# **Public Document Pack**



# Alcohol and Entertainment Licensing Sub-Committee

# Thursday 2 October 2025 at 10.00 am

The meeting will be open for the press and public to follow via the live webcast available HERE

# Membership:

Members Substitute Members:

Councillors: Councillors:

Ahmed (Chair) Akram, Bajwa, Chohan, Hylton, Mahmood,

Long Rajan-Seelan, L Smith Clinton

For further information contact: Devbai Bhanji, Governance Assistant

Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes and agendas please visit: Council meetings and decision making | Brent Council



# **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 of 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 a New Premises Licence by DS Laser Clinic Ltd for 1 - 57 the premises known as DS Laser Clinic, 758 Harrow Road, NW10 5LE, pursuant to the provisions of the Licensing Act 2003



#### **LICENSING ACT 2003**

# **Application for a New Premises Licence**

# 1. The Application

Name of Applicant:	DS Laser Clinic Ltd
Name & Address of Premises:	DS Laser Clinic, 758 Harrow Road, NW10 5LE
Applicants Agent:	

### 1. Application

The application is for a new premises licence as follows:

To provide: the sale of alcohol and to remain open from 10.00am to 7.00pm Monday to Sunday.

#### 2. Background

None

# 3. Promotion of the Licensing Objectives

See pages 18 & 22 of the application.

# 4. Relevant Representations

Representations have been received and withdrawn from the Police. Representations remain outstanding from the Licensing Officer.

# 5. Interested Parties

None

#### 6. Policy Considerations

#### Policy 1 - Process for Applications

Conditions on the licence, additional to those voluntarily sought/agreed by the applicant, may be considered. Conditions will focus on matters which are within the control of individual licensee and which relate to the premises or areas being used for licensable activities, the potential impact of the resulting activities in the vicinity. If situations arise where the licensing objectives may be undermined but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be granted or continue to operate.

# 7. Determination of Application

Members can take the following steps when determining a new premises licence application:

- grant the licence;
- exclude from the scope of the licence any of the licensable activities to which the application relates;
- refuse to specify a person in the licence as the premises supervisor;
- reject the application

# 8. Associated Papers

- A. Application Form & plan
- B. Licensing Rep
- C. Police Rep & Withdrawal
- D. OS Map

# Application for a premises licence to be granted under the Licensing Act 2003

# Please read the following instructions first

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You n	nay v	vish to keep a copy of the completed form	for yo	ur records.		
I/We						
apply premi applic of the	for ises cation	ert name(s) of applicant) a premises licence under section 17 of described in Part 1 below (the premise n to you as the relevant licensing author ensing Act 2003 remises details	s) and	l I/we are ma	king this	
Post	al ac	Idress of premises or, if none, ordnance so	urvey	map referenc	e or description	
Pos	t tow	/n		Postcode		
Tele	phor	ne number at premises (if any)				
Non-	-dom	estic rateable value of premises £				
	e sta	oplicant details te whether you are applying for a premise te	s licer	nce as P	lease tick as	
a)	a) an individual or individuals * please complete section (A					
b)	ар	erson other than an individual *				
	i	as a limited company/limited liability partnership		please comp	olete section (B)	
	ii	as a partnership (other than limited liability)		please comp	olete section (B)	
	iii	as an unincorporated association or		please comp	olete section (B)	
	iv	other (for example a statutory		please comp	olete section (B)	

corporation)

c)	a recognised club	please complete section (B)
d)	a charity	please complete section (B)
e)	the proprietor of an educational establishment	please complete section (B)
f)	a health service body	please complete section (B)
g)	a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales	please complete section (B)
ga)	a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England	please complete section (B)
h)	the chief officer of police of a police force in England and Wales	please complete section (B)

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or
- I am making the application pursuant to a
- statutory function or
- a function discharged by virtue of Her Majesty's prerogative

# (A) individual applicants (fill in as applicable)

Title							
Surname							
First names							
Date of birth				I am 1	8 year old or	over	
Nationality							
Current resident different from paddress		ess if					
Post town					Postcode		
Daytime conta telephone nun							
E-mail address (optional)	6						

<sup>\*</sup> If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

							applicant by	ce online right to that service
Second inc	dividual ap	<b>plicant</b> (if	í applic	able	<b>;)</b>			
Mr	Mrs	Mi	iss	1	Ms		her Title r example, v)	
Surname					First na	<u> </u>	<i>'</i>	
Date of bir	rth		l a	am 1	18 years o	old	Plea	ase tick yes
Nationality	y			_				
Current res address if o premises a	different fro	om						
Post town				_			Postcode	
Daytime c number	ontact tele	phone				_		
E-mail add (optional)								
work check		e), the 'shar	re code				e Home Offic applicant by	ce online right to that service:
appropriate other joint v address of	vide name a e please giv	ve any reg ther than a	gistered a body	d nu	ımber. İr	n the	cant in full. Ve case of a passe give the r	artnership or
Name								
Address								
Registered	d number (w	/here appli	cable)					

D ' ' ' ' ' ' ' ' ' ' ' ' ' ' '		
Description of applicant (for exassociation etc.)	xample, partnersnip, company	/, unincorporated
·		
Telephone number (if any)		
E-mail address (optional)		
Part 3 Operating Schedule		
When do you want the premis	es licence to start?	DD MM YYYY
If you wish the licence to be vowhen do you want it to end?	alid only for a limited period,	DD MM YYYY
Please give a general descrip	tion of the promises (please r	oad guidanco noto 1)
riease give a general descrip	uon or the premises (please n	ead guidance note 1)

	What licensable activities do you intend to carry on from the premises?  (please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)					
Pro	vision of regulated entertainment (please read guidance note	Please tick all that apply				
a)	plays (if ticking yes, fill in box A)					
b)	films (if ticking yes, fill in box B)					
c)	indoor sporting events (if ticking yes, fill in box C)					
d) boxing or wrestling entertainment (if ticking yes, fill in box D)						
e)	e) live music (if ticking yes, fill in box E)					
f)	recorded music (if ticking yes, fill in box F)					
g)	performances of dance (if ticking yes, fill in box G)					
h)	h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)					
Provision of late night refreshment (if ticking yes, fill in box I)						
Sup	oply of alcohol (if ticking yes, fill in box J)					

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

In all cases complete boxes K, L and M

Standa timings	pply of alcohol ndard days and ings (please read dance note 7)		Will the supply of alcohol be for consumption – please tick (please read guidance note 8)	
Day	Start	Finish		
Mon			State any seasonal variations for the sup (please read guidance note 5)	ply of alcohol
Tue				
Wed				
Thur				
Fri			Non standard timings. Where you intend premises for the supply of alcohol at difference listed in the column on the left, ple	erent times to
Sat			read guidance note 6)	
Sun				

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):

