



London Borough of Haringey

Statement of Licensing Policy (DRAFT)

2026 - 2031

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Haringey Statement of Licensing Policy

Section 1: Introduction, principles and context

1. Purpose of the Statement of Licensing Policy

1. The London Borough of Haringey (“the Council”) is the licensing authority under the Licensing Act 2003 (“the Act”) and is responsible for granting premises licenses, club premises certificates, temporary event notices and personal licenses in the London Borough of Haringey.
2. The purpose of this licensing policy is to outline the approach that Haringey Council will take to implementing the Licensing Act 2003. The policy will act as a guide for applicants, residents and Responsible Authorities under the Act.
3. This policy, along with current national guidance issued by the Home Secretary and primary legislation, forms the basis on which all licensing decisions are made.
4. The Council is required by primary legislation to promote through its actions the four licensing objectives. These are outlined in the Licensing Act 2003 and are:
 5. the prevention of crime and disorder.
public safety.
the prevention of public nuisance; and,
the protection of children from harm.
6. Each of these objectives is of equal importance in terms of licensing actions and decision making.
7. This policy:
 - Outlines the legal framework and responsibilities under the Licensing Act 2003 and the i. associated Section 182 Guidance issued by the Home Secretary.
 - Makes clear the expectations the Council has for those engaging with the licensing system in Haringey: including license holders, license applicants, residents and Responsible Authorities.
 - Makes clear the expectations that those engaging in the licensing system in Haringey may have of the Council and other licensing partners.
8. The aim is to make the Licensing system in Haringey clear, simple and as effective as possible. The policy is set out as follows:
 - A clear statement of the legal framework and linkages to other legal frameworks and strategies.
 - The Haringey context and the aspirations and intent of the policy within that context.
 - The Licensing Objectives and the measures expected to promote them as required by the Licensing Act 2003.
 - specific policy points that will provide more detailed guidance on the approach the Council will take to specific issues and circumstances; and,
 - Appendices that will provide further useful information.
9. Each new license application or application for the variation of an existing license will, where a representation is received, be considered on its own merits. This will include the proposed venue and its operation, or proposed change to an existing venue and/or its

operation, as well as the context in which it operates. If no representations are made to an application, the Council must grant it in full.

10 Section 5 of the Licensing Act 2003 requires each licensing authority to prepare and publish a statement of its licensing policy every five years. The previous Haringey Statement of Licensing Policy was published on 30th January 2021.

11 In drafting this Policy, the Council has had regard for the Home Office Guidance issued under S.182 of the Licensing Act and has given appropriate weight to the views of consultees. When revisions of the guidance are published the Council will determine if revisions of this policy are appropriate.

12 Review of the Statement of Licensing Policy

13 Under the Act, the Council must carry out a review of its Licensing Policy every five years. Prior to publishing the revised version, the Council will consult fully with those individuals and organisations outlined under section 5 of the Act.

14 In addition, within the five-year period of the Licensing Policy the Council will review the Licensing Policy whenever it feels that relevant issues have arisen or significant changes to the s.182 guidance or the Act have occurred.

2. Scope of the policy

2.1 The scope of the policy is the oversight and management of the provision and holding of licenses under the Licensing Act 2003. The Act regulates the following licensable activities:

- Retail sale of alcohol.
- Supply of alcohol to club members.
- Supply of hot food and drink between 23:00 and 05:00
- Provision of regulated entertainment to the public or club members or with a view to profit.
- Film exhibitions.
- Performances of a play.
- Indoor sporting events.
- A boxing or wrestling entertainment.
- Live music performances
- Playing recorded music;
- Dance performances; and,
- Provision of dancing facilities.

2.2 There are a number of exemptions and details of these are set out in full in Part 2 of Schedule 1 of the Act.

2.3 The scope of these licensable activities are covered through application to the Council for a license to undertake these activities. These applications include applications for new premises licenses, club premises certificates, variations to these and reviews of license/certificates.

2.4 The scope of the policy will be subject to revisions to the guidance issued by the Secretary of State from time to time. When revisions are issued, there may be periods of time where the Haringey policy is inconsistent with the guidance. During such periods this Council will have regard, and give appropriate weight, to the revised guidance.

2.5 In the drafting of this policy the Council has had regard to Home Office Guidance issued under S.182 of the Licensing Act and has given appropriate weight to the views of consultees. When revisions of the guidance are published the Council will determine if revisions of this policy are appropriate.

2.6 Planning

2.7 It is understood that the Planning regime in Haringey has an impact on the Licensing regime. It is also noted that each of these regimes is covered by a separate legislative framework and administered through separate parts of the Council, with separate Committees overseeing the processes. However, the Council commits to working in alignment with the Planning regime as closely as is possible.

2.8 The use of premises for the sale or provision of alcohol, provision of entertainment or late-night refreshment or indoor sports is subject to planning control. Such use will require planning permission or must otherwise be lawful under planning legislation. Planning permission is generally required for the establishment of new premises or the change of use of premises.

2.9 In general, all premises which are the subject of an application, should have the benefit of planning permission, or be deemed permitted development. Licensing and Planning are separate regimes, but consents from both must be in place to operate legally. If there is variance between the hours given under a license and those permitted by the planning permission the earlier hours will apply.

2.10 Commercial premises need to have provision for collection of waste etc. Care should be taken to ensure that collection of rubbish and glass does not occur at unsocial hours.

2.11 Land owners consent

2.12 Where licenses are granted or temporary event notices are submitted for licensable activities to persons who do not own the premises/land where the licensable activity is to take place, this authorisation does not authorise the use of the premises without the prior consent of the land owner and does not allow an operator to breach any covenants or restrictions on the titles or leases for the use of land/premises.

2.13 With regards to public or Council owned premises/land there is no implied permission to use the premises/land with the issue of a premises license without obtaining separate consent from the appropriate Council department such as Highways, Commercial Estates, Parks or from Haringey Housing, who need to grant permission for the use of the land.

2.14 Other consents

2.15 Other consents such as planning permission are separate regimes and a premises licence or temporary event notice cannot be used unless all other relevant consents are in place.

2.16 Vision for London as a 24-hour City

2.17 We note that since the publication of the last Statement of Licensing Policy the Mayor of London has outlined his vision for London as a 24-hour City and has also appointed a Night Time Commission to encourage the development of London as a vibrant, diverse, cultural city with a Night Time Economy that would be of global relevance.

2.18 The Council supports the Mayor's vision for these areas and will support applications which facilitate an enhancement of leisure and entertainment functions and the night time economy, with appropriate safeguards.

2.19 Haringey has a number of town centers and wants to support businesses with a commercial food, drink, and entertainment offer, but with appropriate safeguards to maintain and promote the licensing objectives.

2.20 *Haringey - The Rebel Borough – Borough of Culture for 2027*

2.21 Haringey's successful bid, "Rebel Borough", will see a year-long festival which will run from April 2027 until March 2028. A mix of culture and creativity celebrating our rich history of everyday rebels and radical activists, as well as our cultural diversity and the warm welcome our borough has provided to many communities from around the world, giving us global artistic connections and buzzing grassroots community culture, from music, dance, and poetry to food, fashion, and design, as well as utilising high-profile cultural spaces in the borough – including Alexandra Palace, the Tottenham Hotspur Stadium, Bernie Grant Arts Centre, Jacksons Lane, and Bruce Castle Museum. Haringey's London Borough of Culture programme will bring arts and culture to the heart of local communities, with community-curated events taking place in all 21 wards in the borough.

2.22 *Responsibilities under the Immigration Act 2016 and the Modern Slavery Act 2015*

2.23 The Council has responsibilities that relate to the prevention of immigration crime, specifically the prevention of illegal working in licensed premises. These responsibilities are outlined in Section 5: Licensing Objectives, and the subsection on the Prevention of Crime and Disorder. The London Borough of Haringey has a duty under the Modern Slavery Act 2015 to co-operate with the Independent Anti-Slavery Commissioner. We all have a duty to protect the most vulnerable in our society from these criminals who are willing to exploit them. We must all be vigilant for signs of this happening in our communities, the hospitality industry plays an important part in this regard. The legislation requires that checks are made to ensure Personal Licence holders and applicants for Premises licenses are checked to ensure their right to work in the UK. We will work with the Home Office and partner agencies on this issue. Haringey's Corporate Delivery Plan has a focus on People, as a borough we are committed to take a lead role alongside our partners in identifying and safeguarding those at risk of harm, exploitation or neglect.

2.24 *Health Act 2006*

2.25 It is expected that all licence holders will be compliant with the Health Act 2006 and all sundry Smokefree Regulations that govern smoking in licensed premises.

2.26 *Public Sector Equalities Duty*

2.27 Haringey Council has a duty under the Equalities Act 2010 to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups

2.28 To support delivering this duty the Council will at all times have regard to the Equality Act 2010 and Haringey's Equality policy and guidance.

2.29 Haringey Council will implement the Statement of Licensing Policy in line with Haringey Council's Public Sector Equalities Duty.

2.30 The Licensing Act 2003 restricts the sale of alcohol to those 18 years of age and above, as such this effects a differential impact of the legislation underlying the Licensing Policy on those under the age of 18 years old. Research outlines specific additional health and social harms and levels of harm that those under the age of 18 years old are exposed to as a result of the purchase and consumption of alcohol. As such the Licensing Policy is likely to support a positive

outcome for those under the age of 18. When applications are received the Council will consider these on their individual merits and will also ensure that the Public Sector Equalities Duty is applied where appropriate.

2.31 Counter terrorism.

2.32 Crowded places, such as bars, pubs, nightclubs, and music venues have been targets of acts of terrorism across the UK and the world. The National Counter Terrorism Security Office has produced guidance to operators of crowded places giving advice to operators to reduce the threat of attack. Applicants and licence holders are encouraged to have regard to this guidance in the design and operation of their premises. The threat level should always be taken into consideration, especially when:

- a) Events / festivals are taking place which attract large numbers of visitors to the Borough.
- b) National and international sporting events are taking place and are televised in licensed premises.

2.33 When planning an event or festival the organiser must always consider counter terrorism and the measures that they need to put in place. In 2022 the Home Office, through the Protect Duty consultation, pledged to consider legislative approaches requiring venue operators to consider the risk of terrorist attacks, and to take proportionate and reasonable measures to protect the public. Links to a range of Counter Terrorism resources and training, can be found section 3.17.

2.34 The Act envisages that holders of authorisations should be responsible for matters that they control. As such, licensing law is not a mechanism for the general control of anti-social behaviour by individuals once they are beyond the immediate vicinity of the individual club, business or licensed premises holding the relevant licence.

3. Principles of the policy

3.1 This policy sets out the general approach the Council will take when considering applications for licences. When determining applications and reviewing licences, the Council will have regard to:

- the Act and related regulations; and
- Government guidance issued under section 182 of the Act and this Policy.

3.2 When determining an application under these considerations, the overriding principle adopted by the Council will be that each application will be determined on its merits.

3.3 Applicants will be expected to address the licensing objectives in their operating schedule with particular regard to the nature of the location, type of premises, entertainment to be provided, and operational procedures. It is important that all operating schedules should be precise and clear on the measures proposed to promote each of the licensing objectives.

3.4 Only conditions appropriate and proportionate to the promotion of the licensing objectives will be attached to any licence, and the Council will have regard to the individual style and characteristics of the particular premises and events concerned. Licence conditions will not be imposed where other regulations or legislation exists to provide sufficient protection.

3.5 Licensees will be expected to comply with the Code of Practice of the Portman Group or equivalent. If a valid complaint is received, the stocking or supplying of products featured in the Portman Group's "Retailer Alert Bulletin" could lead to review of the premises licence, and ultimately a suspension or revocation of that licence if the Council considers that such action would undermine one or more of the licensing objectives.

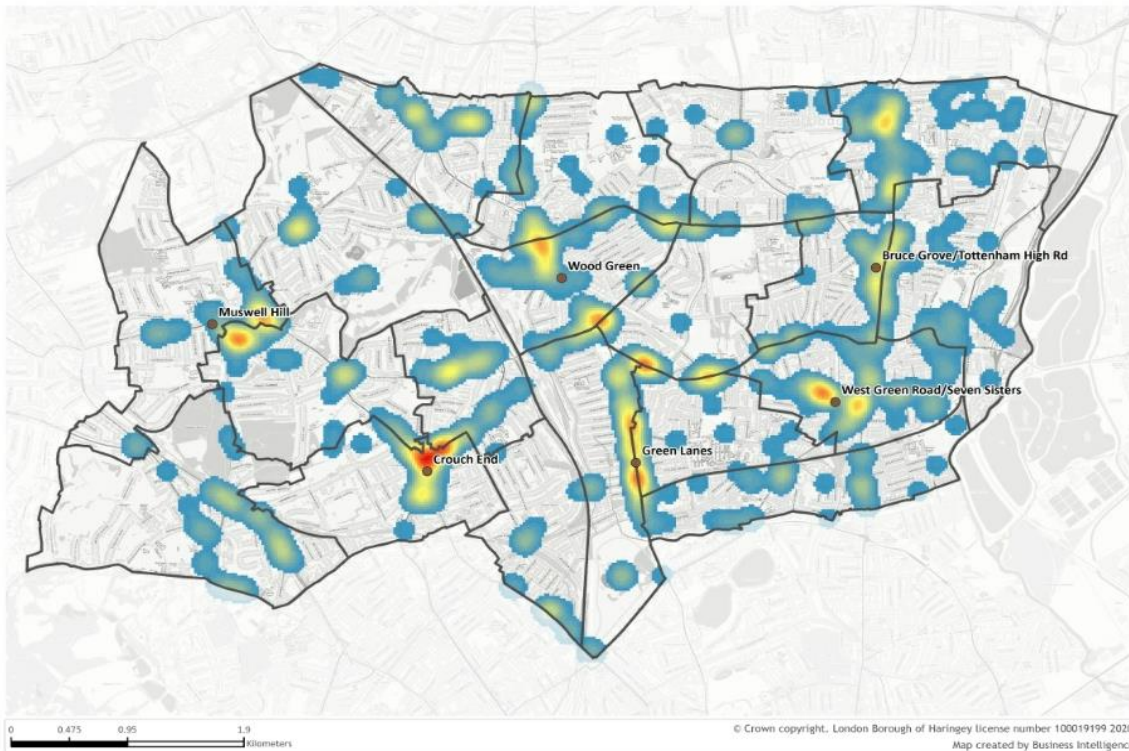
- 3.6 Where there is a notification to hold a temporary event the Council will expect, where applicable, the holder of the event to comply with the relevant conditions attached to the premises licence where the event is to be held.
- 3.7 A notification of a temporary event should not be used to cover multiple events. The Council expects each notification to be for a single event, and the date and times that the event is to be held. One notification for 168 hours should not be used to cover more than one event.
- 3.8 The Council recognises that, in addition to the licensing objectives, it also has a duty under section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough.
- 3.9 The Council will not take “need” (commercial demand) into account when determining an application. This is not a matter for the Council in discharging its licensing functions.

