



**Revising the Durham County Council Licensing
Policy: An Investigation into Good Practice
associated with the Promotion of the Four
Licensing Objectives**

Abstract

Statements of licensing policies address economic needs of businesses whilst promoting the four licensing objectives: Prevention of Crime and Disorder, Public Safety, Prevention of Public Nuisance, and Protection of Children from Harm. Prior to revising the Durham County Council licensing policy, the level of guidance which the policy provides to applicants of licensed premises needs to be investigated. Comparisons were made between the Durham policy and six other UK licensing authority areas' policies. Thematic analyses identified common themes within each objective addressed by the policies. It was concluded that good practice associated with the licensing objectives involves targeting all these themes, as well as considering the issues specific to each local authority area, as this influences the level of focus required on each objective. To communicate good practice, it is suggested that the revised policy should be structured according to these common themes, and appendices should guide applicants on how to ensure they are addressed. Queuing, club-hopping, underage sales and binge drinking were identified as central issues within Durham County, thus should be highlighted in the policy. These changes will better communicate to policy readers what good practice entails.

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Summary of suggested revisions

The following bullet points summarise suggestions to be considered by Durham County Council licensing authority when revising the statement of licensing policy for adoption in October 2019. It is proposed that by including these revisions, good practice will be more effectively communicated to prospective premise licence applicants. The points that are outlined will be discussed in more detail further on in the report.

- The authority should address each of the four licensing objectives by breaking them down into smaller sub-objectives to ensure all aspects of each objective are addressed sufficiently. The policy should be structured in accordance with these sub-objectives. Suggested sub-objectives are as follows:
 1. The Prevention of Crime and Disorder: Illegal sales, Drunkenness, Conflict in and around the premises, Theft, Drugs, Weapons.
 2. Public safety: Fire, Drinks, Drugs, Over-occupancy, Lack of seating, Arrival and dispersal, Construction, Medical emergency.
 3. The Prevention of Public Nuisance: Noise, Waste, Smoking, Visual.
 4. The Protection of Children from Harm: Underage activity, Sexual exploitation, Age inappropriate cinema, Unaccompanied children.
- The authority's minimum expectations of what to include in an application should be stated in the main body of the text, and an appendices section should be added, offering further suggestions for what applicants should consider including in their application to ensure that the objectives are carried out. Examples of suggestions are outlined in the results section.
- The policy should contain further details of schemes available in Durham which applicants can participate in to assist in carrying out the objectives. Active schemes include the Best Bar None scheme, ERASE exploitation, Safe City Watch Radio scheme, and the UK Drowning Prevention Strategy.

- The policy should include a general section informing applicants that they must use their initiative to assess whether the premises' location means that they will face any specific issues and whether this will influence the level of focus they may need to place on any of the objectives.
 - The authority should consider tighter expectations regarding how applicants plan on mitigating risks posed by central issues in Durham. These concerns include busy queues, club-hopping, binge drinking, and underage sales.
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Glossary

The first use of the words or phrases defined in the glossary within the body of the report are highlighted in boldface.

Applicants – Individuals who are applying to the authority for a premises licence.

Licensing authority – The group responsible for the licensing of alcohol, regulated entertainment and late night refreshment.

Licensing authority area – The geographical area where a licensing authority practices its functions under the Licensing Act 2003.

Local authority type - Authorities which share similar characteristics, such as size, have similar licensing statistics. There are six main local authority types: Unitary Authorities, Metropolitan Districts, District Authorities, Welsh Unitary Authorities, London Boroughs, and Unspecified (Inner Temple and Middle Temple within Greater London).

Operating Schedule (OS) – A document written by the applicant outlining how the licensed premises is proposed to be run, including steps that will be taken to promote the four licensing objectives. The operating schedule is submitted to the licensing authority as part of a premises licence application, and is used in the decision process.

Premises licences - A licence used for the sale or supply of alcohol, the provision of regulated entertainment or late-night refreshment or any combination of these activities. Retail sale of alcohol refers to consumption on the premises, off the premises, or both on and off the premises.

Introduction

Statements of licensing policy are written by **licensing authorities**, to be used as a framework when considering licence applications and provision of these **premises licences** in accordance with the Licensing Act 2003 (Salford City Council, 2019). Policies involve the licensing and regulation of businesses where there is the sale of alcohol, provision of regulated entertainment and late-night refreshments (Ealing Council, 2019).

In order to prevent adverse effects of activities associated with licensed premises, the Licensing Act 2003 states that a licensing authority must ensure that all premises are seeking to promote the following licensing objectives:

1. The Prevention of Crime and Disorder;
2. Public Safety;
3. The Prevention of Public Nuisance;
4. The Protection of Children from Harm.

With this in mind, a statement of licensing policy has two main purposes. Firstly, it provides a decision-making framework for the licensing authority to use when responding to licence applications. Secondly, it advises businesses and the public on the authority's position concerning the Licensing Act 2003, including details of how the licensing objectives should be carried out. It guides **applicants** in how to apply for a licence in accordance with the licensing authority's expectations, and which factors must be considered when drawing up an application. Licensing policies aim to balance the legitimate needs of businesses and public demand for leisure and cultural activities alongside the need to mitigate against potential adverse effects. Failure to achieve the correct balance could lead to a policy being overly prescriptive and therefore reducing the freedom permitted to leisure activities. Alternatively, the policy could be open to challenge or otherwise unsuccessful in the protection of local residents through a failure to promote the licensing objectives effectively. When policies are under-prescriptive it can reduce the efficiency of the licensing application process as applications for premises can be rejected due to insufficient detail. It is within the interest of the applicant and the authority for the policy to be as clear as possible about what should be included in an applicants' **operating schedule**, and in their application as a whole. Inclusions

of suggestions and expectations within a licensing policy for the applicant to follow ensure an efficient licensing application process.

Section 5 of The Licensing Act 2003 states that every “licensing authority [is required] to determine and publish a statement of its licensing policy at least once every five years” (Home Office, 2018). The policy must be reviewed and the licensing authority may make appropriate revisions to it. Durham County Council (DCC) adopted the current statement of licensing policy on 29th October 2014, thus it must be revised, adopted and published by Wednesday 30th October 2019. Part of the reviewing process involves comparing the current licensing policy to those written by other licensing authorities in the UK.

As such, in order to achieve an adequate balance between demands for licensed premises and prevention of associated adverse effects, the current project aims to research recognised good practice associated with the promotion of the four licensing objectives to assist in the development of a revised statement of principles for adoption in October 2019. Research will involve reading licensing policy statements from other authorities across the United Kingdom, identifying differences in content and level of detail included compared to the DCC policy. This research will be used to decide what good practice involves, and what changes can be made in the revised statement by the Durham County licensing authority to ensure that good practice is communicated to applicants. Suggestions will encompass possible structural changes, including the level of detail, as well as highlighting issues applicable to Durham County, that should be considered in the revision.