	ı

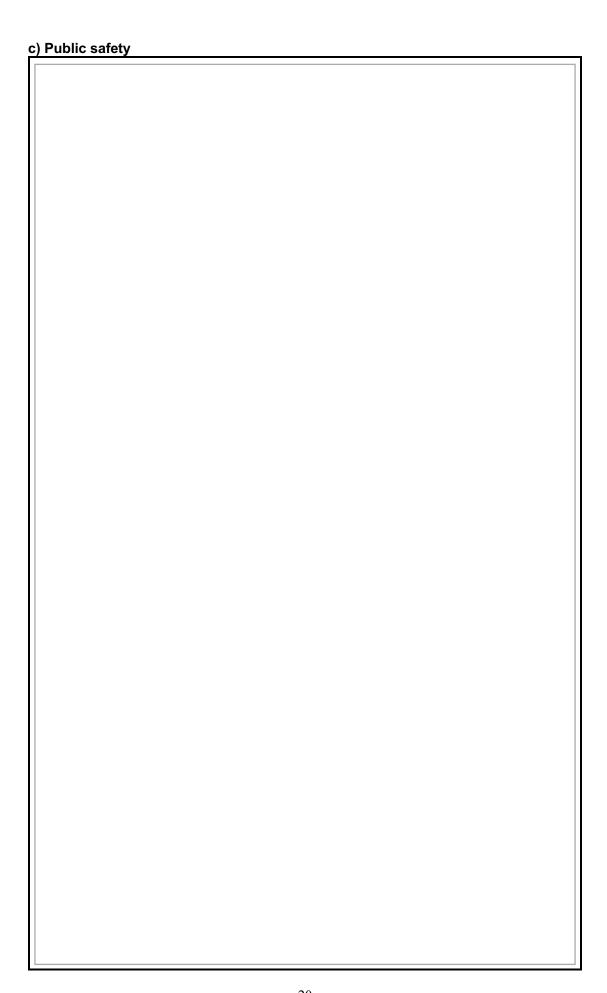
concern in res	matters ancillary pect of children (p	olease read guid	lance note 9).	

L

open to Standa timings	premise to the put ard days is (please conte	ublic and read	State any seasonal variations (please read guidance note 5)
Day	Start	Finish	
Mon			
Tue			
Wed			Non standard timings. Where you intend to use the Non standard timings. Where you intend the premises to be open to the public at different times from those listed in
Thur			the column on the left, please list (please read guidance note 6)
Fri			
Sat			
Sun			

IVI
Describe the steps you intend to take to promote the four licensing objectives:
a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

The preven	tion of crime and	disorder		



<u>d)</u>	The prevention of public nuisance

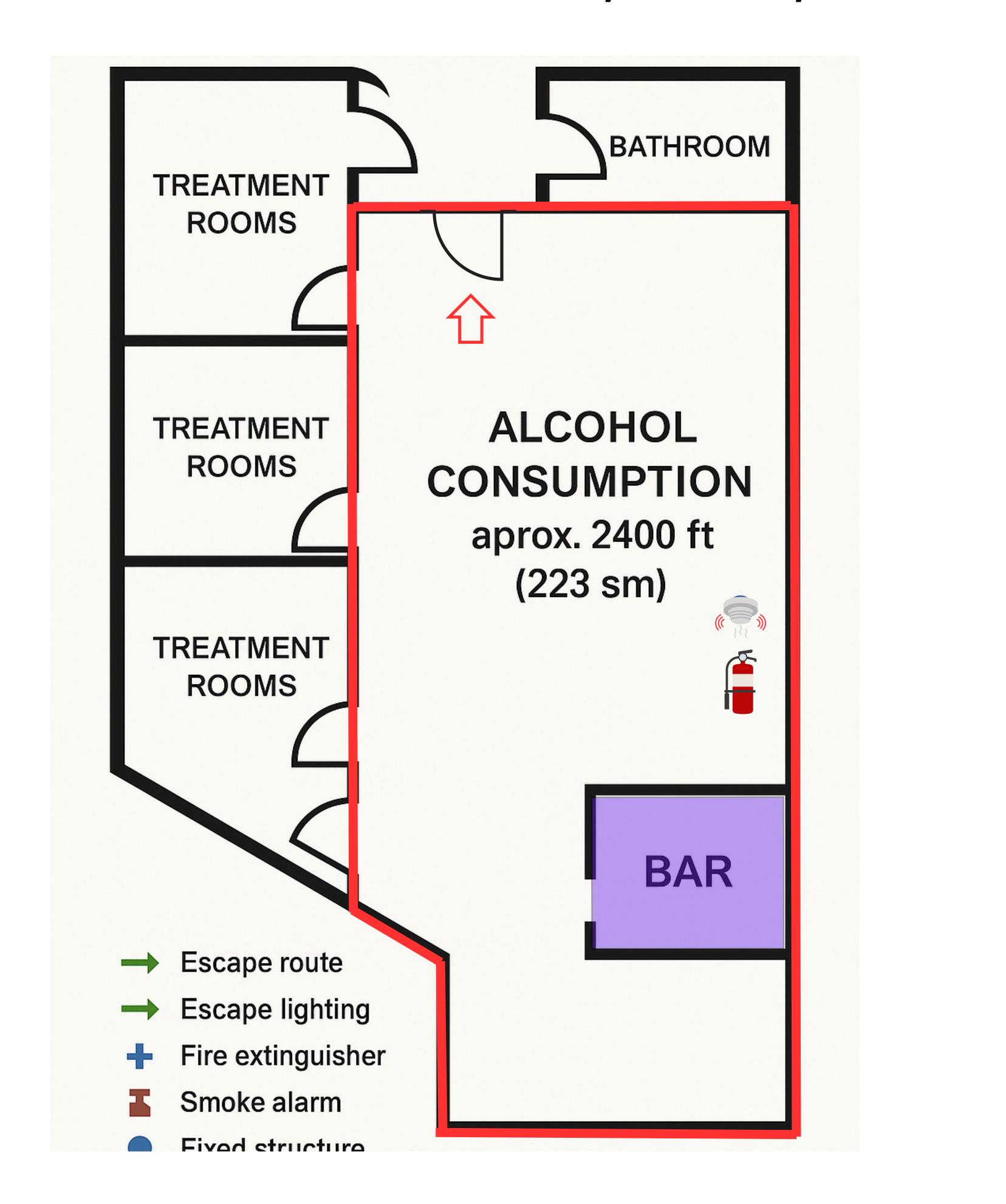
E	) The protection of children from harm	

# Part 4 – Signatures (please read guidance note 11)

Signature of applicant or applicant's solicitor or other duly authorised agent (see guidance note 12). If signing on behalf of the applicant, please state in what capacity.

Declaration	<ul> <li>[Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).</li> <li>The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, or have conducted an online right to work check using the Home Office online right to work checking service which confirmed their right to work (please see note 15)</li> </ul>
Signature	
Date	
Capacity	
authorised age	ations, signature of 2 <sup>nd</sup> applicant or 2 <sup>nd</sup> applicant's solicitor or other nt (please read guidance note 13). If signing on behalf of the se state in what capacity.
authorised age	nt (please read guidance note 13). If signing on behalf of the
authorised age applicant, pleas	nt (please read guidance note 13). If signing on behalf of the
authorised age applicant, pleas Signature	nt (please read guidance note 13). If signing on behalf of the
Signature Date Capacity Contact name	nt (please read guidance note 13). If signing on behalf of the
Signature Date Capacity Contact name	nt (please read guidance note 13). If signing on behalf of the se state in what capacity.  (where not previously given) and postal address for correspondence
Signature  Date  Capacity  Contact name associated with	the (please read guidance note 13). If signing on behalf of the se state in what capacity.  (where not previously given) and postal address for correspondence in this application (please read guidance note 14)  Postcode
Signature  Date  Capacity  Contact name associated with  Post town  Telephone num	the (please read guidance note 13). If signing on behalf of the se state in what capacity.  (where not previously given) and postal address for correspondence in this application (please read guidance note 14)  Postcode

# 758 Harrow Road, London, NW10 5LE



Supply of alcohol

Fire alarm

Fire extinguisher

Reception desk/bar

Fire exit

**Scale**: 1:100 @ A1

This page is intentionally left blank



Brent Civic Centre Engineers Way Wembley Middlesex HA9 0FJ

TEL 020 8937 5303

EMAIL esther.chan@brent.gov.uk

WEB www.brent.gov.uk

Shantelle Clarke D S Laser Clinic Ltd 102 Harley Street London W1G 7JB

20 August 2025

Our Ref: 35548

Dear Shantelle Clarke,

# Licensing Representation to the Initial Application for the Premises Licence at D S Laser Clinic Ltd, 758 Harrow Road, NW10 5LE

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

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

The application has been made for a new premises licence under section 17 of the Act. The Licensing Authority representations are primarily concerned with the four licensing objectives;

- the prevention of crime and disorder:
- public safety;
- the prevention of public nuisance; and
- the protection of children from harm.

