

Century Building (Rochester) Limited

87-88 Bank Street

Maidstone

Kent ME14 1SD

**Background
Operations Schedule
&
Risk Assessment with
Crime Prevention Strategy
For SEL Application**

June 2012

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Description

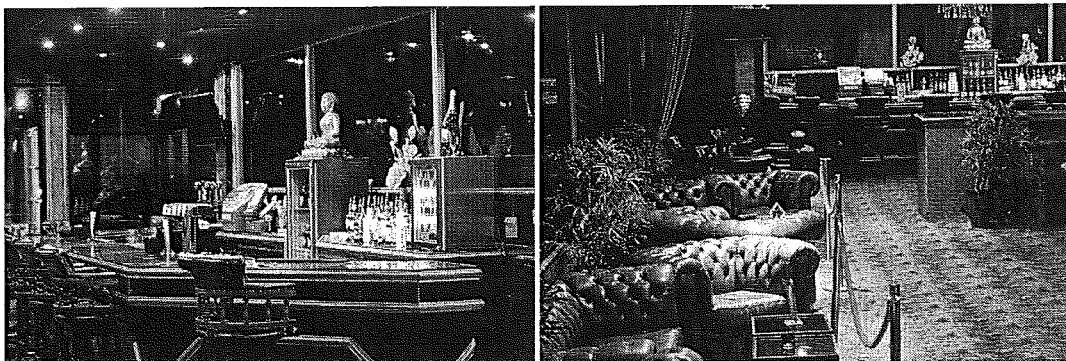
In its current form the property is vacant is due to be refurbished completely. Upon completion the premises would be split with ground floor and part first floor as a cafe, restaurant and bar with dancing and part of the first floor for a sex entertainment license subject to grant.

We currently trade a purpose built venue at the Circus Tavern in Essex know as 'Tenshi'. This is licensed to APS CT Properties Limited of which Mr. J Stone is a director and Mr. P Roue is the DPS and Manager of the Venue. We are also in the process of refurbishing part of the Casino Rooms in Rochester to accommodate a 'Tenshi' for license that was granted in 2012 which the Mr. A.P.Stone is shareholder.

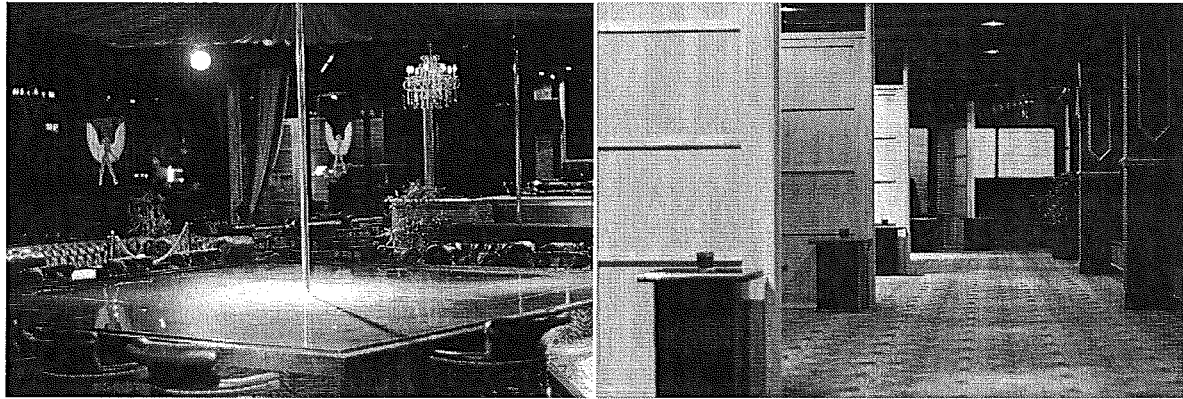
Our objective subject to the grant of the SEL would to use designated area for dual purpose use when the SEL is not use.