Method

The first stage of the project involved background reading (Chambers & Butterfield, 2006; Home Office, 2018) to better understand licensing law and provide context to the statement of licensing policy. Following this, as the project involved comparing DCC's policy with other licensing authorities, decisions had to be made as to which licensing authorities should be selected for this comparison. It was important to select authorities which faced similar issues to one another as this influences what needs to be considered within the licensing policy. Six notable characteristics were selected and licensing authorities which were similar to Durham County in each of these features were chosen. These characteristics were: local authority type, heritage, population size, student population, crime rate, and proximity. These features were selected as areas varying in these characteristics will have different issues to tackle which will effect what should be focused on in a licensing policy. A policy covering a licensing authority area with a large population size may have higher numbers of residents close to licensed premises, thus will need greater focus on the Prevention of Public Nuisance objective than would a licensing authority area with a smaller population size. Likewise, a policy for an area with a high crime rate would require greater focus on the Prevention of Crime and Disorder objective than a policy covering an area with a low crime rate. Moreover, student population size was considered to be an important characteristic to include because such a population will influence the nightlife climate in the city centre. Student culture is associated with binge drinking (Carpenter et al., 2008; Chambers & Butterfield, 2012), as such, licensing policies covering areas with a high student population need to focus more on ensuring premises know how they can attempt to best control and manage binge drinking in order to ensure that the four licensing objectives are carried out.

Regarding which licensing policies were selected, Cheshire East was included as, like Durham, its **local authority type** is a unitary authority (Cheshire East Council, 2019; Durham City Council, 2019), where one tier of local Government provides all services (Gov.uk, 2019). These authorities are categorised together due to holding similar licensing statistics (LG Inform, 2019). For heritage, York and Durham are both part of "a collection of unique and fascinating historical cities across England" (Heritagecities.com, 2019). Moreover, they are both located in North East England, and have a cathedral in the city centre. As such, York was

considered to match to Durham in heritage. Sheffield was selected as it has a similar population size to that of Durham County, where both populations are just over half a million, according to the 2011 national Census of Population (Durham Insight, 2019; Sheffield City Council, 2019). Oxford was selected as its student population size of 23,975 (University of Oxford, 2019) is comparable to the 18,031 students residing in Durham County in the term time (Durham University, 2019). Great Yarmouth was chosen as it had a similar crime rate (police recorded crimes per 1,000 population) to Durham County in the year ending September 2018, namely 97.84 relative to 96.4 in Durham (Police.UK, 2019). Finally, Newcastle was elected due to its close proximity to Durham, therefore they are assumed to have a similar night-time and drinking culture to one another.

Firstly, internet research identified issues central to Durham County which should be addressed in the policy. Following this, for the remainder of the process, the four licensing objectives were targeted one at a time. To help in deciding what represents good practice, and thus provide suggestions for the licensing policy in order to achieve good practice, thematic analyses was conducted for each objective (see appendix A for details of the analyses processes). Firstly, after reading DCC's Policy in order to become familiarised with the policy, the main points from each objective were summarised, hence making the information more accessible to allow easy further interpretation. This same process was repeated for all of the policies, summarising the main points from each objective. During this step, notes were also made regarding the difference in general structure and level of detail within the policies compared to the Durham policy. Following this, upon reading the condensed notes, initial codes were identified and sorted according to their overarching themes. The most common themes that emerged from the six policies for each objective were noted in tables, providing "sub-objectives" within the larger objective.

The sub-objectives identified by the analyses guided how DCC's policy could be structured. Using the identified themes, each policy was revisited and common suggestions for how to address each sub-objective which emerged across the city policies were noted down, providing further guidance for what could be included in the Durham policy.

Meeting with representatives from the local responsible authorities under the Licensing Act 2003, including fire and police departments and the council, provided the opportunity to discuss initial ideas of what good practice consists of, specific issues that Durham faces, and suggested improvements for the policy.

Results

Focusing on the structure and level of detail within licensing policies, the thematic analyses identified different sub-objectives to be addressed within the larger objectives. Common suggestions which emerged across the licensing authority policies for how to address each sub-objective are outlined.

Licensing Objective 1: The Prevention of Crime and Disorder

Six sub-objectives were identified within the larger objective of Prevention of Crime and Disorder, as shown in table 1, and suggestions for how to prevent the specific crime/disorder are outlined.

Table 1. The Prevention of Crime and Disorder

Crime/Disorder	How to prevent the crime/disorder
Illegal sales	<ul style="list-style-type: none"> Implement a No ID – No Sale policy and use posters to advertise its use Keep staff training records Put up posters stating that it is a crime to do proxy sales Make a note each time somebody is refused to be served due to being underage Implement a plan to prevent counterfeit alcohol and tobacco sales
Drunkenness	<ul style="list-style-type: none"> Have procedures to deal with drunken customers Participate in local “Pubwatch” schemes Refuse to serve drunk people Ensure a Designated Premises Supervisor is on the premises whenever alcohol is sold Do not have irresponsible promotions Plan for caring for intoxicated customers Binge drinking reduction plan Plans to distribute free drinking water Measures to limit alcohol abuse caused by drinking games → especially suitable for a student population with a binge drinking culture

Conflict in and around the premises	<p>Have procedures to deal with drunken anti-social behaviour</p> <p>Ensure to do ongoing risk assessments</p> <p>Implement a dispersal policy</p> <p>Club hopping minimising plan</p> <p>Capacity management policy eg head counts</p> <p>Have plans to minimise queues</p> <p>Layout and lighting designed to minimise opportunities for crime and disorder</p> <p>Drinking location restrictions</p> <p>Drinking display areas to be considered</p>
Theft	<p>Store alcohol away from doors</p> <p>Security tag products</p> <p>Ensure to have well-lit premises</p> <p>Use well managed cloakrooms</p>
Drugs	<p>Conduct searches in public and in view of CCTV</p> <p>Devise an effective drugs policy containing details of search procedure and storage procedure of confiscated drugs</p>
Weapons	<p>Use drinking vessels which cannot create sharp edges</p> <p>Ensure there are no loose items which can be used as weapons eg heavy ash trays</p> <p>Bottle bans</p> <p>Use toughened/safety glass to hold drinks</p> <p>Train staff on drugs, knives and weapons</p>

Licensing Objective 2: Public Safety

Eight sub-objectives, in the form of different dangers, were identified within the larger objective of Public Safety, as shown in table 2, and suggestions for how to prevent the specific danger are outlined.

Table 2. Public Safety

Danger caused by...	How to prevent the danger
Fire	<ul style="list-style-type: none"> Consider smoke free premises Consider the fire risk of special effects Have plans for a safe means of evacuation Outline electrical installations, training staff in fire safety and visible escape routes in the fire risk assessment
Drinks	<ul style="list-style-type: none"> Implement plans for reducing drink driving Have plans to distribute free drinking water Do not have irresponsible drink promotions eg women drink for free, discount nights for students, pay entry then drink for free until 10pm
Drugs	<ul style="list-style-type: none"> Train staff in drug awareness Use anti drink spiking products Report suspected and actual spiking to police
Over-occupancy	<ul style="list-style-type: none"> Ensure safe construction of premises Ensure that Operating Schedule states occupancy of individual floors Use measures to count the number of people
Lack of seating	<ul style="list-style-type: none"> Provide seating in vertical drinking establishments
Arrival and dispersal	<ul style="list-style-type: none"> Provide taxi contact information Provide adequate lighting in car parks Ensure a well-managed door policy and dispersal policy
Construction	<ul style="list-style-type: none"> Consider safe construction of and within the premises
Medical emergency	<ul style="list-style-type: none"> Have a First Aid box available and a qualified First Aider 24/7 Have an accident book to log accidents Have a written policy to deal with A&E Review the risk assessment every 12 months

Licensing Objective 3: The Prevention of Public Nuisance

Four sub-objectives, in the form of nuisance types, were identified within the larger objective of the Prevention of Public Nuisance, as shown in table 3, and suggestions for how to prevent the specific nuisance type are outlined.

