractors also have a safeguarding officer and responsible person.

10 Age policy /Security

The **Children's Act 1989** defines a 'child' as a person under the age of 18. (UN convention of the Rights of the Child)

In law a child is a child until their 18th birthday, and this applies to all domestic legislation. There is no legal definition of a young person and different projects work with 'young people' of different age groups, e.g., 11-16, 14-19, or up to 25.

There is no official age at which a "child" becomes a "young person".

The venue policy is that those under the age of **14** must be accompanied by a responsible adult over the age of **16**. If you are planning to attend a standing show, under 14s are not permitted into the standing area (14 year and 15-year-olds must be accompanied by an adult, aged 16 or above).

Unaccompanied children will be held at the entrance and a manager called. The young person will be asked where their adult is, and one will be contacted if not on site. Children will not be turned away as we have a duty of care.

Children will not be ejected from the venue and will leave with an accompanied adult where the adult is being ejected.

11 Complaints about compliance with the Policy

Any complaints or concerns should be addressed in the first instance to the General Manager of the venue in which the incident giving rise to the complaint occurred. ASM Global commits to immediately investigating any claims when brought to its attention of any breach of its Child Protection Policy.

Appendix 1 – Lost Child Policy

<https://asm365gbr.sharepoint.com/sites/WemFS/Wembley%20Arena/OPERATIONS/TEMPLATES/13.2.3%20-%20Lost%20Child%20Procedure%202022.pdf>



Safeguarding Policy Child/ Adult at Risk Policy

Centre Circle Event Management Ltd. (CCEM) believe all individuals have a right to learn and develop within a safe environment, and is committed to protecting children and adults at risks from harm. CCEM also recognises its responsibilities to protect staff (both employed and contracted), learners and visitors against unfounded allegations of abuse.

With regard to safeguarding, CCEM works on the principles of:

RECOGNISE > RESPOND > REPORT

Purpose

The purpose of this policy is to:

1. Ensure a safe environment for all
2. Provide CCEM staff and with guidance on procedures to adopt in the event they suspect a potential safeguarding issue
3. Identify CCEM staff compliance and training requirements.

Scope

This policy applies to all CCEM staff (employed and contracted), learners and visitors. Furthermore, it applies to all CCEM business activities, including those delivered online/ via a virtual environment.

Definitions

Learner: is anybody who is enrolled on programme of learning with CCEM

Children: as in the *Children Acts 1989* and *2004* respectively, a child is anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout this policy

Adult at risk: any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.



1. Ensuring a safe environment for all

Principles

CCEM safeguards children and adults at risk in the following ways:

- By seeking to make CCEM safe and welcoming to all
- By prioritising specifically, the welfare and protection of children and adults at risk
- By appointing staff with specific responsibilities regarding safeguarding
- By giving staff information, training and guidance about how to recognise potential abuse, how to respond appropriately and how to report
- By ensuring all staff adhere to policy, and all managers ensure the policy is an integral part of meeting agendas
- By ensuring staff complete mandatory online safeguarding every three years
- By ensuring the Designated Safeguarding Officer (DSO) and Deputy Designated Safeguarding Officer (DDSO) complete an annual training course
- By ensuring all suspicions and allegations of abuse are taken seriously, investigated and responded to swiftly and appropriately
- By consulting potential victims of abuse and taking their views into account as part of deciding an appropriate course of action
- By sharing information appropriately, working in partnership with relevant agencies, ensuring all parties recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

Safeguarding for learners who are adults at risk or under the age of 18 years

CCEM does not discriminate on the basis of any of the protected characteristics for example, age or disability, and will make reasonable adjustments to admit suitably qualified applicants who are under 18 years old or who are adults at risk.

The standard personal and support arrangements apply equally for all learners. However, CCEM acknowledge learners under the age of 18 and adults at risk may have additional needs in relation to their support and welfare, and encourages self-



disclosure of information and may require additional information by learners to support this.

The parents or guardians of learners who are under 18 are required to nominate a guardian for the period the learner remains under the age of 18. This nomination is to be made and communicated to CCEM prior to the learner's participation on a programme.

CCEM will seek to work with applicants who will be under the age of 18 on entry and their guardian to carry out an individual 'risk and readiness' assessment to ensure appropriate safeguarding measures are put in place, and the guardian has a full understanding of the nature of CCEM's environment and the support that is (and is not) available.

2. Procedures: RECOGNISE > RESPOND > REPORT

Recognise

There are a number of ways in which abuse of a child or adults at risk can become apparent:

- A child or adult at risk discloses abuse
- A third party discloses that a child or adult at risk has told him or her that abuse is taking place
- A child or adult at risk shows signs of physical injury for which there appears to be no satisfactory explanation
- A child or adult at risk's behaviour leads to suspicion he or she is being, or has been, abused.

Respond

CCEM will respond in an appropriate, proportionate and timely way to suspicions or allegations of abuse.

If staff, in the course of their work, have a safeguarding issue brought to their notice, or observe an instance of abuse themselves, or have cause for concern, they must treat this as a priority and address the issue immediately. All staff have a duty to raise concerns, without prejudice to their own position, about behaviour by staff,



managers, learners or others. Staff, other than the designated safeguarding leads, should recognise it is their duty to inform but not to investigate.

Staff are required to report any incident of abuse or cause for concern which arises in the course of their work with children and adults at risk. This must be done immediately to a DSO or DDSO.

The following list gives examples of incidents which are required to be reported. It is not exhaustive:

- A child or adults at risk is accidentally hurt
- There is concern a relationship is developing which may be an abuse of trust
- A member of staff is worried a child or adult at risk is becoming attracted to them or a colleague; or a member of staff is becoming attracted to someone in their care
- A child or adult at risk displays inappropriate sexually explicit behaviour or sexual awareness
- A member of staff believes a child or adult at risk has misinterpreted or misunderstood something that has happened or something that a colleague has done
- A member of staff notices any suspicious marks on a child or adult at risk or receives a report/hears of an allegation of abuse from a child or adult at risk regarding events outside the college
- A member of staff, or a colleague, has had to use reasonable physical restraint to prevent a child or adult at risk harming themselves or another, or from causing significant damage to property
- There is suspicion, or an allegation is made, of abuse
- If there is an immediate risk of significant harm and emergency medical treatment is required, this must be arranged following normal health and safety procedures.

Report



Any suspicions or allegations should be reported to the DSO (or Deputy) who will investigate the matter and determine an appropriate course of action, including contacting external authorities where this is indicated.

Disclosing abuse is difficult for variety of reasons. Some children and adult at risks do not disclose because they feel they will not be believed or be taken seriously. It is very important staff actively listen and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure.

| DO | DO NOT |
|--|---|
| Stay calm | Panic or delay |
| Recognise your feelings, but keep them to yourself | Over-react |
| Use language the person can understand | Use jargon or express opinions |
| Reassure the person: <ul style="list-style-type: none"> - they have done the right thing telling you - they are not to blame - you believe they are telling the truth | Probe deeply for information Use leading questions |
| Listen carefully, record what the person says and keep these notes | Make them repeat the story |
| Explain what you will do next (i.e. tell the Designated Safeguarding Lead (or Deputy) in a simple and clear way | Promise unconditional confidentiality |
| Inform the Designated Safeguarding Lead (or Deputy), and seek advice and support for yourself | Approach the person against whom the allegation has been made or discuss the disclosure with anyone other than a Designated Safeguarding Lead |

Contacts

CCEM - Designated Safeguarding Officer (DSO)



Stephen Rowden – stephen.rowden@centre-circle.co.uk

CCEM - Deputy Designated Safeguarding Officer (DDSO)

Lorraine Wilkins - lorrainewilkins@outlook.com

3. Staff compliance and training requirements

If a member of staff feels they may be at risk from being the subject of or exposed to accusations in connection with children or learners who are adult at risks, they should alert their line manager.

If an allegation is raised against a member of staff or student they may be informed of the allegation, on the advice of the Local Authority and/or Police, and may be removed from contact with children and adult at risks in line with the appropriate disciplinary process (staff or student).

Any internal disciplinary action arising from an investigation will be handled in accordance with the relevant disciplinary process (staff or student).

If the matter is the subject of a criminal investigation:

- CCEM is entitled to pursue its own or complementary confidential enquiries and disciplinary action and the DSO will consult with the relevant agencies in such cases
- Following an investigation, disciplinary action may be taken as appropriate
- Information is shared and discussed between staff and relevant agencies on a need-to-act basis only
- The written record of the matter will be retained by the DSO.

Compliance with these procedures

CCEM expect staff and all those contributing to its activities to follow the requirements of this policy and procedure, and to promote a safe environment in which the welfare of children and adult at risks is protected and promoted.

Failure to follow this policy and procedures may not constitute abuse but is nonetheless a matter of concern for CCEM and may lead to disciplinary action.

If members of staff or learners are concerned that the guidance and procedures are not being followed, they should raise it with the DSO.

Recruitment, vetting and training of staff



CCEM takes all appropriate steps to safeguard children or adults at risk and complies with the Disclosure and Barring Service (DBS). Furthermore, CCEM complies with its on-going duty to notify DBS with any relevant information regarding the conduct of any individual which CCEM consider to have caused harm or pose a risk of harm to groups at risk.

Staff training requirements

CCEM make clear expected standards to all staff, and will provide initial safeguarding training. Furthermore, mandatory training completion is required (see below) and monitored, with evidence being held in individual personnel files. Refresher training is required every three years.

<https://www.foundationonline.org.uk/course/index.php?categoryid=34>



Monitoring & Review

CCEM will monitor all feedback received in relation to the issues affected by the policy and will amend the policy as necessary.

The policy will be updated with any amendments to existing legislation, new legislation or Awarding Organisation or other organization requirement.

In any event, this policy will be reviewed annually.

Signed:

A rectangular box containing a handwritten signature in black ink. The signature appears to be "S. NR" followed by a stylized flourish.