- ***Tenshi Essex – Currently Operational SEL***

Tenshi Essex operates as one of the premier Gentlemen's clubs in the UK. The Club prides itself on providing a high standard of furnishing and fittings. This reflects the quality of the custom we aim to achieve.



The main floor area consists of a pay desk and cloaks facility, 2 Bar areas, a dance stage, DJ Box, performers changing area with private toilets and smoking area, Male and Female Toilets and dance booths.



The venue is subject to CCTV throughout the premises. This included the dance booth areas that are subject to individual cameras.

This CCTV is available for 31 days and is always available for Police and Local Authority representatives to view.

The performers as detailed have private secure changing facilities including toilets to ensure that no unsupervised contact can occur with patrons.

The trading area has no exposed windows or areas where persons in the vicinity could see licensable activity taking place similar to the proposal for the Bank Street.

Location



The proposed property to host the SEL is located on the Bank Street in central Maidstone.

Although the property is located on a busy street the application is that the entrance for SEL use will be via the side of the property of the street. There would be minimal signage the on the actual street that would be subject to planning application and approval by the council licensing section.

Although the premises is located in the centre of a historic town we have operated property previously of a similar nature in Rochester where we have always ensured that there is no evidence of entertainment of an adult nature taking place in its marketing or operation of events.

The venue is placed in around a mix of commercial and residential property. As with our previous operations we have always attempted to live harmoniously with our neighbours and have always welcomed feedback from the public towards and concerns.

Management Structure

- ***Aaron Paul Stone – Director***

Mr. Stone has actively worked in the licensed sector for over 20 years and holds a personal license and SIA License. He has had experience large licensed premise with a capacity of 2300. He is currently also the director of several companies and also shareholder in 2 others that operate venues which are licensed for Sex Entertainment. Mr. Stone has always taken a positive hands on roll with the all the premises in the group and is a regular visitor to them ensuring the standards of day to day operation.

- ***S.Ross Hutchins - DPS***

Mr. Hutchins has worked in the licensed trade since 1998 with a range of experience from bars to nightclubs with capacities in excess of 3000.

He brings a wealth of operational experience to application having managed dancing of an adult nature under the Licensing Act 2003 and also in granting and operation of 2 licenses under the new regime.

He is currently the holder of a Personal License and also a SIA License for Door Supervision and also CCTV and also received awards for Crime Reduction partnership work from the Home Office.

- ***Peter Roue – Tenshi Manager at Circus Tavern(Relief Cover)***

Mr. Roue has been the GM at the Circus Tavern for over 20 years and again brings a wealth of experience to this application through his experience through the years within adult entertainment. He is currently the Designated Premises Supervisor for the Circus Tavern and responsible for the day to day operations of this venue and also holder of a frontline SIA Door Supervisor badge. He has been

responsible for the operation of Tenshi since its opening in 2008 and has established an excellent relationship with the Police and local authority.

Day to Day Operations

Operating Schedule

Relevant Entertainment- Lap Dancing, Pole Dancing, Strip Shows
(Male or Female)

Hours of operation- Monday to Sunday 12:00 to 06:00

SEL License Manger to be present at all times during operations.

- The premises would normally commence trade around 8pm except for special events.
- Performers are expected to arrive prior to opening to minimise outside contact with patrons.
- All performers must sign the attendance register prior to changing and any new performers must complete induction explaining the house rules, codes of conduct and the provision of documents to support eligibility to work.
- The premises are inspected by the Duty Manger prior to opening including checking of CCTV systems.
- A Security Industry Authority approved door supervisor greets all patrons and directs their attention to rules of conduct and patrons are asked to pay subject to their agreement to terms.
- Patrons may approach the bar areas to purchase drinks and waitress service is available at peak times.