4. The local Haringey context

4.1 Haringey and the leisure and entertainment industry

- 4.2 Haringey is home to a number of iconic leisure and cultural institutions that attract people from across London and the UK, benefitting from the borough’s excellent public transport links. The borough is the home of Alexandra Palace, the centre of many cultural events and activities. The new Tottenham Hotspur Stadium in High Road Tottenham has come about through working in partnership with the Council, it has been redeveloped into a world-class multipurpose stadium. Finsbury Park has played host to major music concerts for many years and continues to attract a wide range of artists. It is an iconic venue where artists want to appear on stage at some point in their career.
- 4.3 Across the borough, Haringey has more than 1 000 premises licensed for the sale and supply of alcohol and/or regulated entertainment and late night refreshment. There is a great variety of licensed premises – from community owned pubs to national chain bars, Turkish cafes to banqueting suites – catering for our diverse communities and playing an important role in making Haringey the borough what it is. The average density across London of population to licensed premises is 281 to 1. In Haringey it is 251 to 1, making Haringey 11th in London for outlet density. The Licensing Policy seeks to encourage premises that will extend the diversity of entertainment and attract a wider range of participants rather than premises mainly or exclusively focused on the sale of alcohol. The Policy aims to develop a more inclusive night time economy and promote high-quality premises that contribute positively to their neighbourhoods. In addition to licensed premises, around 9 00 small occasional events take place under temporary event notices each year. This number is likely to grow year on year.

4.4 Haringey Licensed premises -Map showing density of alcohol licensed premises:



4.5 Geography

4.6 Haringey is situated in north London. It is not an inner London borough but does share borders with six other London boroughs. The borough contains diverse areas like Tottenham, Wood Green, Crouch End and Muswell Hill. Haringey is known for its diverse communities, vibrant cultural scene and large green spaces.

4.7 Our vision for Haringey

4.8 Haringey embodies the future of London: a borough that embraces growth and harnesses the strengths of diverse communities and innovative businesses to create an excellent place to work learn and live. As a gateway to central London we are determined to be a well-connected hub of activity rather than a dormitory borough. Our Community Wealth Building approach is a direct response to people and communities being left behind by economic growth, resulting in increasing inequality. Questions about fairness and equality are therefore at the core of Community Wealth Building. These should prompt us to consider not only who will benefit from any intervention or investment, but also whether all parts of our community are equally well equipped and supported to take advantage of the opportunities that exist to improve their prosperity and wellbeing with a focus on creating a good economy which supports our residents and businesses to thrive with an ambitious objective for achieving full employment and establishing Haringey at the epicenter of London's small and medium sized innovation economy. Our Housing Strategy and Local Plan lay the foundations for major house building and the regeneration of neighbourhoods with an exciting mix of employment, retail, entertainment and housing. Here we are building on our existing strengths: Haringey is a vibrant place to live, with many different cultures mixing together, and a fantastic variety of characterful High Streets – from the metropolitan centre at Wood Green to the boutiques and restaurants of Muswell Hill and Crouch End to the developing and growth in Tottenham – creating a strong sense of local pride. The State of the Borough Profile has been put together to provide all Haringey's stakeholders –from Officers and Councilors to Residents –with access to the data they need to understand the borough and can be accessed via this link:

- 4.6 Licensing policy has a key role in helping us achieve this vision for promoting growth, creating exciting mixed-use neighbourhoods and helping communities to continue to mix and live comfortably with one another. The entertainment and night-time economies make a valuable contribution to economic growth, through employment and local spend, and an effective Licensing Policy can ensure that these sectors grow in a positive and sustainable way. An effective Licensing Policy can also ensure that all neighbourhoods have a vibrant entertainment and night-time offer that reflects the diversity of the borough and provides space for people to come together.
- 4.7 Haringey's Corporate Plan lays out how the Council will seek to pursue its vision for the borough over the next four years. The principles of the Corporate Plan are reflected in the Licensing Policy, in particular the emphasis on working in partnership. The Licensing Policy lays out how the Council's Licensing team will work in partnership with the Police, Public Health and other Community Safety partners to analyse data and take intelligence led approach to licensing enforcement. It also describes how we will work with resident's associations and other community groups to ensure that Haringey residents have a real say over the development and operation of licensed premises in their neighbourhoods. Working in partnership is also about shared responsibility and the Licensing Policy lays out how we will look to build alliances with responsible businesses and traders associations to tackle problems together. It is through such partnerships that we will apply our commitment to prevention. By engaging early with businesses and educating them on how to avoid alcohol related problems, we can increasingly prevent the need for costly enforcement action.
- 4.8 Through partnership and prevention, the Licensing Policy will help ensure that the entertainment and night-time sectors are able to play their part in the diverse, dynamic and pro-growth Haringey that is being built through the combined efforts of residents, businesses and public sector agencies.

4.9 Challenges facing Haringey

- 4.10 Haringey ranks as one of the most deprived boroughs in the country with pockets of extreme deprivation concentrated in the east. Haringey is the 84th most deprived borough in England and the 4th most deprived in London, yet it is also a borough of contrasts, with great prosperity and affluence in some communities.
- 4.11 Persistent inequalities are manifest in the health and wellbeing of our residents. The life expectancy gap between the most and least deprived wards is 7.6 years for men and 3 years for women. The borough is facing an obesity crisis with 1 in 5 reception aged children, and 1 in 3 10/11 year olds, measured as overweight or obese. The number of people with long term conditions like diabetes and heart disease is increasing and there are approximately 4,000 adults with severe mental illnesses – three times more than would be expected, even given Haringey's level of deprivation. There are also inequalities in educational achievement, access to employment and housing quality. The borough has seen twelve consecutive years of improvement in GCSE performance and A-levels scores, making Haringey one of the top 3 most improved areas. Yet too many of our young people still leave school without the skills needed to secure sustainable employment, blocking their access to one of the world's most dynamic economies at their doorstep. It remains our priority to make all of our schools good and outstanding and to ensure our young people are accessing the skills needed for the jobs of the future.
- 4.12 The Council's response to these challenges is to meet them head on with ambition, innovation and a commitment to work ever more closely with residents, businesses and public sector partners. Nowhere is our ambition greater than in our most deprived

communities in Tottenham. Working with central and local Government, developers and major local businesses like Tottenham Hotspur, the Council has secured £1bn of public and private investment in Tottenham's physical environment. Over the next 20 years, this investment will deliver new homes, new transport links and stations, education and health facilities, green public space and 5,000 new jobs. Wood Green is another community that will be the focus of major regeneration that will look to build more homes and create better connections to Alexandra Palace. We are determined that regeneration will be shaped by the views of residents and are pioneering new governance structures to embed the resident voice in the key decisions.

- 4.13 We are also determined that regeneration has a transformative effect on the health and wellbeing of residents. Regeneration has the potential to promote health and wellbeing through the built environment in a number of ways, including designing infrastructure to increase ease of walking and cycling, increasing the accessibility and perceived safety of green space, and shaping the retail offer to promote access to healthy foods.
- 4.14 We are also keen to encourage innovative responses to the health challenge – such as promoting 'Healthy Catering' in the Food industry across the borough and Responsible Retailing scheme to the licensed premises. In Haringey we are adamant that economic growth has to be harnessed as an engine for tackling deprivation and the role of the Licensing Policy is to ensure that licensed businesses play their part. The aim of the policy is to ensure that licensed premises have a positive impact on their locality and where any premises do cause problems, they are addressed swiftly and in the most appropriate manner. Indeed, the need for responsibility and innovation is even greater in the licensed sectors, given the scope for negative impacts is so much higher, as the evidence shows.

4.15 Alcohol and public health

- 4.16 Health bodies were made 'responsible authorities' under the Licensing Act 2003 in April 2012. Although public health is not a licensing objective, the significant negative impact of alcohol on our residents, reflected in hospital admissions and deaths from alcohol related illnesses, alcohol induced crime and domestic violence can be used to inform the potential impact of the premises on the licensing objectives. Alcohol plays a significant part in the social lives of many people and the economic development. However, alcohol consumption is a contributing factor to hospital admissions and deaths from a diverse range of conditions. In 2023, there were 23 alcohol-specific deaths and 62 alcohol-related deaths recorded in Haringey and around 6,113 patients in Haringey were identified by their GP with Alcohol abuse or dependency. This is significantly higher compared to the North Central London (NCL) average. However, this is based on recording at GP practices, so the true prevalence is expected to be higher. The sale and availability of high strength, low cost alcohol is a particular problem in Haringey and contributing factor behind these figures.
- 4.17 According to Haringey's State of the Borough document the businesses in the Borough sell above the London average for litres of alcohol. This high level of sales can be contributed the fact that the borough hosts very large variety of music and sporting events at Spurs Stadium Finsbury Park and Alexandra Palace. The high level of sales points and high levels of potential unsafe drinking, may increase the risk of both health and social related alcohol harms. This has a large impact on our communities, such as alcohol fuelled crime and disorder, behaviour, street drinking and other hidden harms (i.e. dependency, family breakdown) domestic abuse and child safeguarding issues). Haringey has one of the highest rates of reported domestic abuse across London. While figures do not specify whether alcohol was a contributing factor, evidence from national studies show that alcohol misuse is associated with domestic abuse. Of all contacts to Children and Young People Services in Haringey, 70- 80% involve domestic abuse. More than 1 in 5 women have been subject to stalking or harassment at some point in their lives.

- 4.18 Alcohol misuse is also associated to more than 60 medical conditions including, from liver disease, Heart disease and strokes to types of cancer, hypertension and mental health issues. This has a significant impact on our health services, increasing demand for treatment, hospital admissions and long-term care.
- 4.19 Haringey has the twelfth lowest rate among all London boroughs and Haringey has the fourth lowest rate of alcohol- related hospital admissions of all five NCL boroughs. Alcohol is responsible for more than 7,000 deaths annually and it accounts for 167,000 years of life lost due to premature mortality. The economic burden on the NHS is substantial, with an estimated cost of over £4 billion per year. The rate of hospital admissions for alcohol-specific conditions was 2.5 times higher in males than in females. At ward level in Haringey, significant variations are evident relating to hospital admissions for alcohol specific conditions during 2023/24. These variations generally correlate with patterns of across the borough as shown on the map (Figure 1.)
- 4.20 In 2023/24, Hornsey ward had the highest Indirectly Standardised Ratio (ISR) for alcohol-specific hospital admissions at 144, indicating that admissions were 44% higher than the Haringey average. Tottenham Hale and White Hart Lane wards also had higher admission ratios with ISRs of 139 and 133, respectively.
- 4.21 Children's Services carry out assessments for Children in Need (CIN) in the borough. During these assessments, a range of factors affecting the child are recorded. In 2024, parental alcohol misuse was the most frequently identified factor, appearing in 7% of assessments (175 cases). Furthermore, Haringey adults in specialist alcohol treatment 15% (n=60) were parents living with children, and 9% (n=35) were parents not living with children. Among Haringey's most prolific young offenders, signs of poor parenting are evident in the first year of life in 45% of cases, parental involvement in substance or alcohol misuse is evident in 30% of cases by the age of 1.
- 4.22 Data on alcohol consumption in children and young people is limited to national and local surveys conducted in schools. Results from the NHS Survey on smoking, drinking and drug use among young people shows that there has been a decline in alcohol consumption amongst young people in England over the last 20 years. The biennial schools survey completed by secondary school pupils reported a quarter of students had drunk alcohol before, but only 1% said they drank it regularly.

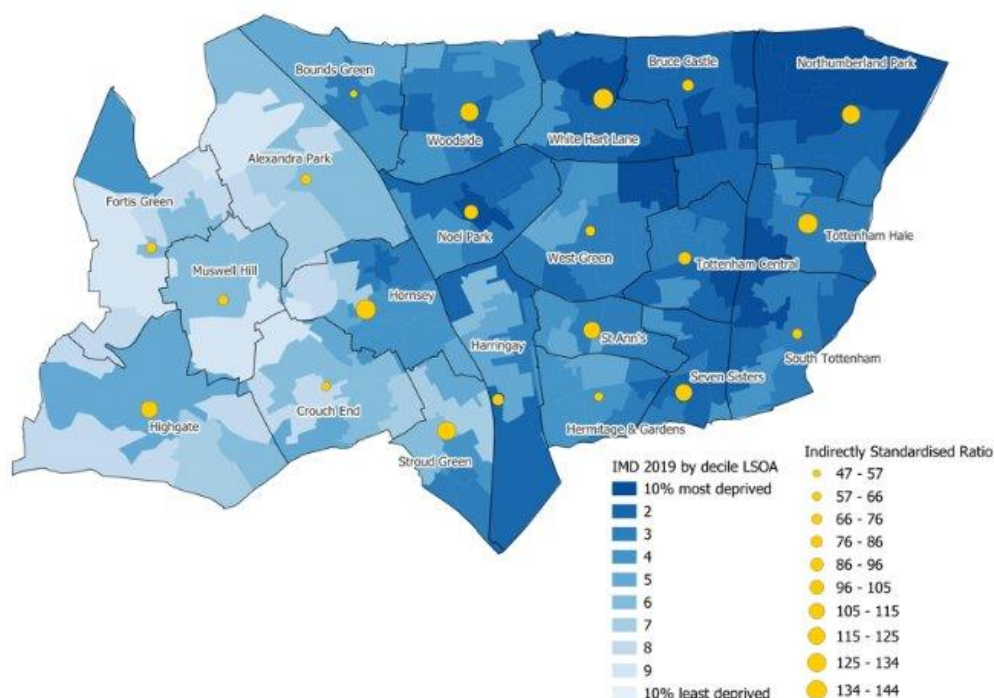


Figure 1. Hospital admissions for alcohol-specific conditions by Haringey wards, 2023/24

Local health data around the impact on alcohol is collected as part of the Joint Strategic Needs Assessment (JSNA) on alcohol and State of the Borough is a core source of data used to inform licensing decisions and broader activity of the Community Safety Partnership.