Table 3. The Prevention of Public Nuisance

Nuisance type	How to prevent the nuisance
Noise	<p>Have sound insulation in place</p> <p>Consider car park arrangements and effects on residents</p> <p>Consider how much noise air conditioning systems create</p> <p>Use a sound limitation device</p> <p>Consider how much noise is created by taxis and routes to/from premises</p> <p>Carry out regular noise monitoring</p> <p>Train staff in reducing noise</p> <p>Have a dispersal policy in place</p> <p>Have plans of how to limit noise upon leaving premises</p> <p>Dispose of bottles during normal working hours</p> <p>Locate DJs/speakers away from doors/windows</p> <p>Reduce number of people loitering outside off-license shops</p> <p>Plan deliveries during normal working hours</p> <p>Use door supervisors to reduce noise</p> <p>Implement measures to minimise or divert queues away from residential areas</p> <p>Consider location of the premises - more planning needed if close to houses/hospitals/worship places</p> <p>Provide locals with the manager number on request and check in on them to make sure they are happy</p>
Waste	<p>Ensure to have steps for clearing litter outside takeaway premises</p> <p>Provide notices pointing to bins</p> <p>Consider other emissions, eg using ventilation systems to reduce odours</p> <p>Use ash trays or wall mounted bins to minimise litter</p>

	Research the Environmental Protection Act 1990
	Devise measures to collect drinking vessels, crockery, cutlery and litter
Smoking	Implement a plan to reduce noise and litter eg using ash trays
	Consider whether there is a need for door supervisors to control customers in smoking areas and keep noise down
Visual	Consider the level of light pollution – need to balance causing nuisance and safety/preventing crime and disorder
	Ensure plans are in place regarding advertising → fly-posting is illegal

Licensing Objective 4: Protection of Children from Harm

Four sub-objectives, in the form of dangers posed to children, were identified within the larger objective of the Protection of Children from Harm, as shown in table 4, and suggestions for how to protect children from each danger are outlined.

Table 4. The Protection of Children from Harm

Danger	How to protect children against the danger
Underage activity	<p>Comply with the Portman group code</p> <p>Use a Proof of age scheme and signpost its use</p> <p>Use and maintain a refusals register which can be made available for inspection. Records should include the refusal date and time, the product attempted to buy, and a physical description of the customer</p> <p>Use measures to avoid proxy sales → use CCTV, regular patrols, posters stating proxy sales are illegal, posters not obstructing shop windows (so that staff can notice proxy sales outside)</p> <p>Specify the age limit of gambling</p> <p>Locate gambling machines in view of staff</p> <p>Have measures to ensure no underage delivery of alcohol</p> <p>Follow a code of practice for children living at license premises</p> <p>Train staff and maintain training records to ensure that they are available upon request</p>
Sexual exploitation	<p>Implement a child sexual exploitation policy and report suspicious behaviour</p> <p>Have a safeguarder – need a member of staff in charge of welfare</p> <p>Train staff to recognise indicators of exploitation</p>
Age inappropriate cinema	<p>Specify film minimum age and display notices</p> <p>Check age at point of sale and prior to entry to screening room</p>
Unaccompanied children	<p>Ensure under 18 events are ticket-only to prevent children being alone on streets if maximum capacity is reached</p> <p>Implement procedures for lost and found children at large events</p>

Discussion

In order to investigate what good practice associated with the licensing objectives involves, and to identify potential changes that could be made in Durham City Council's revised statement of licensing policy, thematic analyses were conducted for each of the four licensing objectives. Analysing six city policies identified commonly mentioned themes, leading to the conclusion that good practice involves addressing every sub-objective within the four licensing objectives, as well as considering the specific issues of the area. These analyses assisted in the project aims of providing suggestions for possible structural changes, including changes to the level of detail, as well as highlighting issues applicable to County Durham that should be considered in the revision. These suggestions will be discussed in turn.

Potential structural changes, including changes to the level of detail

The thematic analyses identified sub-objectives within each of the four larger, umbrella-term licensing objectives. For example, the Prevention of Crime and Disorder refers to a number of different types of crimes. Structuring the policy in regards to each of these factors would aid clarity as it would ensure that applicants are aware of the types of crimes and disorders which are relevant to their premises and how they can go about preventing them. Different types of crimes must be tackled differently, thus separating the objectives out into smaller elements would make it easier for all aspects of the objective to be approached. The right hand columns of the tables in the results section collate all of the suggestions made by the different policies in order to address the sub-objectives, therefore the authority should consider their inclusion in the revised statement.

The project also sought to compare the level of detail in the current Durham policy as compared to other cities' policies. When applications are submitted with little detail, it is likely to be due to the applicant being unaware of what is required, or not knowing how to present the information. The authority should assume that the applicant has little to no knowledge about licensing, thus the policy should educate and guide the applicant, providing clear suggestions of what should be considered in the application. Throughout the project it has become apparent that DCC's current policy is less detailed than other cities' policies that have been researched. The policy mainly focuses on the minimum expectations of what to include

in an application, without providing much further guidance. Section 18.1 of the County Durham premises licence application asks applicants to list the steps they will take to promote each of the four licensing objectives (Durham County Council, 2019, p.31). There are no indicators as to the level of detail required, thus the licensing policy should specify this. However, as mentioned, when creating a licensing policy, or in fact any report, it is important to strike a balance between being concise enough to follow and allow flexibility, but detailed enough to answer all of the readers' questions. The Newcastle policy has a similar level of detail to Durham's policy in the main body of text, but also provides appendices containing a document named "Good Practice Guidance for Licensed Premises & Protocols", providing clear suggestions of what should be considered by applicants in their operating schedule. The main policy outlines the licensing authority's expectations and requirements, whilst the document within the appendices provides further details for consideration. A similar structure is found in the Great Yarmouth policy. Separating out the two ensures that the main policy is concise, whilst also providing the opportunity for further guidance in a separate document if required. The Durham policy provides an appendix containing "guidance for the protection of young people under 18 years of age who attend events at licensed premises" (Durham County Council, 2014, p.42), however it does not provide guidance to target other risks posed to children in the licensed premises, nor does it cover the other three licensing objectives. Therefore, the licensing policy should consider the addition of more appendices, giving suggestions regarding what should be included in the entirety of the operating schedule to ensure the four licensing objectives are addressed in sufficient detail. Furthermore, whilst the policy contains a section in the appendices outlining guidance for protecting children from harm in licensed premises, the authority could also consider adding a regulation already implemented by Oxford City Council whereby under-18 events must be ticket-only (Oxford City Council, 2016, p.16). This would avoid the risk posed by "pay-at-the-door" events where children may be left alone on the street once venue capacity has been reached, thus further ensuring that the objective of protecting children from harm is met.