- Patrons may stand at the bar area or be seated in the seating provided around the stage area.
- Performers will dance on the main stage area to music as called by the DJ and directed by the Duty Manager.
- Performers may interact verbally with patrons in the main floor area. Patrons who request a personal dance are escorted to the dance bay area which is covered by monitored CCTV and staff.
- On completion of a dance the performer and patron will return to the main floor area immediately.
- This operation will continue until closing time where patrons are asked to leave.
- Once the patrons have cleared the car area performers are escorted to transport if requested.
- The venue is then secured.
- During the operation the Duty Manager is either present on the operational floor area or monitoring the areas on CCTV.

Guidelines for Safe Operation

- 1) Lap Dancing and Pole Dancing will only take places in the areas as approved by plans from the local authority.
- 2) Patrons are only permitted in areas as licensed by the local authority.
- 3) No Person under 18 shall be permitted and a Challenge 25 policy will be in force only accepting government approved photo ID.
- 4) No person under 18 will be permitted to work at the premises.
- 5) No solicitation or prostitution is permitted in the premises or its immediate perimeter. Any indication that this is occurring Council CCTV operators and/or police will be informed.
- 6) No displaying or advertising of the activities regulated by the SE License will be visible from the outside of the premise except exemptions specified in the local authority policy.
- 7) The premises will be subject to the presence of a Duty Management including staff and door supervisors at all times during operation. This includes the regular inspections of public toilet areas.
- 8) Access will not be permitted to any other areas of the building by passing through SE licensed areas during operation.
- 9) All windows and openings will be blocked from public view from the external areas of the premises.
- 10)The duty manger will ensure that on all external access doors that closers are operational to ensure that public view in external areas is restricted

- 11)The SE License will be clearly on display available for inspection at all times during operations.
- 12)CCTV will be installed and in operation during the hours of operations as agreed with local Police. Prominent signs will remind customers of the use of CCTV.
- 13)CCTV preview monitors will be available in the reception area to assist with licensing inspections.
- 14)Performers may not stand in the lobby area nor may it be permitted for them to be visible in any way from the exterior of the premises.
- 15)The duty manager will be named on a sign for each operational shift when SE license is in use which will be displayed in the reception area to assist police or council officers inspecting the premises.
- 16)The duty manager will ensure that the premises operates in accordance any specific conditions outlined by the SE license.
- 17)The duty manager shall remain on the premises except in the case of an emergency or when relieved of duty by an alternative duty manager.
- 18)The duty manager will ensure that the appropriate levels of SIA approved door supervisors are present on a ratio of 1 to 100 for the purpose of monitoring the premises and its upstairs entrance.
- 19)The duty manager and SIA door staff will actively monitor the licensed area to ensure conditions of the SE license are upheld and the Dancer and Customer codes of conduct are complied with.
- 20)Signs in the entry area must display the customer code of conduct and all patrons entering the venue and these must be pointed out to patrons entering.

- 21) Any customer found to be breaching the code of conduct will be safely ejected from the premises and recorded in an incident register.
- 22) The premises will produce a 'Code of Conduct for Dancers' to be agreed in writing by Kent police. No changes may be made to this document unless agreed with Kent police.
- 23) The dancer's code of conduct will be displayed in the entrance area and customers arriving will be directed to review it.
- 24) All dancers will be subject to the code of conduct (as detail in separate section). This will include details of a disciplinary procedure to deal with breaches in the code of conduct.
- 25) All managers, staff and security staff must sign to acknowledge understanding of the 'Code of Conduct for Dancers'. Any breaches should be reported to the Duty Manger immediately.
- 26) Duty Manager will check documents regarding proof of age and eligibility to work in the UK and retain photocopies in employment files signing and dating each copy. Employment files to include full facial photograph of all dancers, proof of ID e.g. Passport or driving license, proof of residence and eligibility to work in the UK.
- 27) Employment files to be retained for 6 months after the employment ends and to be made available to Police and relevant authorities upon demand.
- 28) A signed and dated copy of the Dancer's Code of Conduct and Disciplinary procedure must be retained on the employment file.
- 29) The Duty Manager shall not permit any dancer to perform if they are clearly under the influence of alcohol or drugs.
- 30) The license holder must retain a incident log at the premises to record any of the following:

- a. Ejections from the premises
- b. Refused admissions
- c. Refused Sales
- d. Breaches of Dancer Code of Conduct
- e. Inappropriate customer behaviour
- f. Failure of CCTV
- g. Incidents of Crime and Disorder
- h. Any complaint made by public, customer or dancer
- i. Any disciplinary action taken against dancers

This log must include the date, details of staff involved and brief summary of the incident.