4.23 The issues highlighted above affect the young people of the borough and the expectation is that applicants and traders will be required to demonstrate a robust policy to ensure the protection of children from harm objective is fully considered. Licence holders failing to have regard for this will receive enforcement action as the challenges facing our young people with regard to availability and consumption of alcohol is a concern..

4.24 ***Alcohol and crime/anti-social behaviour***

4.25 We know we face some significant challenges. London has a problem with serious violence, particularly with knife crime. Some of this is due to less funding for work to intervene at an earlier stage in order to put preventative measures in place. There have also been significant cuts to neighbourhood policing across London, which means that the police are less visible than they were. We want Haringey to be a safe borough for everyone who lives and works here; a place with strong, resilient and connected communities where people can lead active and healthy lives in a safe environment. As the borough continues to grow, becomes better connected and continues to be a destination for many Londoners, we will need to ensure Haringey remains a safe and pleasant environment for all. The Community Safety Strategy provides the partnership approach with an opportunity to set out how it will achieve that vision. The Crime and Disorder Act 1998, as amended by section 97 and 98 of the Police Reform Act 2002, places a requirement on Local Authorities to co-operate in the reduction of crime and disorder in the Borough.

4.26 We will continue to work together with local people and businesses to ensure licensed premises are contributing to this requirement through the promotion of the licensing objectives. It is against this backdrop that Haringey will seek to robustly implement its policy to ensure responsible retailing of alcohol and the impact on the wider community re considered and monitored. The Community Safety Partnership is now receiving anonymised data on alcohol related violence which may also be useful, particularly if it can be related to a specific premise(s).

4.27 Pavement Licence

- 4.28 The Business and Planning Act 2020 makes it easier for premises serving food and drink such as bars, restaurants and pubs to place tables and chairs on the pavement outside their premises for customers to use while consuming food and drink. This temporary license essentially permits the use of public highway space for business purposes, subject to specific conditions and regulations. To sell or serve alcohol on a pavement outside your premises you need both a pavement licence and a premises licence (or a temporary event notice) that permits alcohol sales. The pavement licence allows you to place furniture on the pavement, and the premises licence or TENS authorises the alcohol sales.
- 4.29 Licences will be subject to the Council's published conditions and any national conditions set by the Government. In some cases, extra measures may be required. This will be determined when assessing any application, on a case by case basis. Where a local authority sets a local condition that covers the same matter as set out in national published conditions, then the locally set condition takes precedence over the national condition to the extent that it is inconsistent with it. Obtaining a pavement licence does not confer the holder immunity in regard to other legislation that may apply, e.g. Public Liability, Health & Safety at Work, Food Hygiene and Safety, Alcohol and Entertainment Licensing, applicants must ensure all such permissions, etc. are in place prior to operating.
- 4.30 If a condition imposed on a licence either by the Council or via a National Condition is breached the Council will be able to issue a notice requiring the breach to be remedied. If the notice is not complied with, the Council may revoke the licence or take the required steps itself and recover the costs of doing so.
- 4.31 There will likely be an increase in public nuisance complaints as a result of this use. Residents who live nearby and find themselves disturbed by the activities taking place outside of venues will feel disadvantaged by this process. It is therefore important that the standard conditions adopted by the Council provide some safeguards for residents and they are made aware of how they can engage in the process.

4.32 Links to the Corporate Delivery Plan

- 4.33 Haringey's Corporate Delivery Plan lays out how the Council will seek to pursue its vision for the borough over the next four years. The principles of the Plan are reflected in the Licensing Policy, in particular the emphasis on working in partnership. The Licensing Policy lays out how the Council's Licensing team will work in partnership with the Police, Public Health, and other Community Safety partners to analyse data and take an intelligence-led approach to licensing enforcement. It also describes how we will work with residents' associations and other community groups to ensure that Haringey residents have a real say over the development and operation of licensed premises in their neighbourhoods.
- Working in partnership is also about shared responsibility, and the Licensing Policy lays out how we will look to build alliances with responsible businesses and traders associations to tackle problems together. It is through such partnerships that we will apply our commitment to prevention. By engaging early with businesses and educating them on how to avoid alcohol-related problems, we can increasingly prevent the need for costly enforcement action.
- Through partnership and prevention, the Licensing Policy will help ensure that the entertainment and night-time sectors are able to play their part in the diverse, dynamic, pro-growth Haringey that is being built through the combined efforts of residents, businesses, and public sector agencies.
- 4.34 The Corporate Delivery Plan outlines our strategic objectives, priorities, and initiatives aimed at creating a fairer, greener borough. Our plan is set out in eight separate themes:

- Resident experience and enabling success
- Responding to the climate emergency
- Children and young people
- Adults, health and welfare
- Homes for the future
- Safer Haringey
- Culturally rich borough
- Place and economy

These themes demonstrate how we are focused on working collaboratively, in line with the Haringey Deal, with residents, businesses, and partners to tackle the biggest issues affecting our communities. We will work to make sure strong families, strong networks, and strong communities nurture all residents to live well and achieve their potential. We will work to create safe, stable, and affordable homes for everyone, whatever their circumstances, and neighbourhoods with strong, resilient, and connected communities where people can lead active and healthy lives in an environment that is safe, clean, and green.

4.35 *Adults, Health and Welfare Outcome areas*

- A healthy and active population
- A welcoming borough with a vibrant voluntary and community sector (VCS)
- Residents connected with the right support at the right time in their neighbourhoods
- Secure and resilient lives
- Vulnerable adults are supported and thriving

In Haringey, we're all about looking out for each other. This part of our Corporate Delivery Plan is about making sure that every adult in our community gets the support they need to live a good life, no matter what challenges they may face. From staying healthy to getting the help residents need when times get tough, our services are here to support all. Our goal is to create a community where every adult feels valued, supported, and empowered to reach their full potential. Critical to this is taking an equitable approach, working hard to understand barriers and striving to address inequalities of access, experience, and outcome. Whether it's access to good quality leisure services or support and advice during the cost-of-living crisis. Haringey is committed to making sure that everyone can live their life to the fullest. The Statement of Licensing Policy will consider the health impact findings from the Alcohol Harm Strategy.

5 Haringey as a major events destination

5.1 Haringey is the home to the Tottenham Football Club Stadium, Finsbury Park and Alexandra Palace. This means that these venues host large events and events of international as well as national significance. The Council and Haringey Borough Police have policies in place to address issues relating to these events. The Licensing Policy outlines specific matters relating to large events and also matters set in a separate Public Space Protection Order. Applicants, residents and Responsible Authorities should consider these additional requirements, guidance and expectations when submitting applications within the footprint of these venues and locations.

Section 2: Licensing objectives

2.1 The Act provides a clear focus on the four statutory licensing objectives which the Council must seek to promote when determining an application. These objectives are:

- the prevention of crime and disorder,
- public safety,
- prevention of public nuisance, and
- protection of children from harm.

Due to the wide variety of premises and activities to which this policy applies, applications will be expected to address all aspects relevant to the individual style and character of their premises and events. These objectives are set out in more detail in this section.

Those making representations to the Licensing Sub-Committee must base them on the four objectives. All applicants communicate the promotion of the licensing objectives in their operating schedule part of the application form which is essential for the full consideration of the application by the Council and all parties.

2.2 Demonstrating local knowledge

Applicants are expected to demonstrate an understanding of the local area in which their premises will operate. Applicants are encouraged to provide a detailed operating schedule which demonstrates how the applicant will promote the licensing objectives. Applicants are expected to:

- demonstrate knowledge of the local area when describing the steps, they propose to take in order to promote the licensing objectives;
- undertake enquiries about the area in which the premises are situated to inform the content of the application;
- obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand:
 - a) the layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children may congregate;
 - b) any risks posed to the local area by the applicants' proposed licensable activities;
 - c) any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) they propose to put in place which might help to mitigate any potential risks.

2.3 Where specific policies apply in the area (for example, a cumulative impact policy or a Public Space Protection Order), applicants are also expected to:

- demonstrate an understanding of how such a policy impacts on their application;
- any measures they will take to mitigate the impact; and
- why they consider their application should be an exception to the policy.

2.3 Demonstrated knowledge about the locality will assist applicants when determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises within close proximity to residential premises should consider how this will impact on patrons smoking, noise management and dispersal policies, to ensure the promotion of the public nuisance objective. Applicants are expected to consider all factors which may be relevant to the promotion of the licensing objectives, and where there are no known concerns, to acknowledge this in their application.

Applicants may consider canvassing the views of their neighbours and local residents as this can clear up any ambiguities and develop a relationship based on mutual cooperation before an application is made. This will assist the applicant by giving an understanding at the outset of what the community believe is acceptable in their area.

2.4 Operating schedules

Lists of matters which should be addressed in operating schedules are included in the Appendices to this document. Whilst applicants are strongly encouraged to consider these they should not be regarded as standard conditions and should be used and modified according to the individual application and location and to inform the operating schedule. By setting out a carefully considered operating schedule applicants can demonstrate that they have given thought to their application and its impact on the local environment.

- 2.5 An operating schedule should contain details relating to the promotion of the licensing objectives that are capable of being translated into enforceable conditions as, if there are no representations against the grant of the licence these will form the basis of the conditions that will be placed on the licence.
- 2.6 The failure by an applicant to clearly and fully demonstrate in the operating schedule that they have properly considered the promotion of the four licensing objectives is a legitimate concern should the application come before the Licensing Sub-Committee following receipt of relevant representations and may trigger a representation from the Council.

2.7 OBJECTIVES:

THE PREVENTION OF CRIME AND DISORDER

The council recognises that well run licensed premises can make a valuable and positive contribution to the local community through the local economy, tourism, and cultural development. However, poorly managed licensed premises, especially those offering late night alcohol and / or entertainment, or late night refreshment for large numbers of people, can become a serious source of crime and disorder or anti-social behaviour problems.

- 2.8 This authority expects applicants for premises licences and club premises certificates to have made relevant enquiries about the local area and prepare their operating schedule on the basis of a risk assessment of the potential sources of crime and disorder associated with the premises operation. The operating schedule should demonstrate an understanding of the level of risk of crime and disorder and include positive proposals to manage any potential risk.

Relevant issues might include:

- Anti-social behaviour;
- Drunkenness on the premises;
- Public drunkenness;
- Violent behaviour;
- The possession of weapons;
- Drugs use;
- Underage drinking;
- Theft of personal property;
- Trafficking and illegal workers;
- Prostitution, lewd acts and similar offences;
- Child sexual exploitation;
- Harassment;
- Counterfeit goods;
- Non-duty paid goods and tax evasion;
- Maintenance of smoke-free environments, including shisha bars.

- 2.9 Applicants are recommended to seek advice from the council's licensing team, the police and trading standards when carrying out their risk assessments and in preparing their operating schedules.

- 2.10 While it is recognised that there is no requirement in the 2003 Act to do so, applicants may find that it helps the licensing process to provide a copy of the completed risk assessment upon which the operating schedule is based to the relevant responsible bodies for consideration at the time of application.
- 2.11 The main part of this section of the policy is intended to provide a guide to prospective licence applicants as to the types of controls that may be appropriate for the promotion of the prevention of crime and disorder licensing objective. It is neither intended to provide a definitive list of preventative measures nor will the controls listed be appropriate in every circumstance. They are provided to be considered and modified to fit the proposed business operation.
- 2.12 Where its discretion is engaged following consideration of relevant representations, the licensing authority will consider attaching appropriate conditions to licences and permissions to deter crime and disorder, both inside and immediately outside the premises. As far as possible these will reflect local crime prevention strategies.
- 2.13 As an additional aide to good management, this authority recommends the range of qualifications designed to support the licensing objectives, available from the British Institute of Innkeeping (BII). Further information is available by contacting the BII by e-mail at the following address info@bii.org
- 2.14 Measures in support of the prevention of crime and disorder licensing objective – all premises**
When compiling operating schedules Applicants are strongly advised to give consideration to:
- **The setting of a safe capacity limit** – While often necessary on public safety grounds, this is equally important in order to prevent overcrowding giving rise to risk of crime and disorder;
 - **Use of crime prevention notices** – For use in circumstances where it would be helpful to warn customers of prevalence of crime which may target them, for instance, to warn of pickpockets or bag snatchers;
 - **Publicise details of the premises operation** – Display details of the premises opening and closing times;
 - **Installation of CCTV** – The presence of CCTV cameras can be an important means of deterring crime both inside and outside of the premises. It can also help to provide valuable evidence in the event that an incident does occur. CCTV should be maintained in good working order and used at all times with a 31 day library of recordings maintained at all times and a member of staff on duty that is able to operate the CCTV system;
 - **The removal of low cost, high strength alcohol from offer** – To help reduce street crime and violence and anti-social behaviour from public drunkenness. Any beers or ciders above 6.5% are considered high strength;
 - **A written drugs policy** – Establish a clear written anti-drugs policy and publicise this to customers;
 - **Use bona fide suppliers** – Being mindful of the prevalence of counterfeit products, particularly alcohol and tobacco, to only stock from legitimate and traceable suppliers
 - **Denying access to hawkers** – Prevent counterfeit products, such as alcohol, tobacco, and other goods from being offered for sale upon the premises.
- 2.15 Premises supplying alcohol for consumption On the premises** - Consideration should be given to the measures set out below.
- **Use of plastic containers and toughened glass** – Consideration should be given to the use of safer alternatives to glass which would inflict less severe injuries if used as weapons.
 - Premises should be using reusable polycarbonate plastic receptacles as the alternative to glass. Single use plastics (both receptacles and straws) should not be used unless there is no alternative. Note: All plastic glasses, both single use and reusable, must carry the approved CE mark when used for draft beer, cider and wines;

- **Introduce bottle bans** – Decant drinks into glasses before being handed across a bar;
- **Provide seating for customers** – sufficient to ensure that the majority of customers do not have to stand;
- **Ensure good availability of soft drinks and food;**
- **Maintain control over the removal of open containers** – To prevent the use of containers as weapons in the street;
- **Off sales to be sold in sealed containers for consumption away from the premises to minimise public nuisance.**

2.16 Premises providing alcohol for consumption upon the premises and regulated entertainment in the night-time economy - Consideration should be given to:

- **Employment of appropriate number of SIA registered door supervisors** – for maintaining orderly behaviour in queues;
 - searching and excluding those suspected of carrying offensive weapons, or illegal drugs; keeping out banned individuals; or controlling admissions and departures. A minimum of two SIA would be expected on most premises;
 - **Make personal searches by door supervisors a condition of entry** – Including the provision of signage and female SIA for personal searches conducted on female customers and performers;
- **Provide door supervisors with search wands / search arches** – Maintained in good working order and used on all occasions;
- **Provide a drugs and weapons box** – Kept under the direct control of premises management with all seized drugs and weapons to be handed over to the Police in accordance with the Police instructions;
- **Install ID scanning and recording equipment** – Requiring all customers seeking admission to the premises to provide ID and agree to being recorded. Notices should be provided to this effect. PASS approved Proof of Age cards should be accepted as part of the age verification system; Government issued photographic ID
- **A last admissions policy** – For both admissions and readmissions. Publicise this at the premises;
- **A written dispersals policy** – Helping to reduce the potential for disturbance to local residents;
- **Co-operate with the Police and Council on Risk Assessments** Management should carry out a risk assessments on all DJ and Live music events and advise police of any medium or high-risk events so advice can be obtained to minimise the risk to the public. To participate in the voluntary partnership for venues and promoters;
- **Ensure certain performances and exhibitions are age appropriate**– That no film be exhibited or performance given that is likely to stir up hatred or incite violence against any section of the public on grounds of colour, race or ethnic or national origin, disability religious beliefs, sexual orientation or gender;
- **Police promote the use of CCTV to prevent and assist with detection of crime and terrorism. The following conditions should be included within relevant applications in consultation with the Police Licensing Officer:**

2.17 That a CCTV system be installed at the premises, be maintained in good working order and be continually recording at all times the premises are in use. The CCTV System must be capable of capturing a clear facial image of every person who enters the premises;

- That all CCTV footage be kept for a period of 31 days and shall be made immediately available to Officers of the Police and/or Council on request;
- That a member of staff shall be on duty at all times the premises is open who is trained in the use of the CCTV system and who is able to view, and download to a removable device, CCTV footage at the request of Police and / or Council Officers.