Still considering the appropriate level of detail, licensed premises have the challenge of balancing the economic gain of a licensed premise and delivery of the four licensing objectives. Licensed premises are run for the purpose of profit, thus from business owners' perspectives, this is most likely to be the primary concern over ensuring that the objectives are met. The policy therefore needs to provide an opportunity for businesses to understand

why they should be concerned with the objectives, and provide motivation for ensuring that they are carried out. Durham County is involved in the Best Bar None scheme which is designed to provide motivation for licensed premises to deliver the Prevention of Crime and Disorder and Public Safety objectives, as those who perform well will be accredited and awarded. The scheme educates applicants about “how operating more responsibly can improve the profitability of an individual business and attractiveness of a general area” (Best Bar None, 2019). The Durham policy already briefly outlines that the Best Bar None scheme is encouraged, mentioning how it “enables premises to demonstrate good safe operating procedures” (Durham County Council, 2014, p.14), however it is suggested that more details are required as to what premises will gain from joining onto the scheme in terms of accreditation, in order to ensure they are motivated to take part in it. A link to the scheme’s website or an appendix section outlining what the scheme entails would allow applicants to develop a better understanding of how it works and how the business would benefit from being a part of it.

As well as the Best Bar None scheme, similar to the Sheffield policy which outlines the “Crime Reduction Radio Schemes” (Sheffield City Council, 2016, p.14), the authority could also consider providing further details of other active schemes running across the county within the appendix guidance section. Active schemes within Durham include the “ERASE exploitation” scheme which provides information and help regarding child exploitation (eraseabuse.org, 2019), the “Safe City Watch Radio scheme” which improves communication between door security and university security and the “UK Drowning Prevention Strategy” (Durham County Council, 2019). Outlining these schemes would ensure that applicants are aware of their existence and their aims, and are thus more likely to be a part of them, aiding in the delivery of the four licensing objectives.

Furthermore, again following the Sheffield policy, it would be useful to have a section of the policy referring to general steps that can be taken to promote all of the licensing objectives. The Sheffield policy outlines that the following should be considered: “layout of the local area”, “proximity to residential premises [and]...where children may congregate”, “any risk posed to the local area by the proposed licensable activities” and “any local initiatives” (such as crime reduction schemes) which may help to reduce potential risks (Sheffield City Council, 2016, p.13). This highlights to applicants that every specific location will have its own risks, and as such more weighting may have to be given to one objective

over another depending on the premises location. For example, to ensure the Protection of Children from Harm, if a licensed premise is likely to have children coming near or onto the premises then the applicant's operating schedule should include a list of potential considerations for the premises, such as the immediate vicinity and its impact on nearby schools or cinemas, or large scale events having procedures for lost and found children (Great Yarmouth Borough Council, 2015). Furthermore, in order to carry out the Public Safety objective, if a premises licence is located near a river, then the operating schedule should outline steps that will be taken to prevent river-related accidents. In summary, the policy should explicitly inform applicants to use their own initiative to consider the issues that their proposed premises may face, and adapt the level of detail required in their application for each licensing objective depending on these concerns.

Issues applicable to County Durham that should be considered in the revision

As well as issues specific to the precise location of the licensed premises, different local authority areas will have their own priorities. A further aim of the project was to highlight the specific issues which County Durham faces and so should be considered to be focused on more in the policy revision. The unique characteristics of an area will impact on the focus appropriate for each objective. One notable issue for Durham City, within the larger local authority area, regards queuing. A relatively recent tragic incident as a result of queuing outside of the nightclub "Missoula" has forced Durham into the spotlight (Halliday, 2018), with more pressure being placed on queue management to ensure that such a devastating event does not happen again, and the Public Safety objective is carried out. Furthermore, the Stockton campus of Durham University moving to Durham city has increased numbers of students wanting to enter licensed premises, thus greater focus still is needed to maintain the safety of club-goers. The authority could consider creating stricter expectations for applicants regarding queueing and occupancy plans in order to tackle this prominent issue.

Another concern focusing on nightlife, raised in the Oxford City Council policy, is "club-hopping", whereby multiple nightclubs are visited in one night, noting that "crime, disorder and public nuisance in urban centres can be increased by persons moving between venues late at night" (Oxford City Council, 2016, p.13). The sunk cost effect explains how if an individual invests resources into an action then, to avoid being wasteful, they will likely continue this action after this investment is made even if they would prefer not to (Arkes &

Blumer, 1985). Based on this theory, it is suggested that an individual is more likely to stay at a nightclub which they have paid entry for, even if they believe that another nightclub would be more enjoyable, in order to avoid wasting their investment. Whereas, if a club is free, there is no economic loss by leaving the club and “hopping” to the next one. Club-hopping is likely to occur in Durham County, especially within the city centre where at least two clubs, “Jimmy Allens” and “Fabio’s”, have free entry, thus creating more opportunity for both public nuisance, and crime and disorder to occur. Crime maps show that antisocial behaviour and violent offences frequently occur “on or near Saddler Street” (Police.uk, 2019), which is the street linking the two aforementioned nightclubs. Although there is no evidence of club-hopping directly resulting in a higher number of offences, it can be assumed that it will at least increase opportunity for offences. The policy should consider including a statement asserting that applicants should include plans for how to mitigate the chances of club-hopping in order to ensure that public nuisance, and crime and disorder are adequately prevented. Suggested plans could be outlined within the proposed appendices. In line with the sunk cost effect, plans could include having an entry fee or having strict last entry times, meaning that if club-goers leave one club at a certain time, they will not be able to enter another one.

As mentioned prior, binge drinking is a prominent issue within Durham; the policy already outlines that “in County Durham rates of binge drinking are significantly higher than the rest of England and the North East” (Durham County Council, 2016, p.5). However, it would be useful if the policy provided guidance regarding how to minimise the likelihood of binge drinking within licensed premises. For example, the Newcastle policy contains a list of examples of irresponsible drink promotions, such as “women drink for free” (Newcastle City Council, 2018, p.84). Reduction of binge drinking would aid in the promotion of all four licensing objectives.

A further ongoing issue within Durham County is that of underage sales. One third of test purchases for underage sales of alcohol resulted in failure by retailers in 2016/17 reviews (Conner-Hill, 2019). The authority could consider including tighter expectations about the level of detail required from applicants regarding steps taken to avoid underage sales. Suggestions have been made in other city policies that could also be included in Durham’s policy. For example, the Newcastle policy suggests that the view outside of shop premises should not be obstructed by posters displayed in windows (Newcastle City Council, 2018, p.9), therefore making it easier to notice underage and proxy sales taking place.

Taking the above together, good practice associated with the promotion of the licensing objectives involves addressing every thread of the four licensing objectives, as well as being cognisant of the issues that the licensing authority area faces. Carrying out thematic analyses led to the suggestion that the policy should be structured in accordance with the individual sub-objectives, outlined in the results section. The analyses also identified a number of steps that can be taken by premises in order to carry out each objective. The authority may wish to consider adding some of these steps into the policy to aid the applicant in ensuring that their premises operates smoothly, as well as a general section informing the applicant that they should use their initiative to identify issues specific to their location and devise plans to address these issues. It has also been suggested that the statement of licensing policy should outline the authority's minimum expectations in the main policy body, but include appendices containing further guidance for the applicant about what they are encouraged to consider when writing the operating schedule. This guidance section should provide further detail about the Best Bar None scheme and information about other active schemes. The policy should also focus on the specific issues that are central to Durham County, such as queuing, club-hopping, binge drinking, and underage sales. Providing further guidance will educate the applicant about how to best operate their premises.

