

**Casino Rooms Response**  
**to Police Review Application**

The Casino Rooms – an overview

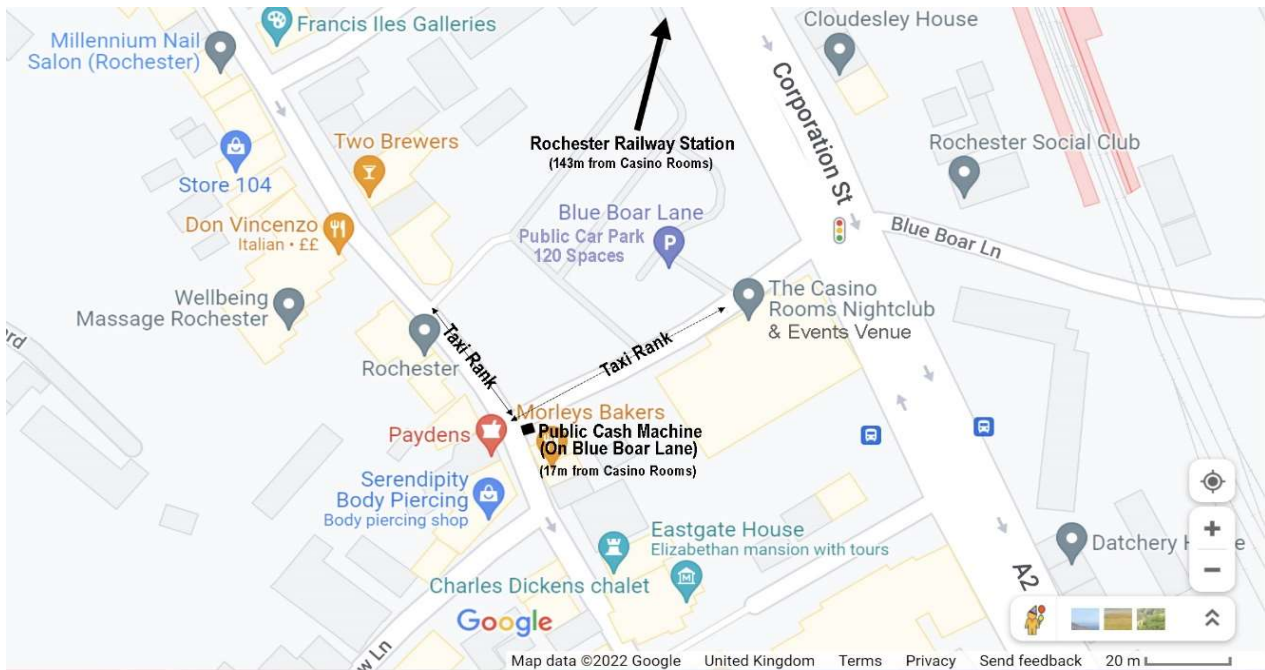
1. In November 1992 the Casino Rooms first opened its doors as a “cabaret room” hosting well known entertainers ranging from David Essex, to The Drifters, Billy Connolly, the Chippendales and Freddie Starr. These personalities and many others helped established the Casino Rooms as a premier entertainment venue - a legacy that continues to thrive today. As it has grown the Casino Rooms is now one of the South East’s most well equipped & experienced Multi-Room Private Hire Venues. Some recent events include: the PDC World Darts (Live on Sky Sports), Charity Boxing, Kickboxing, Wrestling, Demelza Charity events, and an Evening with Jamie Johnson (a gifted local singer who reached the final of “The Voice” on BBC). Events are also held during the day such as the popular brunch event: Bongo’s Bingo. These daytime and evening events include trade fairs, product launches and art and antiques collectors fayres – a taste of the range and scope of activities is provided in the accompanying printed brochure.
2. In 1993 the ground floor was converted into a nightclub that has operated alongside the cabaret and entertainment events space. The nightclub has been witness to the changing fashion and music scene and is something of a rite of passage for many local residents and patrons who consider the Casino Rooms to be a much loved community asset and stalwart – this can be seen in the many representations of support submitted for this review hearing by staff, contractors and members of the public.
3. To this day the Casino Rooms combines cabaret, entertainment (including the “*Tenshi*” *Gentlemen’s Club*), music and sporting events with live music and night club operations all under one roof. With three rooms over two floors the Casino Rooms is a versatile entertainment venue that can adapt to host weddings through to world darts. The venue even hosts local policing events, most recently in November 2021 the Rooms hosted Kent Police for its briefing of “Operation Madrid” to the licensed trade in Rochester.
4. In November 2022 the Casino Rooms will celebrate 30 years of entertainment here in Rochester. One of the earliest entertainers Martin Kemp from Spandau Ballet who performed at the venue back in 1992 will be guest-hosting a “Back to the 80’s” party as part of our anniversary celebrations.
5. Moving forward from 2023 we will increase our focus on grass roots and up and coming musicians with planned Live Music Events.
6. The Police review is targeted towards the operation of the Casino Rooms as a nightclub. The night club operation at the Casino Rooms operates from 10pm on Friday’s, Saturday’s and Bank Holidays.
7. Casino Rooms was hard hit by the Covid-19 Pandemic. The business model is music and entertainment led, built solely around people socialising. The Casino Rooms was stopped in its’ tracks by Covid and was completely closed for 16 Months. Sadly, most of the staff had to be made redundant. With the limited help from the Government, the venue struggled to stay alive

and to still be in a position to be able to re-open, when restrictions were lifted. The venue like many others in the entertainment industry is still in recovery mode.