2.18 The Data Protection Act 2018 and the need to comply with GDPR controls how your personal information is used by organisations, businesses or the government. Where a premise collects personal data, including CCTV images and ID scanners in licensed premises, the licence holder should have a formal procedure in place regarding the use, retention and destruction of this data within a reasonable time period. <https://www.gov.uk/data-protection>

2.19 Designated premises supervisor / personal licence holders and authorisations for the retail sale of alcohol

This Authority recognises that neither the Act nor the mandatory conditions outlined elsewhere in this chapter require either a designated premises supervisor or any other personal licence holder to be present on the premises at all times when alcohol is sold or supplied. Nor does the fact that every sale or supply of alcohol must be made under the authority of a personal licence holder mean that only personal licence holders can make such sale or supply or that they must be personally present at every transaction.

2.20 However, this Authority wishes to emphasise that the designated premises supervisor and the premises licence holder remain responsible for the premises at all times including compliance with the terms of the Licensing Act and conditions attached to the premises licence to promote the licensing objectives.

2.21 This Authority considers it reasonable to expect therefore that either the designated premises supervisor or another personal licence holder will normally be present upon the premises at all times that alcohol is either sold or supplied or that proper arrangements are in place for authorisation of staff in their absence and for their monitoring. This Authority does recognise that there may be occasions when it is not possible for the designated premises supervisor or another personal licence holder to present but this Authority considers that this should not occur for any extended period and emphasises that there can be no abdication of responsibility in their absence.

2.22 Furthermore, this Authority expects that authorisations of other staff to sell and supply alcohol made By the designated premises supervisor, preferably in written form; and any other personal licence holders must be meaningful and be properly carried out.

2.23 It is understood that, ultimately, whether or not an authorisation has been given within the meaning of the Act will be a matter for a court to determine on the evidence before it when the issue arose, but this Authority notes the Secretary of State considers that the following factors should be relevant in considering whether there was real authorisation:

- a) The person(s) authorised to sell alcohol at any particular premises should be clearly identified;
- b) The authorisation should have specified the acts which may be carried out the person being authorised;
- c) There should be an overt act of authorisation, for example a specific written statement given to the individual(s) being authorised;
- d) There should be in place sensible arrangements for the personal licence holder to monitor the activity that they have authorised on a reasonably regular basis.

2.24 Attention is drawn; however, to the fact that recent provision has been made for certain community premises to apply for the removal of the mandatory condition relating to the requirement for a DPS and personal licence and replace this with an alternative condition making a Management Committee or Board of individuals responsible for the supervision and authorisation of alcohol sales. Where such application is made the Council will expect the Applicant to demonstrate that the arrangements for the management of the premises by the Committee or Board are adequate to ensure adequate supervision of the supply of alcohol on the premises. In cases where it is intended to make the premises concerned available for private hire, this Authority will wish to consider the arrangements for hiring agreements. This consideration will include steps to be taken to ensure that the hirer is aware of the licensing objectives and offences in the 2003 Act and to ensure that no offences are

committed during the period of the hire.

2.25 The sale and possession of smuggled, bootlegged or counterfeit products and the handling of stolen goods

The guidance to the Act indicates that offences can be committed by certain persons in licensed premises if they allow the sale or supply of smuggled, bootlegged or counterfeit goods on the premises. This is in particular relation to alcohol or tobacco products, but may also include the sale of other counterfeited products such as DVDs and CDs and the handling of stolen goods:

- Smuggled – foreign brands illegally brought into the UK;
- Bootlegged (duty evaded) foreign products brought into the UK in illegal quantities and / or resold in the UK;
- Counterfeit – Fake goods and packaging. Cheap low quality and often dangerous products packaged to look like premium UK brands.

2.26 Offences are for selling illicit products but also for employees permitting sales and for employees buying or selling. To prevent these offences occurring, the Licensee should consider taking certain precautions. Advice on this can be obtained from the Council's Trading Standards service. Note: That on conviction for offences relating to counterfeit products a proceeds of crime confiscation hearing may be sought by the Council.

2.27 The Licensing Authority's approach is that the supply of illicit goods will be taken seriously as these matters undermine the licensing objectives. Licensees supplying illicit goods can expect the Licensing Authority to impose additional controls and sanctions and run the risk of losing their licence. The Licensing Authority will consider licence review applications where there is evidence that illicit alcohol has been offered for sale on the premises. Where other illicit goods, such as tobacco, have been found this may be considered by the Licensing Authority as evidence of poor management and have the potential to undermine the licensing objectives. The Authority notes that the Home Office guidance under S.182 makes it clear that matters such as these should be treated particularly seriously.

2.28 Door Supervision

Door supervisors will often play an important key role in ensuring that well managed premises are Free from crime and disorder and nuisance problems. A reminder is given that where a premises licence (other than for plays or films) includes a condition that at specified times there must be persons employed for the purposes of security; protection; screening the suitability of persons entering premises; or dealing with conflict in pubs, clubs and other licensed premises open to the public, then such persons must be registered with the Security Industry Authority (SIA). In any event it is in operator's own interests to ensure that all security staff employed, whether under contract or employed in-house are so licensed, since the operator may be legally liable for their actions. Licensed door supervisors will have undergone an identity and criminal record check and have received suitable training. It is recommended that employers should consider using only SIA approved contractors to source staff.

2.29 Event risk assessments

This Authority recommends that for significant events (see note below) further specific comprehensive risk assessments are undertaken by premises licence holders to identify and minimise any risk of serious violent crime (or public nuisance). Accordingly, for premises that wish to stage promotions, or events (as defined below) this Authority recommends that Applicants address the risk assessment and debrief processes in their operating schedules.

Risk assessment should be completed by the management for all 'significant events' and when they are assessed as medium or high risk by the management or have an audience of over five hundred the Police should be informed. This Licensing Authority anticipates that these will be forwarded to the Metropolitan Police and a consultation will take place. Risk assessments should be submitted to

the Metropolitan Police more than 14 days prior to any proposed event and debrief forms submitted within 14 days of the conclusion.

Note: The Metropolitan Police define “a significant event” as any occasion in a premises licensed under the provisions of the Licensing Act 2003, that is promoted /advertised to the public at any time before the event; predominantly features live music, DJs or MCs performing to a recorded backing track; runs anytime between the hours of 22:00hrs and 04:00hrs; and is in a nightclub or large public event.

2.30 Dispersal and Entry

Licensed premises should take all reasonable measures to ensure that dispersal of patrons from the premises, and entry of patrons into the premises uphold the licensing objectives. Section 182 guidance makes it clear that licensing should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of those with responsibility for managing and controlling licensed premises. However, licensees should take all reasonable steps to prevent the occurrence of crime and disorder and public nuisance immediately outside their premises, for example on the pavement, in a beer garden, or in a smoking shelter to the extent that these matters are within their control.

Licence holders should also consider the impact that patrons or others congregating around entry points to their premises have on the licensing objectives, particularly in relation to the general public. Licence holders should take all reasonable measures to ensure that both dispersal from their premises and entry into the premises uphold the licensing objectives.

The Council recognises that it is difficult for licence holders to have influence over their patrons once they have left the immediate vicinity of their premises; however, disturbance caused by patrons, if linked to the operation of the premises, where contrary to the licensing objectives, can be a reason for the Council to take action.

2.31 Off licences

Street drinking can be a major cause of antisocial behaviour, often involving underage persons and those with alcoholic problems, which gives rise to disorder, concerns over public safety and harm to children. Additionally, it is widely reported that consumption of alcohol by persons on the way to on-licensed premises gives rise to problems of drunken and disorderly behaviour.

The licensing authority therefore adopts the following policy in relation to premises licensed for the Sale of alcohol for consumption exclusively off the premises where any Responsible Authority makes representation against the grant of a licence for off-sales and, following a hearing the committee are satisfied that there is evidence of serious concerns over demonstrable problems of street drinking or disorder associated with the off-sale of alcohol in the area, there shall be a presumption against granting a licence.

Applicants will need to demonstrate in their operating schedule their willingness to address any known anti social behaviour issues in the area:

- Consider the types of alcohol intended to be sold at the premises
- Times for alcohol sales
- Social responsibility
- Joining the Responsible Retailer Scheme
- No irresponsible sales of bottles or cans of beer, lager or cider with an alcohol volume of 6.5% or more that is sold cheaply as this appeals to street drinkers, and leads to wider social issues in an area.

Applications shall only be granted where the licensing authority is satisfied the grant of the licence

would not harm the Licensing Objectives following a hearing. Where relevant representations are made, the licensing authority will also have particular consideration to the hours requested for sales of alcohol. Persons who are alcohol-dependant may be drawn to particular premises if they are licensed to sell alcohol at earlier or later times than other premises.

Additionally, if there are issues related to late-night disorder, the hours for alcohol sales from the Premise may be restricted. Other conditions may be imposed directed at avoiding problematic street drinking in the vicinity of the premises. Another particular concern will be irresponsible drink promotions that do not follow best practice, would appeal to underage drinkers or street drinkers, or encourage excessive consumption.

In areas where street drinking has been identified as a problem by the Council, new applicants and those applying for variations are required to demonstrate how their premises will not contribute to street drinking in those areas. Applicants may wish to seek guidance from Licensing, Community Safety, and Police partners as to specific measures that may be appropriate for their specific location. However, some general examples of good practice include:

- Reducing the strength approaches having voluntary bans on high strength low cost alcohol.
- Visible labels identifying the premises.
- Use of different coloured or labelled bags for sales of alcohol.
- Ensuring street drinkers do not congregate outside the premises.
- Ensuring drinkers do not consume alcohol on the premises, also not having the paraphernalia to allow that (e.g. single plastic drinking vessels or bottle openers near the till area).
- No sale of miniatures.
- Keeping the premises locality clear of litter.

2.32 Mandatory conditions

A number of mandatory licence conditions are set out in the Act. The following mandatory conditions will apply to all premises licences authorising the retail sale of alcohol:

- (a) Where a premises licence authorises the sale of alcohol, every supply of alcohol is to be made or authorised by a person who holds a personal licence; and
- (b) Where a premises licence authorises the supply of alcohol, no supply may be made if no designated premises supervisor has been specified in the licence, or at a time when the designated premises supervisor does not hold a personal licence, or his or her licence has been suspended.

Further mandatory licence conditions have been introduced under Orders which cover:

- The prohibition of irresponsible drinks promotions (on sales only) – Requiring the responsible person to ensure staff do not carry out, arrange or participate in any irresponsible promotion carried on for the purpose of encouraging the sale of alcohol on the premises. Irresponsible promotions incorporate drinking games; provision of unlimited or unspecified quantities of alcohol for free or fixed or discounted prices which undermine the licensing objective; promotional posters; and dispensing alcohol directly into the mouth of a customer by a member of staff
- The provision of free potable water (on sales only)
- Requirements for age verification policies to be established in relation to the sale and supply of alcohol, including photo-identification for persons appearing to be under 18 years of age (on and

off sales).

- Requirements for alcohol, where sold or supplied for consumption upon the premises) to be made available in the following measures beer or cider half pint; gin, rum, vodka or whisky – 25ml or 35ml; and still wine in a glass – 125ml
- A ban on the sale of alcohol below the cost of VAT and duty

2.33 Entertainment involving striptease and nudity

On 11th January 2011, Council resolved to adopt the provisions under Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 as amended by section 27 of the Policing and Crime Act 2009, with effect from 8th February 2011. This legislation established a new extended licensing regime for sex establishments, covering sex shops, sex cinemas and sex entertainment venues.

Any person wishing to operate a lap dancing club or similar in the Haringey area will require to be licensed as a sex entertainments venue under a sex establishments licence. The policy decision taken in January 2011 was that the number of sexual entertainment venues across the borough should be nil in each ward, meaning that no licences will be issued. The exemption that existed in law that enabled lap dancing clubs or similar to operate under the provisions of the 2003 Act no longer applies, excepting that occasional striptease performances are permitted without a sex establishments licence. Occasional performances are limited to no more than 11 per year, each of less than 24 hours duration and each at least one month apart.

This authority's approach to the licensing of sex establishments is covered in full under the separate Haringey Sex Establishments Licensing Policy, which is available from the Licensing section.

Beyond the remit of the 1982 Act (as amended) where activities specified in the operating schedule include any permitted adult entertainment (involving full or partial nudity, occasional striptease or any other kind of adult entertainment) the licensing authority will give particular consideration to the implications of the proposals across the four licensing objectives.