Dated: July 2022

Next review: July 2023

Internal Investigation Report- Privileged and confidential

CONTENTS

CLAUSE

1. EXECUTIVE SUMMARY.....pg 2

2. BACKGROUND.....pg 4

3. INVESTIGATIVE ACTIVITIES.....pg 5

4. FACTUAL FINDINGS.....pg 17

5. CONCLUSIONS.....pg 18

6. RECOMMENDATIONS.....pg 20

7. APPENDIX 1- SUPPORTING DOCUMENTSpg 22

To: ASM Global Management

From: Ms Sy [REDACTED] ("Investigator")

Date: 22nd March 2023

Re: Investigation into an incident at the *Matchroom Boxing Event – Taylor v Carabajal* on Saturday 29th October 2022 at the OVO Arena Wembley

1 EXECUTIVE SUMMARY

The OVO Arena Wembley is managed by AEG Facilities (UK) Limited (trading as ASM Global). The OVO Arena Wembley ("the Venue") was made aware of a complaint, including a Subject Access Request ("SAR"), made by the complainant, Ms B [REDACTED], that was sent directly to the CEO of OVO Energy on the night of the event in October 2022. It was not until 4th November that Ms B [REDACTED] contacted the Venue directly. However, OVO Energy did forward the initial complaint correspondence onto the Venue's customer services inbox on 31st October 2022. An initial investigation was carried out by the Venue, whilst Ms B [REDACTED] contacted several different parties, including the Security Industry Authority ("SIA"), the press and the police, to report her grievances.

In Ms B [REDACTED]'s complaints she has alleged that she was illegally detained, illegally searched, sexually assaulted by a security staff member, physically assaulted by a staff member and that her SAR has not been dealt with properly. The allegations against staff members relate to the Venue's security staff (a subcontracted service provided by Centre Circle Event Management Limited ("Centre Circle")).

A response was provided to Ms B [REDACTED] by the Venue's customer services team on 8th November 2022 refuting her allegations. This email also informed Ms B [REDACTED] that her SAR would not be dealt with at that time due to the police investigation of the matter. Ms B [REDACTED] made a further request for CCTV and bodycam footage on 23rd February 2023. In response to this and because the police investigation had been closed, ASM Global moved forward with this request. ASM Global requested identification to be provided by Ms B [REDACTED] (i.e. copy passport or driving licence) in accordance with ASM Global's standard internal process upon receipt of any SAR and in order to be satisfied of the identity of the requester (this follows the guidance provided by the ICO). To date, Ms B [REDACTED] has refused to provide ID documents, resulting in ASM Global being unable to confirm that she is the correct data subject to provide the information to. ASM Global is unable to respond substantively to Ms B [REDACTED]'s SAR until identification has been provided in accordance with ICO guidance.

On 16th November 2022, representatives of the SIA visited the Venue, viewed the CCTV footage and checked the licences of SIA licensed security staff involved in the incident. They confirmed that they were satisfied with these checks. On 22nd November 2022 the Venue was contacted by PC [REDACTED] from the Met Police, who was investigating Ms B [REDACTED]'s reports of assault at the Venue. The Venue submitted the bodycam and CCTV footage which it held on 23rd November 2022 and PC [REDACTED] confirmed on 4th December 2022 that the Met Police had completed their investigation and that there would be no further action taken in relation to the matter. It was confirmed that the case was now closed.

Having undertaken a comprehensive investigation, I have concluded that the allegations made by Ms B [REDACTED] against the Venue are not corroborated by the evidence I have obtained. I can find no evidence

that Ms B [REDACTED] was physically detained by staff and this is not supported by footage of the incident. There was no physical contact between Ms B [REDACTED] and any employees of Centre Circle until the point of the ejection, whereby staff adhered to approved techniques and used reasonable force. I can find no evidence that Centre Circle staff carried out a search on Ms B [REDACTED] without her consent and both of the security staff members directly involved with this incident have refuted this allegation (and a refusal to be searched would have led to an earlier ejection from the premises under the Venue Search policy). The security staff state that the search was carried out in accordance with the SIA guidance and that no sexual assault took place.

ASM Global have contacted Ms B [REDACTED] in relation to her SAR requesting identification documents to ensure that the data is given to the correct data subject, which follows ICO guidance; however Ms B [REDACTED] has not provided any identification. Details of the full process, investigation, factual findings and conclusions of the Investigator are detailed in this Report.

Notwithstanding the above, upon reviewing the evidence, I have concluded that improvements could be made in relation to the recording/documenting of the search process carried out by security staff on guests of the Venue. For example, in future, any searches carried out inside the Venue will be carried out (if possible) in a dedicated search area along with bodycam evidence capturing the consent of the individual and the search itself. Whilst staff adhered to the Venue's Search Policy on the date in question, the Venue has made the decision to enhance its existing procedures as detailed above. As such, no future search inside the Venue should be carried out without a bodycam present.

2 BACKGROUND

I was asked by ASM Global Management to conduct a further internal investigation into an incident at the *Taylor v Caranajal* Matchroom Boxing event on Saturday 29th October 2022 involving an attendee of the event, Ms B [REDACTED]. The investigation concerns the allegations raised by the attendee including illegal detention by a staff member, illegal search by a staff member, physical assault by a staff member, sexual assault by a staff member and breach of a SAR under GDPR legislation.

The Venue's records in relation to this incident indicate that staff involved were called to the area where Ms B [REDACTED] was seated as other customers had complained about her allegedly taking illegal substances and causing a disturbance, including allegations of Ms B [REDACTED] being racially abusive to guests seated near her.

The purpose of this internal investigation was for ASM Global to investigate the allegations made in order to assess their validity. It is anticipated that there could be further litigation in relation to this incident. For the purposes of this Report, references to 'Venue staff' includes ASM Global's subcontracted security providers, Centre Circle.

Investigator's Experience and Qualifications

I am the Venue Security Manager and have worked at the Venue for 7 years. I joined the team as an Operations Manager and have recently been appointed Venue Security Manager (June 2022). Before this, I worked as the Operations Manager at Wembley Stadium, reporting directly to the Safety Officer, where my role included planning and executing safe events, at a wide range of concerts for artists such as One Direction and Eminem. I am the Venue's contract manager for Centre Circle, the Venue's external security providers, and I work closely with them to ensure training records, licences and general standards adhere to ASM Global's requirements. Within my daily role, I investigate customer concerns, review CCTV and gather evidence to review and resolve any issues. I am also the point of contact for the Police in order to share any evidence relating to and assist with any investigations within their jurisdiction.

3 INVESTIGATIVE ACTIVITIES

SCOPE OF INVESTIGATION

On 8th March 2023, ASM Global Management instructed me to conduct an internal investigation relating to the incident at a boxing event – the Taylor v Carabajal fight – which took place on Saturday 29th October 2022. I can confirm that this Report is true and factual to the best of my knowledge. The Report represents my independent opinions. I have spent approximately 20 hours conducting the investigation.

I reached the conclusions set out in this Report at the end of an extensive and thorough investigation and based those conclusions on the totality of the evidence collected and reviewed. I have investigated all matters I believe were relevant to reaching my conclusion. I have not spoken to Ms B [REDACTED] in the commissioning of this Report because Ms B [REDACTED] has intimated that she intends to litigate this matter.

This matter was originally dealt with by my colleague in the Operations team at the Venue, Ms S [REDACTED], who implemented a document preservation protocol on 31st October 2022 in relation to the CCTV footage and incident reports as a result of the initial complaint received from Ms B [REDACTED] in October 2022. As part of completing this Report, I was therefore able to review the Venue CCTV that had been downloaded, the SIA bodycam footage and the initial reports completed by staff who were involved in the incident.

I was also able to speak to Ms S [REDACTED] to ascertain how the original complaint was investigated and to determine whether further evidence was available or required to complete this investigation. I considered with ASM Global Management whether Ms S [REDACTED] should be a joint investigator for this Report, but it was decided that as she had been so closely involved with the initial investigation, she could be perceived as being biased or having already made up her mind in relation to how this Report should be concluded. I therefore asked for a statement from Ms S [REDACTED] instead, asking her to detail her initial investigation.

No party influenced me in forming my opinion.

WITNESS STATEMENTS

I have reviewed the initial statements provided by the staff involved in the incident. Whilst these statements provided details of the incident, I requested further information and another statement from Ms C [REDACTED] and Ms Be [REDACTED], security officers for Centre Circle. All staff involved remembered the incident due to its nature and the initial complaint. A request was also made to Ms N [REDACTED] to provide a written account of her involvement rather than a verbal account which was provided to Ms S [REDACTED] at the time of her initial investigation. Ms N [REDACTED] provided her written account and I sought further clarity from Ms N [REDACTED] and Mr H [REDACTED] regarding the incident. As detailed above, I also requested a statement from Ms S [REDACTED] detailing the initial investigation.

| No. | Name | Job Title and Employer |
|-----|----------------------------|--|
| 1. | B [REDACTED] H [REDACTED] | Security Supervisor, Centre Circle |
| 2. | G [REDACTED] C [REDACTED] | Security Officer, Centre Circle |
| 3. | C [REDACTED] Be [REDACTED] | Security Officer, Centre Circle |
| 4. | J [REDACTED] N [REDACTED] | Operations Manager, OVO Arena Wembley |
| 5. | S [REDACTED] S [REDACTED] | Operations Director, OVO Arena Wembley |

MATERIALS REVIEWED

I collected and reviewed a broad range of materials during the course of the investigation, dating back to October 2022 including the following:

- a) CCTV and Bodycam footage
- b) Witness Statements detailed above
- c) Previous correspondence with Ms B [REDACTED], including text messages and details of telephone conversations with ASM Global staff members
- d) Police Investigation and SIA investigation
- e) ASM Global's policies on accessibility and relevant Venue policies.

a) CCTV and Bodycam Footage Review

Footage 1

This piece of footage starts with Ms C [REDACTED] and Ms Be [REDACTED] (Security Officers, Centre Circle) with Ms B [REDACTED] on the concourse. It appears that the initial communication has already occurred prior to a staff member with a bodycam arriving at the scene. The initial conversation is inaudible, but Ms B [REDACTED] states that her coat is still in the auditorium and that standing is not good for her. Ms C [REDACTED] offers to get Ms B [REDACTED] a chair to sit down on while they await Venue Management – Ms B [REDACTED] declines.

Ms B [REDACTED] states that she needs to use the bathroom, which is the reason she came out of the auditorium. Ms C [REDACTED] (Security Officer, Centre Circle) requests that she remains on the concourse until the incident is resolved and it should not take too long. Communication ceases between the parties for a few seconds and Ms B [REDACTED] then starts recording on her mobile phone. She asks Ms C [REDACTED] to explain again why she is being detained. By phrasing this as 'again' it implies that she has already been informed. Whilst Ms B [REDACTED] is recording on her own device she states that she is being detained, to which Ms C [REDACTED] responds that there is no physical detention other than Security requesting her to stay. Ms B [REDACTED] then starts to walk away towards the toilets and is followed by the Venue staff. Again, parts of the footage are inaudible at this point, but Ms C [REDACTED] can be heard informing Ms B [REDACTED] that there is a disabled toilet down the stairs, but they continue towards a closer toilet on the concourse.