Following a detailed assessment of your recent application for a new premises licence, the Licensing Authority wishes to raise a number of concerns relating to the promotion of the licensing objectives, with particular emphasis on public safety.

Upon review of the documentation submitted to date, it has been noted that there are discrepancies concerning the occasions during which alcohol is being provided to clients and whether alcohol should be provided to clients receiving 'non invasive treatments'. These inconsistencies raise concerns as to whether licensable activities are being conducted in accordance with promoting the licensing objectives.

The Licensing Authority sent an an initial email on 28 July 2025 in seek of clarification regarding various aspects of the application.

Ms Clarke responds the following questions:

# 1. Sub-Tenancy Agreement

We are the licence holder of the premises, and one attached the sub tenancy/licence.

- 2. List of Special Treatments Provided, we are a doctor led skin clinic. The treatments provided at the clinic include:
- o Laser hair removal
- o Skin resurfacing
- o Chemical peels
- o Microneedling
- o Injectables (Botox and dermal fillers)
- o PRP (Platelet-Rich Plasma) therapy
- o Skin rejuvenation and tightening treatments (e.g. Sofwave, Morpheus8)

A full treatment list and their respective protocols are available upon request.

#### Use of Treatment Rooms

Yes, we occupy and operate from all the treatment rooms illustrated in the plan.

# 4. Type of Alcohol Provided to Clients

We may offer a complimentary glass of prosecco or non-alcoholic alternative to clients as part of their experience, <u>strictly post-treatment</u> and only where medically appropriate.

#### 5. Trading Name

Yes, the trading name is Diamond Skin. Limited company name DIAMOND SKIN KNIGHTSBRIDGE LTD

This different to applicant on the application. Ms Clarke confirmed that she would like to keep D S Laser Clinic Ltd as the proposed licence holder.

#### 6. Customer Alcohol Assessment

Alcohol is <u>never offered prior</u> to any treatment. All clients complete a full medical consultation form and are assessed by a qualified practitioner before any service is carried out. Alcohol is only offered post-treatment to clients who have been deemed medically fit and only when it does not contraindicate the procedure they have received.

#### 7. Risk Assessment

A full risk assessment has been carried out for all treatments and clinic operations. We can provide a copy upon request or upload this to the licensing portal if required.

It has been noted that the risks and hazards related to the supply of alcohol were not mentioned on the risk assessment.

# 8. Other Businesses at the Address

Diamond Skin is trading form this address and Savannah beauty is in a different section which has been patrician off from my section.

The Council were made aware that 'Savannah Private Spa' is operating at the same address.

On 31 July 2025, Ms Clarke responded to questions raised by the Licensing Authority with a copy of an updated risk assessment following our telephone conversation on Tuesday 29 July 2025.

#### Business Model – Alcohol Provision and Events

At D S Laser Clinic Ltd, we provide high-end medical-aesthetic treatments in a professional clinical setting. Alcohol is not central to our business model but may be sold as part of an elevated client experience during specific moments, such as:

- "Skin Days" and promotional events, where clients attend for consultations, product demonstrations, and educational sessions
- Waiting area hospitality, where clients or their guests are offered a drink while awaiting treatment or relaxing post-treatment
- Treatment package enhancements, where alcohol may be included in premium service bundles for eligible clients

All alcohol will be offered and consumed in designated non-clinical areas (e.g., waiting room, hospitality lounge) and never within treatment rooms. No self-service is permitted.

# Treatment Policy – Alcohol Eligibility

To protect client safety and remain fully compliant with our medical obligations, we have conducted a detailed risk assessment and developed a treatment-specific alcohol policy:

#### Treatments Where Alcohol Can Be Offered

(Alcohol may be offered before or after treatment, subject to staff discretion)

- Skin consultations
- Hydrafacials
- LED light therapy
- Oxygen facials
- Diamond microdermabrasion
- Dermaplaning
- Enzyme peels (non-medical grade)
- Non-invasive body contouring (no numbing or downtime)
- Skin analysis sessions (e.g., dermascope imaging)
- Post-treatment relaxation for non-invasive procedures
- Guests or companions not receiving treatment

Treatments Where Alcohol Will Not Be Offered (Alcohol is strictly prohibited before or after these services)

- Injectables (e.g., Botox, dermal fillers, Profhilo)
- Laser treatments PicoWay, Fraxel, tattoo/pigmentation/hair removal
- IV Drips (e.g., Glutathione, Vitamin C, Stem Cell Therapy)
- CO2 laser resurfacing
- Morpheus8 and RF microneedling
- SoftWave and ultrasound skin tightening
- Chemical peels (medium to deep strength)
- Any treatment involving topical anaesthesia
- Any treatment requiring medical clearance or with systemic effects
- Pregnant or breastfeeding clients
- Clients showing signs of intoxication

Clients are verbally informed and sign treatment consent forms confirming they have not consumed alcohol prior to undergoing any contraindicated procedure.

#### Excessive Alcohol Consumption – Risk Mitigation

Alcohol will be offered in a controlled, professional, and measured manner:

- Only selected low-ABV drinks (e.g., prosecco, wine, cocktails, champagne) will be available
- Clients and guests may be offered a maximum of one to two small servings, based on staff discretion
- Alcohol will be measured or served in pre-portioned bottles
- No excessive or irresponsible consumption will be allowed under any circumstances

#### Premises Capacity (Fire Risk Assessment)

The total number of people expected at the premises, including staff and clients, is approximately **10 individuals at any one time**. This aligns with our fire safety planning and evacuation procedures.

#### Staff Training – Internal and External Delivery

All staff involved in the service or sale of alcohol will receive both in-house training and access to external qualifications as appropriate.

Internal Training – Delivered by Shantelle Clarke

- Licensing Act 2003 essentials
- Challenge 25 and ID checking
- Clinical risk awareness (treatments where alcohol is prohibited)
- Signs of intoxication and refusal of service
- Incident reporting and recordkeeping

Training is provided to all new staff and refreshed at regular intervals. Staff will sign a declaration confirming their understanding of the alcohol policy.

External Training (Optional but Encouraged)

Staff will also be directed to relevant accredited courses, such as:

- BIIAB Level 1 Award in Responsible Alcohol Retailing
- Personal Licence Holder (APLH) certification, where applicable

This dual approach ensures staff are trained both in the clinical nuances of our setting and in the legal requirements of alcohol licensing.