In such circumstances, this authority advises that applicants should give specific consideration when conducting their risk assessments and operating schedules to the appropriate management controls. This must include issues around the protection of children and young people from harm.

Where occasional striptease performances are provided, the licensing authority will normally expect the operating schedule and, if the application is granted, the licence conditions to address all relevant matters in pursuit of the licensing objectives. These are likely to include conditions relating to:

- The exclusion of persons under 18 at all times from the premises and the prevention of views into the premises
- The prohibition of exterior advertising of the sex-related entertainment at the premises
- The prohibition of leafleting or touting for business
- That the provision of services will be to seated customers only
- The prohibition of the participation of customers in the performance
- The maintenance of a minimum distance of 1 metre between performer and customers during the performance
- The provision of CCTV and the maintenance of a library of recordings
- A code of conduct for dancers including appropriate disciplinary procedures for failure to comply with the code

- Rules of conduct for customers, including appropriate procedures for breach of these rules
- Procedures to ensure that all staff employed in the premises have pre-employment checks including suitable proof of identity, age and (where required) permission to work
- The provision of supervisors and security staff
- Other necessary steps to be taken, including in the recruitment or supply of performers, is free of the influence or organised criminal activity

2.34 Theft of personal property

Recent analysis of crime statistics has given rise to increasing concern over levels of theft of personal property within licensed premises. Licence applicants are asked to give consideration to appropriate control measures within their risk-assessments and operating schedules.

Important steps that can be taken to reduce the risk of theft of personal property include:

- Raise the level of awareness among customers of the risk of theft of personal property through crime prevention information. This is especially important within premises where there is a high level of transient, tourist trade
- Provide controlled cloakroom areas
- Provide Chelsea clips under tables
- Ensure all areas of the premises are well lit and able to be observed by staff. Direct staff to observe the customer areas and politely raise with customers when personal belongings are unattended
- Provide and publicise internal CCTV
- Ensure adequate staffing levels and provided appropriate staff training

2.35 Major events at Tottenham Hotspur Stadium /Finsbury Park/Alexandra Palace

During major events the following recommended conditions will be considered where there is A relevant representation:

- Customers shall not be allowed to congregate outside the premises.
- No glass bottles shall be handed over the bar but shall be decanted into plastic vessels.
- The DPS shall work in partnership with the Police and comply with any direction given by the most senior Police Office on duty at the event.
- No alcohol or 'alcopop' type drinks shall be displayed or sold in glass containers with the exception of wines and spirits.
- No more than 4 cans of alcohol shall be sold per customer.

The following lists suggestions that should be considered, although they will vary according to the use of each premise. The list is not exhaustive and is intended to act as a prompt for matters to consider. Licensees/applicants should use their own experience and knowledge of their customers and location to add or amend these and formulate them into an operating schedule.

The content of an operating schedule subsequently becomes the basis of conditions on the licence and should be in a form that can be expressed as an enforceable condition. Failure to do this may lead to a representation from the Council, a Responsible Authority or other person

2.36 Matters for consideration:

- Is there CCTV, and, if so, what are the areas covered, does it have the ability to see clear full-face recording of patrons entering, does it record the patron search area at the entrance as well as the till or servery area;
- What is the retention period for recordings and the provision of instant access to Police and

Authorised officers. Does it have an ability to produce copies or download images;

- Are SIA door staff employed, numbers of door supervisors, use of search arches/wands, location of such searches, all such staff to have their details recorded and checks made with SIA website to ensure that licences are current, staff to sign in when commencing work and sign out when they leave. Any induction/training given to new door staff;
- Do door staff receive any venue specific training to enable them to deal effectively with the clientele of the venue;
- Is there use of ID scanning and recording systems, if so, what are the hours during which such systems will be in place, that all patrons will be required to use the system;
- Will there be a “No ID No entry” policy, or use of Clubscan;
- Any measures proposed to prevent possession, supply or consumption of illegal drugs and possession of weapons. For example, designing out areas or surfaces where there is a likelihood of drug use;
- Is there a clear written policy regarding persons caught using/supplying, provision of safe storage for any seized drugs;
- Has the use of plastic or toughened glass for the serving of alcohol been considered, will glass bottles be handed across the bar;
- Any restrictions on patrons taking drinks outside the premises;
- Any restrictions on numbers of patrons using outside smoking areas;
- Are patrons searched on re-entering from smoking areas if there is the potential for patrons to have contact with non-patrons;
- Location of lighting inside/outside the premises;
- Is there a proof of age scheme to be used, if so what? Is there any dress code used at the premises;
- How are the numbers of patrons in the premises managed, including reference to any capacity restriction;
- The means by which the capacity is counted if appropriate;
- What is the frequency of staff training, what training is given. Will training records be available for Police and Authorised officers. Will the content of training be made available?
- What measures will be used to manage queuing;
- Detailed, achievable dispersal policy;
- Is there a drinking up time or quieter music before the terminal time of the licence?
- Are staff aware of how to respond to and record incidents of crime on their premises? Are incidents logged and reviewed in order to identify recurring issues?

For premises selling alcohol for consumption off the premises the following should be considered:

- Should beers, ales, lagers and ciders and anything similar that are sold/ supplied in a can only be sold in multiple packs in order to discourage street drinkers?
- Will there be a restriction on the sales/supplies of beers, ales, lagers or ciders or anything

similar of 6% ABV or above, excluding the sale of specialist branded alcoholic beverages?

- Will there be a restriction on the sale/supply of miniature bottles of spirits of 50ml or less at any time?
- Will ales, lagers and cider be supplied only a bottles of 2 litres and above?

2.37 Venue Safety and Assessment of Risk at Venues and Events

Public safety in venues is a key consideration for the Council in large venues and higher profile events. This should include conducting risk assessments to identify risks and mitigation approaches for venues where certain factors or circumstances, such as overcrowding or terrorism, may make the venue unsafe for those present in the premises. Incidents occurring at larger venues or events with high attendance are of particular concern to the Council. The Council expects applicants of larger venues or where high attendance events may take place to give particular consideration to measures to promote public safety. These may include:

- Conducting a risk assessment and consulting Haringey Licensing and Police (see section below);
- Considering the role of security staff in promoting safety as well as security; and,
- Consideration about capacity limits and the ingress and egress of customers.

The Council considers it prudent to prepare for the passage of the legislation related to this ('Martyn's Law'). When and if legislation is introduced, there will be additional requirements placed on a number of licensees to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. If such legislation is passed, the Council expects relevant applicants to include appropriate measures to meet these obligations in their licensing application.

2.38 Risk Assessments

Where an event involves live performers (for example, musicians, DJs, MCs, and other artists) at a licensed premises that is promoted by the licence holder or an outside promoter, the Police may require that a risk assessment be completed and submitted in advance to the satisfaction of the Police. This may also include the completion of an after-event debrief form. This is to ensure that any crime and disorder, public safety matters, or concerns are identified and addressed satisfactorily. Where risk assessments are required, they should be submitted at least 14 days before any proposed event.

2.39 Venue Capacity

When determining applications for a licence, consideration of venue capacity will be taken into account. This is to help the Council limit the potential for large venues becoming problem hot spots. This will apply to those venues that fit or are likely to fit within the description of high-volume vertical drinking establishments where applicable. Applicants are required to submit robust crime & disorder proposals in their operating schedules as well as noise dispersal policies.

The Council accepts that a lot of the problems that may occur in large premises may be controlled by good management practices. However, controlling the numbers of customers allowed into the premises may also assist in promoting all of the licensing objectives, primarily crime & disorder. The Council will consider capacity conditions in promoting the licensing objectives.

2.40 THE PREVENTION OF PUBLIC NUISANCE

Licensed premises, especially those that operate late at night or in the early hours of the morning, can give rise to a range of nuisances that may potentially impact on people living, working or sleeping in the vicinity of the premises. Principal concerns relate to noise nuisance, light pollution and noxious smells.

This Authority expects Applicants for premises licences and club premises certificates to have made relevant enquiries about the local area before submitting their application. It is important to recognise that the impacts of licensed activity are not contained within a building. Inevitably there is a wider impact as people travel to and from the premises or congregate outside while it is in operation. Nuisance is best managed by careful consideration of the suitability of the selected site at an early stage. Though each site will be considered upon its own characteristics, locating licensable activities in town centres on main roads well served by public transport will generally offer a better prospect of mitigating the impact of the activity.

When a suitable site is identified, operating schedules should be prepared on the basis of a risk assessment of the potential sources of nuisance posed by the premises operation to the local community. The operating schedule should demonstrate an understanding of the level of risk of nuisance and include positive measures to manage any potential risks.

2.41 Relevant considerations might include

- Preventing disturbance caused by patrons upon arrival; when queuing or being admitted to the premises; while congregating outside the premises; or upon departure. This particularly (though not exclusively) between 22:00hrs and 08:00hrs;
- Preventing noise and vibration escaping from the premises, including from music played upon the premises; public address systems; and customer noise;
- Preventing nuisance from the positioning and operation of plant and machinery such as kitchen extraction systems, ventilation plant, condensers etc.;
- The need for regular patrols of the boundary of the premises and / or at the nearest residential points to ensure nuisance impacts are not being experienced by neighbours;
- Controlling disturbance that may be caused by the use of external areas. This should include gardens and terraces as well as other open-air areas including the highway (particularly in relation to the smoking ban and passage of patrons between internal and external areas);
- Arranging clear up operations conducted by staff so they do not cause a nuisance and controlling staff departures;
- The provision of adequate parking arrangements for customers, preventing illegal parking and obstruction of emergency and other vehicles;
- The prevention of queues of traffic forming outside the premises;
- The availability of alternative public transport and local provision for licensed taxis or private hire vehicles, including arrangements to ensure their use does not cause disturbance to local residents;
- Restricting delivery and collection times (waste, equipment and consumables) to between 08:00hrs and 20:00hrs;
- Limiting any nuisance or glare caused by the positioning of external lighting, including security lighting;
- Preventing odour or pests from refuse storage and waste disposal and the accumulation of litter and smokers waste in the vicinity of the premises;
- Preventing odour from food preparation and have adequate kitchen extraction systems in place.

Applicants are recommended to seek advice from the Council's Environmental Protection Team when preparing their operating plans and schedules. Where relevant,

Applicants are also advised to refer to:

- The Institute of Acoustics “Good Practice Guide on the Control of Noise from Pubs and Clubs”;
- Noise at Work Guidance for employers on the Control of Noise at Work Regulations 2005 issued by the Health and Safety Executive and obtainable from <http://www.hse.gov.uk/pubns/indg362.pdf>;
- In the case of large music events, the Code of Practice on Environmental Noise Control at Concerts – This document is under review

While it is recognised that there is no requirement in the 2003 Act to do so, Applicants may find that it helps the licensing process to provide a copy of the completed risk-assessment upon which the operating schedule is based to the relevant responsible bodies for consideration at the time of application. Where appropriate, an acoustic report / noise impact assessment can also be submitted to support an application.

2.42 Guide to control measures

This section of the policy is intended to provide a guide to prospective licence Applicants as to the types of controls that may be appropriate for the promotion of the prevention of public nuisance licensing objective. It is neither intended to provide a definitive list of preventative measures nor will the controls listed be appropriate in every circumstance. They are provided to be considered and modified to fit the proposed business operation.

Applicants should note that where the discretion of the Authority is engaged following consideration of relevant representations, the Licensing Authority will consider attaching appropriate conditions to licences to prevent nuisance. This may include additional site specific controls relevant to the planned activities and their timing.

2.43 Preventing nuisance outside of premises

Nuisance caused by patrons outside of premises, whether by patrons queuing for entry; enjoying the facility of a beer garden or terrace; or by smokers congregated on the pavement; or any other outdoor areas in licensed premises is of considerable concern to local residents. This forms the basis for many of the complaints received within the Authority, especially through the summer months. While people noise is often the main concern, obstruction of the highway preventing people passing by on the pavement and forcing them into the road, can also be both intimidating and dangerous and may also hamper access by emergency services, or street cleansing. Local residents may be further affected by smoke from barbeques and other cooking equipment used in the open air.

Licensees have a responsibility for the conduct of their customers while they are in and around their premises. If provision is made for customers to congregate or smoke outside of premises, then sufficient management controls must be put into place to ensure that no nuisance or disturbance is caused to local residents. Failure to control customers outside of premises can result in licence reviews being submitted endangering the continuation of the premises licence.

Some simple management controls can be put into place which can significantly reduce the risk of nuisance caused to local residents by customers outside of licensed premises. Consideration should be given to placing controls on:

- Queues of patrons awaiting admission and how these are arranged;
- The hours of operation of any licensed external area, requiring customers to return back into the premises at a specific time. It is suggested that a closing time no later than 22.00 is appropriate. No drinks allowed outside after this time;
- All off sales to be sold in sealed containers for consumption away from the premises;
- The supervision of patrons using any external area so as to prevent nuisance and disturbance;

- Setting a maximum occupancy figure for the premises to address the likely impact of public nuisance from patrons arriving and leaving the premises, particularly where the application seeks to continue beyond recommended closing times;
- Setting a maximum capacity figure for the outside area to control the number of patrons at any one time and the potential noise from the use of the area;
- Whether it is appropriate to relay music into any external area (Licensees must take care not to cause nuisance at any time of the day or night)
- The times during which any live music or amplified sound may be played in, or relayed by external speakers into, any external area or marquee. (Note: Any music played or relayed into the external area should cease earlier than the time set on the use of the external area).
- The numbers of persons using any licensed external area at any one time;
- The numbers of 'smokers' allowed outside of the premises at any one time;
- The taking of drinks outside of the premises when patrons step outside to smoke should be discouraged as it encouraged patrons to stand outside longer giving rise to public nuisance.
- The areas within which patrons may congregate outside of the premises, restricting them, for instance, to the curtilage or footprint of the premises;
- The times within which barbecues or other cooking facilities may be provided within any external area;
- The terminal hour for last admissions and readmissions to the premises;
- The reduction of music levels within the premises 30 minutes before closing so as to reduce levels of excitement among patrons upon leaving;
- Arrangements made with local cab companies when calling for customers, requiring that they call within the premises for their customers without sounding their horn in the street;
- The display of notices at exit points asking patrons to 'please leave quietly' and be mindful of local neighbours;
- The supervision of patrons outside of the premises to ensure quick dispersal from the immediate area upon closing time;
- The clearance of any litter created by the operation of the premises;
- The hours during which external activities such as the handling and removal of waste or musical equipment or the delivery of goods. (Note: It is recommended this is prohibited between 22.00hrs and 08:00hrs);
- Restricting the use of artificial lighting outside of the premises so as to reduce the potential for light nuisance;
- Ensuring any/all external plant (i.e. air conditioning units, kitchen extraction systems etc.) are maintained and serviced so as not to create any additional unnecessary noises;
- The time and number of people allowed to use shisha or similar items in any area.