Conclusions and Recommendations

The project has focused on good practice associated with the four licensing objectives. Conducting a thematic analysis provided a structured way of analysing information in order to recognise what constitutes good practice associated with the four licensing objectives. The thematic analysis identified common themes mentioned by policies in regards to each objective, aiding in the conclusion that good practice means targeting every aspect, or sub-objective, within the four licensing objectives, as well as being sensitive to the specific issues of the area. Using this conclusion, suggestions for changes to be made in the revised policy have been explored in order to communicate good practice to the applicant. These suggestions include possible changes to structure and level of detail in order to ensure the four objectives are carried out, as well as highlighting to applicants that they must plan how to mitigate the effects of the specific issues that Durham faces.

When revising the policy, it has been mentioned prior that the correct balance needs to be attained between ensuring that the licensing objectives are promoted, and the needs of the businesses and freedom permitted to leisure activities. The project's aim was to focus more on how to promote the licensing objectives, providing suggestions as to how the promotion of these can be communicated to applicants. However, upon considering the suggestions, the authority must be sensitive to the business needs as well, and ensure a balance between an overly or insufficiently prescriptive policy. As such, the authority may not wish to include all of the suggestions that have been made, however they offer a starting point for discussion and consideration when revising the licensing policy.

Furthermore, it must be noted that the report may be limited in the sense that much of the focus has been on Durham City, as opposed to the wider local authority area which the policy covers. This was due to personal anecdotal experience within the city providing a starting point for research of key issues in Durham, for example club-hopping. Whilst attempts have been made to ensure that the whole county has been researched, with sources showing that underage sales and binge drinking are a county-wide issue (Durham County Council, 2016, p.5; Conner-Hill, 2019), the focus has naturally been biased towards the city centre. However, statistics obtained from Durham County Council indicate that the density of licensed premises within the city centre is higher than that of neighbouring villages and

towns. Therefore, a bias in the amount of focus placed on the city centre is not necessarily unjust. However, more research is required to assess to what extent club-hopping and poorly managed queues are an issue county wide, instead of just in Durham city. How much of an issue these factors are will then identify how much focus is needed regarding suggestions for minimising these issues by licensed premises when revising the licensing policy.

In conclusion, the project postulates that good practice associated with the four licensing objectives consists of breaking each objective down into smaller sub-objectives which can be targeted, as well as considering specific issues facing the premises location. Thus, the report has suggested how to ensure the objectives are undertaken: by altering the policy structure in accordance with these sub-objectives; increasing the level of detail by adding further appendices containing details of active schemes within Durham and clear guidance for how to ensure objectives are carried out, to compliment the authority's minimum expectations for an application as outlined in the main body of the licence; and increasing the level of focus on the central issues of busy queuing, club-hopping, binge drinking and underage sales. The authority should consider these suggestions when revising the policy for adoption in October 2019. This would help to ensure that the two main purposes of the statement of licensing policy are realised: to inform applicants about the licensing authority's expectations, and to provide a decision-making framework for the licensing authority to use when responding to license applications.

References

Arkes, H., & Blumer, C. (1985). The psychology of sunk cost. *Organizational Behavior And Human Decision Processes*, 35(1), 124-140.

Carpenter, R., Fishlock, A., Mulroy, A., Oxley, B., Russell, K., & Salter, C. et al. (2008). After 'Unit 1421': an exploratory study into female students' attitudes and behaviours towards binge drinking at Leeds University. *Journal Of Public Health*, 30(1), 8-13.

Chambers, D., & Butterfield, R. (2006). *Alcohol and Entertainment Licensing A Practical Guide*. Kent: Shaws & Sons.

Cheshire East Council (2014). Cheshire East Council Statement of Licensing Policy (Licensing Act 2003) Policy dated January 2014 to January 2019, 1-41. Retrieved from https://www.cheshireeast.gov.uk/PDF/Statement_of_Licensing_Policy_2014-2019.pdf.

Cheshire East Council (2019). Cheshire East – the area. Retrieved from https://www.cheshireeast.gov.uk/council_and_democracy/your_council/about_cheshire_east/about_cheshire_east.aspx

City of York Council (2014). Statement of Licensing Policy 2014 Licensing Act 2003, 1-56. Retrieved from https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKewjlk2mtu3hAhULURUIHWv-D7cQFjAAegQIBRAC&url=https%3A%2F%2Fwww.york.gov.uk%2Fdownload%2Fdownloads%2Fid%2F3102%2Flicensing_policy_2014_to_2019pdf.pdf&usg=AOvVaw1cdsSBC2Gx53xi7bwzOcch.

Conner-Hill, R. (2019). Dozens of shops fail underage sales test. Retrieved from <https://www.thenorthernecho.co.uk/news/15343205.dozens-of-shops-fail-underage-sales-test/>

Durham County Council (2014). Licensing Act 2003 – Statement of Licensing Policy 2014 – 2019, 1-48. Retrieved from <http://www.durham.gov.uk/media/1050/Licensing-Act-2003-Statement-of-Licensing-Policy/pdf/StatementLicensingPolicy.pdf?m=636634554310370000>.

Durham City Council (2019). About Us. Retrieved from <https://durham.gov.uk/aboutus>

Durham County Council (2019). Application for a premises licence from Durham County Council. Retrieved from <https://www.gov.uk/apply-for-a-licence/premises-licence/county-durham/apply-1>

Durham County Council. (2019). Durham City Safety Group: actions and achievements. Retrieved from <https://www.durham.gov.uk/article/6231/Durham-City-Safety-Group-actions-and-achievements>

Durham Insight. (2019). InstantAtlas Durham – Population. Retrieved from <https://www.durhaminsight.info/population/>

Durham University (2019). Summary of Student Numbers. Retrieved from <https://www.dur.ac.uk/resources/student.registry/statistics/summary/1.1summary/181-1.pdf>

Ealing Council (2019). Licensing Policies in Ealing – Statement of Licensing Policy. Retrieved from https://www.ealing.gov.uk/info/201017/licences_and_street_trading/1007/licensing_policies_in_ealing/2

Eraseabuse.org (2019). Retrieved from <http://www.eraseabuse.org/Pages/Home.aspx>

Great Yarmouth Borough Council (2015). Licensing Act 2003 Licensing Policy 2016 edition, 1-35. Retrieved from <https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=2661&p=0>.

Halliday, J. (2019). Durham student death: witness tells of 'shambles' of nightclub queue. Retrieved from <https://www.theguardian.com/education/2018/feb/09/olivia-burt-durham-student-death-nightclub-queue>

Heritagecities.com. (2019). About Us – England's Historic Cities. Retrieved from <http://www.heritagecities.com/about-us/>

Home Office (2018). Revised Guidance issued under section 182 of the Licensing Act 2003, 1-151.

LG Inform (2019). Display and comparison groups. Retrieved from <https://lginform.local.gov.uk/about-lg-inform/faq/display-and-comparison-groups>

Newcastle City Council (2018). Licensing Act 2003 Statement of Licensing Policy 2018 to 2023, 1-171. Retrieved from https://www.newcastle.gov.uk/sites/default/files/wwwfileroot/business/trading-standards/nccs_licensing_policy_-_16.01.18.pdf.