The Licensing Authority have concerns in respect of the following:

# **Comments**

#### **Business Model**

Ms Clarke states there is a 'waiting area' hospitality, where clients or their guests are offered a drink while awaiting treatment or relaxing post-treatment.

It is generally recommended to avoid alcohol for a period of time before and after cosmetic treatments such as laser hair removal, skin resurfacing, Botox, and PRP therapy etc. Alcohol may trigger increased risk of bruising and swelling, delayed healing, interference with treatment effects, increased risk of infection and impaired judgment and coordination. Alcohol can affect cognitive function and physical coordination, potentially leading to accidental injury to the treated area or improper aftercare.

1. Alcohol Consumption in Relation to Treatments

As mnetioned, it appears that customers are permitted to consume alcohol both prior to and following non-invasive treatments at the discretion of staff. However, despite the categorisation of certain procedures as non-invasive, there is conflicting information suggesting that alcohol should not be provided under any circumstances. Examples supporting this are outlined below.

#### **LED Light Therapy**

• Why it matters: Alcohol can dehydrate the skin and increase sensitivity.

• **Risk:** May cause redness or irritation after LED therapy, especially if skin is already inflamed.

#### **Diamond Microdermabrasion**

- Why it matters: This treatment exfoliates the outer layer of the skin, which can already be sensitive.
- **Risk:** Alcohol thins the blood and increases inflammation and bruising, which could worsen redness or prolong recovery time.

#### **Dermaplaning**

- Why it matters: This involves shaving off the top layer of skin and fine hairs.
- **Risk:** Alcohol can lead to flushed, reactive skin, making the treatment more irritating or increasing the risk of microtears and post-treatment breakouts.

#### 2. Inadequate Risk Assessment

The current risk assessment fails to adequately address or outline the potential risks associated with the supply and consumption of alcohol on the premises. A comprehensive evaluation of the implications and safety concerns related to offering alcohol in a treatment setting is lacking.

#### 3. Inconsistencies in Information Provided

Ms Clarke initially indicated that only Prosecco is served to clients. However, in her most recent correspondence, she refers to the provision of "only selected low-ABV drinks (e.g., prosecco, wine, cocktails, champagne") will be available Upon review, the types of alcohol provided do not meet the standard definition of low-volume alcohol, leading to concerns regarding the accuracy of the information disclosed.

#### Low ABV Alcohol

Typically refers to drinks with 3.5% ABV or less, but sometimes anything under 5%-6% ABV is considered low.

#### Categories of Alcohol by ABV:

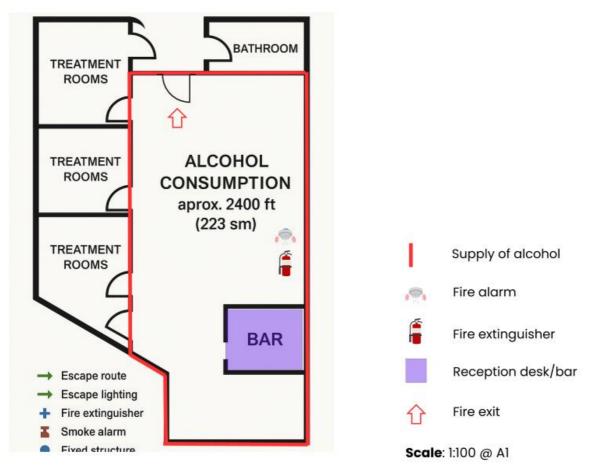
Category	ABV Range	Examples
Non-alcoholic	0.0% - 0.5%	NA beers, mocktails
Low ABV	0.5% – 4.0% (or up to 5%)	Light beers, spritzers, some hard seltzers
Standard beer	4.5% – 6%	Most lagers, IPAs
Strong beers	7% – 12%+	Imperial stouts, double IPAs, sparkling wine
Wines	9% – 16%	Table wines, dessert wines,
		champagne
Spirits	35% – 50%+	Vodka, gin, whiskey

#### 4. Client Consumption Areas

Ms Clarke has referenced the existence of a waiting area or lounge intended for clients or guests to consume alcohol. However, upon review of the submitted premises plan, there is no designated area clearly identified for this purpose.

#### **Proposed Plan**





An attempted site visit by the Licensing Authority on Monday 28 July 2025 revealed that the premises were closed at the time of inspection.

Subsequently, an email was sent to Ms Clarke on 13 August 2025 requesting images of the premises. As of the date of this report, no images have been provided in response to this request.

The submission of current and accurate images is essential for the Authority to assess the suitability of the premises in relation to public safety and operational standards

# **Conclusion**

There are several inconsistencies and gaps in the information provided regarding the supply and consumption of alcohol on the premises. Additionally, the lack of a clear risk assessment and absence of a designated lounge area for alcohol consumption are causes for concern. Further investigation and clarification are required to ensure how the applicant can safeguard customer wellbeing and promote the licenisng objectives.

Until these matters are satisfactorily addressed, the Licensing Authority is unable to progress your application further and recommend **refusal** of the application.

Yours sincerely,

Esther Chan



Licensing Inspector Regulatory Services



# Working together for a safer London

#### TERRITORIAL POLICING

Ms Shantelle Clarke
DS Laser Clinic Ltd
758, Harrow Road,
Kilburn
NW10 5LE

**Tel:** 07500 087 115

603, Harrow Road

Wembley

HA0 2HH

Wembley Police Station

Email: Phil.S.Graves@met.police.uk

**NW BCU Licensing Department - Brent** 

Web: www.met.police.uk

Your Ref: 35548

*Our ref:* 01QK/4458/25/3122NW

Date: Sunday 17th of August 2025

Police representations to the application for a new Premises Licence for 'DS Laser Clinic Ltd, 758, Harrow Road, Kilburn NW10 5LE '

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

Police are of the opinion that the risk to the Council's objectives can be mitigated by removing the requested variations or attaching conditions to the Licence as shown below. If these conditions were accepted in full, police would be in a position to withdraw their representations.

Officer: PC Phil Graves
Licensing Constable 3122NW

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

The application has been made for a new premises licence under section 17 of the Licensing act 2003. The Police representations are concerned with all four of the licensing objectives, namely:

- The prevention of crime and disorder;
  - Public safety;
- The prevention of public nuisance; and
- The protection of children from harm.

# **The Application**

The application is to add the sale of alcohol to customers attending DS Laser Clinic on the Harrow Road. The applicant details how this would only be to a very small number of customers during trading hours of 10.00 to 19.00 hours Monday through to Sunday.

With the appropriate conditions in place that only alcohol is supplied / sold to customers attending the clinic police will support the application.

#### **Personal License Holder**

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

#### **Closed Circuit Television (CCTV)**

Good quality CCTV is a basic requirement to help deter and detect criminal activity for all reputable license holders. Therefore, a decent quality CCTV system is an essential tool and should be installed and maintained in accordance with Home Office Guidance. The system should be fully operational during the hours of business, with a member of staff present who can operate and if required download footage upon request of the police or other recognised authority.

Notices should also be displayed advertising the presence of the CCTV to help promote a secure and safe working environment.