8. Casino Rooms is a beloved and long-established part of the Medway and Kent entertainment landscape, but sadly is now one of the very few surviving Nightclubs & Events Venues in the County.
9. From an economic viewpoint, Casino Rooms is a major contributor to the local economy. It attracts people to the area for its events, who in turn visit other local businesses, restaurants and bars beforehand. This was evidenced back in 2009 when the venue was closed for 9 months due to damage from a fire. While many local bars and pubs thought that they would benefit from the Casino Rooms being closed, what in fact happened was entirely the opposite. Footfall in the Rochester Night Time Economy dropped to an all-time low and trade was significantly reduced. We know this first hand as some of the other businesses negatively affected were ours: The George Vaults (Restaurant, Bar & Function Venue), The Rochester Bar and The Royal Victoria & Bull Hotel. Things got so bad that some staff and owners of other local hospitality establishments offered to come and help us get back open for free, as they were losing money.
10. Casino Rooms is also a large provider of employment in the area. Since re-opening in July 2021, the venue has, to date, taken on 146 new starters (18-54 year olds) into its in-house team alone. On top of this, a plethora of other jobs/positions have been created as an indirect result of Casino Rooms operating for the agencies and suppliers that we use and as part of the wider night time economy. While it is recognised that the night time economy places burdens on the police and local authority Covid has reminded us of the vitally important social function that entertainment venues including night clubs play in our personal and community lives.

#### The Casino Rooms – Local Context

11. The Casino Rooms is located on Blue Boar Lane in the heart of Rochester. The Casino Rooms sits within the context of the town centre and night-time economy and cannot be considered in isolation but part and parcel of its location.
12. There are a large number of licensed premises in the area, many of which have late trading hours. There are approximately 60 premises with hours of 2am or later and approximately 20 premises with hours of 3am or later, all within 500 metres of Rochester High Street.
13. The main taxi rank for the area is in Blue Boar Lane directly opposite the venue which often continues right up into Rochester High Street past Don Vincenzo's restaurant. People walk to the taxi rank from all parts of Rochester in order to get a cab home, irrespective of where they have spent their evening.
14. Directly opposite the venue is the 120-space car park on Blue Boar Lane. This is a public car park that is not owned or operated by the Casino Rooms. There is also a small taxi rank at the station and another public car park.
15. One of the very few ATMs (Cash Machine) in Rochester, is situated in Blue Boar Lane. People visit this from all over the town.



16. It is also worth noting that during its almost 30 years of operating, Casino Rooms has become a familiar landmark and local signpost. This landmark is used as a convenient shorthand identifier of the area by the police and civil society.

#### Casino Rooms attendance figures

17. During the time of the Police Review period the venue hosted 50,229 patrons. Since re-opening after Covid in July 2021, the Nightclub has opened for 99 nights, welcoming 91,108 customers through its doors.
18. Our chartered accountants, *if requested*, are prepared to certify these attendance figures if required. All sales data, revenue and admission figures are submitted weekly to our accountants – this data is commercially sensitive and, if requested, we ask that it is kept confidential.

#### Aaron Paul Stone:

#### General Manager & Designated Premises Supervisor (“DPS”)

19. At its core the Casino Rooms remains a local family operated venue. The venue was founded by father and son Paul Stone and Aaron Stone. Aaron Stone continues to run the venue to this day and takes a keen, active and hands-on responsibility for the management and operation of the venue.
20. Aaron has worked in the licensed trade his entire life. He is the General Manager of the Casino Rooms and the DPS. He takes a hands-on and practical engagement with the running of the Rooms. Aaron is a member of the British Institute of Innkeepers, holds an SIA (Security Industry Authority) Front Line Licence and is a qualified First Aider.

