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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 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 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 initial email on 28 July 2025 in seek of clarification regarding various aspects of the application.

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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.

3. 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, strictly post-treatment 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 never offered prior 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 from 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.*

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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
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## 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.

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## 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 mentioned, 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.
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- **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

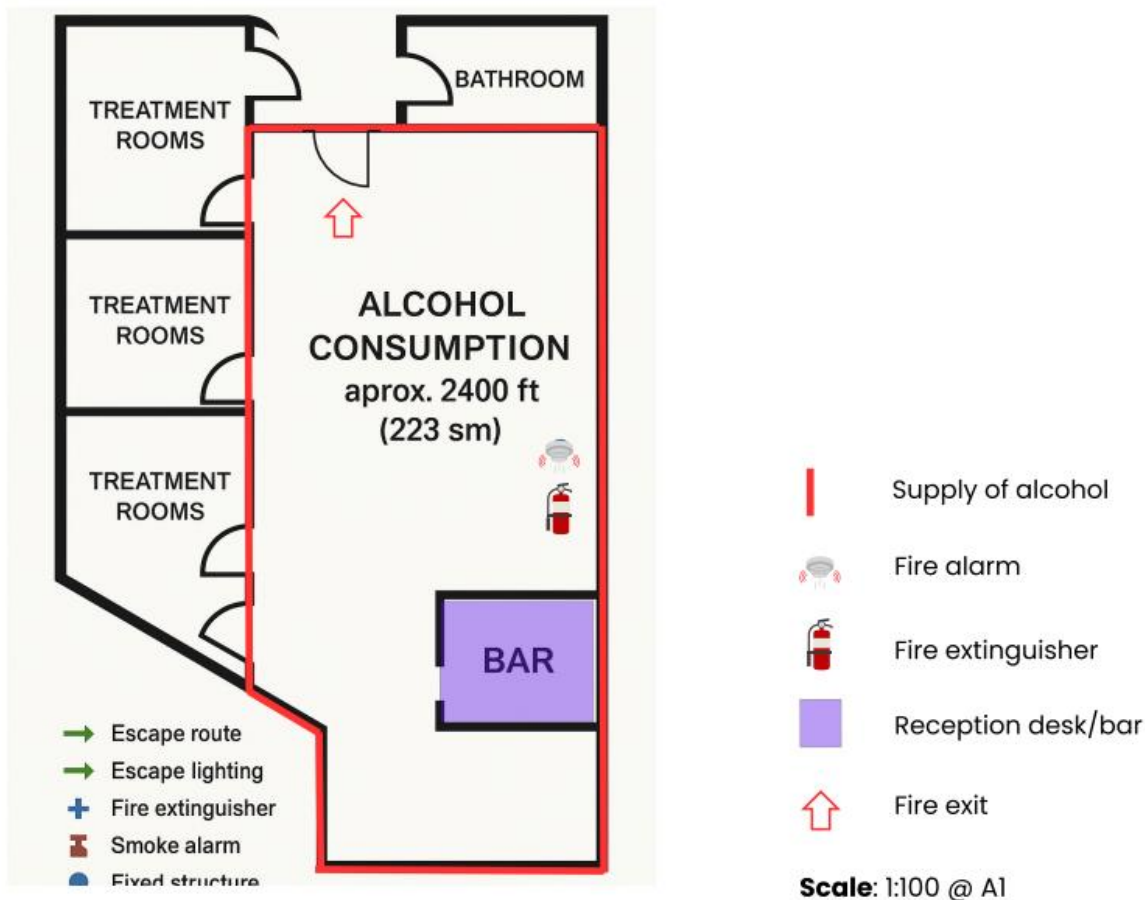
## **4. Client Consumption Areas**

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.

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## Proposed Plan

**758 Harrow Road, London, NW10 5LE**



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 licenising 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,

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Esther Chan

A handwritten signature in black ink, appearing to read 'E Chan', with a stylized, cursive script.

Licensing Inspector  
Regulatory Services

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