#### **Police Representations**

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

- 1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for <u>31 days</u> and shall be made available to police and authorised Officers from Brent Council upon request.
- 2. CCTV camera shall be installed to cover all the entrances and exits of the premises
- 3. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading. This staff member shall be capable of making copies and downloading any footage immediately requested by the police of authorised Brent council officials.
- 4. The CCTV system shall display on any recordings the correct date and time of the recording.
- 5. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulder image of every person entering or leaving the premises and all areas where alcohol is sold from.
- 6. A suitable intruder alarm complete with panic button shall be fitted and maintained.
- 7. A 'Challenge 25' policy shall be adopted and adhered to at all times.
- 8. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent Council of the police, which will record the following:
- a) Any complaints received.
- b) Any incidents of disorder.
- c) Any faults in the CCTV system.
- d) Any visit by a relevant authority or emergency service.

Any inputs recorded in this log shall be done within 24 hours of the incident

9. A refusal book detailing date and time of the refused sale (of alcohol), the name of the person refusing the sale and a description of the person attempting to purchase alcohol, shall be kept and maintained and made available for inspection by authorised officers from Brent Council or the police.

Any inputs recorded in this log shall be done within 24 hours of the incident

- 10. Training records of all staff that sell or serve alcohol shall be kept. This training shall be done at least once a year for each individual staff member. The training records shall detail: -
  - (a) Staff member's name, signature and date
  - (b) Name of person providing the training
  - (c) Training on use of the incident log
  - (d) Training on refusal of sale
  - (e) Training on challenge 25 policy
  - (f) Training on the use and downloading (providing copies) of the CCTV system
- 11. A copy of the premises licence summary including the hours which licensable activities are permitted shall be visible from the outside of each entrance to the premises.
- 12. The maximum number of people within the premises including staff and customers shall be fifteen (15) people.
- 13. Only customers attending the clinic shall be served alcohol. There shall be no sale or supply of alcohol to any other person(s).
- 14. Customers shall not be knowingly permitted to leave the premises in possession of open containers of alcohol as defined on the plan submitted with the operating schedule to and approved by the Licensing Authority.
- 15. Acceptable proof of age shall include identification bearing the customer's photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport. No ID No delivery.
- 16. There shall be no self-service of alcohol on the premises. Alcohol shall only be supplied / served by staff at the venue

If the above conditions are met in full, police would be able to withdraw representations.

Yours Sincerely,

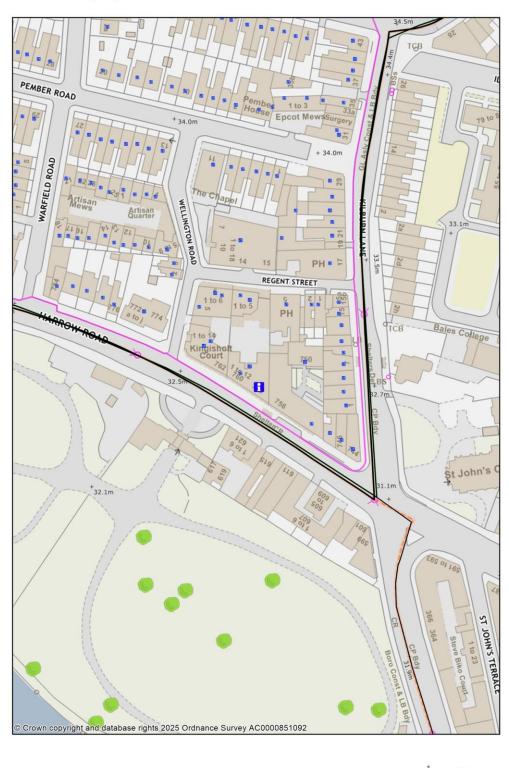
PC Phil Graves 3122NW NW BCU - Brent Licensing Philip.Graves@met.police.uk



From: Phil.S.Graves@met.police.uk  Sent: 02 September 2025 14:36  To: Business Licence Cc: Esther, Chan  Subject: FW: New Premises - D S Laser Clinic Ltd, 758 Harrow Road, NW10 5LE - 35548 - Police Reps			
od afternoon Brent,			
Myself and Shantell are both in agreement with the attached, therefore police withdraw reps.			
Thanks,			
Phil			
From: DS LASER CLINIC Sent: 28 August 2025 12:27 To: Graves Phil S - NW-CU Subject: Re: New Premises - D S Laser Clinic Ltd, 758 Harrow Road, NW10 5LE - 35548 - Police Reps			
Hello,			
Yes I'm in agreement			
Thanks			
Sent from my iPhone			
On 28 Aug 2025, at 11:26, <a href="mailto:Phil.S.Graves@met.police.uk">Phil.S.Graves@met.police.uk</a> wrote:			
Shantell,			
Did you receive the attached?			
Are you in a position to agree to the conditions I have listed?			
Thanks,			
Phil			



1:1250



0 0.02 0.04 kilometres \*\*\* \$\mathbb{G}^{\text{rent}}\$





Brent Civic Centre Engineers Way Wembley Middlesex HA9 0FJ

TEL 020 8937 5303

EMAIL esther.chan@brent.gov.uk

WEB www.brent.gov.uk

Shantelle Clarke D S Laser Clinic Ltd 102 Harley Street London W1G 7JB

30 September 2025

Our Ref: 35548

Dear Shantelle Clarke,

# Supplementry Information to the Initial Application for the Premises Licence at D S Laser Clinic Ltd, 758 Harrow Road, NW10 5LE

Further to the representation from the Licensing Authority on 20 August 2025, I wish provide further supplementry evidence.

On Sunday, 24 August 2025, I was on duty carrying out my responsibilities in relation to the Notting Hill Carnival.

At approximately 13:35 hours, I observed that the premises known as Diamond Skin Clinic had a stall operating at the front of the premises, selling Jamaican patties to members of the public predominantly attending/leaving the carnival. A portion of the stall was positioned on the public highway, causing obstruction.



Ms Clarke was present at the time and was advised that she was not permitted to trade on the public highway without holding a valid street trading licence. Furthermore, when questioned, Ms Clarke was unable to confirm whether she was registered as a food business operator with the Food Safety Team.

On 3 September 2025, the Licensing Authority received information from the Food Safety Team stating that Shantelle Clarke had submitted a retrospective food registration form for Shantelle Patties received 27 August 2025. The following details were provided:

First Name: Shantelle Surname: Clarke

Date of birth:

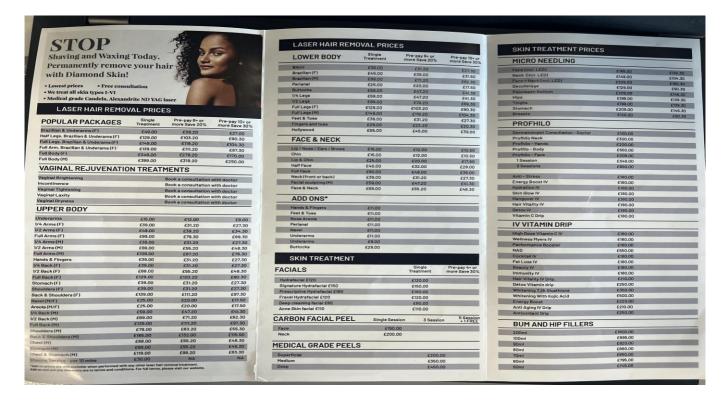
Email address: Mobile/daytime telephone number:

Address: 758 Harrow Road, London, NW10 5LE

### Visit on 18 September 2025

On Thursday 18 September 2025 at 10:58hrs, I conducted a visit to the premises accompannied by Environmental Health Officer Trainee Regulatory Services. At the time of our visit the premises was open to the public. On entering the premises, a member of staff was present behind the reception desk. He confirmed that treatments were available on the day and presented the below leaflet with the treatment price list.