2.44 Preventing nuisance from within premises

Nuisance may often be caused by sound escaping from the premises or transmitted through the structure of the building. While some simple management steps may be taken to reduce the problem, it should be understood that in some premises physical works may be necessary to prevent nuisance being caused to local residents. The likelihood of this increases where regulated entertainments are to be provided; the later the intended hour of operation; where residents live adjacent to, above or close by the premises; or where there are other noise sensitive premises close by. Where physical measures are likely to be necessary expert advice should be sought on appropriate measures.

This Authority expects that the following measures will be considered and applied appropriate to the level of risk of nuisance being created.

- The provision of and management control of entrance / exit lobbies, so as to ensure that the integrity of the premises is maintained and internal sound contained;

- The provision of acoustic double door lobbies of an adequate residence time;
- The provision of acoustic seals and self closers on doors;
- The installation and / or maintenance of double glazing / sound resistant glass;
- The provision of sound insulation to party walls, floor and ceiling;
- The provision of alarms to fire doors or other private external doors;
- Keeping doors and windows closed where performances of regulated entertainment take place;
- The installation and use of a sound-limiting device for all amplified sound to enable maximum volume and bass to be set at levels appropriate for the premises / event;
- The connection of fire doors and / or private external doors to the sound limiting device (so that volume is reduced if the doors are opened);
- The provision of additional air conditioning / air cooling to enable doors and windows to remain closed during any entertainment;
- The provision of acoustic baffling to any ventilation extract and intake system;
- Management and recording of periodic perimeter checks;
- Management should ensure that there are sufficient toilet facilities on the premises.

It is important to understand that, even though recent government deregulation initiatives have relaxed the requirements around the licensing of small scale entertainments taking place during day time hours, all operators remain responsible for preventing public nuisance arising from their premises operation. Failure to prevent public nuisance may give rise to deregulation provisions being removed and endanger the continuation of a premises licence.

2.45 Outdoor events

Haringey hosts a number of major commercial events, these events add to the vibrancy of the Borough and are enjoyed by both residents and visitors alike. It is important that such events are organised and managed so as to ensure that minimum disturbance is caused to people living and working nearby. In order to achieve this, Applicants are asked to submit an 'Event Management Plan' as part of the licensing process and to consult with the Haringey Safety Advisory Group early in the process of preparing for any event.

Account will be taken of:

- (i) the type/s of events planned
- (ii) the number of events that take place each year
- (iii) the numbers of participants and people attending each event
- (iv) the times of day and duration of events
- (v) the days/dates of the events
- (vi) conformity to The Noise Council's 'Code of Practice on Environmental Noise Control at Concerts', guidelines and recommended noise control procedures
- (vii) conformity to standards set by the council in relation to the existing external noise levels at the nearest noise sensitive properties.

The Noise Environmental Health Team as Responsible Authorities, will assess all licence applications for their impact with regard to public nuisance. Nuisance from outdoor events can be created by many activities, for example:

- Set up rigging / de-rigging;
- Vehicle movements on and around site;
- Patrons congregating and dispersing;
- Parking arrangements;
- Music and entertainment;
- Fireworks and special effects;
- Smoke;
- Odour from concessions or open food preparation;

- Lighting;
- Operation of plant and machinery (including generators etc.);
- Litter.

It is recommended that event organisers include a 'noise management section' within the Event Management Plan, assessing all nuisance-causing activities and setting out the measures proposed to mitigate any nuisances that are likely to be caused.

The noise management section should include the following information

- Location and site plan;
- Date /hours of operation. It is suggested a finishing time of 22:00hrs is appropriate; however an earlier finish time may be requested subject to local circumstances;
- Information on the type of event, with programme and timetable;
- Orientation of any stage(s), marquees or potential sources of noise;
- Plans for access to and from site and site routes within the event perimeter
- Location of operational plant and vehicles;
- Background noise survey and predictive noise assessment;
- Details of event and stage management structure including names and contact details for persons responsible for liaison with Council and other Enforcement
- Officers at the event; for management of sound systems; recording of noise levels; dealing with complaints and keeping records of and remedial actions; and attending pre-event and post-event audit meetings with the Authority;
- Details of noise control measures:
 - Sound limiting technology to be used
 - Maximum noise / bass levels
 - Selection of equipment etc.
- Location of light sources and light impact assessment;
- Litter control, waste management and recycling provisions;
- A copy of the pre-event information leaflet to be dropped to occupiers of nearby noise sensitive premises.

2.46 Other consents

Licensees should be aware that a range of other consents may be necessary to provide smoking shelters or space heaters, awnings, tables and chairs, metal or rope barriers. The Council does not encourage or license the use of 'A' boards on the highway.

Please discuss your proposals with the Licensing Team in the first instance

2.47 PUBLIC SAFETY OBJECTIVE

Licence holders have a responsibility to ensure the safety of those using their premises as a part of their duties under the Licensing Act 2003. This concerns the safety of people using the relevant premises, including the prevention of accidents and injuries and other immediate harms that can result from excessive alcohol consumption such as unconsciousness or alcohol poisoning.

The act covers a wide range of premises that require licensing, including night clubs, cinemas, concert halls, theatres, public houses, off-licences, supermarkets and grocers, cafes/ restaurants and fast food outlets. Each of these premises presents a mixture of risks. While many risks are common to most premises, others are unique to specific operations. It is essential that premises are constructed or adapted and managed in a manner which acknowledges these risks and safeguards occupants against them.

This authority is committed to ensuring the safety of people visiting and working in licensed premises. Thereby, this authority expects applicants for premises licenses and club premises certificates to prepare their operating schedule on the basis of a risk-assessment and demonstrate an understanding of the potential risks and hazards and include positive proposals to promote the public safety licensing objective. In certain premises where existing legislation does not provide adequately for the safety of the staff or others lawfully on the premises, consideration should also be given to conditions that deal with Living accommodation attached to or accessed via Licensed Premises, such as: ensuring that sufficient fire safety arrangements are in place to detect and warn occupants and all other relevant persons ensuring adequate fire separation and means of escape is provided between the mixed use premises.

In certain premises where existing legislation does not provide adequately for the safety of the public, consideration might also be given to conditions that ensure that when disabled people are present, adequate arrangements exist to enable their safe evacuation in the event of an emergency; and disabled people on the premises are made aware of those arrangements.

This authority is committed to ensuring the safety of people visiting and working in licensed premises. Thereby, this authority expects applicants for premises licences and club premises certificates to prepare their operating schedule on the basis of a risk-assessment and demonstrate an understanding of the potential risks and hazards and include positive proposals to promote the public safety licensing objective.

2.48 Relevant issues might include

- Premises configuration and site layout arrangements, including access for emergency services such as ambulances
- Means of escape
- Temporary structures
- Fire and other emergency safety and systems
- Building services
- Hygiene and welfare
- Special installations and special effects
- Communications systems
- Ensuring good communication with local authority and emergency services (for example, communications networks with the police and signing up for local incident alerts)
- Ensuring appropriate provision of trained staff including the presence of trained first aiders on the premises and appropriate first aid kits
- Ensuring the safety of people when leaving the premises (for example, through the provision of information on late night transport)
- Ensuring appropriate and frequent waste disposal, particularly of glass and bottles

- Ensuring appropriate safe limits on the maximum capacity of the premises
- Considering the use of CCTV in and around the premises (see previous section)
- Considering the use of licensed security

Applicants are recommended to seek advice from the council's occupational health and safety team and / or local fire safety officers when carrying out their risk assessments and preparing their operating schedules. Reference should also be made to the following documents, where appropriate:

- **Model National and Standard Conditions for Places of Public Entertainment** and Associated Guidance ISBN 904031 11 0 (Entertainment Technology Press – ABTT Publications)
- **The Event Safety Guide** - A guide to health, safety and welfare at music and similar events (HSE 2002) ("The Purple Book") ISBN 0 7176 2453 6
- **Managing Crowds Safely** (HSE 2000) ISBN 0 7176 1834 X
- **5 Steps to Risk Assessment: Case Studies** (HSE 1998) ISBN 07176 15804
- **The Guide to Safety at Sports Grounds** - (The Stationery Office 1997) ("The Green Guide") ISBN 0 11 300095 2
- **Safety Guide for Street Arts, Carnival, Processions and large scale Performances** published by the Independent Street Arts Network, copies of which may be obtained through www.streetartsnetwork.org/pages/publications.htm
- **Fire Safety Risk Assessment – Open Air Events and Venues** (ISBN 978 1 85112 823 5) which is available from the Communities and Local Government website www.communities.gov.uk/fire
- The London District Surveyors Association's **"Technical Standards for Places of Public Entertainment"** ISBN 0 9531229 2 1
- **Safer Clubbing** - Produced by the Home Office in conjunction with the London Drugs Policy Forum

The following British Standards should also be considered

- BS 5588 Part 6 (regarding places of assembly)
- BS 5588 Part 9 (regarding ventilation and air conditioning systems)
- BS5588 Part 9 (regarding means of escape for disabled people)
- BS 5839 (fire detection, fire alarm systems and buildings)
- BS 5266 (emergency lighting systems)

It helps the licensing process to provide a copy of the completed risk-assessment upon which the operating schedule is based to the relevant responsible bodies for consideration at the time of application.

This main part of this section of the policy is intended to provide a guide to prospective licence applicants as to the types of controls that may be appropriate for the promotion of the public safety licensing objective. It is neither intended to provide a definitive list of preventative measures nor will the controls listed be appropriate in every circumstance. They are provided to be considered and modified to fit the proposed business operation.

Where its discretion is engaged following the consideration of relevant representations the licensing authority will consider attaching relevant conditions to licences permissions to promote public safety where these are not provided for within other legislation and are necessary for the promotion of the public safety licensing objective. This may include additional site specific controls relevant to the planned activities and their timing. The Council has provided at Appendix 2 – Model Conditions to assist applicants.

2.49 Other relevant legislation

Applicants are firstly reminded of the general duties imposed under other legislation (i.e. the Regulatory Reform (Fire Safety) Order 2005) and the Health and Safety at Work Regulations 1999.

2.50 Regulatory Reform (Fire Safety) Order 2005

Under the Regulatory Reform (Fire Safety) Order 2005 the “responsible person” as defined by the order, must

- Take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of his or her employees
- Take such general fire precautions as may be reasonably required in the circumstances of the case to ensure that the premises are safe for the use by other persons
- Make a suitable and sufficient assessment of fire risks to which relevant persons may be exposed for the purposes of identifying the general fire precautions he or she needs to take
- The responsible person **MUST** record the information gathered by the risk assessment for all premises covered by the Licensing Act 2003, in particular, the significant findings; the measures taken, or to be taken, to ensure general fire safety; and any person identified as being especially at risk.

This authority recognises that it may not impose any condition relating to any requirement or prohibition that is or could be imposed under the “Fire Safety Order” and thereby that conditions relating purely to fire safety matters may not be placed on premises licences. Further information and guidance about the Order and fire safety legislation is available from the Communities and Local Government website at www.communities.gov.uk/fire .

2.51 Health and Safety at Work Regulations 1999

The Health and Safety at Work Regulations 1999 state that

“(1) Every employer shall make a suitable and sufficient assessment of

- (a) The risks to the health and safety of his employees to which they are exposed whilst they are at work; and
- (b) The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking, for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed upon him by or under the relevant statutory provisions.

(2) Every self-employed person shall make a suitable and sufficient assessment of -

- (a) The risks to his own health and safety to which he is exposed whilst he is at work; and
- (b) The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,”

The Health and Safety Executive helpfully provides a range of example risk-assessments which may be viewed at <http://www.hse.gov.uk/risk/casestudies/> The examples provided include for night-clubs, pubs, village halls, off-licences and convenience stores.

2.52 A proactive approach to customer safety

Applicants are also encouraged to take a proactive approach to general safety issues, including that of their customers, and to discuss appropriate measures with the responsible authorities concerned. Arrangements that might be taken into account could include steps;

- To monitor customers, present upon the premises so as to ensure that no customer continues to be supplied with alcohol to a point where they become drunk
- To ensure the regular collection of glass within the venue and / or external areas
- To ensure against drinks being “spiked” or otherwise tampered with
- To ensure all (internal and external) parts of the premises are adequately lit and may be monitored by staff.
- reports of harassment and sexual intimidation should be taken seriously and take appropriate action
- Take active steps to support persons who report harassment or sexual intimidation which might take place in their premises
- Train all front of house staff to address women’s safety and harassment issues
- Take active steps to ensure females leave the venue safely
- To ensure that customers are able to return home safely, for instance, by providing information on local transport availability or making arrangements with reputable cab companies

Premises should not be altered in such a way as to make it impossible to comply with an existing licence condition without first seeking a variation of the premises licence proposing the deletion of the condition relating to public safety in question. The applicant will need to propose in a new Operating Schedule reflecting the proposed alteration to the premises how he or she intends to take alternative steps to promote the public safety objective. The application for variation will enable the responsible authorities with expertise in safety matters to consider whether the proposal is acceptable.

2.53 THE PROTECTION OF CHILDREN FROM HARM

The licensing objective of the protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated with alcohol but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing Authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.

This Authority expects Applicants for premises licences and club premises certificates to have prepared their operating schedule on the basis of a risk- assessment of the potential sources of harm to children. It is expected that the operating schedule will demonstrate an understanding of the potential risks to children and set out the steps to be taken to protect children from harm when on the premises. This authority believes that it is completely unacceptable to sell alcohol and associated age-restricted products to children.

Relevant issues might include

- Preventing access to alcohol
- Removing encouragement for children to consume alcohol
- Preventing exposure to gaming
- Preventing exposure to adult entertainments or facilities

While it is recognised that there is no requirement in the 2003 act to do so, applicants may find that it helps the licensing process to provide a copy of the completed risk-assessment relating to the protection of children from harm to the child safeguarding officer and the trading standards team when submitting the application.

This section of the policy is intended to provide a guide to prospective licence applicants as to the types of controls that may be appropriate for the promotion of the protection of children from harm licensing objective. It is neither intended to provide a definitive list of preventative measures nor will the controls listed be appropriate in every circumstance.

