COSTCUTTER, BURNOPFILED

<u>Appellant</u>

And

DURHAM COUNTY COUNCIL

Respondent

CORE BUNDLE

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WITNESS STATEMENT OF TIM ROBSON

Witness Statement

Statement of Tim Robson

Age if under 18: Over 18

Occupation: Licensing Consultant and Trainer

This statement (consisting of: [4] pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

- My Name is Tim Robson and I am currently self-employed as a licensing consultant and teacher
 of licensing legislation to the approved standard in relation to the Award in Personal Licence
 Holder's. I make this statement in my capacity as a Licensing Consultant for TJR Licensing and
 former Police Licensing Officer.
- 2. Briefly, my experience as a Police Officer involved in the latter 14 years of my career working as a Licensing Sergeant within Durham police area. In the last four years of my career I worked within the Durham Alcohol Harm Reduction Unit which was a specialist unit divided into prevention, enforcement, treatment and education. My role was primarily Licensing Sergeant dealing with Prevention and Enforcement, and my role extended within the unit to target organised crime groups, problem premises and deal with vulnerability and child and sexual exploitation. I have worked closely on operations with the Border Agency targeting immigration breaches in licensed premises. I therefore have a detailed knowledge of both lower level breaches in the licensing objectives but more importantly the more serious breaches that occur such as those mentioned above and serious violence.
- 3. I was involved in several high-profile Reviews and Summary Reviews and commented on hundreds of licensing applications. I received a Chief Constables commendation for instigating in excess of 20 reviews on licenced premises in one year, where I identified serious undermining of the objectives and ensured that the problem premises was brought to the attention of the licensing committee.
- 4. I was one of eight specialist officers appointed in England and Wales as a representative of the National Police Chiefs council (formally ACPO), and I worked with the alcohol sub group based in the Home Office. Since retiring in December 2015 I have, worked as a Licensing Consultant. I continue to deliver training and conduct premises risk assessments and I report on my findings. I also am a Training Coordinator with the Institute of Licensing, Northern Section and the North East representative for Pubwatch.

- 5. As a result of instructions received from Mr Matt Foster of Mincoffs Solicitors, I attended The Costcutter Post Office at the Units 2-3, Old Co-op Buildings, Front St, Burnopfield, Newcastle upon Tyne NE16 6LX. I am aware that this premises is subject to a review following the sale of alcohol to persons under 18yrs of age during a test purchase operation on two occasions in December 2018. My visit on this occasion was to risk assess the premises in relation to the licensing objectives and to speak to the manager and Premises licence holder Mr James Millican in relation to the social responsibilities in the sale of alcohol awareness. I attended the premises at 3pm on Wednesday 2nd April 2019 where I met Mr James Millican manager and Premises holder for the Premises'. The Designated premises licence holder is Mr Harjinder Bal, who was not present at this time. Mr Millican was serving customers and I was able to monitor his method of operation during my visit.
- 6. During this visit I took a number of photographs of the outside and inside of the shop. Externally to the front of the premises was a sign displaying its opening times. The single door placed central to the front of the premises was covered by an external CCTV camera. An alarm system and shutters were sited to the front of the shop.
- 7. Once inside the premises was very well lit with the alcohol sited some distance from the shop door to the far right of the shop. The point of sale was to the right of the shop door and had a clear view of persons entering. Alcoholic drinks were primarily located in six cooler units at the side of the cash pay point. As per the licence condition's the spirits were stocked behind the counter. In comparison to many other of licensed premises that I have visited this premises has only a small quantity of alcohol for sale. The condition of the premises I would describe as well presented and the floor was of good quality and non-slip. Aisles were clear and obstruction free.
- 8. All fire exits were clearly marked and properly signed. Fire extinguishers were within their date of testing and complied with regulations.
- 9. The till was fitted with an electronic point of sale age verification system and all of the statuary signs were displayed. Cigarettes' were hidden from view with the statutory signs displayed and the summary of the premises licence part B was displayed. The premises was displaying a Challenge 25 age verification policy.
- 10. I saw that the premises had a good quality 8 channel CCTV system which was recording for 28 days and covered all entrances and exits.
- 11. Upon speaking to Mr Millican it was apparent that he was very busy, engaged with both post office and shop duties. He informed me that he was primarily the main operator in the premises with one other member of staff to assist. He knew a number of the customers very well and

presented a good quality of service to all patrons who he dealt with. During the time I was in the shop I did not see any persons enter whom I would challenge as being under 25yrs of age. I examined a refusal register which was completed and in date.

- 12. On Wednesday 8th May 2019 I attended the premises again and on this occasion I conducted a detailed training delivery complying with the Highfield accredited qualification for the Award for Personal Licence Holders and in particular the responsibility on the staff in ensuring compliance and their role in conducting a continued risk assessment of the objectives. The training was accompanied by a presentation on the expectations of the act and specifically what to look for with regards to identification for sales of age related products and the procedure to be followed when inspecting documents prior to employing new staff. I also defined the legal definition of drunkenness and demonstrated fake identification. I included in my training the need to monitor the outside of the shop and ensure that groups gathering outside are politely moved on. This training took five hours and was delivered to James William Millican, Oliver and Laidler. I was able to put questions during the training to all three candidates on their understanding of the training. Following the training I conducted an approved examination on the knowledge required relating to the Award for Personal Licence Holders. Immediately after this the three candidates completed a second examination in relation to licensing law and general knowledge. All three candidates passed both of the examinations.
- 13. After the training each of the three signed a declaration of training and compliance regarding complying with the age verification process.
- 14. The three candidates then signed a declaration of compliance in regards the need to refuse the sale of alcohol to persons whom are drunk.
- 15. I recommended that refresher training was conducted every 6 months, and full training records are maintained for future inspection by the authorities.
- 16. I introduced a new challenge compliance sheet that indicates the number of age verification challenges conducted on a daily basis.
- 17. My initial recommendations were as follows:-
 - Utilise the challenge sheet.
 - Maintain at least 2 staff to provide assistance and support to Mr Millican.
 - Identify a new Designated Premises Supervisor, as Mr Millican is on a daily basis engaged in Post Office duties which take him away from the general operation of the

shop sales, of which I would recommend set and experience.

Laidler from her previous skill

Maintain an up to date CCTV log demonstrating regular checking and compliance.

 Although the customer matrix may be elderly in comparison to the challenge 25 scheme maintain a comprehensive refusal register and identify when there have not

been any customers in the premises under the age of 25.

Improve displayed signage in respect of Challenge 25 and tobacco sales.

 All future staff are to be trained to a high standard with regards to licensing legislation and the social responsibilities surrounding the sale of alcohol as well as

how to challenge 25 and age verification. Full training records to be maintained.

During training the candidates were given a number of examples of fake and real

identification to assist him in identifying true and correct identification methods for

future reference. The premises would benefit from the use of an ultraviolet light to

identify fake identification.

Summary and Recommendations

18. I am satisfied that the training of all three members of staff is of the required standard to

ensure future compliance.

19. I am satisfied that the training has been received well and that the sales team has the skills

to ensure continued compliance with the legislation.

20. I am satisfied that this premises, if the Licensing Committee is minded to allow the licence to

continue, will operate in a safe, socially responsible and overall legal manner.

21. I respectfully submit this document for the information and attention of the licensing

committee.

Signod	
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TRAINING IMPLEMENTED AT THE PREMISES



TJR Licensing, Consultancy and Training.

Record of Training Given to a Member of Staff Regarding Social Responsibilities Surrounding the Sale of Alcohol and all in House Policies and Procedures. Trainers Declaration.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



I hereby confirm that I have delivered training to all staff members listed on the attendance sheet in relation to Costcutter convenience store. The training given was at a level of the Award in Personal Licence Holders Level 2. The subject matter covered the new Licensing Act. I included a strong police definition of identifying drunk customers and conflict resolution. I confirm that I have delivered training to all of the listed staff on the "Police determination of a drunk"

I covered the necessity to check identification and I produced examples of fake ID. I fully defined the manner in which alcohol should be sold in a socially responsible manner. In recognising current traits, I included training in vulnerability, Novel Psychoactive substances and Nitrous oxide usage.

At the end of the training the learners were all tested with an examination on company policy and procedure and all passed. Certificates have been provided to demonstrate the achievements of the learners.

in relation to age restricted products I feel confident that those trained fully understand the legislation, liabilities, policies and procedures to be complied with namely.

- Acts of Terrorism and Major Incidents
- Crime Prevention Policy
- Drinks and Drunkenness and conflict management.
- Disorder Policy
- Disorder and Drunkenness policy declaration
- Fire Fighting Policy.
- Preservation of a Crime Scene
- Recognising the needs of Disabled or impaired persons.
- Responsible Service of Alcohol Policy and Age Restricted products
- Request for evidential images from CCTV.
- Immigration Policy
- Incident Report Form
- Social Media Policy
- Vulnerability Policy
- Weapons and how to deal with weapons policy.
- Novel Psychoactive Substances and Laughing Gas

Name of Premises; Costcutter, Old CoOp buildings Burnopfield Trainer Name Tim Robson Cert.Ed. MIOL, BII

Signature

Date 8/5/19

It is recommended that refresher training is given every six months.