Oxford City Council (2016). Statement of Licensing Policy Licensing Act 2003 February 2016 – February 2021, 1-82. Retrieved from https://www.oxford.gov.uk/download/downloads/id/1303/statement_of_licensing_policy.pdf.

Piacentini, M., & Banister, E. (2006). Getting hammered?...Students coping with alcohol. *Journal Of Consumer Behaviour*, 5(2), 145-156.

Police.uk. (2019). Compare Durham City, Durham Constabulary - Police.uk. Retrieved from <https://www.police.uk/durham/39/performance/compare-your-area/>

Police.uk. (2019) Crime map. Retrieved from <https://www.police.uk/durham/39/crime/2019-01/>

Salford City Council (2019). Statement of Licensing Policy. Retrieved from <https://www.salford.gov.uk/licensing-and-permits/trading-and-business/entertainment/alcohol-and-entertainment/statement-of-licensing-policy/>

Sheffield City Council (2016). Sheffield City Council's Statement of Licensing Policy Under the Licensing Act 2003, 1-48. Retrieved from <https://www.sheffield.gov.uk/content/dam/sheffield/docs/business/licensingandtradingstandards/Licensing%20Act%202003%20-%20Statement%20of%20Licensing%20Policy%202016.pdf>.

Sheffield City Council (2019). Sheffield's Population. Retrieved from <https://www.sheffield.gov.uk/home/your-city-council/population-in-sheffield.html>

University of Oxford (2019). Student numbers | University of Oxford. Retrieved from <https://www.ox.ac.uk/about/facts-and-figures/student-numbers?wssl=1>

Wikipedia (2019). Durham, England. Retrieved from https://en.wikipedia.org/wiki/Durham,_England

Appendices

Appendix A: Thematic analysis process

Thematic analyses were conducted to identify the main themes discussed within the policies.

Licensing Objective 1: The Prevention of Crime and Disorder

1. Data familiarisation

	Topic	Details
Cheshire East	Operating Schedule 7.2	Risk assessment should be undertaken by application of the likelihood of crime and disorder occurring as a result of the applicant
	Layout, lighting and fittings 7.3	Have these been designed to minimise conflict and opportunities for crime and disorder
	Door supervision	7.3 TOGETHER with maintenance of incidence book 7.4 SIA supervisors to control numbers or deny entry to those appearing drunk, disorderly or intent on crime
	CCTV	7.10 Licensing Authority may impose a condition of the license requiring CCTV installation
	ID scan equipment use	
	Drinking vessel 7.4	Must not form a sharp edge when broken
	Drinking location 7.4	Restrict drinking in areas within and outside premises
	Safer Clubbing 7.6	Home Office Guidance recommended
	Cinema Exhibitions 7.11	No film shown which will lead to disorder or incite hatred towards any person
Great Yarmouth	Use of appendix for further details	Makes it easier to read, not too much info in the main body of text but more details available to avoid ambiguity
	Section 17 C & D Act 5.1	Good as same as DCC – states responsibility of council
	Risk assessment Appendix 4	CCTV risk assessments
	Drugs storage	Details of search procedure and storage procedure of confiscated drugs

	Door supervisors protocols	Details of protocols in relation to drugs and violent proceedings
	Binge drinking	Measures to limit alcohol abuse caused by drinking games → especially suitable for a student population whereby binge drinking is part of the culture
	Bottle bans	DCC already covers shatterproof glass, but should also focus on bottle bans as these can be used as weapons
Sheffield	Radio schemes	Have 3 radio schemes in place to aid instant communication between police and businesses to avoid crime
	ON-GOING risk assessments	
	Door supervisors	Good as similar to DCC says they need SIA training. However they also specify that untrained staff cannot be used
	Counterfeit alcohol and tobacco	Contains section about trading standards which is very good
	Winding down time	Customers can remain in the premises after last orders. Applicants should specify how they will wind down, eg slower music
York	CCTV	Should cover queues outside. Should display time/date and be kept for 28 days
	States reasoning at all times	Says the point then says reason, relating to key objectives
	Section on reducing irresponsible drinking	
	Radio scheme	Section on this in order to prevent crime
	Dispersal	Premises must have a plan for making people leave at the end of the night
	Queuing plan	Must have a plan for how to prevent queues building up as violence occurs here → especially suitable for Durham where there are often very long queues
Oxford = not separated into 4 objectives	Club hopping 5.4	Crime increased by club hopping therefore last admission one hour before last orders
	Late night refreshment	Need a plan for how to reduce ASB
	Other potential weapons	Premises should not provide loose items eg heavy ash trays which could be used as weapons

	Drinking water	Premises should state how free drinking water will be given out
Newcastle	Drinking display areas	Operating schedule should outline if additional displays will occur at Christmas, Easter etc
	Voluntary code of good practice for reducing binge drinking	Gives examples of drink promotions eg girls drink free
	Uses very clear sections outlining what aspect of crime is trying to be reduced	Makes it very clear for applicants
	Preventing underage sales	No ID – No Sale → posters advertise Posters say it is a crime to do proxy sales Make a note each time somebody is refused to be served due to being underage
	Preventing drunkenness	Not having irresponsible promotions Refusing to serve drunk people
	Street drinking	Restrict access to alcohol
	Preventing conflict around and in the premises	Dispersal policy Capacity management policy eg head counts Reduce queues
	Preventing theft	Store alcohol away from doors Security tagging Well-lit premises Well managed cloakrooms
	Preventing drugs	Searches in public in view of CCTV Effective drugs policy

2. Initial coding of data

- Risk assessment should be carried out
- Layout and lighting to be considered
- Door supervision
- CCTV
- ID scan equipment use → plans to prevent underage drinking
- Drinking vessels to not create sharp edge
- Drinking location restrictions
- Safer clubbing HO guidance
- Cinema exhibitions to not incite hatred
- Drugs procedure

- Binge drinking reduction plan
- Radio schemes
- Counterfeit alcohol and tobacco
- Winding down time
- Queuing plans
- Club hopping minimising plan
- Weapons → do not use heavy ash trays
- Drinking water
- Drinking display areas to be considered
- Drunk people plan → do not serve
- Preventing conflict in and around premises plan eg dispersal policy and queue management
- Preventing theft plan eg well-lit areas
- Preventing drugs plan

3. Search for themes based on initial coding

Illegal sales

- ID scan equipment use → plans to prevent underage drinking
- Counterfeit alcohol and tobacco

Drunkenness

- Drinking water
- Drinking display areas to be considered
- Drunk people plan → do not serve
- Drinking location restrictions
- Binge drinking reduction plan
- Radio schemes
- Winding down time

Conflict in and around the premises

- Preventing conflict around and in premises plan eg dispersal policy and queue management
- Club hopping minimising plan
- Queuing plans
- Risk assessment should be carried out
- Layout and lighting to be considered
- Door supervision
- CCTV
- Safer clubbing Home Office guidance

Theft

- Preventing theft plan eg well-lit areas

Drugs

- Preventing drugs plan
- Drugs procedure

Weapons

- Weapons → do not use heavy ash trays
- Drinking vessels to not create sharp edge

Cinema exhibitions to not incite hatred**4. Review and labelling of themes → see pages 9-10: Table 1**

Themes that were selected were those that consistently emerged throughout the policies:

Illegal sales

Drunkenness

Conflict in and around the premises

Theft

Drugs

Weapons

Licensing Objective 2: Public Safety

1. Data familiarisation

	Topic	Details
Cheshire East	Voluntary activities	Same level of health and safety protection should be used as if there was an actual employer
	Fire safety	Consult fire department
Great Yarmouth = provides brief in body of text, then guidelines in appendix for more detail	Appendix 4 – general for all principles	Specifies what the operating schedule should include → provides more detail about potential safety issues, all of what is in appendix should be included BUT should also include about position near river = definite safety issue
Sheffield	Examples of public safety when leaving as well as in premises	Providing taxi contact info and adequate lighting in car parks
	Examples of how to prevent drug use	
York = makes a statement, has a clear reason underneath linking to objective	Section on occupancy	Ensures public safety within premises and also in the case of evacuation
	Vertical drinking establishments	Ensure there are still seats for people in large capacity premises
Oxford = not separated into 4 objectives	Construction of premises also an issue	2 types of safety – construction of and within the premises
	Provides resources to use	Eg books etc
	OS must specify management structure	When are staff in, depending on activities occurring within premises
	Occupancy	Must state occupancy of each floor
	Free drinking water	Must state how they will distribute free drinking water
	Smoke free premises	Must state how they will comply with Health Act 2006 without compromising the objectives eg nuisance due to noise outside
Newcastle	States a minimum of what must be considered	Eg special effects

	Capacities	Specifies → how many people per m squared
	Safeguarding initiatives	Eg First Aid
	Risk assessment to be reviewed every 12 months	
	First Aid	Have a First Aid box available Have a qualified First Aider 24/7 Accident book to log accidents Avoid irresponsible drinking promotions Written policy to deal with A&E
	Occupancy	Ensure not to exceed capacity Have measures to count number of people Decide max capacity by fire risk assessment and by dividing space by max capacity per square metre Provide book to use to assist
	Safe arrival and departure	Adequate lighting Well managed door policy Dispersal policy
	Drink driving	Publicise designated driver scheme Promoting safe transport schemes eg taxi ranks, safe waiting areas, night bus
	Fire safety	Safe means of evacuation Fire risk assessment should consider: <ul style="list-style-type: none"> • Electrical installations • Staff trained in fire safety • Visible escape routes
	Drink spiking and drugs	Staff trained in drug awareness Considering anti drink spiking products Reporting suspected and actual spiking to police

2. Initial coding of data

Voluntary activities

Fire safety

Drug use

Drink spiking

Safe arrival and departure → dispersal

Occupancy

Vertical drinking establishments → provide seating

Construction of premises safety

Resource available to use

Management structure, staff rota

Free drinking water

Smoke free premises

Special effects

Risk assessment reviewed every 12 months

First Aid

Drink driving

3. Search for themes based on initial coding

Fire

- Fire safety
- Special effects
- Smoke free premises

Drinks

- Drink spiking
- Free drinking water
- Drink driving

Drugs

- Drug use

Over-occupancy

- Occupancy
- Management structure, staff rota

Lack of seating

- Vertical drinking establishments → provide seating

Arrival and dispersal

- Safe arrival and departure → dispersal

Construction

- Construction of premises safety

Medical emergency

- First Aid
- Risk assessment reviewed every 12 months

Voluntary activities

Resources available to use

4. Review and labelling of themes → see page 11: Table 2

Themes that were selected were those that consistently emerged throughout the policies:

Fire

Drinks

Drugs

Over-occupancy

Lack of seating

Arrival and dispersal

Construction

Medical emergency

Licensing Objective 3: The Prevention of Public Nuisance

1. Data familiarisation

	Topic	Details
Cheshire East	Car parks	Car parks → consider arrangement and effects on residents
	Environmental Protection Act 1990	Need to consider this
	Operating Schedule suggestions	Soundproofing, air conditioning, acoustic lobbies, sound limitation devices or locking doors at specified hours
	States what the licensing authority will consider	<p>Whether people standing or sitting outside are likely to cause obstruction or other nuisance</p> <p>Whether premises are under or near residential accommodation</p> <p>The hours of sale of alcohol in open containers or food for consumption outside the premises</p> <p>Measures to make sure that customers move away from outside premises when such sales cease</p> <p>Measures to collect drinking vessels and crockery, cutlery and litter</p> <p>The extent and location of areas proposed to be set aside for the consumption of food and alcoholic drink for smoking</p> <p>Whether there is a need for door supervisors to prevent or to control customers congregating in outdoor areas to smoke, consume food or drink (whether supplied by the premises or not), between certain hours or at all times.</p>

	Other emissions	Litter, smells, fumes, dust, tobacco or other smoke, or other emissions
	Queuing	Minimize where possible, or divert away from residential areas
	Taxis and routes to/from premises	Consider if these are likely to disturb
	Waste	Consider if this would increase
	CCTV/door staff	Are they necessary to prevent nuisance?
	Drugs	Measure to prevent sale
Great Yarmouth = provides brief in body of text, then guidelines in appendix for more detail	Antisocial behaviour	Should be considered
	Queuing	Steps to prevent / divert away from residents
	Parking arrangements	
	Taxis	Will they disturb?
	Waste	Would this increase?
Sheffield	Light pollution	Told to balance not causing nuisance with prevention of crime → lighting reduces crime
	Smoking shelters	Management plan so not too loud
	Advertising	Plans needed to ensure advertising is not annoying
York = makes a statement, has a clear reason underneath liking to objective	Hours of operation	States particular plans for reducing nuisance should be between 11-7
	Carry out regular noise monitoring	
	Train staff in reducing noise	
	Provide locals with the manager number on request	
Oxford = not separated into 4 objectives	Fly-posting	Considered to be a public nuisance Gives alternative for advertising: use 1 or 7 poster boards States that OS should include details of how they plan to advertise events
Newcastle	Smoking	Ash trays or wall mounted bins = minimise litter

	Specific location	Extra consideration needed if near to houses or hospitals
	All premises should	Liaise with locals to ensure everything is okay Provide locals with contact number Dispose of bottles during normal working hours
	On trade premises should	Consider getting a noise report done Locate DJs/speakers away from doors and windows
	Off trade premises should	Ensure people don't hang about outside shop Plan deliveries in normal working hours
	Ventilation systems	To reduce odours Ensure they are silent
	External lighting	Turn off once premises is shut

2. Initial coding of data

Car parks → arrangements and effects on residents

Environmental protection act 1990 – consider

Soundproofing

AC

Sound limitation device

Operating hours – between 1–7 need special plans for reducing nuisance

Dispersal policy

Measures to collect drinking vessels

Door supervisors and CCTV

Other emissions → ventilation systems to reduce odours

Queuing – measure to minimize or divert away from residential areas

Taxis and routes to/from premises – consider if they will disturb

Waste – consider if it will increase

Drugs – measure to prevent sale

Antisocial behaviour – consider

Light pollution – balance causing nuisance and safety/preventing crime and disorder

Smoking shelters – management plan to reduce noise and litter – ash trays?

Advertising/fly-posters → fly-posting is illegal. Need plan for how to advertise.