Applicants should note that where its discretion is engaged following the consideration of relevant representations, the licensing authority will consider attaching appropriate conditions to protect children from harm.

2.54 Access to licensed premises

The act makes it an offence to permit children under the age of 16, who are not accompanied by an adult to be present on premises being used exclusively or primarily for the supply of alcohol for consumption on those premises, under the authorisation of a premises licence, club premises certificate or where that activity is carried on under the authority of a temporary event notice. In addition, it is an offence to permit children under 16 who are not accompanied by an adult, between midnight and 0500 at other premises supplying alcohol for consumption on the premises, under any such authority.

The council recognises, however, that licences may be sought for a great variety of premises, including theatres, cinemas, restaurants, concert halls, take-away and fast food outlets as well as public houses and nightclubs. While the council would encourage applicants to make provision for the access of children, where appropriate, conditions restricting the access of children will be strongly considered in circumstances where:

- Adult entertainment is provided.
- A member or members of the current management have been convicted for serving alcohol to minors or with a reputation for allowing underage drinking.

- It is known that unaccompanied children have been allowed access.
- There is a known association with drug taking or drug dealing.
- The premises are used exclusively or primarily for the sale of alcohol for consumption upon the premises.

Applicants must be clear in their operating schedules about the activities intended to be provided and the times at which these shall take place, in order to help determine when it is not appropriate for children to enter the premises.

Conditions should reflect the licensable activities taking place on the premises. Consideration should be given to appropriate conditions

- Restricting the hours when children are present
- Restricting or excluding children under a specified age when certain particular specified activities are taking place
- Restricting the parts of the premises to which children may have access;
- Age restrictions (below 18)
- Requirements for an accompanying adult
- Full exclusion of people under the age of 18 years from the premises

2.55 The purchase and consumption of alcohol by children and young persons

This Authority is committed to tackling the illegal sale of alcohol to children, including proxy sales when adults buy alcohol for children. Licensees are expected to have robust management arrangements in place to prevent all staff making underage sales. This Authority will take appropriate action, including the review of licenses, where sales persist.

The UK has one of the highest rates amongst European countries of admissions to hospital or A&E due to alcohol use by 15-16 year olds.

Frequency of drinking is associated with offending in children and young people. The borough carries out alcohol test purchase campaigns, while the compliance rates are seen to be improving over the years, the rate of test purchase failures remains a concern. It is important that compliance rates are further improved.

2.56 Age verification policies – Mandatory condition

The following mandatory licence condition must be attached to all premises licences and club premises certificates issued by this authority.

- The premises licence holder or club premises certificate holder must ensure that an age verification policy applies to the premises in relation to the sale of alcohol. This must as a minimum require individuals who appear to the responsible person to be under 18 years of age to produce upon request, before being served alcohol, identification bearing their photograph, date of birth, and a holographic mark

2.57 Age verification policies-applicants considerations.

The trading standards service, in its role as responsible authority, considers each individual licence application received by the licensing authority and makes recommendations on the appropriate range of management controls around this issue. The service's recommended approach to controlling under-age sales is set out below. As a minimum it is recommended that:

- That an age verification scheme is established and maintained that requires the production of evidence of age (comprising any Proof of Age Standards Scheme (PASS) accredited card

or passport or driving licence) from any person appearing to staff engaged in selling or supplying alcohol to be under the age of 18 and who is attempting to buy alcohol.

- That notices be displayed informing customers and staff that sales of alcohol will not be made to under 18s and that age verification will be required.
- That evidence of the scheme (in the form of documented procedures) is maintained and made available for inspection by authorised officers.

However, the service recommends that as best management practice

- That “Challenge 25” is supported as part of the age verification scheme established. The scheme should require the production of evidence of age (comprising any PASS accredited card or passport or driving licence) from any person appearing to staff engaged in selling or supplying alcohol to be under the age of 25 and who is attempting to buy alcohol.
- That “Challenge 25” notices be displayed informing customers and staff that sales of alcohol will not be made to anyone appearing to be under 25 unless they can prove they are 18 or over.
- That evidence of the scheme (in the form of documented procedures) is maintained and made available for inspection by authorised officers.
- That all staff involved in the sale of alcohol shall be trained in the age verification scheme and records of such training shall be retained on the premises and made available for inspection by authorised officers.
- That an incident log shall be maintained and details of all age related refusals recorded. This book shall be reviewed monthly by the DPS and any actions taken recorded in the book and signed off by the DPS. This log shall be retained on the premises and made available for inspection by authorised officers.
- That if a CCTV recording system is installed inside the premises, it shall be positioned to capture the sale of alcohol. A library of recordings taken by the system shall be maintained for 31 days and made available to authorised officers upon request.
- That a personal licence holder shall be on the premises at all times that alcohol is supplied.
- That an EPOS (electronic point of sale) system is installed at the premises, it shall be configured to prompt the operator to check proof of age when an alcoholic product is scanned. This prompt should require the operator to confirm the purchaser is over 18 before the next item can be scanned or the transaction completed.
- That the DPS shall ensure that, as far as is reasonably practical, alcohol is displayed in an area which can be constantly monitored or supervised by staff, separate from goods likely to be purchased by persons under 18.
- That, if any advertising campaigns or promotions of alcohol are planned, the premises licence holder shall ensure they are carried out in a socially responsible manner and that they do not encourage irresponsible drinking. If authorised officers raise concerns about any promotion the premises licence holder shall discontinue it.

While this is intended as guidance only, this authority recommends that all operators should give careful consideration to introducing these controls into their management practices and including them within their operating schedules.

Trading standards also provides practical support to licensees. This includes:

- Running a local PASS approved proof of age card scheme.
- Provision of a range of downloadable business advice information leaflets.
- Free retailer support materials such as refusals registers, signage, posters and point of sale material.

In detailing the council’s recommended approach to under-age sales it is recognised that some sales may be made through intimidation or fear. Licensees experiencing such problems are

advised to discuss their situation with licensing or trading standards officers.

2.58 Children and responsible drinks promotions

The Portman Group operates, on behalf of the alcohol industry, the 'Code of Practice of the Naming, Packaging and Promotion of Alcoholic Drinks' to ensure that alcohol is marketed responsibly and only at adults.

The Code applies to all alcohol marketing (including naming, packaging, sponsorship, point of sale and brand merchandising) which is primarily UK targeted and not already subject to regulation by the Advertising Standards Authority (ASA) or Ofcom.

The Code can be viewed at <http://www.portmangroup.org.uk/codes/alcohol-marketing/code-of-practice/code-of-practice>. This authority commends the Code accordingly.

2.59 Children and cinemas – Mandatory licence condition

Where premises licences incorporate film exhibitions as a licensable activity the following mandatory condition will be imposed:

- The admission of children to films is to be restricted in accordance with recommendations given either by a body designated under section 4 of the Video Recordings Act 1984 specified in the licence (currently the British Board of Film Classification) or by the licensing authority itself.

Applicants are expected to include within their operating schedule arrangements for restricting children from viewing age-restricted films.

Information regarding the classification of films by the council can be requested from the licensing service.

2.60 Regulated entertainment provided for children

Where entertainments or facilities generally are provided specifically for children, applicants are asked to demonstrate within their application

- That the company / organisation has a policy or statement on keeping children safe from harm
- How employees or contracted agencies will be made aware of the company's / organisation's policy / statement on keeping children safe from harm
- That recruitment processes for staff who may have to deal direct with children under the age of 18 seek to ensure, as best the company / organisation can, that the appointed applicant has not been known to have harmed children
- That there will be clear expectations on staff with regard to their personal conduct in direct relations with children under 18 and guidance on what is appropriate in dealing with specific situations which may arise
- There are systems in place and that staff are aware of them for dealing with possible abuse or violence to children from other users of the licensed facility
- There are clear and accessible complaints systems for children to report if they have been harmed and that there are clear whistle-blowing procedures for staff who may have concerns about the welfare of children on the premises
- That all duty managers or staff in charge of the premises are aware of how to refer any concerns about the welfare of children to the local police, education authority or social services as necessary

2.61 Where a theatrical entertainment is specially presented for children, the council advises the

presence of sufficient adult staff to control access and egress of children and to protect them from harm as follows –

- (1) An adult member of staff to be stationed in the vicinity of each of the exits from any level, subject to there being a minimum of one member of staff per 50 children or part thereof
- (2) No child (unless accompanied by an adult) to be permitted in the front row of any balcony
- (3) No standing to be permitted in any part of the auditorium during the performance

2.62 Raising awareness of child sexual exploitation and dealing with the risk.

The risks will vary from premises to premises depending on the type of licensing activity and the age of the children. Young children may be at risk if they are not properly supervised or are exposed to adults who have become intoxicated. Young children can be dangerously intoxicated by quite small quantities of alcohol, so care needs to be taken to clear used glasses to protect them from this risk. Young teenagers may attempt to buy and consume alcohol and then become vulnerable because their judgement is impaired, this could put them in danger from getting involved in fights, from drink driving or from sexual predators.

All children are at risk of adults who are viewed as a danger to them. Care must be taken when staff are appointed to ensure that such individuals are not placed in an environment where they can exploit their position.

Adult entertainment is not suitable for children. At premises where such entertainment is allowed arrangements must be enforced to ensure that children are not exposed to any inappropriate acts or material.

2.63 Steps to reduce risks to children and young persons

- Use clear signs so that people are aware when and where children are welcome in the premises
- Display signs and adhere to laws relating to alcohol and children
- Have a clear policy for dealing with children on their premises, e.g. age, thresholds, supervision, expectations of adults, timings, etc.
- Age-identification procedures used – national, local, premises schemes
- How expectations on adults are enforced e.g. instructions to staff
- Vetting procedures for staff, to ensure that no unsuitable adults are employed
- Staff should be easily identifiable (uniform or badge) and aware of safeguarding issues
- Policy on clearing glasses to minimise opportunities for children to access left-over alcohol
- Minimise the risk of passive smoking with clearly defined 'smoking' areas to which children have no access.
- Use CCTV to monitor the premises/event including toilet and play areas.

2.64 The risks vary depending on the style and character of the business but premises can be involved in the following ways:

- If an adult venue (night clubs/sex entertainment venue) is frequented by underage customers this can attract perpetrators; or if a premises (or event) hosts under 18 events or mixed age activities
- Where underage drinking takes place, children and young people are vulnerable as their judgement is impaired
- There is a risk of child sexual exploitation (CSE) at premises where goods or services can be offered in exchange for sexual favours (such as free food, transport, drinks, cigarettes, or free access to a venue). This can happen if a perpetrator is employed there (or works voluntarily) and has regular or private contact with children
- Children and young people are vulnerable in areas of premises that are not monitored (such as toilets, beer gardens)

- Risk may present if information technology is in use at a premises (internet, mobile phones/cameras/video recorders)
- Premises providing facilities for private parties, private dancing/entertainment booths or overnight accommodation may be vulnerable to child sexual exploitation

2.65 What can licensees do to manage this risk.

Under the Licensing Act 2003, the 'due diligence' defence can be used to protect your business, if you can demonstrate that all reasonable steps have been taken to manage risk. Here are some suggested safeguarding measures to help evidence 'due diligence' and keep children safe:

- Undertake a written children and young people's risk assessment and use it to inform your operating policy and staff training
- Staff should be trained to recognise indicators of child sexual exploitation and know how to report concerns
- Staff should be trained to operate an age verification scheme, know what types of identification are acceptable and to recognise signs of proxy purchase of alcohol
- Staff training records should be maintained
- Activity at the premises should be monitored (for example using CCTV or by regular patrols. Patrol records should be maintained)
- Suspicious activity should be reported to the police (including details such as vehicle registration numbers, description of individuals) and should be recorded in your incident log
- If you, or your staff, are in a situation involving the supervision of a vulnerable young person at your premise, it is important to follow a consistent and auditable protocol.
- If you have a delivery service (for example hot food) enforce a Code of conduct to promote good safeguarding when deliveries are made to unaccompanied children.

The authority recognises that training is a key factor for applicants to demonstrate and evidence how they will monitor and maintain standards to promote the licensing objectives. Applicants are recommended to use specialised accredited training providers where appropriate.

2.66 Film classifications

Where a Premises Licence authorises the exhibition of films, the licence must include a condition requiring the admission of children to films to be restricted in accordance with:

- Either the BBFC classification;
- Or where the film is not classified by the BBFC, any recommendations made by the licensing authority.

In accordance with the Guidance issued under s182 of the Licensing Act 2003, the licensing authority shall concern itself primarily with the protection of children from harm when classifying films. It will not use its powers to censor films save where there is clear cause to believe that this is required to promote the Licensing Objectives.

The Guidance states: 'The protection of children from harm includes the protection of children from moral, psychological and physical harm and this would include the protection of children from too early an exposure to strong language and sexual expletives, for example, in the context of film exhibitions or where adult entertainment is provided.'

The licensing authority considers the classification system used by the BBFC to be nationally understood and accepted. It will therefore use this system and any amendments thereto, as a reference point for determining its recommendation(s) on the restriction of access of children to the film(s). It should be noted however that the licensing authority is not obliged to follow these guidelines.

Requests for certification by the licensing authority should be made at least 28 days in advance of

the proposed screening date and submitted to the Licensing Unit. Requests should include:

- (a) a DVD copy of the film
- (b) details of any existing classification issued by an existing classification body, whether within or outside the UK
- (c) a synopsis identifying the material within the film considered by the exhibitor to be likely to have a bearing on the age limit for the audience for exhibition of the film
- (d) such recommendation as may have been made by the film-maker upon age limit for the intended audience for exhibition of the film
- (e) proposal of age restriction by the applicant

Applicants should note that where its discretion is engaged following the consideration of relevant representations, the Licensing Authority will consider attaching appropriate conditions

The majority of specific matters relating to licensing are dealt with through the following sections.

31 Process for applications

The process for applications set out in this section will be followed in all cases of applications for Licences. The Council recommend that applicants, where possible and appropriate, consider submitting a provisional application early in the process. This allows early engagement and discussion and can improve the quality of the subsequent application.

Applications will be progressed in accordance with procedures laid down by the Act. Prospective applicants should refer to the separate relevant guidance documents for further details. Where reference is made to applications in this policy this should be taken as referring to applications for new premises licences, club registration certificates, variations to these and reviews of licence/certificates.

Once an application is made and received electronically by the Council it will be provided to all Responsible Authorities by the Council. The public will also be notified via the Haringey Council website.