ACTS OF TERRORISM OR ANY OTHER MAJOR INCIDENTS

This convenience store hopes to attract a wide range of individuals and groups of people that may come to this shop in order to purchase items and hopefully in the knowledge that we will do our best to provide a safe and crime free space for them to enjoy their shopping experience without worrying about what might happen. Unfortunately, it is exactly this kind of atmosphere that can attract people that wish to commit crimes of terrorism against ourselves and the general public.

This training guide has been put together in an effort to reduce the amount of injury, stress and possible loss of life that could possibly happen in the venue, in the event of an act of terrorism or other major incident. You as a staff member of the shop are responsible for what happens in the store when you are on duty. Whether you are selling products or stocking shelves it is your duty to be aware of everything that is happening around you. In the event of an act of terrorism or other major incident the evacuation or possible non evacuation may differ completely to that of a fire evacuation depending on the exact nature of the incident.

Your senior on duty manager will decide the best course of action to take in these instances and you will have to follow their instructions carefully until the all clear is given. In an effort to reduce panic amongst the general public the code word CINDERELLA has been given in case of any major incident or act of terrorism.

If you are the first to become aware of any situation that may require emergency procedures other than a fire this is the code word you must give, when made aware of the situation via the code word it is important that you remain calm and pay attention to any instructions given by your manager or supervisors, remain at your workstation or return to it if you are away for any reason. DO NOT LEAVE THE PREMISES UNLESS INSTRUCTED TO DO SO. The threat may be outside the building and it may be safer to remain inside. There are a number of different situations that could possibly occur and the procedures to follow in each instance could be very different.

In case of a pre-warned bomb threat

- It is possible that bomb threats may be telephoned in to the club If you are the person that answers the phone in this instance it is important that you do the following.
- Switch on the voicemail recorder on the phone
- Tell the caller which town/district you are answering from
- Record the exact wording of the threat write it down.

Ask the following questions

- · Where is the bomb right now?
- When is it going to explode?
- · What does it look like?
- What kind of bomb is it?
- · What will cause it to explode?
- Did you place the bomb?
- · Why?
- · What is your name?
- · What is your address?
- · What is your telephone number?
- · Record the time and date the call ends, length of the call
- If the number was not given try and retrieve it via 1471



- · Inform the senior duty manager of the details of the call
- Contact the police on 999 and record the time of that call
- · Write down any details of the caller you could guess from their voice, such as
- Sex of the caller
- Nationality
- Age
- · Were they well spoken, threatening, offensive, was the threat read out?
- · Were they calm, crying, angry or emotional in any other way?
- · Was the voice disguised in any way?
- Did they have a lisp or other defined way of talking?
- · Was the voice familiar? If so who did it sound like?
- · Were there any background noises such as music or traffic?

Search and evacuation of premises due to Pre warned bomb threat

- If the situation is a pre-warned bomb threat and the manager has been informed that the device is inside the building and where it is they will most likely decide to evacuate the building through escape routes furthest away from the position of the bomb in this instance the code word CINDERELLA will be followed with the area of the device CINDERELLA IN THE REAR YARD for instance. In this case the senior staff and managers will take care of the evacuation in a similar way to a fire procedure ushering everyone from the shop areas first. It is important that you obey the same set of rules as the fire procedure e.g. not returning for personal belongings, remaining calm and assisting disabled people with evacuation etc. Managers and supervisors must remain on site and search for the device until it is found and Emergency services can locate it easily from directions given by them.
- If the situation is a pre-warned bomb threat and the manager has been informed that the device is outside the building (such as a car bomb) they will most likely decide that the safest option is to remain inside the building until given the all clear by emergency services. In this instance the code word CINDERELLA OUTSIDE will be given and you must await instruction from your senior manager and supervisors. All members of the public and staff must remain inside the building in an area the manager deems to be safest from the threat. It is important that you remain calm and follow the instructions given to you by your manager and senior staff, you may be asked to comfort members of the public, hand out water or help your manager in some way.

A suspect package is found in the shop without warning

- If a suspect package is found in the shop at any time by a member of staff or by a member of the public it is essential that the manager on duty is informed immediately, the code word CINDERELLA is used to reduce panic.
- · Do not attempt to touch or move the package from where it is
- Your senior manager will most likely evacuate the building through escape routes furthest away from the suspect package.
- Remain calm and obey regular fire evacuation rules, listen carefully to instructions given by managers and senior staff, leave through escape routes designated by management.

Biological/chemical/radiological threats inside the building

- It is possible the building may come under threat from biological or chemical threats through letters or parcels being delivered. It is unlikely that this would happen during times when the building is occupied by members of the public (all deliveries are completed during times when customers are not present)
- In this instance it is important that All air conditioning devices are switched off including computers with fans and refrigeration equipment. NOBODY leaves the building until medical advice has been given. All doors and windows must be locked shut and surrounding businesses must be informed of the situation. Emergency services must be informed immediately.

Biological/chemical/radiological threats outside the building

- It is possible an incident may occur outside the building, in this situation you will be informed by the use of the code word CINDERELLA OUTSIDE
- In this instance your manager will most likely decide it is safest to remain inside the building away from all ventilated areas, turn off all systems that draw air into the venue (air conditioning etc.), lock all windows and doors and remain inside until given the all clear by emergency services.
- · It is essential that you remain calm and listen to all instructions given by your manager and senior staff

Why do we have to deal with it?

• There are many ways we could come under threat in this industry partly because the places we work are busy crowded environments with limited protective security measures and therefore the potential for mass fatalities and casualties. It is therefore our duty to be aware of how to deal with these situations in the best manner possible in the unfortunate event we may have to.





CRIME PREVENTION POLICY

Theft and Shop Lifting

Lost property is another issue, if you find an item of lost property: a mobile phone perhaps or an item of jewellery you must hand it in to the manager and it must be logged correctly and taken to the police if it does not get collected by the owner.

You CANNOT KEEP Lost property it is not yours. If you are found in possession of an item of lost property by way of a security search at the end of shift it will be treated as gross misconduct and you will be dismissed immediately. Lost and found property will be recorded in the appropriate registers and details of the item recorded. The item will be retained in a safe place for a period of 28 days.

Robbery

As a cash handling business which operates a convenience store and a post office, the threat of robbery is real. You should be vigilant, and report anything to a manager which you think is suspicious. A written record can also be made of persons behaving suspiciously, and CCTV can be retained just in case.

Criminal damage and acts of Violence

It is unfortunate that some members of the public may get aggressive, particularly if they have already been drinking alcohol. This may lead to them damaging property or turning their anger against other members of the public or staff. It is important that you are aware of this. If you witness any situation that looks like it may become violent you must report this to a member of management immediately. If nobody is available then call the Police.

If someone is aggressive or violent to you, you must also report it to a member of management. Do not get involved in any arguments or violent conflicts. If you see someone damaging property report it immediately.

Theft from the company

It is also important to consider that members of the public and indeed employees of the company may try to steal company property and/or your own property. It is your duty to do your best to combat this.

You can do this in many ways:

- Making sure all doors to staff only areas are locked behind you;
- · Being observant and watching the behaviour of the public;
- · Keeping stock/cash etc. out of reach of customers;
- Reporting any suspicious behaviour or evidence of theft by either customers or staff members to your manager immediately, your manager will keep this anonymous if you wish: and
- · Being vigilant and aware at all times

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CCTV

A 24 camera Close-Circuit Television (CCTV) system will be operational at the premises at all times when licensable activities are being carried out and at any other times where members of the public are present on the premises.

The CCTV system will contain the correct time and date stamp information.

The CCTV system will have sufficient storage retention capacity for a minimum of 31 days continuous footage which will be good quality.

A designated member/members of staff at the premises will be authorised to access the CCTV footage and be conversant with operating the CCTV system. At the request of an authorised officer of the Licensing Authority or a Responsible Authority (under the Licensing Act 2003) any CCTV footage, as requested, will be downloaded immediately or secured to prevent overwriting. The CCTV footage material will be supplied, on request, to an authorised officer of the Licensing Authority or a Responsible Authority.





DISORDER POLICY

Costcutter hopes to continue to be a very popular shop, attracting a wide range of individuals from nea and far that may come to the store, hopefully in the knowledge that we do our best to provide a safe space for them to purchase goods without worrying about what might happen.

You as a staff member of the venue are responsible for what happens in the shop when you are on duty. The management wishes to promote the opportunities of all in this area and will seek to actively employ local staff. You have an enormous duty of care and social responsibility in any role that you work. Whether you are serving customers, stocking shelves or working around the building it is your duty to be aware of everything that is happening around you. If you are working in the venue and you see an instance of disorder happening or just about to happen it is essential that you:

- Take a mental description of the people involved clothes, hair colour, height/size etc., who is the aggressor in the incident? All incidents of disorder must be recorded afterwards with as much information as possible in the incident book.
- · Get a manager immediately explain the incident calmly and return to the scene. DO NOT intervene.
- If the incident is over and the people you saw have fled give your description to the security staff and go about your business DO NOT seek out the people involved on your own and try to intervene
- If you see the people involved again, inform management of where they are and go about your business. DO NOT intervene
- If what you witness is a serious incident of disorder and someone is injured you may need to make a statement to the police. It is important that all incidents are recorded write a statement stating what happened, where and at what time and date. It is important to mention that you as a member of staff may be the victim of disorderly conduct by a member of the public. If at any point you feel as though you are being threatened in any way and disorder could follow DO NOT try and deal with it yourself. Go and get a member of security or management and the person involved will be removed from the premises immediately

Duty of care to those involved in incidents of disorder

It is important that those involved in incidents of disorder are taken care of if necessary. Any injuries must be taken care of by the duty manager trained in first aid, Ambulances or Police must be called if necessary and if you were involved in the incident or simply witnessed it a statement must be made.