21. Aaron is not only committed to the safe and successful operation of the Casino Rooms, but has stepped up to assume a central role in the necessary partnership between the police, local authority and civil society to promote a safer night out in Rochester and the surrounding areas.
22. At the request of Kent Police, Aaron is, the founding and remains the current, Chairman for the “Safer Medway Partnership”, which he helped to create in 2006. This is a non-profit organisation which works with the police, the council and local businesses within Medway’s five towns, to reduce crime and anti-social behaviour using a radio system and a predominantly web-based information sharing network. Affiliated partners to this project include Medway Council, Kent Police and Medway CCTV. The partnership currently has 190 member businesses and has been highly successful in reducing crime of all kinds throughout the day and night time economies.
23. In December 2009, Aaron was one of the first non-Local Authority/Kent Police/Home Office people to be invited to sit on Medway Community Safety Partnership Strategic Executive Group (S.E.G), chaired by the Chief Superintendent/Area Commander. This group devises and implements strategies for crime reduction as part of the overall Community Safety Partnership effort.
24. In January 2011, Aaron became one of the founding partners of the Medway Community Alcohol Partnership (M.C.A.P), which is a multi-agency group led by Trading Standards, formed with a view to challenging and improving the way that alcohol is sold and enjoyed within Medway, tackling issues such as under age sales/use, proxy purchasing and other criminality associated with alcohol.
25. In March 2011, Aaron became one of the founding partners of the Kent Business Crime Advisory Group. Hosted by the Chief Superintendent at Kent Police Headquarters in Maidstone, this group aims to assist businesses within Kent to detect and prevent criminality, hence reducing the cost of crime to businesses and its’ impact on owners and staff.
26. Aaron also led the Casino Rooms to become, in 2012, the only venue of over 850 Licensed Premises in Medway to ever achieve the prestigious “SAFER SOCIALISING AWARD”. This Nationally recognised official accreditation is issued by the local Business Crime Reduction Partnership, which awards certificates to successful premises following an in depth & stringent multi agency inspection & assessment process, involving the partnership, Kent Police, Medway Council Licensing, Trading Standards & Kent Fire & Rescue Service.
27. In November 2021, Aaron led Casino Rooms to become the first ever venue in the county, to receive the Kent Police “Lsavi Award” for safety. “Licensing SAVI” was developed at the request of the Home Office by Police Crime Prevention Initiatives (Police CPI), which works alongside the Police Service to deter and reduce crime. As well as providing safer and more secure venues for managers, staff, customers, and local communities, it also seeks to reduce demand on Police Forces, NHS Ambulance Services and Accident & Emergency Departments.
28. LSAVI award attached. **Please see Item 2.**

### Casino Rooms Core Management Team

29. Aaron is assisted by the core management team:

**CASINO ROOMS' MANAGEMENT TEAM**

|   |  |  |
|---|--|--|
|    |   |                                       |
| <b>Aaron Paul Stone</b><br>Designated Premises Supervisor<br>& General Manager<br>33 Years Experience in the Licensed Trade<br>30 Years at Casino Rooms | <b>Greta Simaviciute</b><br>Deputy General Manager<br>12 Years Experience in the Licensed Trade<br>4 Years at Casino Rooms | <b>Lisa Batterbee</b><br>Duty Manager<br>25 Years Experience in the Licensed Trade<br>25 Years at Casino Rooms           |
|    |   |                                       |
| <b>Kalvinder Dhesi</b><br>Security Manager<br>33 Years Experience in the Licensed Trade<br>30 Years at Casino Rooms                                     | <b>James Seery</b><br>Assistant Manager<br>12 Years Experience in the Licensed Trade<br>10 Years at Casino Rooms           | <b>Ben Blackwell</b><br>Trainee Assistant Manager<br>5 Years Experience in the Licensed Trade<br>5 Years at Casino Rooms |

### Training & Staff Development

30. The Casino Rooms has always invested time and money into the development of its staff, no matter how experienced they may already be.
31. See attached training schedule – **Item 5**.

### Daily Operational Risk Assessment

32. Casino Rooms has completed a number of Risk Assessments as part of its' best practice to ensure the safety of all patrons and staff. Management also voluntarily complete a Daily Operational Risk Assessment (DORA) before every trading session. This assesses the expected level of attendance and many operational considerations relating to this, such as how many SIA Doorstaff will be required etc. This is signed by a Manager completing it and then signed off by the DPS.
33. A copy of our recent risk assessments is attached with our supporting information. **Please see Item 6.**

### The Casino Rooms SIA Team and Policies

34. In any licensed premises, it is important that Doorstaff are deployed in the correct places at the correct times and are given the correct protocols to deliver maximum efficacy within the venue. Front door staff are the “First Face” that customers see and their experience with these team members will set the tone for their visit as a whole. Doorstaff should always be smartly dressed in accordance with venue guidelines. Clothes should be clean and shoes polished. All security staff should be confident, clearly spoken, professional, yet approachable and friendly.
35. Casino Rooms is always revising its procedures in this regard and is always evolving to meet the needs of both the business and the Licensing Objectives. At Casino Rooms, the risk assessed number of SIA doorstaff will be booked in advance and deployed to certain locations, depending on how many rooms are in use, what type of event is being hosted and the predicted attendance etc.
36. Generally, doorstaff will be deployed to fixed locations within each room. These locations are chosen for their maximum arcs of view, proximity to major exits or advantage of height (both their own and that of the location). A senior member of the team will be in charge of that room and will make “live” decisions within that trading area. They will also perform “walkarounds” and toilet checks, where they will “walk” the various areas under their control at customer level. Doorstaff will be regularly rotated from their fixed points. This not only keeps them fresh/aware, but in terms of public perception, sews the seed that we have “many” doorstaff working that night in that area.
37. Separate to this, there will be a front door team, supervised by the Head of Security. They will be checking ID, searching and generally vetting potential patrons. The front door team are generally selected for their exceptional personal skills as well as their ability to recall faces and past behaviours. It is important to verbally engage all customers at the front door before permitting entry. This is a good opportunity to judge a person’s potential level of intoxication and also to “make a friend” of a customer, who suddenly realises that the Door Supervisor who is asking for his ID is actually “an alright person”. This is of course very useful, if later on that SIA Door Supervisor is required to speak to that same customer who may need to “calm or quieten down”.
38. All Doorstaff (and management) are in constant radio contact with each other, so preventative measures can be implemented effortlessly, if a perceived future problem is diagnosed. The Head of Security will manage the door team overall during trading and then will deploy staff in High Visibility tabards, to assist dispersal of patrons at the end of the session, directing patrons to the taxi rank and asking them to “respect our neighbours” and “keep it quiet” if required, as part of our dispersal policy.
39. As per Home Office recommendations, Casino Rooms accepts Passport, Photo Driving Licence, Citizen Cards and any other photo card that has a PASS (Proof of Age Standards Scheme) hologram on it.
40. On occasion, persons under 18 may try to use ID that is not their own. These can be borrowed or even stolen. If it seems that the ID does not match the person presenting it, questions will be asked about the ID, to try to catch them out. People attempting to use someone else’s ID are often nervous and answer the questions incorrectly, so are easily found out. In this instance