Ms B [REDACTED] exits the toilets and continues to record on her own device. Ms B [REDACTED] states she has done nothing wrong and it appears from the footage that Ms C [REDACTED] attempts to explain, but Ms B [REDACTED] talks over Ms C [REDACTED]. Ms C [REDACTED] asks Security 10 (Mr H [REDACTED], Security Supervisor, Centre Circle), how long the incident will take to resolve as an altercation appears to have happened between Ms Be [REDACTED] (Security Officer, Centre Circle) and Ms B [REDACTED]. I am unable to determine exactly what happened from the bodycam footage provided. Mr H [REDACTED] appears in the footage at the end.

From the footage provided, it is not clear whether Ms B [REDACTED] is aware of the reasoning behind her ejection.

Whilst reviewing the footage I noted that Ms B [REDACTED] was spoken to for at least 8 minutes and 30 seconds. I do not know how long prior to this Ms B [REDACTED] was in discussion with the Venue team. Unfortunately, the footage starts after the initial search and conversations had taken place. Due to the time lapse I am unable to view all the Venue CCTV from the evening, to see whether any initial conversations were captured on the concourses or Ms B [REDACTED] leaving the auditorium to provide an estimated duration of the incident.

Footage 2

This piece of footage is from the Venue's external CCTV and Ms B [REDACTED] can be seen exiting the Venue. She is met by the external team and walks along Lakeside Way to the top of the Arena Square steps. She is seen engaging in conversation with the external team and then stands at the top of the steps.

Footage 3

This external CCTV is from the opposite side of the Venue, but Security can be seen handing Ms B [REDACTED]'s belongings back to her as her coat was left at her seat in the auditorium

b) Witness Statements review

I have reviewed the initial statements provided at the time of the Ms B [REDACTED]'s complaint in October 2022.

OVO Arena Wembley management received a further communication from Ms B [REDACTED] on 23rd February 2023 which is detailed below.

OVO Arena Wembley management were notified of a further representation to the Local Authority, by Ms B [REDACTED]. As a result, I requested further updates from Ms C [REDACTED] and Ms Be [REDACTED] (Security Officers, Centre Circle) stating that a further representation had been received from a female they had ejected from the Venue during the boxing event in October last year. I stated that I required as much information as they could recall, including who asked the search to be carried out, why the search was carried out and how this was done. No details of the allegations against the staff were divulged. As stated previously, the Venue staff do recall this incident well due to the initial investigation, the SIA visit and the police request for information.

Statement 1- Mr H [REDACTED]

Ms S [REDACTED] (Operations Director, OVO Arena Wembley) initially reviewed the incident report completed on the night by Mr H [REDACTED] (Security Supervisor, Centre Circle) although this contained minimal information.

Mr H [REDACTED]'s ejection report confirms the reason why Ms B [REDACTED] was stopped in order to investigate the incident, namely that Ms B [REDACTED] appeared to be taking illegal substances in her seat. However, Mr H [REDACTED]'s report lacked details such as how the incident was brought to his attention, how he identified Ms B [REDACTED] and details of the customers who were reported to have been complaining.

I therefore requested this to be clarified, asking Mr H [REDACTED] how the incident was brought to his attention and his actions that immediately followed.

Mr H [REDACTED] states that a member of the public (who was part of a larger party) brought the allegations of drug use to his attention and he investigated these claims further by speaking to other people in the area. All parties stated the same allegation against Ms B [REDACTED], that she appeared to be taking illegal substances in her seat and had made racial slurs.

Statement 2- Ms C [REDACTED]

A report was received from Ms C [REDACTED] (Security Officer, Centre Circle) on 8th March 2023 giving Ms C [REDACTED]'s full account to her memory. Ms C [REDACTED]'s report details the same as her initial statement, however, Ms C [REDACTED] believed that she had turned her bodycam on when requesting to search, and to capture the search itself. Ms C [REDACTED] does state that Ms B [REDACTED] reluctantly consents to the search, which matches her initial statement whereby she stated that Ms B [REDACTED] was 'not happy'.

Statement 3- Ms Be [REDACTED]

Ms Be [REDACTED] (Security Officer, Centre Circle) provided a statement on 7th November 2022 stating that an incident had occurred on the night in question in the Venue's 'D block'. As Ms C [REDACTED] and Ms Be [REDACTED] arrived, the individual who guests had been complaining about was not in her seat. As a result, they gathered evidence from witnesses in and around the area. Ms B [REDACTED] was located and Ms C [REDACTED]

explained that allegations had been made against her and a search was required, due to the fact that the allegations involved the use of drugs. Ms Be [REDACTED] carried out the search.

I further clarified the statement provided by Ms Be [REDACTED] as I was unable to ascertain how Ms B [REDACTED] was identified (as she had not been in her seat) from her initial statement.

Due to a family bereavement, Ms Be [REDACTED] had not supplied an updated statement until I saw her at an event at the Venue on 14th March 2023. I asked Ms Be [REDACTED] to ensure that she wrote down all the details that she could remember of the incident. Due to the initial complaint and the investigation at the time, Ms Be [REDACTED] remembered the incident. She provided a detailed account dated 14th March 2023.

Ms Be [REDACTED] states that she, along with Ms C [REDACTED] were called to the area due to complaints and that a search was required to be carried out on a female. The female in question was pointed out by one of the complainants on the concourse. Ms Be [REDACTED]' account confirms that Ms B [REDACTED] was not happy about being searched but did eventually agree. Ms Be [REDACTED] detailed that she conducted the search with the back of her palms and searched Ms B [REDACTED]'s top area and carried out a lower body search as well, including checking her jean pockets and running the back of her palm along her ankles. No drugs were found during the search.

Ms B [REDACTED] was requested by staff to stay on the concourse while the matter was resolved. She was not detained and when she wanted to go to the toilet she was escorted there. The reason she was asked to stay on the concourse was so that the complaints could be investigated. During this time, Ms Be [REDACTED] states that she escorted Ms B [REDACTED] to the toilets. Following this, Ms Be [REDACTED] states that Ms B [REDACTED] "shrugs" past her and the decision is taken to restrain Ms B [REDACTED] by her wrists.

At this point authorization is received for the ejection of Ms B [REDACTED].

Statement 4- Ms N [REDACTED]

In the initial investigation Ms S [REDACTED] (Operations Director, OVO Arena Wembley) spoke with Ms N [REDACTED] (Operations Manager, OVO Arena Wembley) who provided a verbal account. Since receiving the further representation from Ms B [REDACTED], Ms N [REDACTED] provided a written statement. Ms N [REDACTED] was informed of the incident after Ms B [REDACTED] had been searched and collated evidence from witnesses in order to ascertain whether Ms B [REDACTED] would be permitted to remain in the Venue.

The incident that took place was complex in nature, with two allegations against Ms B [REDACTED] and 4 members of Venue staff involved. To ensure that I had read all of the statements correctly and to ensure I understood the incident and the actions that were taken, I sought final clarifications from Ms N [REDACTED] and Mr H [REDACTED] (Security Supervisor, Centre Circle). This clarification was to confirm their interactions with customers and security in relation to this incident.

Statement 5- Ms S [REDACTED]

At the time of Ms B [REDACTED]'s initial complaint Ms S [REDACTED], Operations Director for OVO Arena Wembley, investigated the allegations and replied to Ms B [REDACTED] via customer services. This statement provided me with some background information in relation to the allegations.

Ms B [REDACTED]'s initial complaint alleged illegal detention, ejection and physical assault, which she also alleges in her representation to Brent Council, along with further allegations against the Venue, which I am investigating.

Ms S [REDACTED] preserved evidence, obtained incident reports from staff and spoke to staff at the time of the initial complaint. Due to the evidence at Ms S [REDACTED]'s disposal, she concluded that Ms B [REDACTED]'s allegations were unfounded and wrote to Ms B [REDACTED] explaining as such and closing down the complaint.

I have reviewed the statements that Ms S [REDACTED] utilized in her investigation to evaluate and assess the subject matter of this Report and this is detailed above in relation to each individual statement. I have also spoken to Ms S [REDACTED] regarding the initial reports provided by staff and her further requests for information in order to draw her conclusion. Ms S [REDACTED] also provided a statement.

c) Correspondence with Ms B [REDACTED] by the Venue and ASM Global Staff

A complaint was made directly to the CEO of OVO Energy on 29th October 2022 after a customer was ejected from our premises. The complainant sent a further communication on 30th October 2022 informing OVO Energy that she had reported the incident to the Police, confirming the Police reference number. This communication was forwarded to the Venue's customer services inbox on 31st October 2022. An investigation was carried out by Ms S [REDACTED] (Operations Director, OVO Arena Wembley) immediately in order to respond to Ms B [REDACTED]'s complaint. Ms B [REDACTED] contacted the Venue directly on 4th November 2022 at 16:50 referring to her initial complaint to OVO Energy and in this email she states that she must be telephoned as the email account was "not in use". In order to keep a written record of matters, the Venue communicates with customers about complaints via email and so this was also the case when communicating with Ms B [REDACTED].

Ms S [REDACTED] sent a formal response to Ms B [REDACTED]'s complaint and SAR on 8th November 2022 from the Venue's customer services account. On 9th November 2022, Ms B [REDACTED] contacted the Venue in response to Ms S [REDACTED]'s reply. In this email Ms B [REDACTED] states that she is claiming compensation and whilst a response was being drafted the Venue received a press enquiry from *My London*, as Ms B [REDACTED] had contacted them regarding her experience at the Venue. The Venue declined to engage with the press enquiry. Given that Ms B [REDACTED]'s complaint had been investigated, a response supplied, and communications expected with the SIA and Police the decision was taken to no longer engage with Ms B [REDACTED]. After Ms B [REDACTED]'s immediate reply on 9th November 2022 no further correspondence was received from Ms B [REDACTED], nor from any third party representing a civil claim as per her statement of claiming compensation. Ms B [REDACTED] again raised her complaint and SAR from 23rd February onwards and has been in correspondence and had telephone calls with further ASM Global staff.