Do your best to assist your manager if they need it, If the manager has not arrived to administer first aid do your best to keep the injured party comfortable and calm, offer water etc. If the crime scene needs to be preserved keep it clear with tape or ropes and poles and a member of management.

Close the room if possible It is very important that all customers attending the venue are safe while in the premises, leave the store safely, and make their way home safely after we close, it is not acceptable to simply get rid of people that may be vulnerable or incapacitated due to instances of disorder they may or may not have been involved in whilst in the premises. It is simply our duty to make sure they are safe while under our care.

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DRUNKENNESS POLICY

You as a staff member of this shop are responsible for what happens in the premises when you are on duty. Whether you are selling age restricted products or re stocking shelves it is your duty to be aware of everything that is happening around you. You will have already filled out your responsible service of alcohol form and are already aware of the consequences of serving somebody alcohol that is under the age of 18 or even serving someone over the age of 18 that intends to supply the alcohol to someone under 18 If you have not filled out this form speak to your manager immediately. Being vigilant to proxy sales is essential.

Alcoholic Drinks are not allowed to be consumed in the premises or immediately outside as it will associate the shop with poor management and anti-social behaviour.

You must also realise that it is an offence to allow the service of alcohol to a drunk on the premises. It is your duty to recognize the symptoms of someone that is drunk and refuse service if necessary.

The Collins dictionary definition of a drunk is:

"intoxicated with alcohol to the extent of losing control over normal physical and mental functions"

• The Oxford English Dictionary states that drunkenness is "having drunk intoxicating liquor to an extent which affects steady self-control"

Effects of Drunkenness

You may recognize someone that is drunk by keeping the above statements in mind or from your own experiences here are a few more points that may help you

- · Glazed, possibly reddened eyes
- Slurred speech
- Poor co-ordination (staggering, being unsteady on their feet, being unable to count out cash or use a mobile phone)
- · Inability to respond appropriately to clearly stated questions or requests
- Strong smell of alcohol on breath
- Rambling conversation
- Unkempt appearance
- Being careless with money
- Spilling drinks
- Bumping into display stands.
- · Inappropriate sexual behaviour
- Drowsiness

If you notice any of the above signs in anyone that wishes to be served alcohol at the bar or are even unsure, check with your supervisor or nearest manager. If this is not possible then the easiest way to deal with the situation is simply to say "I'm sorry but its company policy that I must not serve alcohol to someone whom I believe to be drunk" If the customer attempts to argue the point do not get into any kind of confrontational argument with them and simply apologise. Inform the manager immediately and make sure the customer does not get served any more alcohol. If the customer becomes aggressive use any of the following: -

- Contact a supervisor
- Phone the Police



It is your duty to be responsible in the way you serve alcohol. If you fail to observe the rules in serving persons under 18 and/or persons deemed to be intoxicated, you are committing an offence and may be fined by the Police and/or disciplined for misconduct.

Proxy Sales

'Proxy sales' is a term used to describe the purchase of alcohol on behalf of children. A person commits an offence if they buy or attempt to buy alcohol on behalf someone under the age of 18. Especially when serving through the hatch, you must be very vigilant as to who you are selling the alcohol to. Observe the potential customer, are they perhaps acting on behalf of younger persons around the corner. Make use of the CCTV and identify regular customers being confronted by young persons. It is your duty to prevent alcohol from falling into the hands of under 18 year olds. You must be satisfied that you are actually selling the alcohol to the genuine individual and not to a proxy sale elsewhere.

Duty of care to those involved in incidents of Drunkenness

It is important that those involved in incidents of drunkenness are taken care of if correctly. As this shop seeks to offer the sale of alcohol for 24 hrs then as a retailer it is your responsibility to be fully satisfied that the purchaser is not drunk at the time of purchase. You may have potential customers attend the shop after having been drinking in an on licenced premises. You must assess them and if drunk refuse the sale. Any injuries must be taken care of by the duty manager trained in first aid, Ambulances or Police must be called if necessary and if you were involved in the incident or simply witnessed it a statement must be made. Do your best to assist your manager if they need it, If the manager has not arrived to administer first aid do your best to keep the effected party comfortable and calm, offer water etc. It is very important that all customers attending the shop are safe, that they enter go about their business and leave safely, and make their way home. It is simply our duty to make sure they are safe while under our care.





Disorder and Drunkenness Policy Declaration

Costcutter will not tolerate disorderly behaviour towards staff or fellow patrons. To counteract any such behaviour, we will seek to do the following:

- Refuse to serve alcohol to people who have consumed too much alcohol and those who attempt to purchase alcohol for people who are in the same condition.
- Refuse entry to people who have already consumed too much alcohol.
- We will not allow people who have consumed too much alcohol to remain on licensed premises.
- Be aware of troublesome signs e.g. people becoming more vocal, aggressive, unsteady on their feet, uncoordinated movements, inflamed eyes, increasing self-confidence and loss of self-restraint.
- We will not tolerate anti-social behaviour.
- Ensure that all staff are aware of the standard of behaviour that is acceptable from customers and the set procedures in place to deal with such behaviour.
- We will attend shopwatch where possible and report any incidents both to the Police and/or Pubwatch should the situation require.

By signing here, I agree to adhere to the disorder and drunkenness policy for Costcutter and am happy that my role in enforcing this approach has been explained to me as part of my staff training.

NAME	POSITION	SIGNED
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THE EFFECT OF DRUGS HOW TO DISPOSE OF DRUGS AND OUR DRUGS POLICY

This training guide has been put together in an effort to reduce the undermining of the licensing objectives caused by drugs that could possibly happen in the venue.

COTCUTTER CONVENIENCE store has a ZERO TOLERANCE drugs policy. This means that drugs are not permitted in any way on the premises. If drugs are found on anybody's person, they will be reported to the police. This applies to staff members too. If any staff member is caught using or in the possession of drugs they will be dismissed Immediately and handed to the Police. If drugs are found in or around the premises, they are to be taken to the manager immediately who will then place them in a self-sealing bag, police will immediately be notified and will be handed to police on arrival. Drugs must not be disposed of in any other way and especially not taken off the premises.

If you find something at work and you are unsure whether it is drugs or not take it to your duty manager to deal with. DO NOT touch needles.

You as a staff member of the venue you are responsible for what happens in the shop when you are on duty. Whether you are selling items or working in the building it is your duty to be aware of everything that is happening around you. It is also part of our job to make sure that members of the public attending premises are kept as safe as possible while under our responsibility. It is your responsibility while working at the premises to be aware of the condition of our customers and whether or not they are in a suitable condition to remain in the venue or need some form of attention or first aid. You may find a number of different instances where people may need to be looked after where drugs are concerned. The following is a list of things to look out for to see if members of the public could be under the influence of drugs and ways to help them if necessary (safer clubbing guide & BBPA used as reference):

- Very dilated pupils
- · Excessive sniffing, dripping nose, watering or red eyes
- · Sudden severe cold symptoms following visit to toilet/smoking area
- White marks/traces of powder around nostrils
- · Excessive giggling, laughing at nothing, non-stop talking
- · Unnaturally dopey, vacant staring, sleepy euphoria
- · Non-stop movement, jiggling about, dancing
- Gagging or retching actions
- Excessive consumption of soft drinks or water
- Sudden, inexplicable tearfulness or fright
- · Any marked alteration in behaviour following visit to toilets/smoking area
- Payment in tightly rolled bank notes
- · Violent, over confident behaviour
- · Lack of co-ordination/confusion
- · Lack of inhibitions
- Overheating/removal of clothing due to excessive movement/dancing

It is possible that the people experiencing these effects are in fact enjoying the experience and wish to be left alone. Offering water to those looking worse for wear would be a good step to making sure they are comfortable and keeping hydrated which is very important where drugs are concerned. Do not agitate anyone in these conditions it may just confuse them and they may become violent towards you.



Legal Highs or 'Novel Psychoactive Substances', 'NPS'

The law

While many of these drugs were once legal, with the advent of the Psychoactive Substances Act it is now illegal to produce, supply, or import them for human consumption – including for personal use. Possession for personal use is not an offence, unless in prison.