31) The license holder will on a monthly basis inspect the incident log to ensure the quality of the record.

32) The incident log must be available at all times for Police or the local authority to inspect.

33) The Duty Manager will ensure that all performers/dancers complete the register of attendance for each shift. This register must be available for inspection by the police and local authority.

Dancer Code of Conduct

- a) Dancers may not intentionally touch a customer during a performance.
- b) Dancers may not permit a patron/customer to touch them during a performance.
- c) Dancers may NOT straddle the customer.
- d) If a patron/customer attempts to touch or speak to a dancer inappropriately, the dancer shall stop the performance and advise the customer of the rules of the Code of Conduct. If the customer persists in inappropriate behaviour the dancer shall stop the performance and inform the Duty Manager immediately.
- e) Only dancers engaged by the company can perform striptease/erotic dance.
- f) No striptease/erotic dance to take place at the bar or to standing customers.
- g) No photography or videoing to be permitted on the premises.
- h) Dancers to re-dress at the conclusion of dance.
- i) No dancers under the age of 18 years of age.
- j) Dancers shall not solicit for gratuities or payment for sexual favours or any act that would constitute prostitution.
- k) Dancers may not be in the company of a patron unless it is in an area of the premises that is open to the public.
- l) Dancers shall not perform if under the influence of alcohol or drugs.
- m) Dancers shall not engage in any act of prostitution, i.e. the receiving of gratuities or payment for sexual favours.
- n) If a customer engages in the act of masturbation or other sexual behaviour, the dancer shall cease the performance immediately and inform the premises manager.
- o) Dancers will use the dressing room area facilities to change into and out of performance outfits at the start and end of each shift.
- p) Dancers may only use the specifically dedicated toilet area.
- q) Dancers must arrive and leave the premises in suitable attire e.g. outdoor wear consisting of a coat or top and skirt or trousers so no element of performance costume is visible.
- r) All dancers shall comply with this code of conduct. Any failure to adhere to it shall result in the dancer becoming subject to the house Disciplinary Rules.

All Dancers will be made aware of 'Dancer's Welfare Policy' that will state at minimum:

- i. Any dancer concerned about the behaviour of a customer shall report the incident to the Duty Manager who will take immediate action to investigate and take appropriate resolution.
- ii. Staff members must constantly supervise the behaviour of customers at the premises and shall intervene where any customer is breaching the 'Code of Conduct for Customers' or otherwise causing alarm or distress to a dancer.
- iii. Any customer behaving inappropriately will be ejected from the venue.
- iv. Dancers shall be provided with free drinking water on request.
- v. Dancers will use the dressing room facilities for rest breaks as agreed with the Duty Manager.
- vi. Dancers will be escorted on request from their transport on arrival and departure from the premises.

Customer Code of Conduct

1. Customers should be aware that CCTV is in force throughout the premises during operational hours. This may be reviewed by police and the local authority at any time in line with our statutory obligations.
2. Management reserves the right of admission to the venue.
3. Customers may not touch dancers during a performance.
4. Customers may not make lewd or offensive remarks to dancers.
5. Customers may not harass or intimidate dancers.
6. Customers may not ask dancers to perform any sexual favour.
7. Customers may not perform acts of masturbation or indulge in other sexual behaviour.
8. No photography or videoing to be permitted on the premises this includes the use of mobile phones that is restricted to the lobby area only.
9. Any customer failing to adhere to the above will be ejected from the premises.