# Informative

On Friday 26 September 2026, the Food Safety Team confirmed that the premises does not currently hold a special treatments licence and have not applied for an exemption.

There is a previous application for an exemption which was not accepted, they have yet to receive another application.

# **Defective Plan**

During my visit, it had been noted that the proposed plan attached the the application is in fact defective, whereby the configuration is incorrect.

Ms Clarke was informed about my findings on the day via a telephone conversation, which included:

- Front door not illustrated on the plan.
- On entry, the seating area is located on the left side of the premises
- There are four treatments rooms, with three treatment rooms located on the right side of the premises on entry.
- The front reception/bar is positioned next by the front window.
- The rear fire exit was locked. Ms Clarke confirmed that you would need to break the glass door to gain access, which brings you to the neighbouring business known as "Savannah Private Spa".

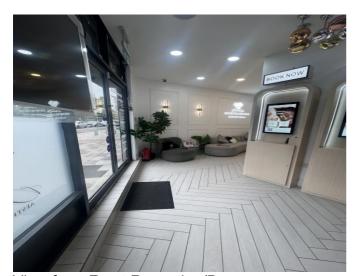


Front of premises





Front Reception/Bar



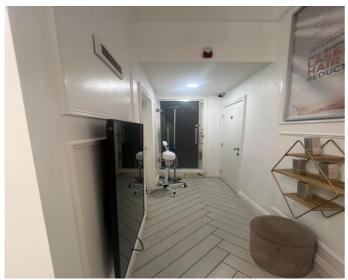
View from Front Reception/Bar



Seating Area (view from entrance)



Toilet next to Treatment Room 3



Treatment Room 4 facing Toilet



Rear 'Fire Exit'

# **Change in Business Model**

During my telephone conversation with Ms Clarke on 18 September 2025, she stated that she would provide alcohol for events taking place at the premises, which is different to what is described on the application form, according to Part 3 of the Application Form— Operating Schedule:

Please give a general description of the premises (please read guidance note 1)

The premises is a skin clinic operating on a single floor. The clinic intends to sell alcohol to clients within the clinic. The business has a total capacity of about 15 people, including both patrons and staff.

# **Details of Applicant**

It has been confirmed that Ms Shantelle Clarke is the sole director of D S Laser Clinic Ltd. However, records indicate that she is associated with several other companies. Upon reviewing information obtained from the Food Safety Team and Companies House, discrepancies have been identified in the dates of birth listed for Ms Clarke. These inconsistencies raise concerns for the Licensing Authority regarding her suitability to be deemed a 'fit and proper' person to hold a premises licence.

DS LASER CLINIC LIMITED (13757793)
Reg office –
Director – Shantelle Clarke
DOB TOTAL CONTINUES OF THE PROPERTY OF THE PRO
Nationality - British
DIAMOND OKINI IMITED (40.400540) DIOCOLVED D
DIAMOND SKIN LIMITED (13400512) DISSOLVED December 2024
Reg office
Director – Shantelle Clarke
DOB –
Nationality – British
CAYMEN INSPECTIONS LIMITED (15737920)
Reg office –
Director – Shantelle Clarke
DOB –
Nationality – Cayman Islander
DIAMOND SKIN KNIGHTSBRIDGE LIMITED (16530615)
Reg office –
Director – Shantelle Clarke
DOB – Company of the
Nationality – British
DIAMOND AESTHETICS AND LASER LIMITED (14103303) DISSOLVED Feb 25
Reg Office –
Director Shantelle Clarke
DOB – Maritalia
Nationality British
Nationality Difficility

# Statement in Support of Refusal of Application

I believe the application should be refused on the following grounds:

- 1. **Defective Plan:** The submitted plan is materially defective and fails to meet the required standards for accuracy and compliance, raising concerns about the applicant's understanding of regulatory obligations.
- 2. **Change in Business Model:** The proposed shift in the business model to include the supply of alcohol at events represents a significant departure from the originally stated purpose. This change has not been adequately justified or assessed for its potential impact on the community.
- 3. **Inconsistent Director Information:** The application contains varying dates of birth for the listed director, casting doubt on the reliability and integrity of the information provided. This inconsistency may indicate a lack of due diligence or transparency.
- 4. **Inappropriate Fire Exit:** The designated fire exit is unsuitable and does not comply with health and safety regulations, posing a potential risk to public safety in the event of an emergency.
- 5. **Failure to Apply for Required Licence**: The applicant has submitted an informative rather than applying for a Special Treatment Licence, which is a legal requirement for the type of services they intend to offer.

Given the above concerns, I strongly recommend that the application be refused.

Yours sincerely,

**Esther Chan** 

Licensing Inspector Regulatory Services



# **Diamond Skin Clinic – Risk Assessment**

Address: 758 Harrow Road, NW10 5LE

Conducted by: Shantelle Clarke

Date: 28 July 2025

Review Date: 28 July 2026

# **1. General Clinic Operations**

Hazard	Who May Be Harmed	Risk	Controls in Place	Further Action Needed
Slips, trips, and falls	Staff, clients	Medium	Anti-slip flooring, regular cleaning, clear signage, immediate spill clean-up	Ongoing staff vigilance
Fire	All	High	Fire alarms, extinguishers, annual PAT testing, clear evacuation procedure	Fire drill training yearly
Electrical equipment fault	Staff, clients	Medium	Regular maintenance, certified devices, turn off equipment when not in use	Annual PAT testing
Manual handling	Staff	Low	Minimal lifting required, trolleys available for stock movement	Staff to follow lifting protocol

# 2. Special Treatments – Laser, Injectables, Peels, Microneedling

Hazard	Who May Be Harmed	Risk	Controls in Place	Further Action Needed
Skin burns from laser treatment	Clients	Medium	CE-certified lasers, patch tests, qualified staff, protective eyewear, consent and medical screening	Continuous training
Allergic reaction to injectables	Clients	Medium	Full medical history taken, consent form, emergency kit (EpiPen), trained staff	Ongoing refresher training
Infection post- treatment	Clients	Low	Strict hygiene protocols, use of sterile equipment, aftercare provided	Periodic audit
Chemical peel reaction	Clients	Medium	Skin type assessment, patch test, aftercare plan	Clear contraindication checklist
Adverse skin response to microneedling	Clients	Medium	Single-use needles, qualified staff, proper aftercare guidance	Review consent forms

# 3. Alcohol Provision (Post-Treatment Only)

Hazard	Who May Be	Risk	Controls in	Further Action
	Harmed		Place	Needed

Adverse reaction to alcohol	Clients	Low	Alcohol only served post- treatment, light amount (1 glass), only if not contraindicated	Keep alcohol log
Underage consumption	Clients	Low	ID checked for all clients under 25 before serving	Staff trained on Challenge 25
4. Infection Cont	trol (Including C	OVID-19)		
Hazard	Who May Be Harmed	Risk	Controls in Place	Further Action Needed
Spread of infection	Staff, clients	Medium	PPE for staff, disinfection between clients, hand sanitiser available, daily cleaning	Review latest NHS guidance
5. Staff Training	& Supervision			
Hazard	Who May Be Harmed	Risk	Controls in Place	Further Action Needed
Untrained staff performing treatments	Clients	High	All practitioners are fully qualified and insured for treatments	Maintain training records
Miscommunication or errors	on Clients	Medium	Clear client consultations, written records, pre- treatment forms	Review consultation SOP