The Psychoactive Substances Act received Royal Assent on 28 January 2016 and came into force on 26 May 2016. The act:

- makes it an offence to produce, supply, offer to supply, possess with intent to supply, possess on custodial
 premises, import or export psychoactive substances; that is, any substance intended for human consumption
 that is capable of producing a psychoactive effect. The maximum sentence will be 7 years' imprisonment
- excludes legitimate substances, such as food, alcohol, tobacco, nicotine, caffeine and medical products from the scope of the offence, as well as 'poppers' and controlled drugs, which continue to be regulated by the Misuse of Drugs Act 1971
- exempts healthcare activities and approved scientific research from the offences under the act on the basis that
 persons engaged in such activities have a legitimate need to use psychoactive substances in their work
- includes provision for civil sanctions prohibition notices, premises notices, prohibition orders and premises orders (breach of the 2 orders will be a criminal offence) to enable the police and local authorities to adopt a graded response to the supply of psychoactive substances in appropriate cases
- provides powers to stop and search persons, vehicles and vessels, enter and search premises in accordance with a warrant, and to seize and destroy psychoactive substances

Some synthetic cannabinoids like Spice are controlled as Class B substances under the Misuse of Drugs Act. Offences for Class B drugs are:

- Possession Maximum sentence 5 years/fine/both
- Possession With Intent To Supply Maximum sentence 14 years/fine/both
- Supply (including being concerned in supply, conspiracy to supply, aggravated supply and offer to supply) –
 Maximum sentence 14 years/fine/both
- Production Maximum sentence 14 years/fine/both

'Legal highs' as they are called contain one or more chemical substances which produce similar effects to illegal drugs (like cocaine, cannabis and ecstasy). These new substances are illegal under the Psychoactive Substances Act 2016

Meaning of "psychoactive substance" etc

In this Act "psychoactive substance" means any substance which-

- is capable of producing a psychoactive effect in a person who consumes it, and
- is not an exempted substance.

For the purposes of this Act a substance produces a psychoactive effect in a person if, by stimulating or depressing the person's central nervous system, it affects the person's mental functioning or emotional state; and references to a substance's psychoactive effects are to be read accordingly.

For the purposes of this Act a person consumes a substance if the person causes or allows the substance, or fumes given off by the substance, to enter the person's body in any way.

'Legal highs' cannot be sold for human consumption so previously they were often sold as incense, salts or plant food to get round the law. The packaging may describe a list of ingredients but you cannot be sure that this is what the product will contain.

Just the fact that a substance is sold as 'legal' doesn't mean that it's safe or legal. You can't really be sure of what's in a 'legal high' that you've bought, or been given, or what effect it's likely to have on you or your friends. We know that many 'legal highs' are sold under brand names like 'Clockwork Orange', 'Bliss', 'Mary Jane' and have been directly linked to poisoning, emergency hospital admissions including in mental health services and, in some cases, deaths.

The main effects of almost all 'psychoactive' drugs, including 'legal highs', can be described using three main categories:

- stimulants
- 'downers' or sedatives
- psychedelics or hallucinogens.

'Legal highs' are usually sold as powders, pills, smoking mixtures, liquids, capsules, or on perforated tabs.

tjr



The powders can range from white to brown to yellow in colour and from flour-like to little crystals in consistency. The pills and capsules can range widely in size, shape and colour.

The smoking mixtures tend to come in colourful packaging, often with labels describing the contents as incense or herbal smoking mixture, and the contents look like dried herbs, vegetable matter or plant cuttings. It's common for synthetic cannabinoids to be added to the dried herbs, vegetable matter or plant cuttings to make a smoking mixture.' Being legal does not mean it is safe and as an employee of this premises you have a duty under the Licensing Act to ensure that patrons frequenting the store do so safely.

Legal Highs will not be tolerated in this shop and will be dealt with as if they were a controlled drug.

Laughing Gas or Nitrous Oxide.

As an employee of this venue you must also be vigilant for customers who are in possession of or seen to use Laughing Gas or Nitrous Oxide. Users of this gas may be in possession of small silver gas cylinders and may be seen inhaling gas from balloons. You must remain vigilant for this as This store has a zero tolerance for use of this gas or possession of it on the company's premises. Be vigilant for discarded canisters.



What are the effects?

It gives a short sense of euphoria, hence the name, and can cause dizziness and a difficulty to think straight. What is the legal position regarding the drug?

Technically the substance falls into a legal grey area, coming under the 'legal high' bracket as it is used by some dentists as an anaesthetic. Although it is not illegal to possess and inhale the substance, it is illegal to supply it to anyone under the age of 18 - should you think they are likely to be inhaling the gas.

However, it is also illegal to use canisters meant for the dental industry for recreational purposes. Doing so can result in an unlimited fine, or a maximum two-year prison sentence. Be vigilant for customers using such substances.





FIRE SAFETY POLICY IN ADDITION TO THE EXTENSIVE FIRE RISK ASSESSMENT AND ON SITE POLICY RELATING TO A FUEL PROVIDER.



This training guide has been put together in an effort to illustrate the extra responsibilities given to you. In the event of a fire you as an employee you will be expected to act as FIRE MARSHALS. In this role you may be expected to use the firefighting equipment placed around the venue. You will be shown where the various extinguishers are placed around the venue and for what types of fires they should or should not be used for.

Causes of fire and what to be aware of

- This diagram shows "the fire triangle". It simply shows that in order for a fire to start there must be all three elements present. Removing any one of them will extinguish the fire.
- Electrical fires can be caused by faulty equipment, overloading sockets, frayed wiring, overheating. If you notice a piece of equipment becoming very hot to the touch, a socket that looks overloaded or something that looks in poor condition notify your manager or a member of technical staff immediately.
- Hard fuel fires can be caused by fuels such as wood, paper, cardboard etc. being exposed to heat such as that coming from a discarded cigarette end. Ensure all cigarette ends are completely removed.
- Petrol, diesel and oil fires can be caused by sparks and other sources of direct ignition or heat. Be aware and report
 any spillages found in the surrounding areas.
- Chemical fires can be caused by various reactions depending on the chemicals involved. Be aware and report any chemical spillages found in surrounding area.

If you find a fire or a fire is reported to you

- Assess the fire decide whether you can tackle it yourself DO NOT TAKE RISKS
- · What kind of fire is it? Where is the nearest extinguisher for this particular fire?
- Tackle the fire IF YOU CAN or begin the evacuation procedure by informing your manager
- You will notice that different types of extinguishers are placed around the building according to the
 equipment or environment surrounding them. This should help you choose the correct extinguisher in the event of any
 breakout of fire.

The mustering point in the event of a fire is in the roadway to the front of the shop at a safe distance.





IMMIGRATION AWARENESS POLICY

IMMIGRATION AWARENESS POLICY

At Costcutter we recognise the important duty we have as employers to prevent illegal working. We expect each of our potential employees to be able to provide sufficient documents to prove they have a right to work in the UK. The Home Office's recommendations for completing a 'right to work' check have been fully implemented in our recruitment process.

RIGHT TO WORK CHECKS

- 1) Obtain the person's original documents
- 2) Check the validity of the documents, in the presence of the holder
- 3) Make and retain a clear copy, make a record of the date of the check

Where a potential candidate is able to provide **original** personal documents, we will conduct a thorough check to ensure that the form of document is valid for the type of work Costcutter is recruiting for. This will take place in the presence of the holder.

If the validity check is performed by a member of our staff or a third party, such as a requirement agency, as the employer I understand that I will remain liable for the civil penalty if it is found that the employee is an illegal worker. Therefore, I will ensure that each validity check is conducted carefully by myself.

For any staff who have right to work in the UK on a time limited period, we will ensure that a follow up 'right to work' check takes place.

Section 21 of the 2006 Act as amended by section 35 of the Immigration Act 2016, states an employer has committed a criminal offence if they **know** or **have reasonable cause to believe** that they are employing an illegal worker.

We are aware that if an employer is found to be employing an illegal worker and has not carried out the prescribed checks to ensure they have a right to work in the UK, action will be taken.

If an employer is found to be employing someone illegally and they have not carried out the prescribed checks, possible sanctions are:

- -civil penalty of up to £20,000 per illegal worker;
- -criminal conviction carrying a prison sentence of up to 5 years and an unlimited fine;
- -closure of the business and an application for a court compliance order;
- -disqualification as a director;
- -seizure of earnings made as a result of illegal working

Summary

Having regard to the Home Offices recommendations, this convenience store wants to ensure that their practices on employing foreign nationals are impeccable. A traceable pack of 'right to work' documents shall be kept for each of our employees, dated and stored for the duration of the employees time with Costcuttert and an additional 2 years after they leave.

If there is any doubt, wer will do further investigation using the Home Office checking service to determine the working status of the potential employee.

I have fully read and understand the contents of this policy and I am aware that it is my duty as an employer to comply.

Signed:

Date:

Print Name



PRESERVATION OF CRIME SCENE

The crime scene is a highly important source of physical evidence that must be kept secured for the authorities. To ensure no possible cross-contamination with any other objects a crime scene must be preserved. Making sure the crime scene is preserved, as evidence is crucial it is also important that fundamental practices are adhered to.

Upon arrival at the scene of the crime, the first staff member must record the time, date and weather conditions and take action to preserve and secure the area to the maximum extent possible.

The administering of medical assistance to victims on the crime scene takes priority. Any unauthorized access must be disallowed as any individual present poses the risk of contaminating or destroying physical evidence. Once the scene has been secured. Immediate action must be taken to protect items of evidence, which may be destroyed by weather

Any persons present at the scene of the crime who may be witnesses should be removed and their details taken. It is also necessary to record all movements at the scene and any items moved or touched by individuals. The use of ropes and barriers to prevent unauthorized persons contaminating the evidence is essential.

When a crime occurs at a scene, the information gathered and the preservation of the scene will be vital in helping the Police with their inquiries. It is important that all staff are aware of their responsibilities should a crime occur.