Communications between Ms B [REDACTED] and ASM Global Staff

The VP and General Manager of the Venue, Mr D [REDACTED], received an email from Mr H [REDACTED], CEO of AEG Europe, as Ms B [REDACTED] had contacted him directly to escalate her complaint. Concerned by the allegations, Mr D [REDACTED] telephoned Ms B [REDACTED] on 24 February 2023 in the morning to attempt to resolve the matter. Unfortunately, Mr D [REDACTED] received verbal abuse from Ms B [REDACTED], who then terminated the telephone call by hanging up. Mr D [REDACTED] reported that, on the call, he "*was met with a lot of shouting, swearing and personal insults*" and that Ms B [REDACTED] shouted at him: "*You are a f***ing moron, you should resign. Why am I talking to you? Get your boss to call me*" and much more.

Ms B [REDACTED] sent texts to Mr D [REDACTED] later the same day, initially asking if Mr D [REDACTED]'s manager would be '*calling [her] today?*' to which Mr D [REDACTED] responded that he had '*just spoken to [his] boss...passed all the information across to head office and [they would] get back to [her] early next week.*' Mr D [REDACTED] concluded by saying: '*We're taking this very seriously and will investigate thoroughly.*'

A full copy of Ms B [REDACTED]'s response to this message (and the exchange as referenced) is included in the Appendix, but Ms B [REDACTED] notes that Mr D [REDACTED]'s '*boss doesn't value [her] enough to speak to [her]*' and that '*the fact he doesn't want to apologise for the way [she has] been treated...further demonstrates [the Venue] need[s] to lose the licence.*' Ms B [REDACTED] further states that Mr D [REDACTED] needs '*to resign or be sacked.*'

Mr D [REDACTED] has received further communications from Ms B [REDACTED] since these text messages, with the last being voicemails left by Ms B [REDACTED] on 13th March 2023, demanding to be contacted by ASM Global's Legal Department.

Mr S [REDACTED], Director of Security, Safety and Risk for ASM Global Europe telephoned Ms B [REDACTED] on 27th February 2022 at approximately 17:00, after she had requested to speak with a member of the Senior Management Team. Mr S [REDACTED] states that he listened to Ms B [REDACTED]'s concerns and was able to establish that she was alleging that Venue staff had searched her without her consent, sexually assaulted her during the search and had caused her stitches to rip. She also stated that she had been unnecessarily ejected from the Venue with no reason and wanted to see the CCTV footage as, despite requesting this in November 2022, this had not been provided. Mr S [REDACTED] stated that he explained that the Police and the SIA had completed an investigation into her allegations and that he was there to understand how ASM Global could resolve her complaint. Mr S [REDACTED] then describes how Ms B [REDACTED] became angry and was swearing and shouting down the telephone, repeatedly saying that J [REDACTED] D [REDACTED] should be sacked. Mr S [REDACTED] states that it was clear to him that he was not going to be able to resolve her complaint and Ms B [REDACTED] also had to go, so Mr S [REDACTED] agreed to telephone her later in the week and closed the call by asking her to consider how ASM Global could resolve the complaint to Ms B [REDACTED]'s satisfaction.

Mr S [REDACTED] then telephoned Ms B [REDACTED] again on 3rd March 2023 at approximately 10:00. Mr S [REDACTED] again listened to the explanation of the complaint by Ms B [REDACTED] and stated that the CCTV footage would be sent to her, but that ASM Global needed to verify her identity. Mr S [REDACTED] also said that ASM Global would be flexible to meet Ms B [REDACTED]'s needs and do this in a way which was most convenient to her. Mr S [REDACTED] then states that Ms B [REDACTED] became angry as he had telephoned her from a withheld number and because she heard a dog bark in the background. Ms B [REDACTED] repeated on this call that J [REDACTED] D [REDACTED] should be sacked and became increasingly abusive: Mr S [REDACTED] states that Ms B [REDACTED] called him "a f***ing w****r" and that she wanted his personal mobile number. Mr S [REDACTED] states that he did not respond to this abuse, but that when there was a pause, he repeated that he was there to help. At this point Ms B [REDACTED] again called Mr S [REDACTED] "a f***ing w****r" and terminated the call. On 3rd March 2023, following Mr S [REDACTED]'s call with Ms B [REDACTED], a request for Ms B [REDACTED]'s proof of ID was sent by the Venue to her stating that this was required before personal data could be released, consistent with ICO guidance. On the same date, Mr D [REDACTED] also sent an email to the Ms B [REDACTED] outlining the Venue's position and next steps.

I understand that ASM Global's Legal Department has also since been in contact with Ms B [REDACTED] and, whilst she has sent a number of emails (some of which contain baseless allegations against staff members and incendiary rhetoric against ASM Global) Ms B [REDACTED] has refused to speak with the Senior Legal Counsel now dealing with her SAR on the telephone and has instead exchanged a number of text messages. At the time of writing, Ms B [REDACTED] has not provided any identification document, as has been requested numerous times.

d) Police correspondence - Met Police Report - 1929040/22 and SIA Investigation

Ms B [REDACTED] made a complaint to the SIA and the Police.

Centre Circle were contacted by PC [REDACTED], investigating on behalf of the Met Police, who requested CCTV footage of the incident. Centre Circle informed PC [REDACTED] that it was the Venue who retained the data.

PC [REDACTED] contacted the Venue on 22nd November 2022 via the Customer Services inbox stating that she was investigating an allegation against staff at the Venue. In my capacity as the point of contact for Police investigations, I requested a call with PC [REDACTED] to confirm the incident and subsequently sent all footage relating to the incident to the Met Police on 23rd November, via the secure link which PC Duke provided. A final communication was received from PC Duke on 4th December 2022 informing me that the investigation had been concluded with no further action to be taken, and that the case would be closed.

SIA investigation

The SIA visited the Venue on 16th November 2022 after receiving Ms B [REDACTED]'s complaint. They viewed the footage and looked at the areas where the alleged incidents took place. Upon leaving site, the SIA requested details of the security company contracted by the Venue, as well as badge numbers for the staff involved with this incident. On 3rd March 2023, J [REDACTED] F [REDACTED] from the SIA returned a call to Ms S [REDACTED] (Operations Director, OVO Arena Wembley) in which he explained that following the SIA's own investigations, the SIA had concluded that the actions taken by the security staff at the Venue were not in breach of their SIA responsibilities.

e) ASM Global's policies on accessibility and relevant Venue policies.

ASM Global has an overarching Accessibility policy and the OVO Arena Wembley has their own policy which refers to the overarching document.

OVO Arena Wembley works closely with charities notably 'Attitude is everything' to ensure that disabled guests and their carers are treated with respect and in a manner that is sensitive and appropriate to the individual and their needs.

At the Venue, all front of house staff are enrolled on or have completed their NVQ Level 2 in Spectator Safety, which has a module on accessibility. All staff are aware that not all disabilities are visible and are briefed to this effect on each event.

The Venue also has various policies and procedures in place which form part of the Venue's licence conditions:

- Search Policy
- Drugs Search Standard Operating Procedure (SOP)
- Ejection Policy

The Search Policy, part of the licensing conditions (condition 16, Admissions), states that notices summarising licensee admissions and searching shall be placed at each entrance. The Venue adheres to this, as notices are at the entrances and staff frequently carry out searches for a variety of reasons as people enter the Venue. All searches are conducted by licensed SIA officers, who the Venue holds the details of and spot check via the SIA website to ensure that they are in date and 'active'. The Venue has recently had an SIA compliance inspection with 4 SIA employees visiting the Venue and checking over 100 licences. The SIA were satisfied with their visit, which took place on 3rd February 2023

The Venue Search SOP states:

'Any person may be searched upon entry into the Arena as condition of entry, or at any time within the venue. Each event is assessed according to the threat and risk and intelligence. This will determine the level of searching required for the event. As a minimum standard The OVO Arena, Wembley will always search 100% bags. Mag arches are set up at each entrance and will be utilised on all events. Search wands may be used.'

As a result, I believe that staff acted in accordance with their Venue specific training on this policy.

The Venue Drugs SOP informs staff on the process to follow should they suspect an individual to be in possession of or under the influence of illegal substances. As an allegation had been made against Ms B [REDACTED] and therefore Venue staff conducted a search as per the policy in order to prove or disprove the allegations.

An annual email sent to Centre Circle regarding the updated SOPs was sent in February 2022 containing the Drugs and Paraphernalia policy. The Search policy was updated in March 2022 and communicated to staff on the ground.

I am aware that there is footage on the internet from Ms B [REDACTED] that was recorded on her mobile device during the incident. I have not considered this piece of evidence as we have not contacted Ms B [REDACTED] for her input into this Report and cannot confirm whether this is actual footage.

No external experts or consultants were instructed, all information was gathered and assessed by the Investigator given their industry knowledge

4. FACTUAL FINDINGS

4.1 Alleged illegal detention by a staff members

This allegation is not supported by the evidence obtained by the Investigator.

4.2 Alleged illegal search by staff member

These allegations are not supported by the evidence obtained by the Investigator.

4.3 Alleged physical assault by staff member

These allegations are not supported by the evidence obtained by the Investigator.

4.4 Alleged Sexual Assault by staff member

These allegations are not supported by the evidence obtained by the Investigator.

4.5 Alleged breach of SAR

This allegation is not supported by the evidence obtained by the Investigator.

5.CONCLUSIONS

5.1 Alleged illegal detention by a staff members

I can find no evidence that Ms B [REDACTED] was physically detained by staff whilst Venue management were investigating the incident. Ms B [REDACTED] states several times in the footage that she is being detained, however, staff have created a distance between themselves and Ms B [REDACTED]. Ms B [REDACTED] is not being physically detained to one area and is escorted to the restroom and then requested to wait for the incident to be resolved before she is able to go back to her seat. Towards the end of the bodycam footage Ms B [REDACTED] is frustrated that she is not permitted to go back to her seat and attempts to move past security. She states that security do not have the right to detain her, and whilst Ms C [REDACTED]'s (Security Officer, Centre Circle) response is not entirely audible from the footage, I have made the assumption that she says 'we do' as Ms B [REDACTED]'s reply is 'no you don't'. At this point, Venue staff position themselves in front of Ms B [REDACTED], restricting her access back to her seat. From the footage, there is an altercation in which it is hard to ascertain the exact movements of the individuals involved. It is shortly after this that Ms B [REDACTED] is ejected from the premises.