the person is refused entry and the ID confiscated. If more than one entry door is being used, the other entrance door is notified by radio, so that other team members are aware.

41. If the confiscated item is a Provisional/Driving Licence, these will be posted back to the DVLA. If it is a passport, these are posted back to the Home Office. Both are at the venue's expense.
42. When patrons are searched by Doorstaff, this again is a good chance to have a chat (even a laugh) with the customer and get to make that all important "friend". Often metal detector "wands" can also be used to double check that no undeclared metallic objects are present on the customer.
43. Any controlled substances found either during searching or at any point in the trading session are confiscated, logged and placed in a locked "Drugs Safe" which is only accessible by the Police and Venue Management. The venue does not permit any drinking vessels or bottles etc to leave the premises. This is enforced by vigilant Doorstaff at the main entrance/exit and also on Door 1 if this is in use. Towards the end of the session and when any remaining patrons are leaving, extra measures are put in place, where one or sometimes two door supervisors stand on the exit from their room and visually check people for drinks. Then, as they make their way to the actual exit doors, they are checked again by the front door team.
44. Subject to risk assessment the Casino Rooms nightclub night typically operate with an SIA deployment of 10 – 18 registered SIA door supervisors.
45. See attached SIA policies – **Item 7**.

#### Search Policy

46. Doorstaff reserve the right to search any person wishing to enter the premises or indeed any person in the venue who is suspected to be in possession of illegal substances or items of concern. Persons not consenting to being searched will be politely refused entry to the premises. The Casino Rooms has a Zero tolerance to drugs policy and operating standard. The drugs policy is attached. **See Item 13**.
47. Any persons found to be in possession of illegal substances will be detained and handed over to the Police, as well as being reported to the Safer Medway Partnership. Confiscated items will be placed by management in Police Evidence Bag and placed in the drugs safe which is located next to the ground floor office. Police will empty this and will sign the log book to confirm receipt of the items.

#### ION Track Testing

48. For many years the venue has openly welcomed Police into the premises to perform ION Track Testing. Upon entry, customers' fingers are swabbed by officers and the swab is fed into a large electronic device that analyses the chemical composition of the traces on the sample and reports back if there are traces of controlled substances etc, so that further enquiries can be made if anything suspicious is detected. The results from this exercise are generally disappointing in terms of catching users/arrests, but it is felt that this random and unannounced testing approach

is a strong deterrent and sends out the right message that controlled substances will not be tolerated in Licensed premises. The venue continues to support this approach from Kent Police.

#### Age Verification

49. Casino Rooms operates a strict over 18's policy on nightclub operations and also a "Challenge 21" policy. Taking the police review period as an example, the venue refused 189 people for failing to satisfy the admissions ID criteria and confiscated 92 fake or 'borrowed' ID's. All of these have been logged on the weekly reports that the venue submits to Police.
50. The venue accepts passports, photo driving licenses and Citizen Cards which have the PASS (Proof of Age Standards Scheme) security hologram. There is a growing trend for under-age people (especially young females) to borrow ID from an older friend/relative, then change their hair/make up to try to look like that person and attempt to gain entry. Doorstaff will often ask the customer questions about the details on their ID, to help catch these people out. It is worth noting that ID scanning technologies do not prevent this from being attempted. Doorstaff will confiscate fraudulent/misused ID.
51. Whilst we know that this is the right thing to do, in the case of "borrowed" ID's, this regularly results in (people claiming to be) parents phoning the venue to try to get the ID back. They are quoted (or sent if on social media) the following:

*"Sadly, under Kent Police Licensing policy, we are not permitted give back any confiscated ID's that have been (or that are believed to have been) fraudulently used to attempt to gain entry to Licensed Premises, either by the owner of the ID, or by someone else. Driving Licences are returned to the DVLA and Passports are returned to the Home Office. Sorry we are unable to help further.*

