



**Kent
Police**

Chief Officer of Police Representation in relation to an application for **variation** of premises licence made under Part 3 **Section 34** Licensing Act 2003 (S35 Licensing Act 2003)

Details of person making representation	
Name of Chief Officer of Police	Chief Inspector Gary WOODWARD
Postal Address: (Area Headquarters)	Maidstone Police Station Palace Avenue Maidstone ME15 6NF
E-mail address	11187@kent.police.uk
Telephone Number:	

Details of premises representation is about	
Name of Premises:	Escape Kent Prison Island
Address of premises:	60-61 High Street Maidstone Kent ME14 1SR
Date application received by police	04/03/2021
Date representation sent to Licensing Authority	17/03/2021 <i>Must be within 28 days of receipt – The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005, Part 4 Reg. 22.</i>

The Chief Officer of Police has received an application for the variation of a premises licence made under the provisions of Section 34 Licensing Act 2003, and under Section 35 of that Act, asks the Licensing Authority to consider these representations in respect of: -

Please tick one or more of the licensing objectives that the representation relates to:

Prevention of crime and disorder	X
Public Safety	X
Prevention of public nuisance	X
Protection of children from harm	X

The relevant representations within the meaning of S.35(5) of the Licensing Act satisfy the requirements of S.35(6) of that Act and are as follows:

Please give the reason for the representation and detail the evidence supporting it:

Kent Police make these representations in relation to an application for Escape Kent Prison Island, 60-61 High Street, Maidstone.

The location falls within Maidstone Town Centre's Public Space Protection Order and therefore it has already been evidenced that alcohol has a detrimental effect in the area.

This application is for prison island escape rooms which is a ground floor property with toilets. The applicant has requested the sale of alcohol whilst patrons enjoy their experience at the venue.

The requested hours of operation will be Monday to Sunday 09:00hrs to 23:00hrs and the sale of alcohol for consumption both on and off the premises will be between 11:00hrs and 23:00hrs each day, seven days a week.

Following discussion with the applicant it is our understanding that the intention is to allow patrons to consume alcohol throughout the premises except within the panic rooms. The applicant confirmed that a bar will be located at the front of the venue and they are currently building a miniature golf course. It is their intention that patrons will be able to consume alcohol whilst enjoying a round of golf.

It needs to be understood that this Premises Licence will potentially allow people to drink alcohol from 11:00hrs to 23:00hrs, some of them may become involved in acts of crime and/or disorder. If persons are involved in disorder this will have a significant impact on the local community and gives cause for concern for the safety of patrons and those near the premises for other reasons. It is clear that this will have a significant demand and resource on staff to control them and even then in reality all the staff will do is push the problem out of the premises and onto the streets where they become a police issue.

Maidstone Town Centre is undertaking a growth in residential premises and all residents should be entitled to a home in which they can live and sleep without being disturbed by licensed premises. Therefore steps need to be taken to control the noise coming from the premises as well as controlling the noise of customers attending the area to utilise the premises. It is obvious that people walking past your address will have an impact on your daily life. When you add in the fact that they have been drinking for some time, the problem will be magnified.

As with any venue the concerns are that if there are insufficient suitably trained staff to control the movement of patrons between the various areas then these issues may escalate quickly and items such as glassware may become weapons.

Kent Police believe the venue may undermine the licensing objectives and lead to a significant rise in crime and disorder within the area having an obvious detrimental effect on the residents and the wider community. The provision of alcohol within any premises gives concern to increased opportunities for crime in the form of theft offences, violence due to intoxication or nuisance due to the premises becoming a focal point for people, all of these give concerns for the safety of the public in the area for any purpose.

Any premises which sells alcohol will become a target for young people to attempt to purchase or otherwise obtain alcohol, this premises will be significantly more appealing due to the family experience of the escape rooms and miniature golf.

The premises will need to ensure that there are adequate measures in place in order to prevent this happening. Children will be permitted on site, however there will need to be sufficient controls in place to protect them from exposure to potentially intoxicated patrons attending the venue.