Risk Assessment & Crime Reduction Strategy

CRIME & DISORDER

RISKS	<p>Public Disorder/Violence/ASB Large Groups of patrons Use or supply of drugs in venue Theft Solicitation/Prostitution Drunkenness</p>
GROUPS AT RISK	<p>Staff/Customers/General Public</p>
CONTROL MEASURE	<p>Well Trained Management Team Venue staff and management at appropriate level to manage patrons Statically placed CCTV Regular Toilet Checks Staff training in relation to the dispense of alcohol Regular collection of glasses and bottles Appropriate First Aid facilities Use of Safer Medway/Council CCTV radio during operation Use of SIA Door Supervisors Operation of Challenge 25 policy for the dispense of alcohol Dance and Customer code of conduct Use of internal radio system Use of internal CCTV monitors to manage licensed areas Drug Awareness training for staff Searching of Customers as required Large Groups are asked to contact venue in advance and details retained from ID as condition of entry Incident report records and active exclusion of know or previous 'trouble makers'</p>

PROTECTION OF CHILDREN FROM HARM

RISKS	<p>Under Age Entry ASB from Customers in area of building Under age Dancers</p>
GROUPS AT RISK	Persons Under 18
CONTROL MEASURE	<p>Well Trained Management Team Venue staff and management at appropriate level to manage patrons Strategically placed CCTV Regular Toilet Checks Upon arrival SIA Door supervisors or Management will inspect ID of any person looking under 25. The only accredited ID would be acceptable. Staff training in relation to the dispense of alcohol including the operation of a challenge 25 policy Use of Safer Medway/Council CCTV radio during operation to report concerns Use of SIA Door Supervisors Dance and Customer code of conduct Inspection and copy records of any Dancer identity records Use of internal radio system Use of internal CCTV monitors to manage licensed areas Incident and refusal report records and active exclusion of know or previous 'trouble makers' or repeated attempts of underage persons to gain entry</p>

PUBLIC NUISANCE

RISKS	Excessive Noise Break Out Large Groups of patrons dispersing ASB/Noise from customers arriving and leaving premises Littering
GROUPS AT RISK	General Public/Nearby Residents
CONTROL MEASURE	Well Trained Management Team Venue staff and management at appropriate level to manage patrons Actively monitoring noise breakout during operation Ensuring all doors closed except for entry of exit. Use of SIA Door Supervisors to monitor perimeter of building area to ensure patrons arrive and leave quietly including queue if present. Any marketing material will carry the message to arrive and leave quietly. Refusing entry to those who are in a noisy manner and report to police/council CCTV as required Posters will be displayed on the exit route from the venue encouraging patrons to leave quietly and to respect our neighbours. A notice will display taxi numbers should the taxi rank be empty. Staff to check perimeter as required for rubbish collection. All staff to leave the premises in a quiet manner.

PUBLIC SAFETY

<p>RISKS</p>	<p>Poor House Keeping including Fire Safety Violence/ASB Personal Injury Uncontrolled dispersal Excessive alcohol consumption Slips, trips, falls including broken glass Drug use on the premises</p>
<p>GROUPS AT RISK</p>	<p>General Public/Staff/Customers</p>
<p>CONTROL MEASURE</p>	<p>Well Trained Management Team Venue staff and management at appropriate level to manage patrons. Regular inspections of the premises by staff including annual risk assessments and fire risk assessment. Use of SIA Door Supervisors to monitor premises and perimeter of building area to ensure patrons arrive and leave quietly including monitoring of queue if present. First Aiders and facilities available. Strategic use of CCTV. Daily inspection of validity of SIA Door staff Badges SIA Door supervisors to monitor dispersal of large groups of customers and will contact police/council CCTV should concern arise. Regular inspection or areas for spillages or broken glass by staff. Drug awareness training for staff. Regular toilet inspections. Dancer & Customer code of conduct Staff training in relation to dispense of alcohol and identifying drunkenness or excessive or rapid consumption.</p>