*You are of course very welcome to discuss this with Kent Police Licensing Department on 01634 792276 or in person at Medway Police Station, Purser Way, Gillingham, Kent. ME7 1NE."*
52. This often results in verbal or social media abuse to the venue's staff, when the individual asking for ID to be returned does not like this response. We are also aware that some people do follow the instructions given and do contact the Police. We are not updated by Police on the outcomes of these interactions.
53. We do also sometimes receive intelligence from third parties about under-age people who may be coming to the venue to attempt to gain admission. We then do our own research into that person and inform Doorstaff, so that they can look out for those individuals. Refusals are also logged. **Please see Item 9.**
54. In addition to these measures, the venue has adopted Home-Office guidelines for the checking of ID and all security staff have read this and signed to say that they understand it. The guidelines are easily available on reception for doorstaff to refer to should they wish to refresh themselves or check a finer point or technicality.
55. Occasionally, we find out where fake ID's are sourced from, by young people (usually websites advertising "Novelty ID's") and these are reported to the Police & DVLA etc. We are not informed of any investigation or action taken against these websites.

56. Misused/fake Driving Licences are sent back to the DVLA and confiscated Passports are sent back to the Home Office, all at the venue's expense. Historically, the venue would hand all confiscated ID's to Police, as often as they would collect them, but even though the Home office guidelines state that Police should receive such items, in September 2016, they informed us that they would no longer take them and that we should send Passports back to the Home Office and Driving Licences back to the DVLA. Their last collection from us was September 2016. Since then, we have confiscated 513 ID's and have paid to send them back.

### Banning & Exclusions Policy

57. In any Night-Time Economy or licensed premises, there will be occasions where people do not manage themselves in the manner that we would like. Depending on the severity of their behaviour, it is important that there are consequences, to both "punish" the individual and deter future occurrences of the same nature. The Casino Rooms broadly adopts the following approach:
- Something minor, such as a verbal disagreement/domestic argument may be dealt with by splitting up the participants and asking them to leave the venue via separate exits to promote a "cooling off" period. If this strategy is successful, no further action may be taken.
  - A more serious infraction, such as physically aggressive behaviour, threatening language to staff, drugs possession etc, may be dealt with by asking the person to leave the premises and they may be banned from the premises for a period of between 2 weeks and 6 months. After this time, should they wish to attend the venue again, they are required to come to the venue and personally apologise to the Head of Security, who will inform them that they must "behave themselves" or may be barred again and for a much longer period.
  - A serious incident, such as physical assault, continued threatening verbal/racial abuse, or criminal damage may be dealt with by Police intervention (if required) and a longer ban from 1 year to life. Information on such occurrences will be submitted to Licensing (Via Weekly Returns) and the Safer Medway Partnership. Very severe or repeat offenders will be submitted for an Exclusion from all partnership businesses. All members are made aware of successfully excluded persons by email and their information is placed on the SMP website, so that all members can refer back to see who "the bad people" are in Medway.
58. As with all such systems, local human knowledge, intuition and tact play a major role in successfully making this work in the real world.

### Radio Communication

59. The venue currently uses 37 individual radios to keep key staff in communication with each other. It is important that staff use correct and effective protocols in order to make best use of this network.
60. If there is time, staff should always say "hello, this is (their name/call sign) before issuing a message. This enables everyone to actively listen and actually take in what is being transmitted. If the sender races straight into their message, before people have had time to "tune in", it is likely that the first part of the message will not be heard and consequently, the entirety of the transmission may be useless.

61. When using a radio, it is important to always speak slowly and clearly - remembering that the sender and the recipient(s) may be in a noisy area or already engaged in a task or dealing with something. The recipient of a direct message – should always reply "received" so that the caller knows that they have been heard and understood.

#### CCTV Coverage

62. The venue already massively exceeds the number of CCTV cameras than are actually required of it. At great expense, the venue has voluntarily continued to expand the system over the years, in the spirit of providing the safest possible environment for all guests. We have 81 CCTV cameras across the premises.
63. We have extensive CCTV coverage that, in our view, is above and beyond the minimum requirements. We fully co-operate with the Police providing support for concerns that relate both to the operation of the premises but also wider policing issues.
64. See for example the recent e-mail of DC Nick Baxter (23 May 2022) thanking the Casino Rooms for our support. **Please see Item 3.**

#### Record keeping & weekly returns

65. The Casino Rooms maintains a comprehensive system for record keeping. Most strikingly through its voluntary weekly returns these are the summaries that the venue voluntarily submits to Police Licensing at the end of every weekend since August 2012, in order to keep them updated. Casino Rooms is one of the only venues in the County that does this.
66. These “Returns” outline how many people have been refused entry, how many people have been asked to leave the venue and how many ID’s have been confiscated, usually for fraudulent use etc. They also outline any occurrences of note, Police attendance or incidents.
67. A copy of the weekly returns is attached. **Please see Item 10.**

#### Safer Socialising Media Campaigns

68. Casino Rooms has always led the way in terms of safety and crime prevention campaigns both through its membership of local bodies and within the Casino Rooms itself. The venue management not only use Police led campaigns, but also innovate and pay to have their own targeted initiatives produced. Posters for these are clearly displayed in the foyer on the “Safer Clubbing & Socialising Wall”. These campaigns are also displayed both in the “Safer Clubbing” tab of the Casino Website and also on Social-Media. Such campaigns include “Ask Angela”, Drink Spiking Awareness and “Respect our Neighbours” to name but a few. **Please see images of these in the brochure provided.**