Staff Procedure

If you are made aware of a crime on the premises, do not touch anything as preserving the scene from the moment of the crime, or making a note what might have changed since the crime is vital in helping the authorities with their investigation. Instead immediately inform a senior member of premises' staff (DPS, Duty supervisor or Door Supervisor). They will be able to handle the situation and take the required course of action. If the Duty supervisor for the shift gives you any instructions regarding the incident carry them out immediately and effectively. If you inform a member of door staff also inform the Duty Supervisor for the shift as well.

Duty supervisor Procedure

If you are made aware of a crime on the premises call the police immediately.

Remember that preserving the scene from the moment of the crime, or making a note what might have changed since the crime is vital in helping the authorities with their investigation. Do not approach the situation alone, if a member of qualified door supervision team is on hand ask them to deal with the situation with you, if not them enlist the help of the Designated Premises Supervisor (DPS). Follow the points below to best help preserve the crime scene. 1. Identify the area of the crime scene

2. Identify any secondary scenes (i.e. areas where first aid was performed)

3. Do not move anything unless it is a risk to human life

4. Do not touch anything, if you have to avoid direct contact and make a note of what has been disturbed to inform to police.

- 5. If the scene has been disturbed (due to emergency services) note what has been moved as well.
- 6. Protect the scene, create a physical barrier (cones, ropes), use staff to enforce this

7. Secure all fire exits if possible.

Remember, if you or anyone has moved anything; make sure you make a note to pass onto the police.

These situations can be difficult to judge and handle, do not take any action you are not comfortable with or action that may put your colleagues or other customers in danger. IF IN ANY DOUBT CONTACT THE DESIGNATED PREMISES SUPERVISOR OR OTHER SENIOR MEMBER OF STAFF. Police - 999 or Durham Police - 101





RECOGNISING THE NEEDS OF DIABLED OR IMPAIRED PERSONS

This training guide has been put together in an effort to illustrate the needs of disabled or impaired persons. It is Important to understand that a person with disabilities may not be a wheelchair user and/or may not be visibly identified as being disabled/impaired in any way. This training guide has been written in an effort to help you recognize a number of disabilities and help any patrons affected in the safest possible manner during a significant event such as an evacuation. With this information, you will be able to recognize people with disabilities before the point of evacuation and be aware of their possible needs in the event of a fire or other serious incident.

Wheelchair users or people with limited mobility That may be able to walk slightly and therefore assist with their own evacuation in this situation it is important that you assess how capable the individual is of getting out safely on their own or assisted by another staff member, you must ask;

- Can you walk aided/unaided down the stairs?
- How far can you walk unaided?
- Would this be increased if assistance was made available?
- How many people would you need to assist you?
- How many times might they need to stop and rest?
- · Would hand rails be of use in assisting your escape?
- How might your disability be worsened e.g. by smoke etc.?

People who use electrically powered wheelchairs may have less mobility than those who use manual chairs. However, there may be exceptions to this rule, so it is important to consult the disabled person wherever possible. This group of people is likely to require much more assistance when leaving the building. It is wise for the person responsible to find the nearest refuge point for anyone in a powered wheelchair and follow the fire evacuation plan as usual.

Hearing impaired and deaf people

Hearing impaired and deaf people may need to know that there is an escape in progress – The alarm is audible only apart from the emergency lights. Hearing impaired or deaf people might not recognize these signs. You may be aware of any hearing impaired or deaf people in the venue due to previous contact on that evening, if this is the case it may be prudent to write a sign in plain English stating the emergency in progress and action to be taken. Note: Shouting louder is unlikely to be the answer in this situation.

Visually impaired and Blind People

Visually impaired or blind people may not be able to easily locate exit signage. In the unlikely event where a blind or visually impaired person is left alone or unattended it will be necessary to use a buddy system and delegate a member of staff to help the person out of the premises safely by guiding them to the nearest exit and to the assembly point.

People with cognitive disabilities

People with cognitive disabilities often have problems comprehending what is happening in escape conditions or may not have the same perceptions of risk as non-disabled people.

There may be reluctance by some to take an unknown route from the building. Some people with cognitive disabilities may fall into the group of unknown disabilities, such as dyslexia, dyspraxia and autism. These people may not be aware of the problem. In the unlikely event that these people are left alone or unattended it will be necessary to use the buddy system mentioned above keeping the individual as calm as possible, possibly using a slower or less crowded escape route if available.



Unknown Requirements

It should not be assumed that because a person has a disability they will need or even ask for assistance. Some will be confident that they can get out of the building unaided.

Conversely, there should also be an opportunity for other people who may not be considered as having a disability to request an escape plan and have the opportunity to have a confidential discussion about their escape requirements and be clear that if they need help it will be provided.

One group of people in this category is people with epilepsy – these people may make themselves known to you at the bar or your manager may make you aware of them via previous conversations. You must also be aware of people that may have asthma, heart conditions or just may not be able to cope with the stress of an evacuation.

Identification of escape routes by reception or security

- Customers visiting the shop may ask staff to show them the escape routes and procedures on arrival. This task should be allocated to the most suitable person in the building or area that the customer will be spending the bulk of their time in order to build up a familiarity with them so they know who to go to in case of emergency.
- You may be made aware of people's disabilities or Impairments via interaction with them or their interaction with your co-workers. It is important that you recognize them and view them as people that may need help in an emergency system mentioned above keeping the individual as calm as possible, possibly using a slower or less crowded escape route if available. Unknown requirements it should not be assumed that because a person has a disability they will need or even ask for assistance. Some will be confident that they can get out of the building unaided. Conversely, there should also be an opportunity for other people who may not be considered as having a disability to request an escape plan and have the opportunity to have a confidential discussion about their escape requirements and be clear that if they need help it will be provided. One group of people in this category is people with epilepsy these people may make themselves known to you at the counter or your manager may make you aware of them via previous conversations. For example, it is possible a person with epilepsy could have a seizure due to the fire alarm operating and may collapse in an area where they are on their own. This is very unlikely and the general practice of fire marshals yourselves) carefully and fully checking during the evacuation process should cover this rare eventuality. You must also be aware of people that may have asthma, heart conditions or just may not be able to cope with the stress of an evacuation

Identification of escape routes by staff

 You may be made aware of people's disabilities or Impairments via interaction with them or their interaction with your co-workers. It is important that you recognize them and view them as people that may need help in an emergency.





RESPONSIBLE SERVICE OF ALCOHOL AND AGE RELATED PRODUCTS POLICY

This short document will outline the groups of people you are unable to serve and our policy on underage persons on premises. If you are unsure of any of the information you are presented on this subject matter it is imperative that you ask for advice as after signing this document, it will be considered **GROSS MISCONDUCT** to in anyway act against our policy on responsible service.

People excluded from service of alcohol

1. Persons under the age of 18 years of age:

The next section fully outlines the procedure of checking for proof of age and what is considered sufficient proof of age.

2. Persons deemed intoxicated:

Although subjective it is important that you practice caution during service and that if you are in doubt of a person's level of intoxication that you ask for a manager/supervisor to 'cut' that person off from service.

The standard legal penalty for Serving either of the above is an £90 spot fine to YOURSELF and the possibility of further fines/Licensing consequences to the license holder.

Persons under the age of 18

This premises operates a Challenge 25 policy. If the person buying an age related product appears under 25 then identification should be requested.

- The only forms of identification accepted in the above cases will be a valid passport, drivers licence or card bearing the PASS logo.
- If the identification is deemed not genuine by the employee asking for it will be confiscated and handed to the police.
- Signs explaining the necessary requirement of identification and the types of identification accepted shall be displayed prominently in the premises.



Age restricted Goods

ITEM			
A I WIVE		MINIMUM AGE	MAX FINE
1	Knifes, Blades, Razors and Box Cutters	18	£5,000
einch.	Alcohol	18	£5,000
	Cigarettes, Tobacco, Pipes & Papers	18	£2,500
	Solvents and lighters, including refills (containing butane)	18	£5,000
	Fĭreworks	18	£5,000
	Spray Paints	16	£2,500
1	Lottery Tickets & Scratch Cards	16	£5,000
	DVD's and Computer Games	15 12 5+	£2,500

Practical Tips





VULNERABILITY POLICY

This training guide has been put together in an effort to raise awareness of vulnerable incidents that could possibly happen in the vicinity of the store, you as a staff member of the staff are responsible for what happens in the store when you are on duty. Whether you are serving at the cash point or stocking shelves it is your duty to be aware of everything that is happening around you.

As employees you will have been trained in drunkenness awareness and as such you should remain diligent towards customers who are under the influence of drink or drugs and if you believe that they are then they should not be served. Be aware that there are vulnerable persons who may be outside of the shop and adults may be purchasing alcohol for them.

Drug use and Drug dealing

It is our duty as a licenced premises operator to make sure we are as vigilant and direct as possible where the use of drugs is concerned in the shop. This shop has a zero tolerance policy towards drugs. If anyone is caught using drugs, dealing drugs or found with drugs paraphernalia they will be escorted from the premises and reported to the Police. It is your duty therefore to report any suspicious behaviour and/or any use of drugs to a member of management immediately. Any drugs or drugs paraphernalia found on the floor must be taken to the manager on duty immediately. If you suspect anybody of taking drugs or dealing drugs you must report it immediately.

