

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

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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.

1. 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.

2. 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
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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, proffilo, 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.