Carry out regular noise monitoring

Train staff in reducing noise

Provide locals with the manager number on request and check in on them to make sure they are happy

Consider location – more special plan needed if close to houses/hospitals/worship places

Dispose of bottles during normal working hours

Locate DJs/speakers away from doors/windows

Off-license: ensure people do not loiter outside the shop

Plan deliveries during normal working hours

3. Search for themes based on initial coding

Noise

- AC
- Car parks → arrangements and effects on residents
- Soundproofing
- Sound limitation device
- Dispersal policy
- Door supervisors and CCTV
- Operating hours – between 1–7 need special plans for reducing nuisance
- Queuing – measure to minimize or divert away from residential areas
- Antisocial behaviour – consider
- Taxis and routes to/from premises – consider if they will disturb
- Carry out regular noise monitoring
- Train staff in reducing noise
- Provide locals with the manager number on request and check in on them to make sure they are happy
- Consider location – more special plan needed if close to houses/hospitals/worship places
- Dispose of bottles during normal working hours
- Plan deliveries during normal working hours
- Off-license: ensure people do not loiter outside the shop
- Locate DJs/speakers away from doors/windows

Smoking

- Smoking shelters – management plan to reduce noise and litter – ash trays?

Waste

- Measures to collect drinking vessels
- Other emissions → ventilation systems to reduce odours
- Waste – consider if it will increase

Visual

- Light pollution – balance causing nuisance and safety/preventing crime and disorder
- Advertising/fly-posters → fly-posting is illegal. Need plan for how to advertise.

Environmental protection act 1990 – consider

Drugs – measure to prevent sale

4. Review and labelling of themes → see page 12-13: Table 3

Themes that were selected were those that consistently emerged throughout the policies:

Noise

Smoking

Waste

Visual

Licensing Objective 4: The Protection of Children from Harm

1. Data familiarisation

	Topic	Details
Cheshire East	Defines	Protection of children from harm includes protection from premature exposure to strong language and sexual expletives
	Serious concerns in specific places eg...	Convictions for underage drinking Known association with drugs Strong element of gambling Sexual entertainment
	Matters considered by the authority...	The likelihood of children being attracted to the premises eg entertainment Whether there is evidence of binge drinking
Great Yarmouth = provides brief in body of text, then guidelines in appendix for more detail	Serious concerns in specific places eg...	Convictions for underage drinking Known association with drugs Strong element of gambling Sexual entertainment Whether unaccompanied children have been let in Whether alcohol selling is the primary purpose
	OS should state whether children are allowed	If children not allowed then details are not necessary in OS BUT details are needed if they are allowed
	Consideration should be given to	Staff training to avoid underage sales Procedures for lost and found children at large scale events Compliance with the Portman group code
Sheffield = frequently provides links/phone numbers for more detail	Risk assessment template	A risk assessment template is available to download at www.safeguardingsheffieldchildren.org.uk
	Access for children to licensed premises	A code of practice for children living at licensed premises is available to download at www.safeguardingsheffieldchildren.org.uk
	Proof of age scheme	Must be signposted
	Refusals register	A refusals register must be maintained and made available for inspection at reasonable request. Records should include the date and time of the refusal, the product the

		young person attempted to buy or the reason for refusal/ejection, a physical description of the customer and any other significant comments;
	Staff training	Records must be maintained and made available upon request
	Delivery of alcohol	Steps must be taken to prevent sale to underage
	'Underage Sales Group'	Tackles underage sales and contains a specific framework of how persistent failures of test purchases are dealt with in Sheffield
	Responsible retailer scheme	Educates staff about underage sales and getting into habit of asking for ID
	Child sexual exploitation policy needed, regarding	Train staff to recognise indicators of exploitation Train staff to ask for ID CCTV and patrols Report suspicious activity
	Proxy sales	Use CCTV and patrols
	Children's Safeguarder	Nominate a safeguarder = shows due diligence and is useful where premises have a high staff turnover
York = makes a statement, has a clear reason underneath liking to objective	Serious concerns in specific places eg...	Convictions for underage drinking Known association with drugs Strong element of gambling Sexual entertainment
	Youths outside shops	May ban children altogether if it is an area for children to gather outside → disorder
	Films age specification	With respect to films with 'U' classification, which are suitable for audiences aged 4 years and over, children under 4 may be admitted at the discretion of the accompanying parent/adult
Oxford = not separated into 4 objectives	BBFC film classification	Appendix specifies classification
	Proof of age documents	Appendix specifies accepted docs
	Reputation	When making a decision, the authority can consider general rules as well as reputation
	Entertainment for children	Need risk assessment for how to ensure safe access and egress of children

	Under 18 events	Must be ticket-only. This is because there is a risk that when ‘pay-at-the-door’ events reach capacity, children will be left alone on the street.
	Child performances	For licences that include performances by children, the Authority will normally expect a nominated adult to be responsible for such child performers.
	Film classification – films without a class	Submit to the authority 28 days before and they will class → authority classification overrides any other
	Film – display of notices	The Authority will expect applications to ensure that appropriate notices are displayed about restrictions on admission and that performances do not take place in areas other than where they can be restricted to a particular audience when necessary.
Newcastle	Proxy sales	<p>Steps must be taken to prevent → trained staff</p> <p>Delivery of alcohol → staff must be made aware that they need to check alcohol is not sold to those underage</p> <p>No ID – No Sale policy eg Challenge 21</p> <p>All premises part of False ID Scheme</p> <p>Till prompts to remind staff to ask for ID</p> <p>Posters put up stating proxy sales are illegal</p> <p>Refusals register for refuse customers</p> <p>Shops and supermarkets → windows not obstructed by posters</p>
	Under 18 events	Refer to a document for details
	Designated staff	Designated welfare staff, trained first aiders and trained staff, to identify vulnerable person(s)
	Club Night Quality Mark	Developed by Newcastle – must adhere to for unaccompanied under 18 events
	Immediate vicinity	Considering the impact the operation of their premise may have on the immediate vicinity, particularly if there are schools, cinemas, family restaurants, bowling alleys

		or other facilities nearby likely to be frequented by children and young people.
	Films	Check age at point of sale and prior to entry to screening room
	Gambling	Age restrictions should be signed and in full view of staff
	Adult nature entertainment	Posters of this nature should not be displayed in areas where children might see

2. Initial coding of data

Proof of age scheme – must be signposted

Need a refusals register

Delivery of alcohol

Child sexual exploitation policy → report suspicious behaviour

Proxy sales → use CCTV and patrols

Safeguarder – need a member of staff in charge of welfare

Films age specification and display notices

Under 18 events = ticket-only to prevent children being alone on streets if max capacity is reached

Gambling – age limit specified and gambling machines in view of staff

3. Search for themes based on initial coding

Underage activity

- Gambling – age limit specified and gambling machines in view of staff
- Need a refusals register
- Proof of age scheme – must be signposted
- Under 18 events = ticket-only to prevent children being alone on streets if max capacity is reached
- Delivery of alcohol
- Proxy sales → use CCTV and patrols

Sexual exploitation

- Child sexual exploitation policy → report suspicious behaviour

Age inappropriate cinema

- Films age specification and display notices

Unaccompanied children

- Safeguarder – need a member of staff in charge of welfare

4. Review and labelling of themes → see page 14: Table 4

Themes that were selected were those that consistently emerged throughout the policies:

Underage activity

Sexual exploitation

Age inappropriate cinema

Unaccompanied children