Date Rape Drugs - ROHYPNOL AND GHB

Rohypnol GHB GHB Ketamine

Rohypnol (flunitrazepam) most commonly known as a date-rape drug, continues to be abused among teenagers and young adults, usually at raves and nightclubs.

STREET NAMES Roofies Rophies Roche Forget-me Pill Forget-me Pill Circles Circles Mexican Valium, Mexican Valium, Rib Roach-2 Roopies Roopies Rope Ropies Ruffies Roaches. Rohypnol Amnesia is the most common side-effect of Rohypnol.

Other Side effects Relaxation or sedation of the body Risk of sexual assault Rapid mood swings and violent outbursts of temper Breathing and heart rate slow down to dangerous levels Comas and seizures (especially when combined with amphetamines) Vomiting and headache Difficulty breathing and nausea. Harsh withdrawal symptoms like insomnia, anxiety, tremors and sweating. Memory loss Death.

Overdose is a very real possibility when Rohypnol is combined with alcohol or any other sedating drug. Rohypnol also severely impairs a user's ability to drive or operate machinery.

Rohypnol Colourless and odourless it has been linked to numerous incidents of sexual assault because it is a fast-acting sleeping pill that can be slipped into a drink and leave the victim with little or no memory of the incident. It has been linked to numerous incidents of sexual assault because it is a fast-acting sleeping pill that can be slipped into a drink and leave the victim with little or no memory of the incident.

Rohypnol the drug has been changed to leave tell-tale blue floating particles when mixed with liquids. If you see these in your drink, do not drink it.

GHB is a colourless and odourless liquid with a slightly salty taste. It is classified as a sedative. The following images give you an idea of what to look for.



There are a number of simple steps that can be taken to prevent young people illegally purchasing age-restricted goods. Listed below are some practical tips that could help prevent you and your staff from breaking the law.

- We operate a "Challenge 25" policy Always ask for proof of age from anyone who looks younger than 25 years old.
- We operate a "No ID, No Sale" policy. Without proof of age identification, no sale can take place. To further enforce this we display a poster at sale points in the store so customers will expect to be asked to prove their age. If possible, set up a prompt or reminder on your till to remind staff to ask for proof of age when selling age-restricted products.
- Refusals book If you or your staff refuse a sale record this in the refusals book, which is enclosed with this pack.
- Train staff. Ensure all staff are fully trained and their training is monitored. Record training details in the training record enclosed with this pack. Ensure you do not sell to a child even if they say the product is for a parent or other adult. Adults over 18 may purchase alcohol or age restricted goods for another underage person. Monitor the actions of Adults and their communications either inside or outside of the service station to alert you that an adult may be making a proxy sale for a child. Do not be afraid to ask.
- Display statutory notices. Ensure statutory notices, for fireworks and tobacco, are prominently displayed in your business.

Proof of age - always ask to see identification

At times it can be difficult to judge a person's age, so it is vital that you take steps to ensure that you maintain your training to prevent the sale of restricted items to young people.

Be realistic – to get what they want many young people will attempt to make themselves look older and may lie when asked their age.

To be on the safe side we operate a "Challenge 25" policy and always ask to see photo proof of age identification for anyone appearing to be under 25 years of age.

Photo ID schemes

As a business trader you are required by law to ensure the photo ID card provided to you belongs to the person using it. We recommend that you only accept cards with a photograph and a date of birth.

Passports and driving licences are acceptable but remember that a person can have a driving licence from the age of 17.

ID cards that include the PASS holographic logo will also show a photograph and date of birth. The hologram is forge-proof and recognisable.

The Home Office, the Association of Chief Police Officers and Trading Standards support this scheme.

Nationally recognised PASS cards are:

- CitizenCard
- VALIDATE UK

You must follow these instructions

Refusals book

When you refuse a sale keep a record of the incident in the refusal book enclosed with this pack. This record provides evidence that you have avoided making an illegal sale to young people. It may also help identify problem groups, individuals and other issues that may be useful for Trading Standards or the Cleveland Police.

You should regularly monitor the refusals book to ensure that all staff are using it correctly. If there are no entries, or very few by certain staff, this will be highlighted by the management and could indicate your reluctance to challenge people about their age and can help identify if extra training or support is needed.

Training and support for staff

All staff responsible for selling age-restricted products must receive regular training. You must remain aware of the age restrictions for the various products you sell.

A reference guide is enclosed in this pack above. Display this next to your till for a quick reference guide for your staff. It is also your responsibility to ensure you are aware of what constitutes acceptable photo ID.

You must always operate a "Challenge 25" policy at all times. It is very important to keep records of training and instructions given to staff.

Following your training session, you will be asked to sign a form confirming you have understood the training. Managers will regularly carry out shadowing and dip tests to check how you are dealing with age restricted products.





It is very important that that our staff are vigilant to glasses and bottles being left unattended as sexual predators take such opportunities to put substances into the drinks.

We sell alcohol and in itself it creates a feeling of lack of awareness of things happening. The individual when drunk will feel less receptive to events.

Young females in particular who may be heavily intoxicated could be preyed upon by sexual predators. Being intoxicated will render certain individuals to sexual assault or rape.

As staff at this venue you will be very aware of vulnerable customers and take appropriate action.

WHAT TO LOOK FOR

- Lone female heavily intoxicated staggering into the premises
- A male approaching a drunken female and taking her from the shop.

WHAT TO DO

- · Tell security or your manager.
- Deal with the incident immediately
- Offer to contact a taxi and ensure that the person is escorted safely to the taxi and the driver informed of where she / he will be going
- Take the person to a chill out area and offer water and monitor.
- Unsure that the person accompanying the heavily intoxicated individual actually knows them.

It's our responsibility to deal with vulnerable customers. Let us not read in the news what we could have prevented.





SOCIAL MEDIA POLICY

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

PROCEDURES

The following principles apply to professional use of social media on behalf of this venue as well as personal use of social media when referencing this venue.

- Employees need to know and adhere to the code of conduct when using social media in reference to this venue.
- Employees should be aware of the effect their actions may have on their images, as well as this venues image.
 The information that employees post or publish may be public information for a long time and may demonstrate an untrue portrayal of the conduct of the venue.
- Employees should be aware that this venue may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to the premises, its employees, or customers.
- Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libellous, or that can create a hostile work environment.
- Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with their manager.
- Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorised company spokespersons.
- If employees find encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party's copyrights, copyrighted material, trademarks, service marks or other intellectual property.
- Social media use shouldn't interfere with employee's responsibilities at this venues computer systems are to be
 used for business purposes only. When using this venues computer systems, use of social media for business
 purposes is allowed (ex: Facebook, Twitter,)
- This shops blogs and LinkedIn), but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.
- Subject to applicable law, after-hours online activity that violates the venues Code of Conduct or any other company policy may subject an employee to disciplinary action or termination.
- If employees publish content after-hours that involves work or subjects associated with this venue, a disclaimer should be used, such as this: "The postings on this site are my own and may not represent the venues positions, strategies or opinions."
- It is highly recommended that employees keep the venues related social media accounts separate from personal accounts, if practical.





SPILLAGES POLICY

It is your responsibility to make sure the floor is as clean, tidy and most importantly safe for the public to use. Public areas of the premises should remain SAFE, CLEAN and TIDY at all times with no exception. Injuries such as falls due to spillages or cleaning fluids can be prevented if signs are placed over the hazard immediately.

Staff

It is your duty to do the following:

- Make sure any breakages or spillages are taken care of immediately (the use of wet floor signs is extremely important in the instance of a spillage)
- Your area must be clean and tidy at all times free of rubbish, discarded boxes etc. spillages
- The pavement and car park in front of the premises is also to be considered and it is your duty to ensure that all rubbish or fluids are removed from concrete areas and not allowed to build up. Broken glass must be removed immediately.

'Spillages'

It is your duty to maintain all areas of the shop at all times — spillages' must be cleared up immediately. The correct procedure for clearing up spillages is as follows:

- · Inform patrons of the danger
- · Place a wet floor sign next to spillage
- · Clear up the spillage with appropriate equipment
- (if you can get another member of staff to stand next to spillage while you go and retrieve wet floor sign and cleaning materials this is best) Your manager will be filling in a check sheet as they walk around the premises to make sure the job is getting done. If any area is not satisfactory you may be given a formal warning. It is also part of our job to make sure that members of the public attending this premises are kept as safe as possible while under our responsibility It is very important that all customers attending the premises are safe while in the forecourt and service area. It is simply our duty to make sure they are safe while under our care.

Street Cleaning

Periodic checks should be made outside of the shop to identify litter and glass. Glass in particular must be collected and placed in a suitable bin. If a bottle of alcohol is found that is not sold within our shop then the details of what has been found should be entered into the incident book. The drinking of alcohol outside of the shop is prohibited and will be addressed immediately.





WEAPONS AND HOW TO DISPOSE OF WEAPONS

This training guide has been put together in an effort to reduce the any form of injury or incident involving weapons that could possibly happen in the shop.

You may or may not be aware of the current national and international problem of violent crimes involving knives or other weapons. In these times we must be aware of the possibility of a member of the public carrying a weapon or using another object such as a glass or bottle as a weapon. It is possible that individuals could gain entry with weapons.

As you already know from previous training documents you know that it is extremely important to keep the floor clear of broken glass at all times to reduce the chances that someone may use them as a weapon. In the event that you find something you would consider being a weapon – This could be a knife, a screwdriver, heavy blunt objects etc.