The view that there was no illegal detention of Ms B [REDACTED] is further supported by the Police correspondence and involvement in this matter. The Police investigated Ms B [REDACTED]'s complaint and have since concluded their investigation after being provided with CCTV and bodycam footage held by the Venue.

The reason Ms B [REDACTED] is requested to remain on the concourse is to await a decision on how the Venue will proceed, as a member of the Venue Management team is investigating the complaints against Ms B [REDACTED]. After speaking to customers, Ms N [REDACTED] (Operations Manager, OVO Arena Wembley) authorized the ejection via Mr H [REDACTED] (Security Supervisor, Centre Circle).

The consideration of re-seating Ms B [REDACTED] was not offered due to the multiple complaints of her behaviour including allegations of drug use and racist comments. Ms B [REDACTED] had also been found to be confrontational by the security staff.

5.2 Alleged illegal search by staff member

I can find no evidence that staff carried out a search on Ms B [REDACTED] without her consent. Ms C [REDACTED]'s (Security Officer, Centre Circle) report states that whilst Ms B [REDACTED] was not happy with the fact that was asked to be searched, she did consent. This is further supported by Ms Be [REDACTED]'s (Security Officer, Centre Circle) report, whereby Ms B [REDACTED] states that she believes it is ridiculous but after further discussion consents to the search.

Unfortunately, the bodycam that Ms C [REDACTED] refers to as capturing footage of the search being conducted was in fact not recording at the time, as Ms C [REDACTED] had previously thought it was, and the allegations therefore cannot be proved or disproved through this footage, which does not exist.

If Ms B [REDACTED] had not consented to a search then security would have warned her that refusal to allow a search enables security to eject customers from the Venue. If Ms B [REDACTED] had still not consented to a search then a search would not have happened, but rather Ms B [REDACTED] would have been ejected from the Venue at that time.

Taking into account the materials which have been reviewed and the factual findings, as detailed above, for this investigation, no evidence can be found in support of Ms B [REDACTED]'s allegation. There are two statements in direct contradiction to the allegation.

5.2 Alleged physical assault by staff member

I can find no evidence that Ms B [REDACTED] was physically assaulted by staff members throughout the bodycam footage.

There was no physical contact with Ms B [REDACTED] until the point of the ejection whereby staff adhered to approved techniques and used reasonable force. At no time was any member of security's behaviour threatening, either physically or verbally. From the bodycam footage, it appears that Ms C [REDACTED] and Ms Be [REDACTED] (Security Officers, Centre Circle) complied with the Venue's ejection policy.

5.3 Alleged Sexual Assault by staff member

There is no evidence to support Ms B [REDACTED]'s allegation. Ms C [REDACTED] states the Ms Be [REDACTED] conducted the search as per training by the SIA. Ms C [REDACTED]'s statement is a direct rebuttal to the allegation of Ms B [REDACTED]. It is also noteworthy that Ms B [REDACTED] does not make any reference to sexual assault on any of the bodycam footage. Ms B [REDACTED] also does not mention this in her initial complaint to the Venue.

It is unfortunate that there is no CCTV or bodycam footage covering the search during this incident, as referenced above.

5.4 Alleged breach of SAR

A request was made initially in October to the CEO of OVO Energy. The Venue received this request on 31st October 2022 and actioned the same. The Venue was notified that the Police had been contacted. At this stage no identification had been requested from the complainant for the SAR. The Venue then believed that they could rely on the crime and taxation exemption for not supplying this information. They considered whether releasing the footage could prejudice a criminal investigation and believed it could. From the Venue's perspective the SAR was closed on the system once they were contacted by the Police and had provided the footage to them. The subject was informed of this by customer services at the Venue. There is a Crime and Tax exemption for the provision of data under a subject Access Request under the Data Protection Act 2018. Ms B [REDACTED] contacted the Venue again in February 2023 requesting that the information should again be provided and, as the Police had closed their investigation, a SAR was actioned by the Venue who requested identification to allow the data to be provided. As of 22nd March, no ID has been provided by Ms B [REDACTED] to enable ASM Global to confirm that she is the individual in the footage to enable ASM Global to provide the personal data. Numerous attempts to obtain this identification from Ms B [REDACTED] have been made, but this has not been forthcoming. Ms B [REDACTED] has been notified that ASM Global cannot comply with the request until this identification information (as per the Information Commissioner's Office (ICO) guidance) has been received. Ms B [REDACTED] has also been provided with a link on how to complain to the ICO, which is the authority who adjudicates on data protection in the UK. The Venue should have requested identification at the time of the initial request from Ms B [REDACTED] in November and the Venue could have explained better both the exemption for Crime and Tax that they relied on, the types of data, length of time the data was held and purpose for the data which ASM hold for the data subject and also Ms B [REDACTED]'s rights to contact the ICO at that time if she wished to complain about the handling of the matter. These issues were rectified in February and March 2023 by ASM Global who were clear on all these areas (including the requirement for ID) with Ms B [REDACTED] and set out her options.

6 RECOMMENDATIONS

6.1 ORGANISATIONAL RECOMMENDATIONS

Having completed this internal investigation, the Investigator proposes that the following recommendations are adopted by the Venue:

Formal incident reports recorded by Front of House Managers on duty to provide their accounts of incidents. If the Operations Manager is in attendance or witnesses an incident, they are also required to complete the incident form with their account. This has been implemented and staff have been informed. For the avoidance of doubt, this is recommended as a supplement to the existing requirement, which is that security staff members are instructed to and are aware of their obligation to complete formal incident reports where they have been involved with an incident.

- Venue Management to confirm with contractor that all incident reports are completed on the evening of the event and not emailed in the following day.
- Review of Incident report forms and details requested on the form – this incident may have been easier to compile if a chronological approach in documenting had occurred on the night.
- Any searches taking place after the entry process must be done in presence of a body cam to ensure evidence is recorded.
- Dedicated search areas within the Venue should sufficient suspicion arise to warrant a search.
- New ‘user-friendly’ bodycams purchased by the security contractor ensuring more footage captured during incidents. The Venue and the contractor had noticed that even though bodycams were present at two incidents during events at the Venue (this being one), no footage had been recorded. The decision was made to purchase easier to operate bodycams along with training on their operation – this was implemented and rolled out in November 2022.
- Any complaints made to staff on the night regarding another member of the public must be recorded and details of the complainant provided to the Venue to gather evidence and to prove / disprove their allegations/complaints.
- Update Drugs SOP to include additional processes to cover allegations of drug use inside the Venue.
- Additional refresher annual workshops for security- to include general security roles and responsibilities and ASM Global policies and procedures on security related incidents to occur with Centre Circle. The current annual workshop is being opened up to wider security staff that are regulars at the Venue
- Enhance training for staff on Data Protection to be arranged with Legal for the Venue to embed current procedures and documents. As part of its commitment to continuous improvement, in 2022 ASM Global implemented additional training to staff in relation to Data Protection. All staff were required to complete an online training course (with a test at the end) in relation to Data Protection. Staff involved in processing SARs have attended in person training and completed their Level 2 Foundation Course in Data Protection (which includes passing an exam).

6.2 PERSONNEL RECOMMENDATIONS

- Event Security

The evidence that has been provided requires no further action by ASM Global in relation to the Centre Circle staff connected with the investigation.

Appendix 1 – Supporting Documents



SOP Searching
V.02 (002)



SOP Dealing with
Drugs and Drug
Paraphernalia V2
05.02.22 (redact...



7.15.3 - Removal
Policy

This page is intentionally left blank



Ejection/Walk Out Report Form - 2022

| | | | | Complete | |
|-------------------|------|---------------|---|----------|-----------------------|
| Score | 100% | Flagged items | 0 | Actions | 0 |
| Site conducted | | | | | Unanswered |
| OVO Arena Wembley | | | | | Unanswered |
| Conducted on | | | | | 29 10. 2022 23:52 BST |

Inspection

Date & Time of Incident

29 10 2022 21:11 BST

Event

Matchroom boxing

Name of Reporter & Role

[Redacted]

Security Company

Centre Circle

Event Control Informed

Yes

Body Cam Footage Taken

Yes

Handed over from Floor Security

No

Name of Security handing over to you - (Name of security officer/bib number/call sign etc - as much info as possible)

N/A

Name of Ops Team Reported to

[Redacted]

INCIDENT:

LOCATION OF INCIDENT: (Note your nearest bay/location & keep as brief as possible)

N11

DETAILS: (Provide a detailed account of the incident. Details of any conversation/interaction with the person.) (Story of how we got here)

Female was seen using class A her seats by customers and was re to be making racist remarks to one of the maies by saying "go back to where you came from"

ACTION TAKEN & OUTCOME: (Details of any actions taken, for instance person's informed (Police Officers Name/Collar Number, Medical etc. or any force used - ejection/walk out/other etc)

Ejection

Signature of person completing form

Signature



29.10.2022 23:56 BST



Incident Report

DATE: 29th October 2022

EVENT: Taylor v Carabjal

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Venue Security Manager

LOCATION OF INCIDENT: South Concourse

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

[REDACTED] spoke to [REDACTED] regarding the incident on 29th October, whereby a female was ejected for a racial slur. [REDACTED] wanted to clarify how the incident was brought to [REDACTED] attention.

[REDACTED] asked [REDACTED]
How was the incident brought to your attention?

[REDACTED] replied:

A member of the public had informed him a female was taking illegal substances in her seat.

[REDACTED] went to investigate the matter and spoke to 3 different groups in the local vicinity; a group of 8 males, a couple and 2 individuals all of whom stated the same allegation against the female.

[REDACTED] called the incident into control and stated that a search is required due to allegations of illegal substances being taken.

[REDACTED] was talking to the group of 8 males on the mezzanine who further alleged racial abuse.