69. They are also displayed on the 34 High-Definition TV Screens & 3 large projectors around the venue on a slideshow. Over the years, Casino Rooms has been asked by other venues and local authorities across the UK for permission to use these campaigns and related imagery and design. In every such instance, Casino Rooms has gladly volunteered to share these, without charge.
70. The Casino Rooms maintains up-to-date policies in respect of safeguarding these are all attached which include guidance to staff on Ask Angela and drink spiking. **Please see Item 8.**
71. See attached email from PC Daniel Grant (13 May, 2022) thanking Casino Rooms on assisting in safeguarding. **Please see Item 4.**

#### First Aid

72. Casino Rooms has a dedicated First Aid Room with a vast array of equipment and supplies. There are photos of this in the Brochure provided. Our qualified First Aiders are always on hand to assist customers or staff that may need help. Records are kept of any First Aid given.

#### Dispersal

73. In order to prepare for people leaving the venue, the venue management adopt a number of measures. The dispersal measures are dynamic to allow for a flexible response to capacity, general atmosphere and climate. An outline of our dispersal policy is **Item 11.**
74. If both floors are in use, the venue Management will stagger the closing times of different floors by approx. 15-25 minutes (depending on attendance) of the building to promote a more efficient exit and hence dispersal of patrons.
75. Generally, it is the ground-floor Club Room that will be closed first, allowing most if not all of these people to collect their coats from the cloakroom and vacate the building and leave the area, before the upstairs room closes. This is of course, supported by the venue's SIA Doorstaff.
76. Towards the end of the night, the DJ's in all rooms will change the genre of the music to provide a more calming influence prior to the closing of that particular room. An announcement is also made stating that the 'cloak room is now open' as a reminder and nudge for patrons to get to the cloak room and start thinking about moving on.
77. The deployment of the SIA, staff and other stewards is equally dynamic. The key goal is to match increase the numbers of SIA to areas of greatest density of patrons – in effect moving from the internal areas to the exit and front of house along with patrons.
78. Early switching on of the house lights may be used by the Management on occasions where they deem this to be appropriate, to amplify the message that "it is time to go home". Only the most senior manager present is authorised to make this decision.

### Clear up

79. Casino Rooms has always allocated a dedicated team to constantly patrol inside the building to look for dropped drinking vessels, rubbish and hazards etc in order to provide the most pleasant and safest experience for its patrons and guests. This is increased close to closing up time to further enhance the mood for dispersal.
80. Whilst the venue staff very strictly enforce that no drinking vessels are permitted outside the building, it is sadly the case that the areas surrounding Casino Rooms are often the dumping ground of such items that emanate from other local premises who are not as strict. It an attempt to make the surrounding area safe (including the Blue Boar Lane Public Car Park) and to prevent such items causing damage to car tyres or them potentially being used as a weapons, the Casino Rooms Health & Safety Patrol goes outside and collects these items, even though they have not come from our venue. Collection logs are completed as diligence and these are attached for review if required. **Please see Item 12.**

### **Casino Rooms Internal Review**

81. We fully co-operate with the police and licensing authority and always take their concerns seriously, so we are surprised by the need for a formal review application given our long-standing relationship. Whether by way of formal application or informal request, we always see merit in reviewing and challenging our practices and procedures.
82. The review application asks us to consider three measures:
- [1] Use of Body Worn video cameras by the security team;
  - [2] Customer identification; and
  - [3] review of the deployment of SIA on dispersal.

### **[1] BODY WORN CAMERAS (BWC)**

83. In an attempt to better understand where the Police are coming from, we have trialled some BWC's. First, we trialled some "Hytera" BWC's for 4 weeks in the Nightclub. We then trialled a significantly more expensive brand called "Reveal", which we have tested for 6 weeks in the Nightclub. Whilst the Hytera units were more moderately priced, we noted that both the Video and Audio capturing capability was much better with the more expensive brand.
84. The Police are demanding that all door supervisors wear BWC's and that they are recording the entire time they are on shift. This request is contrary to the advice on the use of BWC given by the Information Commissioner and would welcome more details justifying the request made by the local police. In our view the current request is excessive, disproportionate and contrary to sound data protection practices and guidance.
85. Remedial conditions attached to a premises licence need to be necessary and proportionate to the concern identified. Upon agreement as to the number of body worn cameras, we are

prepared to pay more for the better quality, as this will provide far better evidence, should it be required. We have tested them operationally in line with the offer made to PC Dan Hunt on email 1<sup>st</sup> March 2022 – With one in use on each of the front doors and one in each nightclub room, worn by a “Key Responder” SIA Doorperson, who attends any occurrence or incident and will activate the BWC as they are on the way to this call. We have found this works well, but we have decided that it may be a good addition to add a fifth BWC to be used in the external smoking area.

86. The locations have been selected as these are key locations at which or from which to respond to incidents that may arise. They will ensure that BWC are deployed in a manner which is non-intrusive but reactive to relevant concerns.