- All objects considered to be weapons should be immediately taken to your senior duty manager.
- It will then be placed in a 'sharp box', or a self-sealing evidence bag and the Police will be informed to come and collect it.
- Written records will be made of this. If the weapon found is a firearm it should not be touched! You must inform your manager immediately and the area must be sealed off and the police called immediately.



Certificate of Completion

James William Millican

2

Responsibilities in the Retail Sale of Alcohol Licensing Legislation and the Social

CENSING

Tim Robson ABII, MIOL, Cert.Ed

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TJR Licensing, Consultancy and Training.

Employees Acceptance of Responsibilities Regarding the Sale of Alcohol and other Age Restricted Products.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



Employee Name

JAMES MILLICAN

I have read and understand the company policy on the sale of age restricted products and I fully understand the companies challenge 25 policy.

- I understand that if I sell an age restricted product to someone who was under the legal age for that
 product I will commit a criminal offence and I may be liable to a fine and/or imprisonment
- I understand that the challenge 25 policy is in place and I must ask for identification from anyone who looks under the age of 25 years.
- I understand that if someone appears under 25 or I have any doubt about the age of the person trying to buy age restricted products I must ask for proof of their age.

The only forms of identification I should accept are

- A valid passport.
- UK photo driving licence (Full or a provisional)
- Pass Logo approved proof of age card.
- I understand that if the customer fails to produce acceptable identification or I believe a person is under age I will refuse to sell any age restricted products and when the customer has left the premises I will complete the refusals register.

I hereby confirm that I have received advice and training from my employer regarding the sale of age restricted products at this convenience store.

Employee	Signature	
-----------------	-----------	--

Date 8/5/17

I hereby confirm that I have explained our age verification policy and provided training for them in relation to the sale of alcohol and other age restricted products and feel confident that they are fully understand our policies and procedures to be complied with.

Tim Robson
TJR Licensing

Date 8/5/19.



TEST OF KNOWLEDGE

PREVENTING UNDERAGE SALES

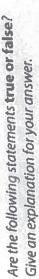
Costcutter, Old Co-Op Buildings, Burnopfield

8th May 2019

NAME OF EMPLOYEE

SAMPS WILLIAM MILLIAM

Making legal sales - true or false?



 All customers attempting to buy age-restricted products must be asked to provide proof of age.

FALSE

2. If customers have no proof-of-age ID with them, it is good customer service to give them the benefit of the doubt and let the sale take place.

FACSE

3. Acceptable proof-of-age documents must, as a minimum, include a photograph of the person and a date of birth.

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 It is always best to ask young-looking persons to tell you their ages and dates of birth before selling an age-restricted product.

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age-restricted product are underage, you must ask If you suspect persons attempting to buy an them for:

appropriate proof of age

- proof of name and address
- their age and date of birth
- a written note from parents
- accurately completing Important reason for What is the most a refusals log?
- It will help identify trends in attempts to buy agerestricted products
- It is a legal requirement to keep a log
- Identify which members of staff are refusing sales It will help managers
- It will be regularly inspected by Trading Standards during test purchases

Remember to always put what you have learned into practice.



- restricted product become customers who have been refused the sale of an age-How is it best to manage the situation when verbally abusive?
- Ignore them and continue serving other customers
- Call a manger or security person for assistance
- Ask other customers for help in removing them
- Call the police immediately to escort them from the premises
- An age 25 verification selling age-restricted policy requires those products to:
- only serve those who are aged 25 or over
- request proof of age from those who look under 25
- request proof of age from those who look over 25
- be aged 25 and over

Staff Training Record

Training Record for (name)

This declaration should be signed by both trainee and trainer/manager and kept on file.

DECLARATION

TRAINEE

confirm that I have completed the Preventing Underage Sales I (name) JAMES WILLIAM MILLIAM Handbook and enclosed activities.

Signed

Date 8 5/1

TRAINER/MANAGER

1M 105502 (name)

confirm that the above-named trainee correctly completed the Preventing Underage Sales Handbook and enclosed activities.

Signed

Date X [5/19.

Certificate of Completion

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Laidler

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Responsibilities in the Retail Sale of Alcohol Licensing Legislation and the Social

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TJR Licensing, Consultancy and Training.

Employees Acceptance of Responsibilities Regarding the Sale of Alcohol and other Age Restricted Products.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



Employee Name CLAIRE LOUISE LAIDLER

I have read and understand the company policy on the sale of age restricted products and I fully understand the companies challenge 25 policy.

- I understand that if I sell an age restricted product to someone who was under the legal age for that
 product I will commit a criminal offence and I may be liable to a fine and/or imprisonment
- I understand that the challenge 25 policy is in place and I must ask for identification from anyone who looks under the age of 25 years.
- I understand that if someone appears under 25 or I have any doubt about the age of the person trying to buy age restricted products I must ask for proof of their age.

The only forms of identification I should accept are

- A valid passport.
- UK photo driving licence (Full or a provisional)
- Pass Logo approved proof of age card.
- I understand that if the customer fails to produce acceptable identification or I believe a person is under age I will refuse to sell any age restricted products and when the customer has left the premises I will complete the refusals register.

I hereby confirm that I have received advice and training from my employer regarding the sale of age restricted products at this convenience store.

Date 8 | 5 | 2019

I hereby confirm that I have explained our age verification policy and provided training for them in relation to the sale of alcohol and other age restricted products and feel confident that they are fully understand our policies and procedures to be complied with.

Tim Robson TJR Licensing Date 8/5/19



TEST OF KNOWLEDGE

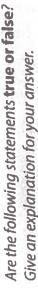
PREVENTING UNDERAGE SALES

Costcutter, Old Co-Op Buildings, Burnopfield

8th May 2019

NAME OF EMPLOYEE

Making legal sales - true or false?





FALSE

If customers have no proof-of-age ID with them, it is good
customer service to give them the benefit of the doubt and let the
sale take place.

PALSE

 Acceptable proof-of-age documents must, as a minimum, include a photograph of the person and a date of birth.

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4. It is always best to ask young-looking persons to tell you their ages and dates of birth before selling an age-restricted product.

FALSE

Test Your Knowledge

1 ./:



age-restricted product are underage, you must ask f you suspect persons attempting to buy an them for:

- appropriate proof of age
- proof of name and address
- their age and date of birth
- a written note from parents
- accurately completing important reason for What is the most

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- It will be regularly inspected by Trading Standards during test purchases

Remember to always put what you have learned into practice.

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Staff Training Record

Training Record for (name)

This declaration should be signed by both trainee and trainer/manager and kept on file.

DECLARATION

TRAINEE

(name)

confirm that I have completed the Preventing Underage Sales LAIDLER Handbook and enclosed activities.

5-Date 3 - 5

TRAINERINANAGER

(marne)

confirm that the above framed trainee correctly completed the Handbook and enclosed activities. Preventing Undergal Sale

Signed

Certificate of Completion

Oliver

Responsibilities in the Retail Sale of Alcohol Licensing Legislation and the Social

-ICENSING

Tim Robson ABII, MIOL, Cert.Ed

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TJR Licensing, Consultancy and Training.

Employees Acceptance of Responsibilities Regarding the Sale of Alcohol and other Age Restricted Products.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



Employee Name

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The only forms of identification I should accept are

- A valid passport.
- UK photo driving licence (Full or a provisional)
- Pass Logo approved proof of age card.
- I understand that if the customer fails to produce acceptable identification or I believe a person is under age I will refuse to sell any age restricted products and when the customer has left the premises I will complete the refusals register.

I hereby confirm that I have received advice and training from my employer regarding the sale of age restricted products at this convenience store.

Employee Signature

Date 08/05/2019

I hereby confirm that I have explained our age verification policy and provided training for them in relation to the sale of alcohol and other age restricted products and feel confident that they are fully understand our policies and procedures to be complied with.

Tim Robson TJR Licensing Date 8/5/19



TEST OF KNOWLEDGE

PREVENTING UNDERAGE SALES

Costcutter, Old Co-Op Buildings, Burnopfield

8th May 2019

NAME OF EMPLOYEE

CLIVE

Making legal sales - true or false?

Are the following statements **true or false?** Give an explanation for your answer.

 All customers attempting to buy age-restricted products must be asked to provide proof of age.

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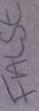
2. If customers have no proof-of-age ID with them, it is good customer service to give them the benefit of the doubt and let the sale take place.

HESK!

3. Acceptable proof-of-age documents must, as a minimum, include a photograph of the person and a date of birth.

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 It is always best to ask young-looking persons to tell you their ages and dates of birth before selling an age-restricted product.



Test Your Knowledge



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- Ask other customers for help in removing them
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- An age 25 verification policy requires those selling age-restricted products to: 0
- only serve those who are aged 25 or over
- request proof of age from those who look under 25
- request proof of age fram those who look over 25
- be aged 25 and over

Training Record for (name)

Staff Training Record

This declaration should be signed by both trainee and trainer/manager and kept on file.

DECLARATION

TRAINEE

(name)

confirm that I have completed the rreventing Underage Sales Handbook and enclosed activities.