# **Emergency Procedures**

- Fire: Evacuate immediately, call 999, meet at assembly point
- Medical Emergency: First aid administered, call 999, incident recorded
- Adverse Reaction: Stop treatment, use emergency kit, follow reaction protocol

**From:** Diamond Skin Laser CLINIC **Sent:** 30 September 2025 16:56 **To:** Legister, Linda; Esther, Chan

Subject: D S Laser Clinic Ltd – Licensing Hearing Bundle

#### D S Laser Clinic Ltd - Licensing Hearing Bundle

758 Harrow Road, London, NW10 5LE
Premises Licence – Supply of Alcohol (On sales)
Licensing Sub-Committee – Brent Council
Prepared by: Shantelle Clarke (Director)

#### Section 1 - Cover Page

Premises: 758 Harrow Road, London, NW10 5LE

Applicant: D S Laser Clinic Ltd

Application: Premises Licence – Supply of Alcohol (On sales)

#### Section 2 - Contents

- Cover Page
- 2. Contents
- 3. Response to Licensing Authority (professional & firm)
- 4. Premises Plan (submitted version)
- 5. Fire Safety Compliance (single exit)
- 6. Proposed Licensing Conditions
- 7. Staff Training & Policies
- 8. Medical Exemption Special Treatments Licence (with authorities)
- 9. Companies House / DOB Clarification (no "fit and proper" test)
- 10. Street Trading Reference Irrelevant to This Licence
- 11. Applicant's Opening Statement (to read)
- 12. Appendices (templates, logs, policies, Risk Assessment incl. alcohol & fire)

# Section 3 - Response to Licensing Authority

To: Esther Chan, Licensing Authority, Brent Council

Re: D S Laser Clinic Ltd – Premises Licence (758 Harrow Road, NW10 5LE)

Dear Ms Chan,

Thank you for your observations regarding this application. I address each point below and confirm that all matters have been resolved or clarified in line with licensing law and Brent policy.

- Premises Plan updated and accurate
   The plan now correctly shows one main entrance/exit, the seating/waiting area, four treatment rooms, the reception desk (not a bar), and locations for the fire alarm point and extinguisher. It complies with the Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005.
- Nature of alcohol use ancillary only
   Alcohol will only be supplied to clients attending pre-booked treatments or
   during small, pre-booked clinic showcase/wellness events. There will be no bar
   operation, no walk-in alcohol sales, no vertical drinking and no off-sales.
   Enforceable conditions are offered.
- 3. Directors' date of birth not relevant to licensing suitability
  Historic Companies House DOB discrepancies arose from third-party filing
  errors. There is no dishonesty or misconduct. Premises licence applicants are
  not subject to a "fit and proper" test under the Licensing Act 2003; the only
  assessment is whether the four licensing objectives are upheld. Corrections are
  being lodged. This point should not be relied upon as an objection.
- 4. Fire safety single exit compliance The premises has one entrance/exit. It is kept unlocked and unobstructed whenever the public are present, with signage/lighting, a fire alarm point and extinguisher in place, a written Fire Risk Assessment, and a daily fire safety checklist. This satisfies the Public Safety objective and the Regulatory Reform (Fire Safety) Order 2005.

- 5. Special Treatments Licence medical exemption
  The clinic is doctor- and nurse-led and therefore exempt from requiring a Special
  Treatments Licence under Schedule 1, Section 4(2) of the London Local
  Authorities Act 1991. A supplementary notification of exemption has been
  submitted to Brent. This is consistent with statutory interpretation and
  authorities including R v Brent LBC ex p Sinderby (1994), R (Gibson) v Waltham
  Forest LBC (2012), and the ultra vires principle.
- 6. Street trading during Carnival irrelevant to this licence The referenced activity was a separate pop-up food business ("Shantelle's Patties"), not D S Laser Clinic Ltd, and did not involve alcohol. It has no bearing on any licensing objective and should be disregarded. For clarity, no outdoor trading will occur under this licence.

#### Request

Given the above clarifications and the robust conditions offered, I respectfully request that the representation be narrowed or withdrawn, or that the Panel grants the licence with the offered conditions.

Yours faithfully, Shantelle Clarke Director – D S Laser Clinic Ltd

#### Section 4 - Premises Plan

Attached

#### **Section 5 – Fire Safety Compliance (Single Exit)**

- Single entrance/exit kept unlocked and unobstructed during operational hours
- Fire alarm call point located by the exit; extinguisher (CO2/Foam) near reception
- Signage and emergency lighting provided
- Low occupancy model (appointment-only clinic); occupancy managed conservatively

- Staff trained on evacuation; daily opening fire checklist completed and retained
- Written Fire Risk Assessment maintained and reviewed annually/after changes

### **Section 6 - Proposed Licensing Conditions**

#### A. Prevention of Crime & Disorder

- 1. CCTV covering the entrance and all alcohol service/consumption areas; system maintained and operational whenever open.
- 2. Recordings retained for at least 31 days and provided to Police/authorised officers upon request.
- 3. At least one staff member on duty trained to operate and download CCTV.
- 4. Incident & Refusals Log (bound or secure electronic) kept on site and produced on request.
- 5. Staff trained in conflict management, dealing with intoxication, and incident reporting; training refreshed every 6 months and recorded.

### **B. Public Safety**

- 6. The single entrance/exit shall remain unlocked and unobstructed whenever the public are present.
- 7. Daily fire safety checks before opening (exit unlocked/clear; signage/lighting; alarm/FE accessible).
- 8. A written Fire Risk Assessment shall be maintained and reviewed at least annually or following material changes; staff shall be familiar with evacuation procedures.
- 9. Seated service only; no vertical drinking.
- 10. Alcohol ancillary to pre-booked treatments or pre-booked private showcase/wellness events only; the premises shall not operate as a bar.
- 11. No off-sales.
- 12. Safe occupancy limits to be observed in line with the Fire Risk Assessment.

#### C. Prevention of Public Nuisance

- 13. No consumption of alcohol outside the premises.
- 14. Doors/windows closed (save for access/egress) when music or hospitality is taking place.
- 15. Deliveries and waste collection to be managed to avoid nuisance during sensitive hours.
- 16. No external stalls, concessions, or street trading of any kind under this licence.
- D. Protection of Children from Harm
- 17. Challenge 25; only passport, photocard driving licence, or PASS-accredited card accepted.
- 18. Staff trained in age-verification and refusal procedures; records kept.
- 19. All refusals recorded in the Refusals Log.
- 20. No alcohol to be supplied to, or consumed by, minors. Children only present in relation to suitable treatments and in the company of a responsible adult where alcohol is supplied.

#### **Section 7 – Staff Training & Policies**

Induction before first solo duty and refreshers 6-monthly covering:

• Licensing objectives; permitted hours; conditions; ancillary-only supply; seated service/no vertical drinking; Challenge 25; refusals procedures; incident reporting; vulnerability and intoxication management; CCTV responsibilities; fire safety and evacuation.