SIGNED: [REDACTED]

DATE: 14th March 2023

PRINT: [REDACTED]

SIGNED: [REDACTED]

DATE: 14/03/2023

PRINT: [REDACTED]



Ejection/Walk Out Report Form - 2022

| | | | | Complete | |
|-------------------|------|---------------|---|----------|----------------------|
| Score | 100% | Flagged items | 0 | Actions | 0 |
| Site conducted | | | | | Unanswered |
| OVO Arena Wembley | | | | | Unanswered |
| Conducted on | | | | | 29.10.2022 15:45 BST |

Inspection

Date & Time of Incident

29/10/2022 21:11 BST

Event

Matchroom Boxing

Name of Reporter & Role

[REDACTED]

Security Company

Centre Circle

Event Control Informed

Yes

Body Cam Footage Taken

Yes

Handed over from Floor Security

No

Name of Security handing over to you - (Name of security officer/bib number/call sign etc - as much info as possible)

N/A

Name of Ops Team Reported to

[REDACTED]

INCIDENT:

LOCATION OF INCIDENT: (Note your nearest bay/location & keep as brief as possible)

S11

DETAILS: (Provide a detailed account of the incident. Details of any conversation/interaction with the person.) (Story of how we got here)

Called over by security 10 to deal with a lady due to customers complaining about her behaviour, was asked to do a drugs search, this was due to her erratic behaviour as well as being seen doing class A drugs, we conducted this out of sight of public, was then asked to hold her, she requested to use the toilet at which myself and [REDACTED] allowed to happen, we then came out of toilet, and was waiting to find out what we was doing regarding letting her stay or ejecting. She then started to wave her arms and pushed towards myself and grabbed [REDACTED] at which point Ops 1 arrived and confirmed she was to be ejected, myself and [REDACTED] then walked her out the door.

ACTION TAKEN & OUTCOME: (Details of any actions taken, for instance person's informed (Police Officers Name/Collar Number, Medical etc. or any force used - ejection/walk out/other etc)

Ejection

Signature of person completing form

Signature



01.11.2022 16:12 GMT



Incident Report

DATE: 29th October 2022

EVENT: Boxing Katie Taylor

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Female response member Alpha 10

LOCATION OF INCIDENT: D3 and South 5

This statement (consisting of two pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

At the time and date stated myself [REDACTED] and the rest of my response team Alpha 10 were conducting patrols inside the Ovo Wembley Arena. At approximately [REDACTED] Alpha 10 was called on the radio to an incident that had been reported by several males in the aisles of D3 that a female women i/c1, aged around 40s, tall approx. 6,0ft, dark brown hair, wear long black leather coat, black jeans. The males had reported she had been abusive to other members of the public and also reported to have been using drugs in front of them. Alpha 10 asked myself and [REDACTED] who was on another response team to assist in speaking to the female and complete a search on her. We approached the seating areas and she was not able to be seen as we looked around we found her by the merchandise near the south side. At the time I approached her I switched my body camera on to correlate the report I'm writing now and to verify my actions. I approached the female and began to speak to her regarding the reports and asked her politely if she would allow me to search her for possible drugs? She was not happy at first about the search as to which I replied if she didn't comply to the search, in which the arena reserves the right to eject her on suspicion of her potentially having illegal drugs in her possession. She reluctantly agreed at which point [REDACTED] conducts a pat down search professionally as taught in her SIA licence course, all to which is recorded on my body camera. I personally conducted a search on her purse, in which me and [REDACTED] could not find any illegal substances in her possession. As we are waiting for Ops team to make a decision as to whether they wanted her to be ejected for abusing other members of the public, the Female asked to go to the toilet, me and [REDACTED] escorted her to the toilets. The female was in the cubicle for around 10mins, when she exited the cubicle she began to get confrontational asking what's happening? and why is she has been stopped? At this time my body camera is still on recording. We left the toilets to which point we have still stopped her from going back to her seat, by that point her own camera is out recording myself and other members of the response team, she was becoming more agitated as to why we were still detaining her. [REDACTED] a member of the ops team arrived and confirmed to myself and [REDACTED] that the female was to be ejected on the grounds of racial abuse towards another member of the public. We then proceeded to tell her she was leaving the premises, at the time the female was holding a pint of beer, I proceeded to ask her to leave it inside as she was not allowed by law to leave with alcohol. [REDACTED] approached her to take the

Page | 1

pint glass from her, the female then palmed her arm away from her to which point we loosely put her in a wrap with her wrists as a preventative in case she tried to assault me or [REDACTED] as she was becoming more aggressive. We proceeded to eject her from the Exit doors of S15. The doors were closed after her and we returned inside. I have nothing further to report.

SIGNED: [REDACTED]

DATE: 9/3/23

STATEMENT 3 - MS BE



Incident Report

DATE: 29th October 2022

EVENT: Taylor v Carabaja!

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Response team

LOCATION OF INCIDENT: S14 section D

This statement (consisting of one page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

There had been multiple complaints about a lady who had been seen doing cocaine in different areas and was also very abusive towards a group of young boys. Me and my colleague [REDACTED] were asked to go and find the lady at her seat but she was not there at that time. We got a description of the woman, she was wearing flared jeans, black top and a dark jacket. On not being able to find the lady, me, [REDACTED] and my supervisor [REDACTED] were speaking to the group of boys as they had a complaint to make about this same lady. They had said she had been very abusive and also racist to one of the guys. When asked what she said they had all responded she said "go back to where you fucking came from". Meanwhile speaking to the group, they had spotted the lady walking on the concourse of the mezone where my supervisor [REDACTED] had asked me to take the lady to one side and have a word with her about the complaints. Me and [REDACTED] then approached the lady on the mezone, asked her to step by the merch stand and explained to her there had been multiple complaints about her doing drugs in the building, we explained to the lady as drugs are against arena policy and are illegal so we had to conduct a search on her. When we explained this she did not seem happy about it, she was saying "you dont have to fucking search me" "this is ridiculous" "these people have just made allegations and you are intimidating me by asking for a search". We had explained further to the lady that her language is unacceptable and because she is on arena grounds, we have to conduct the search regardless. She then agreed to the search to which I conducted on her using the back of my palms, I searched her top area, along her arms, behind her back and around her chest area, I then carried on to the lower half checking her jean pockets and running the back of my palm to her ankles. I could not find any drugs on her, I then told this to my supervisor and [REDACTED]. They were both happy. The lady then was trying to walk away but we had explained that she could not yet leave until a senior member of staff has come. She then said she needed to go to the bathroom so me and [REDACTED] then escorted her to S13 ladies toilets. Me and [REDACTED] waited inside the toilet with each other while the lady had locked herself in the cubicle and had turned sideways, we know this because we could see her feet facing the opposite direction of the wall. We were in the bathroom for about 7 minutes to when she came out and tried to dismiss herself again. We explained to her that she could not leave until a senior member of staff, an opps manager were there to authorise it so we needed to wait. The lady started to then record us because we were not allowing her to go. After trying to leave a third time, the lady had then shrugged past myself to where [REDACTED] then told her "donot put your hands on a member of staff" - due to her shrugging me out of the way, me and [REDACTED] then restrained her by her wrists and walked her back out of the arena doors by s13.

SIGNED: [REDACTED]

DATE: 14/03/2023



Incident Report

DATE: 29th October 2022

EVENT: Matchroom Boxing

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Operations Manager

LOCATION OF INCIDENT: East terrace/Mezz level

I, [REDACTED] Operations Manager for OVO Arena Wembley, was called by my Security 10 Supervisor to an incident that had occurred on the east terrace during the event.

When I arrived, I spoke directly with Security 10 Supervisor [REDACTED] who advised me on the situation, that there had been allegations the female had taken drugs in the seats – a search had been carried out and nothing was found on the female.

However, she had also been using racist language towards a group of young males who were sitting along from her in the seats.

I spoke with the group of 8 males concerned and they advise the female had been using racist language towards them and shouting "go back to where you came from" etc.

I apologised to them for what they had heard from another member of the public and that this was unacceptable to the venue. They returned to their seats satisfied that we were aware and dealing with the situation. They said they appreciated me coming to speak to them about it.

Once I had finished speaking to the young males, myself and Security 10 Supervisor then went to find the female who had been with 2 female SIA, Security 10A, [REDACTED], and one of the response team, [REDACTED], who had carried out the initial search and had taken the female to the toilet.

Once she was out of there, I authorised the ejection and she was walked out by Security 10A and the female member of the response team.

The female then came back to Door One at the front of the building as her coat was in the seating bay, Security 10A went back to get this, and it was taken to her.

At no time whilst I was present was there any physical assault to the female.

SIGNED: [REDACTED]

DATE: 1st March 2023



Incident Report

DATE: 15th March 2023

EVENT: Boxing 29/10/22

PERSON REPORTING: [REDACTED]

ROLE/POSITION: Operations Director, OVO Arena Wembley

LOCATION OF INCIDENT:

This statement (consisting of two page each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

I am the Operations Director for the OVO Arena Wembley, responsible for the Operations and Security of the venue, I also manage the front of house including customer services. I have worked at the arena for 22 years. I regularly investigate complaints which includes reading statements and viewing CCTV footage. I was informed of a complaint by a Ms B [REDACTED] that was forwarded to the venue's customer services inbox from OVO on 31st October. I carried out an initial investigation immediately in order to respond to Ms B [REDACTED] complaint. I implemented a document preservation protocol on 31st October 2022, in relation to CCTV footage and incident reports due to the initial complaint received. Venue CCTV was downloaded to preserve evidence of the incident, SIA bodycam footage as a protocol was downloaded immediately post event and this was reviewed and filed accordingly. I watched the bodycam footage and read all of the statements and clarified the facts of what appeared to have happened; I spoke to [REDACTED] about her account as the Operations Manager on the event.

Ms B [REDACTED] contacted the venue directly on 4th November at 16:50 referring to her initial complaint to OVO. In this email she stated that all communication must be via telephone but as she had emailed and for the preservation of evidence, I communicated in writing via our customer services inbox. Ms B [REDACTED] sent a further email, after receiving our automated response that is generated when customers contact our customer services inbox. This email was received at 17:35 and is written all in capitals.

As part of my initial investigation, I asked Centre Circle Management for a copy of the incident reports that had been done on the night, one had been completed on the night by the Security Supervisor, [REDACTED]. There was another report in progress on their iPad, but it had not been sent, this was [REDACTED]. I requested this and it was sent on 1st November 2022. At the time of initial complaint, I asked for Centre Circle management to contact [REDACTED] to provide further detail on the incident, which was received by email on 8th November and similarly [REDACTED] was contacted to provide a statement which was received on 7th November. In the initial investigation, I spoke with [REDACTED] who provided a verbal account of what happened. She became aware of an incident of customers complaining about an individual taking illegal substances in her seat, as [REDACTED] approached the area she was met with a group who had accused the complainant of racially abusing them and she authorised Ms B [REDACTED] ejection.