Signed

Date 08/05/2019

TRAINER MANAGER

[marrie]

g-named trainee correctly completed the ives Handbook and enclosed activities. confirm that th Preventing u

Signed

Date 8 15/17

Please be prepared to show roof of age when buying alcohol





DHRINK AWARE.CO.UK

Retail of Alcohol Standards Group



TJR Licensing, Consultancy and Training.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



REQUEST FOR EVIDENTIAL IMAGES FROM CCTV

DVD/USB	
Time and date of request	
 .	Date
	Police Officer
	icerDate
	own

To be completed when any lawful request is made for CCTV images by the police, trading standards or other Responsible authority.

Costcutter, Units 2-3 Old Co-Op Buildings, Burnopfield, NE166LU



INCIDENT REPORT FORM

Date of incide	ent	/ /		_	Time o	fincident			
Name of pers	on record	ing detail	s	•••••••••••••••••••••••••••••••••••••••	******			*** * * * * *	
Description of	f incident (Theft, Dis	sorderly incid	ent, Assault)				
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Did Police atte	end; (recor	d collar n	umber of offic	cer you deal	lt with)	YES / NO	Date	1	1
Request for Co							Date		
Incident Refer						• • • • • • • • • • • • • • • • • • • •			
Signed:	*********	* * * * * * * * * * * * * * * * * * * *	• • • • • • • • • • • • • • • • • • • •					•••••	
Date:	**********	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •						
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WITNESS STATEMENT OF CLAIRE LOUSE LAIDLER

Witness Statement

(Criminal Justice Act 1967, Sect 9; Magistrates' Court Act 1980, ss.5A (3) (a) and 5B; M.C. Rules, 1981, r.70)

Statement of

LAIDER

Age if under 18: Over 18

Occupation: Retail Assistant

This statement (consisting of: 3 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything which I know to be false or do not believe to be true.

- 1. My name is Laidler and I am a resident of Burnopfield and I am employed in Costcutter, 2-3 Old Court Buildings, Front Street, Burnopfield, NE16 6LX. I have been employed at the premises since October 2017 and since then I have been working 20 hours per week. I typically work a Sunday and a Tuesday Wednesday and Thursday evening. When I first started at the premises I was trained by James on everything to do with the shop. This included how the post office operated, tills, merchandising, how orders were made and also in relation to Challenge 21 (we now operate Challenge 25). Whilst I already felt that I was quite trained in regards to this from my experience at Asda, James did make me aware of the policies and the risks in selling alcohol.
- 2. I have previous retail experience, most recently I was self-employed running my own cleaning business for two years. Prior to that I was a house keeper in the new Northumbria Hotel in Jesmond for a number of years. I also worked as a merchandiser in Superdrug and as a checkout assistant in Asda. Asda provided me with the greatest deal of experience in retail and, in particular, in relation to the sale of alcohol as I received quite a lot of training and I was taught to be vigilant at all times.
- 3. I do love working in Costcutter with James, and I think that we make a good team. The business is really starting to work well now I have joined the team, and I am enjoying working close to home being just a five minute walk away.

- 4. James has been operating the business for nearly two years, and I have been a customer all of that time. Since he started I have been asking James if I can have a job and in October he finally offered me a job. I could see that he was very busy, and I know what it is like to start a new business as you have got to make sure that what you have got coming is enough to pay for what you have got going out. But James has worked really hard to get this business up and running and it is a community hub. All of the customers are regulars and locals and it has a very friendly atmosphere and it genuinely is a very nice place to work.
- 5. I was very surprised when James told me that he had failed two test purchases and that the Licence was going to be reviewed. I, myself am very diligent and ID everybody. The premises though isn't a place typically where young people try to get served alcohol. It sometimes happens in holidays when kids are coming from other areas but it is not a regular occurrence. We have had cause to refuse customers but that is few and far between.
- 6. I have been thinking about why James might have failed the test purchases. I can only think that he was caught off guard and was very tired as since I started in October he was running this premises by himself and still continued to work very long hours. After Christmas, James decided to take on Oliver as a new employee and she also works 20 hours per week. I know this has made an enormous difference to James since he can now afford to take some time off.
- 7. James is an enormously hardworking man and I know he would do anything to make this business a success. Unfortunately with these mistakes he has made it has put the business in jeopardy. The loss of the Licence would dramatically affect this business as it would impact on its financial viability and the hours that we were able to operate both the shop and the post office. It would also likely impact upon the employees, myself and Samantha. The

residents would also suffer as a result as there are old people in the area who completely rely on this shop as a means of providing groceries, banking and sometimes just as a place to go and speak to somebody. Without this shop the community would suffer. When I moved to the village there had been two post offices in Burnopfield, and now there is just one.

- 8. Whist I feel that I was already well trained in regards to responsible retailing of alcohol, from my experience at Asda and other retail experiences, I found the training provided recently by Mr Robson of TJR Licensing to be both interesting and informative. For the most part it reinforced what I already knew. It has though pushed this issue more to the forefront of my mind and other members of staff, and has impacted upon the way in which we operate the shop.
- 9. James has asked me if I will stand as designated premises supervisor for the premises. I am happy to carry out that role as I do believe in what we are doing at the premises, and I am hoping this will be a long-term job for me. Having recently passed the Personal Licence Course, it is now my intention to apply for a Personal Licence and I am happy to accept the responsibility of being the DPS for the premises should the Licensing Committee decide that the Premises Licence can continue at the shop.

PERSONAL LICENCE COURSE CERTIFICATES



Highfield Qualifications

Certifies that

Laidler

has successfully passed an assessment in

Highfield Level 2 Award for Personal Licence Holders (RQF)

Qualification number

603/2597/5

Date of award

14 May 2019

Certificate number

PLH2358489

Course Director

Mincoffs Solicitors LLP





Jason Sprenger - Chief Executive Highfield Qualifications











Highfield Qualifications

Certifies that

James W Millican

has successfully passed an assessment in

Highfield Level 2 Award for Personal Licence Holders (RQF)

Qualification number

603/2597/5

Date of award

14 May 2019

Certificate number

PLH2358487

Course Director

Mincoffs Solicitors LLP

Training Organisation



Jason Sprenger - Chief Executive Highfield Qualifications











Highfield Qualifications

Certifies that

Oliver

has successfully passed an assessment in

Highfield Level 2 Award for Personal Licence Holders (RQF)

Qualification number

603/2597/5

Date of award

14 May 2019

Certificate number

PLH2358490

Course Director

Mincoffs Solicitors LLP













Proposed Conditions

CCTV

- 1. A digital Closed Circuit Television System (CCTV) will be installed and maintained in good working order and be correctly time and date stamped.
- 2. The system will incorporate sufficient built-in hard-drive capacity to suit the number of cameras installed.
- 3. CCTV will be capable of providing pictures of evidential quality in all lighting conditions, particularly facial recognition.
- 4. Cameras will encompass all ingress and egress to the premises, outside areas and all areas where the sale/supply of alcohol occurs.
- 5. The system will record and retain CCTV footage for a minimum of 28 days.
- 6. The system will incorporate a means of transferring images from the hard-drive to a format that can be played back on any desktop computer or laptop.
- 7. The Digital recorder will be password protected to prevent unauthorised access, tampering, or deletion of images.
- 8. There will be at all times, when the premises is open, a member of staff on duty with access to the CCTV system who is trained in the use of and is able to operate the equipment.
- 9. CCTV footage must be made available to be viewed by the Police, Licensing Officers or other Responsible Authorities on request during an inspection of or visit to the Premises.

INCIDENT BOOK

- 10. An incident book must be kept at the Premises and maintained up to date (no later than 24 hours after the incident) at all times.
- 11. The incident book must be made available to Police, Licensing Officers and all other Responsible Authorities on request or during an inspection.

REFUSALS REGISTER

- 12. A refusals register must be kept at the Premises and maintained up to date at all times recording the date time, type of product refused, reasons for every refusal to sell alcohol to a customer and the name and signature of member of staff refusing the sale. There will also be a record of challenges made, which didn't result in refusals.
- 13. The refusals record must be made available to the Police, Licensing Officers and all other Responsible Authorities on request or during an inspection.
- 14. The Premises Licence Holder/Designated Premises Supervisor must monitor the refusals register on a monthly basis and must sign and date the register to confirm when this has been completed.

TRAINING

- 15. Training in relation to Challenge 25, under age sales, sales to adults on behalf of minor (proxy sales), sales to intoxicated persons, refusals registers, incident records and all other conditions on the Premises Licence must be provided and undertaken by all members of staff (whether paid or unpaid) before he / she makes a sale or supply of alcohol and at least every six months thereafter.
- 16. Documented training records must be completed in respect of every member of staff and must include the name of the member of staff trained, date, time and content of the training. The record must be signed by the member of staff who has received the training, the Designated Premises Supervisor/ Premises Licence Holder or external training providers.
- 17. Documented training records must be kept at the Premises and made available to the Police, Licensing Officers and all other Responsible Authorities on request or during an inspection.

CHALLENGE 25

- 18. Staff must require ID in the form of a current ten year passport, photo card driving licence or PASS Hologram identity card from any customer who appears to be under the age of 25 and verify the customer is over the age of 18 before any sale or supply of alcohol is made.
- 19. There shall be notices at the point of sale and at the entrances and exits informing customers and reminding staff that the premises is operating a proof of age scheme which includes a "Challenge 25" policy.