Documents kept on site: Staff Training Log; Incident & Refusals Log; Daily Fire Checklist; Fire Risk Assessment; CCTV maintenance records; policy statements (Age-Verification, Vulnerability/Intoxication, Spiking Prevention, CCTV, Incident & Refusals, Fire Safety, No Outdoor Trading).

#### Section 8 - Medical Exemption - Special Treatments Licence

Legal basis: London Local Authorities Act 1991, Schedule 1, Section 4(2) – exemption where treatments are provided by a person registered under the Medical Act 1983

(doctor) or by a person included in a statutory register of health professionals (including the NMC). The clinic is medically led (GMC/NMC). Supplementary notification of exemption has been submitted.

Authorities: R v Brent LBC ex p Sinderby (1994); R (Gibson) v Waltham Forest LBC (2012); ultra vires principle.

Conclusion: No STL is required; no breach; not a relevant basis for objection.

#### Section 9 - Companies House / DOB Clarification

Historic DOB differences were administrative and corrected. There is no "fit and proper person" test for premises licence applicants under the Licensing Act 2003. The only relevant assessment is whether the licensing objectives are promoted. The point has no bearing on suitability and should not be relied upon.

#### Section 10 - Street Trading Reference - Irrelevant to This Licence

The referenced Carnival activity was a separate pop-up food business ("Shantelle's Patties"), not D S Laser Clinic Ltd, and involved no alcohol. It is unrelated to this premises licence, does not engage any licensing objective, and should be disregarded. For clarity, there will be no external stalls, concessions, or outdoor trading under this licence.

# Section 11 - Applicant's Opening Statement (to read)

Chair and Members, this is a doctor- and nurse-led, appointment-only aesthetics and laser clinic. Alcohol is strictly ancillary, seated, and limited to pre-booked clients or small, pre-booked showcases. There is no bar operation, no walk-in alcohol trade, no vertical drinking, and no off-sales.

We operate safely with one compliant entrance/exit kept unlocked whenever the public are present; fire equipment, signage and checks are in place; and a written Fire Risk Assessment and daily checklist are maintained.

The clinic is exempt from Special Treatments Licensing under Schedule 1, Section 4(2) of the London Local Authorities Act 1991; a notification has been submitted. The Companies House DOB issue was an historic administrative filing error and is irrelevant under the Licensing Act 2003. The Carnival pop-up was a separate food business, involved no alcohol, and is unrelated to this licence.

We offer robust conditions covering CCTV, Challenge 25, seated ancillary service only, no off-sales, no outdoor alcohol consumption, and no street trading. All concerns have been addressed. I respectfully ask you to grant the licence with the offered conditions.

#### Section 12 - Appendices

# Appendix 1 - Templates & Policies (ready to print/use)

A) Daily Fire Safety Checklist (Opening)

- Exit unlocked and unobstructed
- Route to exit clear
- Signage/lighting visible
- Alarm call point accessible
- Extinguisher in place
- Occupancy control understood

Signed (Manager) / Date / Time

- B) Incident & Refusals Log (sample headings)
- Date/Time Staff Person details (if taken) Refusal reason / Incident summary Action taken Notified (Police/LA?) Staff signature
- C) Staff Training Log (sample headings)
- Name Role Training completed (licensing, Challenge 25, vulnerability, fire, CCTV) Date Trainer Refresh due
- D) CCTV Policy Statement (one page)
- Coverage; retention (31 days); access; trained staff member; disclosure on request

E) Challenge 25 Policy (one page)

Accepted ID; refusal process; logging

F) Vulnerability & Intoxication Policy (one page)

- No service to intoxicated/vulnerable persons; monitoring; intervention; logging
- G) No Outdoor Trading Policy (one page)
- No stalls, concessions, or external sales under this licence

# Appendix 2 - Combined Risk Assessment (Alcohol Service & Fire Safety)

Responsible Person: Shantelle Clarke (Director)

Premises Use: Medically led skin & laser clinic; ancillary alcohol (on sales)

Layout: Ground floor; single entrance/exit

Part A – Alcohol Service Risk Assessment (original criteria reinstated)

Purpose: To ensure alcohol is supplied only where clinically and legally safe, strictly ancillary to the clinic's services, and in a manner that does not undermine licensing objectives.

- 1. Treatments where alcohol is NOT permitted (before/during/after the session)
  - CO2 laser / laser resurfacing (incl. fractional/ablative)
  - Morpheus8 and other RF microneedling/energy-based tightening
  - Injectables (toxins, fillers, PRP, mesotherapy, profhilo, etc.)
  - Microneedling (manual or device-assisted)
  - Medium/Deep chemical peels and any peel requiring strict aftercare
  - Laser tattoo removal / high-energy laser treatments
  - Any treatment requiring topical anaesthetic/numbing or sedation
  - Any procedure with increased bleeding, swelling, or impaired judgement risk
- 2. Treatments where alcohol MAY be offered (strictly ancillary; small quantity)
  - Non-invasive facials and mild skincare treatments
  - LED light therapy
  - Skin consultations / patch-tests where appropriate

- Low-risk, pre-booked pamper/showcase events (controlled setting)
  Service rules: seated only; max 1 small glass of prosecco or equivalent (e.g., 125ml); no top-ups for anyone driving post-appointment; no alcohol if any red flags present.
- 3. Client suitability & red-flags (no service)
  - Appears intoxicated / impaired judgement
  - Pregnant or trying to conceive (avoid alcohol service)
  - Driving immediately after treatment
  - Under 18 (Challenge 25 applies)
  - Vulnerable persons (health, safeguarding, or medication concerns)
  - Conflicting medical conditions/medications where alcohol is contraindicated

#### 4. Operational controls

- Seated waiter-service only; no vertical drinking; no bar sales; no off-sales
- Alcohol only during appointment times or pre-booked showcase events
- Challenge 25; refusals logged; incidents logged
- Maximum occupancy controlled; staff supervision at all times
- Clear signage: "Alcohol is ancillary to treatments only seated service"
- Manager/DPS oversight on all alcohol supply

#### 5. Records & review

- Refusals and incidents recorded same day
- Staff trained at induction; refreshed 6-monthly; training logs retained
- Policy reviewed quarterly or after any incident

#### Part B – Fire Safety & Evacuation (integrated)

- Single entrance/exit kept unlocked and unobstructed whenever the public are present
- Fire alarm call point near exit; extinguisher (CO2/Foam) at reception; signage/lighting provided
- Low occupancy model typical of clinical setting (e.g., staff 2–3; clients 4–6)
- Evacuation: staff direct clients to the exit; assemble on pavement outside the premises; no re-entry until safe
- Daily opening checks recorded (exit unlocked; route clear; signage/lighting; alarm/FE accessible)

- Staff roles: Manager (overall control), Front-of-house (alarm/exit), Clinicians (assist clients)
- Documentation retained: Fire Risk Assessment; daily checklist; equipment service records; training logs
- Review: annually, after changes, or following any incident

# Appendix 3 - Special Treatments Exemption Note

• Cites LLA 1991 Sch.1 s.4(2); GMC/NMC-led services; notification submitted.

# **Appendix 4 – Companies House Correction Note**

• Admin filing issue; no licensing relevance; corrections lodged.

# Appendix 5 - Street Trading Clarification

• Separate entity ("Shantelle's Patties"); no alcohol; not relevant; assurance of no outdoor trading under this licence.