After viewing the evidence and talking to [REDACTED] who made direct contact with the customers who were the alleged victims of the complainant's racial abuse, the decision was made to not suspend either [REDACTED] or [REDACTED].

Once I had concluded my investigation, I supplied a detailed response to be sent via the customer services inbox – this was sent on 8th November where I refuted her allegations and informed her that her SAR request is being transferred to the police for their investigation. By transferring this to be dealt with through a police request for the data I believed that this fell within the crime and tax exemption to a DSAR. I believed that providing the CCTV and bodycam footage to anyone other than the police (even the claimant) could prejudice a potential legal matter while there was an active police investigation. I am aware of the contact Ms B [REDACTED] made on the 23rd Feb, however [REDACTED] picked up the investigation as instructed by ASM Global going forward.

On 9th November Ms B [REDACTED] contacted the venue in response to my reply. In this email Ms B [REDACTED] stated that she is claiming compensation and whilst a response was being prepared the venue received a press enquiry from My London. Ms B [REDACTED] had contacted them regarding her experience. I asked for advice from my General Manager who sought advice from the ASM Communications team, no comment was provided to the press and the email filed in Ms B [REDACTED] correspondence folder.

Ms B [REDACTED] took her complaint to the SIA and the police. The SIA visited the venue on the 16th of November and met with me to view all footage available, we also visited the locations of the incident. The officer left the venue satisfied with the evidence provided and stated that they will be in touch should they require any further assistance from us.

The venue ceased responding to the DSAR relating to the complaint due to the police investigation and their request for footage. This was explained in the outcome email sent to Ms B [REDACTED] by me via customer services on 8th November. I have provided input into the 2nd investigation; I spoke to [REDACTED] on the history of the complaint and where I had got to with it. We considered being joint investigators for the report, but the decision was made that as I had investigated and responded initially that I could be perceived to have already had a fixed view. To avoid any appearance of bias it was decided [REDACTED] should be the independent investigator. I agreed to provide this statement in relation to the historical aspects that I investigated

SIGNED: [REDACTED]

DATE: 16-03-23

VENUE CORRESPONDENCE WITH MET POLICE
(22 NOVEMBER 2022 - 4 DECEMBER 2022)

From: [REDACTED]@met.police.uk [REDACTED]@met.police.uk>
Sent: 04 December 2022 18:15
To: [REDACTED]@evoarena.co.uk>
Subject: RE: Met Police Report - 1929040/22

CAUTION:EXTERNAL EMAIL

Good evening [REDACTED]

Met Police have completed their investigation into the incident involving Ms [REDACTED] B [REDACTED] and the ejection from OVO ARENA.

I can confirm there is not going to be any further action in relation to this case and it will be closed.

Should you have any questions please do let me know.

Kind regards,

PC [REDACTED]
Police Constable | Response Team B (W) | Wembley
Tel: Internal: Mobile:

NIW NORTH WEST BCU
Barnet • Brent • Harrow

Wembley Police Station, 603 Harrow Road, London, HA0 2HH

From: [REDACTED]@ovoarena.co.uk>
Sent: 23 November 2022 17:00
To: [REDACTED] NW-CU [REDACTED]@met.police.uk>
Subject: RE: Met Police Report - 1929040/22

Good evening,

I have submitted the bodycam footage along with footage from our CCTV.

I do have another piece of CCTV from across the square but it wouldn't upload for some reason. More than happy to try again on alternative link. It is from the opposite side of the square and doesn't show much but I can try to reupload if you wish.

Also further to our conversation, the SIA Officer is:

[REDACTED]
Investigations Officer
Compliance and Inspections
London
+44 [REDACTED]

Please do keep up me updated with your investigation.

Many thanks,
[REDACTED]

From: [REDACTED]@met.police.uk [REDACTED]@met.police.uk>
Sent: 23 November 2022 15:17
To: [REDACTED]@ovoarena.co.uk>
Subject: RE: Met Police Report - 1929040/22

CAUTION: EXTERNAL EMAIL

Hi [REDACTED]

Thanks for your email. I have just tried to give you a call on the numbers below but cannot get through. Please let me know when is a good time to call you.

Kind regards,

From: [REDACTED]@ovoarena.co.uk>
Sent: 23 November 2022 14:39
To: [REDACTED] NW-CU [REDACTED]@met.police.uk>
Subject: RE: Met Police Report - 1929040/22

Hi [REDACTED]

I believe I know the incident that you refer to below.

We do have footage at the venue.

If you able to phone my mobile (below) so that I can verify, it is the incident I am thinking off that would be much appreciated. I can then upload the footage to your link for review.

Thanks,
[REDACTED]

2

From: [REDACTED]@met.police.uk [REDACTED]@met.police.uk>
Sent: 22 November 2022 12:42
To: OVO Arena Wembley Customer Services <customerservices@ovoarena.co.uk>
Subject: Met Police Report - 1929040/22

You don't often get email from [REDACTED]@met.police.uk. [Learn why this is important](#)

CAUTION:EXTERNAL EMAIL

Good afternoon,

I am the investigating officer in relation to an assault report received by a member of the public that attended an event at Wembley Arena on 29th October 2022.

It has been reported that she was assaulted by security staff working at the venue that evening. I have spoken with Managers at Centre Circle Security who have advised that the footage is retained at the venue rather than with the security team.

Please could you confirm if you have the footage available. If so, I will forward a link to you for the footage to be securely uploaded.

If you need further information please feel free to provide me with a contact number and I can give you a call.

Kind regards,

PC [REDACTED]
Police Constable | Response Team B (W) | Wembley
Tel: Internal: Mobile:
Wembley Police Station, 603 Harrow Road, London, HA0 2HH
Web: www.met.police.uk Email: [REDACTED]@met.police.uk

NW NORTH WEST BCU
Barnet • Brent • Harrow

Text Message
Fri 24 Feb at 15:32

Will your manager be calling me today?

I've just spoken to my boss (we've both been in separate meetings today). I've passed all the information across to head office and we'll back to you early next week. We're taking this very seriously and will investigate thoroughly

[REDACTED], CEO was



Text Message



[REDACTED], CEO was happy to speak to me. Noted that your boss doesn't value me enough to speak to me. Especially when I clearly have more SKATE in sports arenas, stadiums and events than any of you. The fact he doesn't want to apologise for the way I have been treated ESPECIALLY WORKING FOR YOU further demonstrates you need to lose the



Especially when I clearly have more SKATE in sports arenas, stadiums and events than any of you.

The fact he doesn't want to apologise for the way I have been treated ESPECIALLY WORKING FOR YOU further demonstrates you need to lose the licence.

Disgusting

You need to resign or be sacked



Text Message



This page is intentionally left blank



THE OVO ARENA WEMBLEY REMOVAL POLICY

The following information is a guideline to Sia security personnel working at the venue in regards to removing members of the public from the premises.

The guide is to be adhered to at all times and any deviation from the policy should be reported immediately.

There are 2 types of removal from the premises:

Voluntary Exit

A situation where an individual is asked to leave and they do without any physical contact or that they leave of their own accord due to an infringement of management policy, the law or premises licence.

Security Ejection

A situation where an individual is removed from the venue using minimum force techniques due to an infringement of management policy, the law or premises licence.

All staff who are required to perform physical removals from the building will be SIA approved personnel. They are to be trained in the minimum force techniques which should be provided by a recognised trainer or training establishment provided by their security company. The technique of restraint, removal and self-defence should all feature in the training and should be demonstrated in calm, non-violent and professional manner.

As a guide, the following activities could result in an individual being removed from the venue under either types of removal above:

- Not having a ticket
- Persistently sitting in the incorrect seat
- Trying to gain access to unauthorised areas i.e. backstage
- Allowing other guests into the building through entry points other than the designated entrances
- Racist, sexist, homophobic or any other inflammatory language
- Physical assault, or violent verbal abuse
- Contravention of either house rules (posted at entrances) specific event briefing instructions, the law or premises licence

There are certain occasions when removal of guests should not be made:

- When the individual is clearly under the age of 18
- When the individual is severely under the influence of drugs, alcohol (medical attention is required)
- When the individual is injured or disabled

The following process is one that should be adhered to at all times when making a removal:

- Inform supervisor of the situation
- Inform control of the possible need for removal
- Await the arrival of Ops1 or Ops2/Ops2A, if not already present. If the removal is requested by Ops 2/Ops2A then ensure Security 10/Patrol teams make the removal using minimum force techniques only
- No removals are to be made without the authority of Ops1, Ops2/Ops2A (unless the situation deems an immediate removal)
- Once the individual(s) have been removed, the external doors should be shut and no more contact to be made to the individual
- Control to inform External supervisors of planned removal to monitor individual(s) removed
- Immediately compile removal report giving times, area and description of individual(s) when completed incident report



SOP Dealing with Drugs and Drug Paraphernalia

| | |
|--------------------------|--|
| Version | Version 2 |
| Document Owner | [REDACTED], Operations Manager, The SSE Arena, Wembley |
| Document Reviewer | [REDACTED], Operations Director, OVO Arena Wembley |
| Review Date | July 2023 |

Procedure Description and Scope:

The handling of drug related articles carries an inherent risk to health and safety. This procedure relates to the finding, handling, and safe disposal of suspected illegally controlled drugs governed by the Misuse of Drugs Act 1971, legal drugs and substances and associated paraphernalia.