## **[2] ID SCAN SYSTEMS (IDS)**

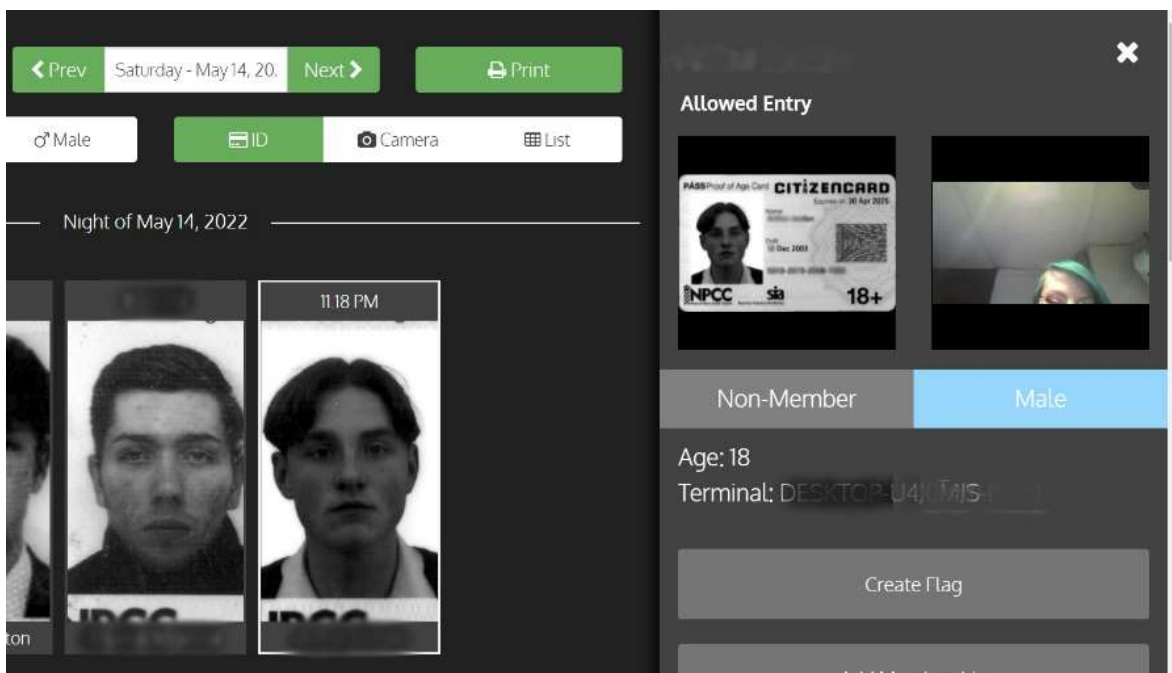
87. In an attempt to gain a deeper understanding of why Kent Police demanding this, we have also been trialling an ID Scan system (IDS). The brand we have chosen is “Patronscan”, which is deemed to be the most advanced one available in the world at this time. It is also the most expensive. At the time of writing, we have been using the system for about 6 weeks and on the whole, it does have some benefits, but also some negatives. Please see some examples of both to follow.

- a) ID scanning takes time. On a busy night, we have found that scanning everyone is causing a MUCH slower admissions processing time. People have to be welcomed and visually (and talked to) assessed for potential intoxication, then asked if they have physical ID, then searched, then ID scanned and then the customer needs to pay to get in. This is a lot to do even without scanning, so adding this in, means that queues are longer and overall waiting time is also. People do not like queueing and we are minded that waiting too long can cause customer to become frustrated. This is obviously not how we would like a customer to feel before they enter the venue, as this may spoil their experience or even worse that they are so wound up that they become a problem themselves later in the evening.
- b) One positive was that we used IDS to very quickly help DC Nick Baxter to determine whether someone he was looking for had been in the venue (May 2022), as part of an investigation that he was working on. He sent us a very detailed email thanking us for our help on this case, where we also provided him with a huge amount of CCTV footage to assist. This thank you email is attached. **Please see Item 3.**
- c) We have also had one strong example of where IDS has failed to do its job:

Approx 23:30hrs on Saturday 14<sup>th</sup> May 2022, a social media message (Facebook) was received at the venue saying that a 17 year old male with a fake ID, may have already entered the venue. A name and description were given. The information provided, was that he had a fake Citizen card in his own name, which he purchased via “Snapchat” (another form of social media) and that they supposedly can pass all scanning technologies. We were told that he had ordered it just changing the year of his birth date by one year, presumably, so that it was easy to remember if questioned. The person giving the information, claimed to be his Sister.

We quickly searched the venue and found the male. We asked him to come to reception and explained that we had reason to believe that his ID was possibly not genuine and we needed to investigate further. We re-scanned the ID and it was accepted by the system. We checked back and he had first been scanned at 23:18hrs and it had been accepted then also, so he had been admitted. We then went to the Citizen Card Verification Website and typed in all the details – the result was NO MATCHING CARD FOUND. The details were tried 3 more times, to make sure that no mistakes had been made, but all results were the same. The male was asked to leave the venue and the Citizen card was confiscated. He wasn't happy, but he seemed acceptant of what had happened.

