



**METROPOLITAN
POLICE**

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TERRITORIAL POLICING

Brent Police Licensing Unit

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Your ref: 23675971

AM/AH/SIL002-1-9/2615

Our ref: 01QK/576/16/157

Brent Borough Licensing Department

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Date: 14th October 2016

Police representation to the Premises Licence application for 'Silvertime Amusements' 446 High Road, Wembley, HA9 6AH

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

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

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

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

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

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

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

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

Drinking up time

There is no provision within the application for a drinking up time. Customers could purchase an alcoholic drink at 2358 hours only two minutes before the provision of bingo ceases. **Police require all sales of alcohol to cease at 2330 hours daily.** This gives customers 30 minutes to responsibly consume their beverage.

Sales of alcohol

Only one alcoholic beverage to be sold to any one customer at any given time. Staff shall not sell alcohol to a customer until the staff member can clearly see that the previous alcoholic beverage has been consumed. In order to prevent stacking of drinks that could be consumed recklessly leading to irresponsibly gambling.

Personal Licence Holder

The sale of alcohol to drunken people and children is a major cause of concern to police and highlighted in the Governments Alcohol Harm Reduction Strategy. Those who sell alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard. Staff at this venue has the added responsibility of supervising adults who are gaming and gambling and to enforce legislation around those activities. Upholding both sets of objectives in the same venue will be challenging. Because of this Police require a personal licence holder to be present on the premises through the sales of alcohol ie 1000-0000 hours daily.

Closed Circuit Television (CCTV)

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

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

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

Operating Hours to be displayed on Premises

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

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

High Strength Alcoholic Drinks

Street drinkers and drunkenness is a major cause for concern in Brent. Brent Borough is a controlled drinking zone. Police do not consider it to be responsible to provide high strength beers and ciders above 6% ABV to customers who are playing bingo and gaming machines.

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

CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.

CCTV cameras shall be installed to cover the entrance of the premises, the area where alcohol is sold and the bingo terminals.

The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises.

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.

No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

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

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

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

Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training of Licensing Act 2003 legislation. This will be documented and signed for by the DPS and the member of staff receiving the training. This training log shall be kept on the premises and made available for inspection by police and relevant authorities upon request.

An incident log shall be kept at the premises, and made available for inspection on request to an authorised officer of Brent Council or the Police, which will record the following:

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

The following crime prevention measures shall be implemented:

- A time delay safe with deposit slot and anti fishing mechanisms must be used at the counter till area
- Regular robbery awareness and cash minimization training shall be given to all staff.

All alcoholic drinks shall be decanted in to plastic drinking vessels at the point of sale.

Only one alcoholic beverage to be sold to any one customer at any given time. Staff shall not sell alcohol to a customer until the staff member can clearly see that the previous alcoholic beverage has been consumed.

Staff shall routinely walk the gaming floor removing any discarded drinking vessels.

Customer shall only be permitted to consume alcohol whilst taking part in bingo activities at a terminal. Vertical and mobile consumption of alcohol shall not be allowed.

Yours Sincerely

Nicola McDonald PC 157QK
Licensing Constable Brent Police