Illegal drugs definition: Illegal drugs are drugs which have limitations on their ownership or use by government and are illegal in certain situations (meaning a person is not allowed to have them).

| Step | Description of Action | Who is responsible? |
|----------|---|--|
| | A guest is suspected to be in possession of drugs whilst entering the Arena at the door or in the immediate external vicinity – concourse or Arena Square. This may be due to erratic behaviour, sweating, or trying to avoid security. | |
| 1 | The external security or security at the entrance will immediately inform their supervisor. | Security |
| 2 | If the guest is still external to the venue and if drugs dogs are deployed on the event, the person suspecting the guest to be in possession should radio the security working with the dog handler, to see whether the dog indicates on the individual. If the dog does not indicate, no further action is required. However, should the dog indicate, the search process below should be followed. If drugs dogs are not deployed for the event, external security should notify the turnstile supervisor of their suspicions for them to be searched prior to entering the venue. | Dog Handler (Romeo 1) All staff Security |
| 3 | The suspect is to be notified that search is a condition entry and if they refused to be searched, Security 10 to be called to reinforce the same message. If this is external with drugs dogs, the security has the power to confiscate the ticket immediately (or scan to not allow re-entry) and refuse entry into the building. | Security Security 10 |

| | | |
|---|--|---|
| | If the individual is at the turnstile and still refuses to be searched, Security 10 to confiscate their ticket (or scan it) and refuse entry. Ops 2 to be notified and incident report completed | Security 10 |
| 4 | If the guest is compliant Security on the door will search the individual. NB – the search must be conducted with a witness and the same sex search. | Security |
| 5 | If the suspect is found in possession of any suspected illegal substance or legal highs, they will be seized, and the suspect's details recorded along with ticket details. The suspect will not be permitted entry and removed from the Arena and their ticket taken where possible. The suspected drugs will be placed in a sealed evidence bag and given into Ops 1 along with all reports. If the individual is not compliant with the ejection/ refusal of entry, security 10 to be informed and is to attend the scene, to ensure the person is removed from the premises. | Security Security 10 |
| 6 | If the suspect is suspected to be under the influence of any controlled substance and is seeking medical assistance, they must be directed or taken to a first aid facility where they will be attended to by an appropriate medically trained member of staff. Security must remain for public order reasons. An incident report must be written by security, stating where they found the suspect and why they believe that they are under the influence of a controlled substance. Once Medical are happy that the individual is fit to leave the premises, they must inform Security 10 who will carry out the ejection | Security Medical Medical Security 10 |

Drugs found discarded

| | | |
|--|--|-------------------------------|
| | Where discarded suspected illegal substances are found within the Arena or our footprint the Steward/Security finding the drugs will inform a supervisor, who will seize the drugs, write an incident report. The drugs must be sealed in an evidence bag, which are available from Ops 1. The evidence bag is handed to Ops 1 for safe storage | Steward/Security Ops 1 |
|--|--|-------------------------------|

Large quantities of illegal substances

| | | |
|--|--|------------------|
| | If during the search process as per above a large number of illegal substance(s) are found security 10 must be called. The guests will be asked to stand to one side until security 10 arrives. Security 10 will explain to the guest that the quantity | Steward/Security |
|--|--|------------------|

| | | |
|--|--|---|
| | <p>found, is deemed to be more than 'personal use'. Security 10 will inform ops 1 and ops 2 who will attend the scene and make the decision to call the police.</p> <p>If deemed appropriate control will be informed and asked to call the police. Security 10 will detain the guest until the police arrive.</p> | <p>Security 10</p> <p>Ops 1</p> <p>Control</p> <p>Security 10</p> |
|--|--|---|

Suspected drug paraphernalia found:

| | | |
|--|---|---|
| | <p>Suspected drug paraphernalia found:</p> <p>When drug paraphernalia is found or handed in to any SSE Arena, Wembley employee or contractor, care must be taken in relation to the safe disposal of the items.</p> <p>Needles are a significant risk and to prevent needle stick injuries, needles must be disposed of in a sharps box. When available, needles will be disposed of by the specially trained cleaning or medical team. When unavailable, needles will be disposed of under the supervision of Ops 1. Once identified, needles must not be left unattended prior to disposal and removal.</p> <p>All other paraphernalia will be disposed of under the guidance of a cleaner supervisor/ manager, and where necessary the area where the items are found will be cordoned off until the items are safely removed.</p> <p>When handling paraphernalia, staff must wear protective gloves to provide maximum protection.</p> <p>If any person suffers a needle stick injury, the affected area must be washed thoroughly in hot soapy water and medical advice sought.</p> <p>An incident report is to be completed.</p> | <p>All staff</p> <p>All contractors</p> |
|--|---|---|

This page is intentionally left blank

SOP

Searching

| | |
|-----------------------|--|
| Version | Version 2 |
| Document Owner | ██████████, Operations Manager, The OVO Arena, Wembley |
| Review Date | February 2022 |

Document review

| | |
|---------------|--------------------|
| Last reviewed | Position |
| Becky Syrett | Operations Manager |
| Noel Deady | Security Manager |

Version history

| Version | Date released | Originator | Authorised | Comments |
|---------|---------------|------------|------------|----------|
| V.01 | 20/02/21 | ██████████ | | |
| V.02 | 23/03/2022 | ██████████ | | |

Procedure Scope & Objectives

This document outlines the process that frontline staff should follow when carrying out searching on spectators during ingress. Searching is a condition of entry and if a patron refuses it is reasonable grounds not to allow them entry into the Arena. Any patron entering the Arena can be searched, even if they are under 16. The document outlines how The OVO Arena, Wembley will manage the searching process to ensure a safe and secure environment for all visitors, spectators, and guest during ingress.

All search security MUST note:

Any person may be searched upon entry into the Arena as condition of entry, or at any time within the venue. Each event is assessed according to the threat and risk and intelligence. This will determine the level of searching required for the event. As a minimum standard The OVO Arena, Wembley will always search 100%bags. Mag arches are set up at each entrance and will be utilised on all events. Search wands may be used.

All searches should be conducted with proper regard to culture, disability awareness and diversity and all searches must be conducted sensitively by treating the person to be searched in a respectful manner. Special consideration must be given to patrons who are in religious dress or pregnant.

Under 16-year-olds may be searched if there is intelligence or grounds to believe a search is necessary. They must be searched in the presence of two members of security staff and if possible, the young person's parents/guardian should witness the search. Should the young person and/or parents object to a search, the individual will be refused entry in line with the ground regulations. Occasionally it is necessary to search a patron who has a form of disability. Should a wheelchair user present themselves at the turnstile, the wheelchair must also be searched along with the spectator.

Consideration must be given and discretion to those who bring medication to the venue. Seek advice from a supervisor but its common practice for these guests to contact the venue prior to arriving and they will be directed to Door 1 to ensure they are able to bring in the medication that they require.

- If the search is targeted, particular attention to the customer profile is required by the search teams. When looking at customer profiles, the customer's actions and clothing will influence the search team's selection process as to whether they be searched or not.
- Guests, visitors, and spectators in possession of a bag will need to be searched. Bag searches will be undertaken on a self-search basis and all search teams must be very aware that they must not put their hands into any person's bag. Search gloves will be supplied. Bags should be opened by the spectator, and they should move their own items around to ensure that the search steward has visibility of the contents within the bag.
- Female guests, visitors and spectators require a female security present to carry out a body search. Female searchers, however, can search a male spectator if the spectator agrees to it. Bags may be searched by any sex security.
- Disabled spectators may also be required to be searched. This will be undertaken with a colleague present. Security must explain that the individual is subject to a search but must consider any mobility restrictions and must be sensitive to the individual.

Prosthetics

Where prosthetics or any other mechanical or muscle-controlled devices are involved; medical supervision must be sought before a search can be undertaken. If the venue is notified prior to the event, this detail will be in the briefing documentation and customer will be directed to Door 1.

Wheelchairs

Where wheelchairs are involved, the searcher must consider the physical and mental limitations of the subject prior to undertaking the search. The subject may have a form of paralysis and therefore the searcher must communicate clearly and concisely with the subject

Visual impairment

When searching subjects who have a visual impairment, the searcher will need to inform the subject that they are a search security officer and will need to subject them to brief search and give the reasons why. The same search procedure must be adhered to.

Hearing impairment

When searching subjects who have a hearing impairment, depending on the environment in which the search is taking place you may be required to communicate via writing to ensure that the subject fully understands the procedure.

Walking Aids

In the event of searching a subject who uses aids to be mobile the officer will need to be sensitive and consider the subject. Some walking aids can conceal forbidden articles.

Flags

Flags are a known item that spectators may bring to events at Arena depending on the nature of the event. We will be as accommodating as possible, but we will not permit flag poles into the venue or flags and signs that display offensive content. If the content is in a foreign language and we cannot determine whether it is offensive, it will not be permitted into the venue.

Linked Documents

Step by Step Procedure

| STEP | DESCRIPTION OF ACTION | RESPONSIBILITY |
|------|---|---|
| 1 | Search Security officers must ask the subject, prior to the search, if they have anything in their possession that may harm the Search Steward or others during the search. | Search Security Officer |
| 1a | If the subject states that they have any needles or other sharps, they must be asked to remove them from their pockets themselves. If the sharp is not in their possession for medical purposes, it will not be permitted into the venue. The sharp will be confiscated and handed to a member of the medical team to place in a sharps bin. | Search Steward Medical Team |
| 2 | Prior to conducting a search, the officer must ask permission to search, and clearly explain the search process and the grounds if asked | Search Security Officer |
| 2a | The officer must continually explain their actions throughout the search process. If patron is compliant, move to step 10. | Search Security Officer |
| 3 | If patron refuses to be searched the searcher will warn them that search is a condition of entry and refusal to be searched will result in them being refused entry into the venue | Search Security Officer |
| 6 | If the spectator still refuses to be searched, the searcher must notify their supervisor, who will further explain the condition of entry to the person and inform them that a failure to be searched will result in refusal of entry | Search Security Officer Turnstile Supervisor |
| 7 | <p>If the spectator still refuses to be searched the Supervisor will inform the person that they will be removed from the venue. Supervisor to inform Ops 2 and control on the situation and request permission to refuse entry.</p> <p>Control to monitor on CCTV and deploy Response to be hand. Control to inform the External Team</p> <p>Ops 2 may choose to speak to patron directly or give permission.</p> <p>If permission given, depending on the entrance the patron will either be passed out via an alternative door or will be walked out of the entrance. Details to be recorded on an ejection form and</p> | <p>Turnstile Supervisor</p> <p>Control</p> <p>Ops 2</p> <p>Turnstile Supervisor Response team</p> |

| | | |
|----|--|-------------------------|
| | the patrons ticket requested and retained once the person has been rejected | |
| 8 | Should the ejected person continue to remain outside the external team will be deployed to move on and to prevent any disorder | Control External |
| 10 | In order to search the spectator methodically, it will be necessary to imagine a vertical line running down from the top of the spectator's head to between their feet. The search steward is then able, whilst controlling the spectator's left or right arm to conduct a systematic search | Search Security Officer |
| 11 | The search will require a stroking and squeezing movement along the arms body and leg as opposed to a pat down (unless required from the promoter) this will ensure that all items that are secreted on the subject maybe found. | Search Security Officer |
| 12 | If a prohibited article is found on the spectator notify the Steward Supervisor immediately and follow the SOP for prohibited articles | Search Security Officer |