BELOW: His acceptance by ID Scan (redacted) – AGED 18 – ALLOWED ENTRY:



BELOW: His Citizen Card verification check (redacted) – NO MATCHING CARD FOUND:



To us this highlights the role that human intuition and experience must assume within an automated system.

- d) An example of when trying our best ID scan everyone (as is the Police's wish) had very negative consequences, which were submitted to Licensing as part of our weekly "Returns" procedure:

Approx 00:37hrs (in the early hours of Sunday 1<sup>st</sup> May 2022)

James Seery (one of the management team) was walking towards Door 2, when Doorstaff asked him to talk to an irate female in regards to our ID policy, as scanning staff had found her not to have any physical ID. Prior to this, she had become abusive to ID scanning, reception and Doorstaff. She had clearly been drinking prior to arrival and was shouting saying that Doorstaff would not allow her entry into the venue because she didn't have any physical ID, only a photo of it. She kept showing her NHS COVID 19 vaccine records exclaiming "look I'm 40 odd".

She was repeatedly explained the ID policy She kept shouting at James saying he wanted her details because he "thought she was a criminal". She was assured that this wasn't the case, but the policy remained. She was shouting "I'm old enough to come in here, I'm not a criminal like the rest of your customers". A member of doorstaff nearby (Manny) was also trying to help explain the situation to her, but she became aggressive to him also and began lots of finger pointing. Another member of doorstaff (Brian Angell) then came through the door into reception. She immediately accused Brian of "intimidation". At this point Brian had not said a single word or become involved in any way.

Brian then also attempted to explain the ID rules, but she refused to listen. Having given up on trying to help the lady, James left the reception. She was asked to leave of her own accord, but refused and became even more aggressive, so Brian began to usher her towards the door, which she grabbed on to in an attempt to remain in the reception. Brian then removed her from the reception, still holding on to her arms to ensure that she did not fall backwards, as she was still forcefully resisting. After a short while, the female simply dropped to her backside where she was standing and sat on the floor near the main steps (seemingly in some kind of protest and to get attention from others). She did not appear to hurt herself or seem in any physical discomfort other than her obvious anger and attitude. She called the Police who attended approx. 00:48hrs, took details and spoke to Brian. They were quite happy and said that they would make contact if they needed more info. We understand that the female left the area in a Police car.

The female, who we now know to be Pamela Clayton, has also left an answerphone message complaining about our ID policy and how she was treated, saying that she will be pursuing the matter with the Police.

We ruined this poor lady's evening, essentially through no fault of her own in an attempt to comply with what we feel is an "over the top" protocol. On the night and since, there has also been a measurable amount of Police resources allocated to this particular event, which we understand is still ongoing many weeks later.

There have been many instances of more mature people not having physical ID with them, but this is by far the clearest example that there needs to be allowable discretion when it comes to the use of IDS.

### **[3] SIA ON DISPERSAL**

88. As far as we are concerned we already follow the police advice.

### **COST IMPLICATIONS**

89. What the Police are asking for in regards of BWC's and IDS is MASSIVE and also has major cost implications for the business, which is still recovering from the catastrophic financial losses of 16 months closure due to Covid. Our calculations show that to provide all that the the Police are asking for would cost the business £46,340 in year one (This is all the equipment and labour to operate/run and manage the systems/data). Each subsequent year would be £20,740, plus whatever wage increases are issued during that time. We have yet to tally the additional costs in terms of staff training and operation that this will also require.

90. **PROPOSED ADDITIONAL CONDITIONS**

#### **Body Worn Cameras**

*Up to five SIA door supervisors must wear Body worn cameras, on any night club trading night, which both record visual pictures and audio. Recordings from the body worn cameras will be maintained for at least 31 days and made available for inspection when required by the Police or local authority. ~~Body worn video cameras will be in record mode for the duration of the shift.~~ Footage from body worn cameras will be made available to police upon request.*

*The operation of Body Worn Cameras by SIA door supervisors **must** be compliant with the Information Commissioner's good practice guidance for using CCTV and other surveillance in clubs and bars.*

*Door supervisors equipped with Body Worn Cameras must be trained in when and how to operate the surveillance, typically in reaction to an alert or engagement with a scenario of concern and not as a means of continuous recording.*

#### **ID Scanner**

*All customers who appear to be under the age of 30 entering the premises must provide proof of identification (including name, photograph, and date of birth) to be scanned by an electronic identification scanning system as a condition of entry on any night club trading night. (If the scanning system malfunctions the identification documents must be photographed until the system is repaired, this period being no longer than 72 hours). The system and its operation **must** be compliant with the Information Commissioner's good practice guidance for using ID scanning and other surveillance in clubs and bars.*

### SIA deployment on dispersal

On *any night club* trading night, at least 2 SIA door supervisors shall be deployed to supervise to the front of the premises including Blue Boar Lane and Blue Boar Lane carpark thirty minutes prior to closing until one hour after the premises has closed (or until the majority of customers have dispersed, whichever is sooner). Additional door supervisors shall be deployed from the premises as and when various rooms within the premises close in order to assist with external dispersal at closing time. Door supervisors shall wear hi-visibility vests when deployed to assist with external dispersal at closing time.

[END]