Due to the location of the premises there is a risk that it will become a focal point for crime and disorder, public safety and public nuisance. The premises will require very strong management to ensure that the staff, premises and the wider community are adequately protected and not subjected to issues arising from it.

The premises offers a number of events such as escape rooms to miniature golf which will attract various party groups including hen, stag and birthdays. This will have more impact on the premises controlling larger numbers and their behaviour. As the premises will cater for all needs from the young to the elderly and certain persons including children/elderly may be exposed to acts of drunken/rowdy behaviour from patrons on parties.

Kent Police does not feel that the operating schedule provides sufficient information to allay the concerns that this application gives rise to. Kent Police believes that should the premises licence be granted as applied for then strong conditions and management controls will be necessary to ensure that the licensing objectives are upheld at all times.

Suggested conditions that could be added to the licence to remedy the representation or other suggestions the Licensing Sub Committee may take into account:

1. CCTV will be provided in the form of a recordable system, capable of providing pictures of evidential quality in all lighting conditions particularly facial recognition.
 - a. Cameras shall encompass all ingress, egress and include all areas to which the public have access, including fire escapes, stairwells and where the supply of alcohol occurs (with the exception of areas agreed by the Police, for example toilet cubicles).
 - b. The CCTV shall be recording at all times that the premises are open to the public.
 - c. Equipment must be maintained in good working order, be correctly time and date stamped, recordings MUST be kept on the hard drive and kept

for a period of 31 days and handed to Police upon reasonable request.

- d. The Premises Licence Holder must ensure at all times a DPS or appointed members of staff is capable and competent at downloading CCTV footage in a recordable format to the Police and Local Authority upon reasonable request.
2. At least one member of staff with a personal licence will be on duty at all times that the premises are open for the sale of alcohol.
 3. Toughened or polycarbonate glass will be used at the premises. All drinks will be supplied in polycarbonate or suitably toughened glass. Exception would be for bottled drinks, wine, champagne and cocktails.
 4. Alcohol sold for consumption off the premises will only be supplied in sealed containers. No persons will be permitted to remove alcohol from the licensed area in open containers.
 5. The DPS will be responsible for the maintaining of an incident book at the premises and this book will log all incidents which are "out of the ordinary" whether police are called or not.
 6. All persons that sell or supply alcohol to customers must have licensing training.
 - a. Training should take place within six weeks of employment and any new employees will be supervised until the training has taken place.
 - b. Refresher training should be repeated a minimum of every six months or earlier if required due to changes of legislation.
 - c. Training records must be kept on the premises and shall contain the nature, content and frequency of all training.
 - d. Records must be made available for inspection by Police, Police Licensing Officer and authorised officers from the Local Authority upon request either electronically or hard copy.

7. The premises will undertake the "Challenge 25" Scheme which will be advertised within the premises by way of sufficient posters to make the public aware.
8. All staff involved in the sale or supply of alcohol will be trained in the "Challenge 25" Scheme and such training will be recorded.
9. Only Home Office approved ID of proof of age will be accepted by staff. This will include photographic driving licence, a passport or a 'PASS' marked proof of age card.
10. A refusal register will be in operation at the premises. All staff involved in the sale of alcohol will be fully trained in the system and it will record the following:
 - a. Item refused.
 - b. Name of description of the person refused.
 - c. Reason for refusal.
 - d. Name of staff member making refusal
11. The register will be available for inspection to any Police Officer, Local Authority Licensing Officer or Trading Standards Officer at any reasonable time.

Signed: James Williams

Date: 17/03/2021

Print name: James WILLIAMS

Force Number: 11187

Pp Chief Officer of Police for the Police Area in which the licensed premises are situated.

Representation may be made at any time during the 28 consecutive days starting on the day after the day on which the application to which it relates was given to the authority by the applicant. Please return this form along with any additional sheets to the Licensing Authority. This form must be returned within the Statutory Period.