Applications for all licences and consents available under the 2003 Act must be made on the relevant form prescribed under secondary regulations. Applications will not be progressed until the form has been completed in full, together with the relevant fee and all other required information, including a detailed premises plan, by the licensing authority and the relevant responsible authorities.

In accordance with the Provision of Services Regulations 2009, electronic application facilities are available. Electronic application facilities for premises licences may be found on Council's own web site. Electronic applications for other categories of licence and consent are also available on this web site. Where electronic applications are made, the application will be taken to 'be given' when the applicant has submitted a completed application form Together with all other relevant documentation and fees.

The Metropolitan Police Service provide up to date crime data for postcode areas in Haringey through both www.mps.police.uk and www.police.uk. Both of these websites can provide applicants with a better understanding of the crime and disorder characteristics for the area in which they are applying for a licence, and this understanding can help inform applications and operating schedules.

3.2 The Responsible Authorities are:

Responsible Authority	Contact
Licensing Authority	licence@haringey.gov.uk
Environmental Health Authority	frontline@haringey.gov.uk
Trading Standards	frontline@haringey.gov.uk
Child Protection Authority	Nam.haringeylicensing @met
Planning Authority	planningenforcement@haringey.gov.uk
Health and Safety	frontline@haringey.gov.uk
Metropolitan Police	NAMailbox.LicensingHaringey@met.police.uk
London Fire Brigade	FSR-AdminSupport@london-fire.gov.uk
Director of Public Health	
Home Office (Immigration Enforcement)	Alcohol Licensing Team Lunar House 40 Wellesley Road Croydon CR9 2BY • Email: Alcohol@homeoffice.gsi.gov.uk

The steps for consideration of a licence application, a licence variation and a club premises certificate are:

- a) If no representations are made to an application, the Council must grant it in full.
- b) When an application is made, and relevant representations are received by the Council it must hold a hearing of the licensing sub-committee (unless those who have made representations agree this is unnecessary or unless the applicant or objectors request a date beyond the twenty days period for specific reasons).
- c) The sub-committee will then consider the evidence provided by applicants and those making representations, the Guidance, this Statement of Licensing Policy and any other relevant data.
- d) The sub-committee will determine the application and will take any steps it considers appropriate for the promotion of the licensing objectives. The steps undertaken will be fair, relevant and proportionate.
- e) Conditions on the licence, additional to those voluntarily sought by the applicant, may be considered. Appropriate conditions will focus on matters which are within the control of individual licensees and which also relate to the premises or places being used for licensable activities and the impact of the resulting activities in the vicinity. If situations arise where the licensing objectives are compromised but cannot be dealt with by the use of appropriate conditions the Council will consider whether it is appropriate for a licence to be granted or continue to operate.

3.3 Pre-application advice

The pre-application advice is designed to support applicants in understanding:

- That the right type of licence is being applied for
- The application form has been completed correctly
- What policies may be applied to an application and why
- The needs of the local area where the proposed premises is situated
- Any specific measures that may need to be considered when submitting an application
- If specialist input may be required, for example, Responsible Authorities, Safety Advisory Group.

The Licensing service can help you:

- Understand and be aware of relevant policies
- Identify any requirements for specialist input for example, responsible authorities
- Check your application and supporting documentation to ensure compliance with legislative requirements
- Explain or make you aware of when an application is unacceptable – does not meet legislative or policy requirements

Any advice given will be from the Licensing Team, acting in their roles as Responsible Authorities under the provisions of Section 13 of The Licensing Act 2003.

With regard to any pre-application advice, any written confirmation will state that pre-application advice will not give applicants any exemptions from the licensing process. Responsible Authorities, including the licensing team may still make a representation against the application and the application may still need to be heard at a Licensing Sub-Committee for a decision to be made. The advice given will not include views from other responsible authorities such as the Police, Fire Authority, etc. Determining any application that is subject to representations will be the function of the Licensing Sub-Committee who will consider the application and the representations on its own merits and determine the application accordingly on the basis of whether it promotes the licensing objectives.

For further advice please contact licencing@haringey.gov.uk. Please note there is a cost incurred for this service.

3.4 Entitlement to work in the UK

Individuals applying for a personal licence must be entitled to work in the UK.

Documents which demonstrate entitlement to work in the UK

Applicants may be asked to demonstrate that they have the right to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity. Guidance on how this can be demonstrated in specific circumstances is outlined in the linked webpage: <https://www.gov.uk/government/publications/right-to-work-checklist/employers-right-to-work-checklist-accessible-version>

A person is also disqualified from holding a licence if they are subject to a condition on their permission to be in the UK preventing them from holding a licence, for example they are subject to an immigration restriction that does not permit them to work.

3.5 Licensing fees

Licensing fees are set nationally and are due for payment on the anniversary of the licence, if the Licensing fee is not paid on time the licence will be suspended until fees are paid.

Licence fees are set in alignment with business rates (rateable value) and the Council expects licence holders to pay the required licence fee when it is due. The licensing fees are set out on this web page <https://share.google/qI3oRWv6gRYBsFwlo>

If Licence fees are not paid at the time they are due suspension for non-payment of fees will be in force two days after the Council notifies the Licence holder. The Council will notify the Licence holder the day after the payment is due if it is not received.

The suspension will cease to be in place when the payment is received.

It is the Licence holder's responsibility to pay their fees, the Council will not issue a reminder of fees when they are due. This is a matter for Licence holders and the Council expects Licence holders to take responsibility for ensuring their fees are paid when they are due.

There are some exemptions to this policy. Where late payment or non-payment is due to administrative error or if the fee is disputed prior to the date it is due for payment the licence will not be suspended.

3.6 Representations

To ensure the best possible consideration of representations it is recommended that anyone making a representation do the following:

- Link the representation to the Licensing Objectives that are most relevant to the representation and outline how the representation is linked to the relevant Licensing Objectives:
- Ensure that the representation is specific to the premises or licence being sought:
- Consider what evidence can be provided to support the representation, particularly in terms of how the representation links to the Licensing Objectives: and,
- Be clear in terms of what the representation relates to, what Licensing Objectives it links to, and what is the proposed remedy, eg. Specific conditions to be placed on the licence or an objection to the licence being granted.

Representations cannot be made anonymously to the Council to ensure that a representation is not vexatious. However, anonymity can be requested from the Council if there is proof of concerns that support it.

Residents can play a significant role in contributing to the effective implementation of this Licensing Policy. The impact of licensed premises will naturally be most felt at a local level and it is important that residents and businesses have an active involvement in the licensing process and understand how they can do this. In order for premises to provide any of the above activities, the operator must obtain authorisation from Haringey in its role as licensing authority.

The authorisation may be in the form of a Premises Licence, a Club Premises Certificate or a Temporary Event Notice.

Where an application for a new Premises Licence or Club Premises Certificate is made to the licensing authority or for variation of an existing licence or certificate, consultation is required with Responsible Authorities and Other parties as defined under the Licensing Act 2003. Details of the Responsible Authorities can be found on page 44.

3.7 Relevant information for residents and other persons

An application will consist of (among other things) an operating schedule, which details the licensable activities applied for as well as specifying during which times and on which days they would be conducted. In the operating schedule, the licensee also sets out any steps they propose to take in order to address the four Licensing Objectives.

Local residents and businesses can play an important role in the licensing process as it will be they who are most likely to be directly affected. This section provides useful information on understanding how to find out about applications and submit any comments (representations) in respect of them. Representations do not have to be objections and can be made in support of an application. In this section, references to 'licences' shall also be relevant to 'Club Premises Certificates'. Further useful information and guidance can be found on the Council's website at www.haringey.gov.uk/licensing and also at <https://www.gov.uk/alcohol-licensing>.

3.8 Finding out about the application

Applicants for new licences and variations to existing licences are required to advertise the application in two ways by:

1. Placing a notice at or on the premises
 - On A4 (or larger) pale blue paper (or on white paper, in the case of an application for a Minor Variation)
 - Printed legibly in black ink or typed in a font of at least 16 point
 - Placed prominently at or on the premises where it can be conveniently read from the exterior of the premises
 - Placed every 50 metres on the external perimeter of the premises abutting any highway (where applicable).
- 2 Placing a notice in a newspaper (not applicable for a Minor Variation)
 - Newspaper circulation must be in the vicinity of the premises (or if there isn't a local paper, in a local newsletter or circular)
 - Advertisement will be at least once in the ten days following the application being given to the licensing authority.

Both of these notices are required to give a brief description of the application. A notice will also be published through the Council's website (www.haringey.gov.uk) outlining key details in respect of an application, including:

- The name of the applicant or club;
- The postal address of the applicant or club;
- The postal address and, where applicable, the internet address where we keep our licensing register and where and when the record of the application may be inspected;
- The date by which representations from responsible authorities or other persons should be received and how these representations should be made; and
- That it is an offence to knowingly or recklessly make a false statement in connection with an application and the maximum fine for which a person is liable on summary conviction for the offence.

It is advised to regularly check the Council's register of licence applications and notices on premises in your local area.

3.9 Representations

If you want your views to be considered by the Council in respect of a particular application, you must submit a 'relevant representation'. A relevant representation must:

- (a) be made by any person or Responsible Authority
- (b) be made in writing to the licensing authority
- (c) be received by the licensing authority no later than 28 days after the date the application was made (ten days for a minor variation)
- (d) relate to the likely effect of the granting of the application upon one or more of the

Licensing Objectives, which are:

- The prevention of crime and disorder
- The prevention of public nuisance
- Public safety

- The protection of children from harm.

Potential issues could include noise or disturbance from the premises, previous examples of crime and disorder associated with the premises, litter problems associated with the premises, or provision of activities not suitable for children where children could be admitted. Any representation that is considered as frivolous or vexatious by the licensing authority will not be accepted.

Representations may be made by email and the licensing authority does not require email representations to be followed up with a hard copy. Representations should be made to:

By post: By email:

The Licensing Team
Level 4, Alexandra House
10 Station Road
London N22 8HQ
Licensing@haringey.gov.uk

3.10 Good practice for making a representation

- In accordance with (d) above, you should demonstrate how your representation affects the promotion of the Licensing Objectives.
- Provide an evidential base for the grounds of the representation, which could include written logs of problems, details of previous complaints, photographs or video evidence of the particular issues.
- Ensure as far as possible that the representation is specific to the premises.
- Consult the Licensing Policy, If you consider that an application has not addressed any particular issues around the four licensing objectives, then you should highlight these and explain your reasons why you think these issues should be addressed.
- Consider how you would like the issues to be addressed. For example, you may wish to propose additional or alternative conditions to those proposed in the application's operating schedule. Alternatively, you may wish to propose restricted hours or licensable activities.
- If you are making a representation in support of an application, explain how the proposed application would promote the Licensing Objectives.
- Representations will not be considered if they are considered 'frivolous' or 'vexatious' by the licensing authority. 'Frivolous' and 'vexatious' have their ordinary meaning; therefore, the licensing authority might disregard representations that are made because of a business dispute between rivals or representations that lack seriousness.

3.11 Disclosure of personal details of persons making representations

The licensing authority is required to provide the licence applicant with copies of any relevant representations received in respect of the application.

The licensing authority may consider withholding some or all of a person's personal details where that person can demonstrate they have a genuine and well-founded fear of intimidation and the circumstances justify such action.

The withholding of personal details by the licensing authority will only be taken in exceptional circumstances and any person requesting their details to be withheld will be expected to demonstrate why such action is necessary.

Where a person who has concerns over an application but does not wish their personal details to be disclosed, alternative approaches include requesting a local councillor to submit a representation based on their concerns, or alternatively providing details on how the licensing objectives are likely to be undermined to a responsible authority, who may make representation, if they consider it justifiable and appropriate to do so.

3.12 The role of councillors

Councillors are able to make their own representations in their capacity as a member of the Council. If you have concerns over a premises and do not wish to submit a representation yourself, an

alternative is to contact your local councillor to enquire whether they will make a representation. However, it is a matter for members whether they accept and it is recommended that such requests are made in writing so that any request can be clearly demonstrated. Additionally, if you have made a representation, you can nominate any person, including a local councillor, to represent you at the hearing to determine the application. It is your responsibility to ensure that the nominated person is available and willing to represent you. As above, any request should be made in writing so that the licensing authority can be satisfied the person has been nominated by you.

Where relevant representations are received in respect of an application, it will be determined at a hearing by a subcommittee of three members from the Council's Licensing Committee. The licensee and any party who has submitted a relevant representation (or their representatives) may attend in order to make submissions to the sub committee.

All applications will be considered on their own merit. Following such a hearing, the Licensing Sub committee can:

- (a) Grant the application as applied for; or
- (b) Grant the application with restricted licensable activities/hours than those applied for and/or impose additional conditions, where considered appropriate for the promotion of the Licensing Objectives; or
- (c) Refuse the application

There is a right of appeal to the Magistrates' Court against the decision of the Licensing Subcommittee by any party to the original hearing.

Licensed premises are an integral part of our communities and this Licensing Policy is a key tool in ensuring the different circumstances of our neighbourhoods are taken into account when considering licence applications.

Haringey, as the licensing authority, is committed to ensuring that licensed premises are an asset to their locality and respect the character and identity of the area through the implementation of this Licensing Policy. However, where licensed premises fail to promote the Licensing Objectives, the licensing authority will take appropriate steps to address any such licence-related issues.

The licensing authority considers it extremely important that licensed premises operate as good neighbours within their community. Operators of licensed premises are encouraged to consult with local residents and businesses prior to submitting applications to ensure they are aware of, and can address, any needs or concerns they may have. Additionally, existing licensed premises are encouraged to have regular dialogue with residents and businesses in the local area in ensuring the promotion of the Licensing Objectives on an ongoing basis.

3.12 Partnership Working

Partnership with responsible authorities and enforcement agencies

The Council aims to work in partnership where and when it is possible and reasonable to do so. This includes aiming to work with: other Responsible Authorities and enforcement agencies within Haringey; regional or national authorities and bodies outside of Haringey; and the trade, trade representative organisations, and schemes such as PubWatch and Best Bar None, Responsible Retailer Scheme.

The Council is committed to working collaboratively and as seamlessly as possible with the Responsible Authorities and enforcement agencies within Haringey and more widely as appropriate.

In particular, this can include:

- Tasking meetings: Tasking meetings forms the basis for partnership working within the wider Council and local partnership.
- Joint enforcement approaches: The Council will work closely with the local police, licensing Police and the Fire Authority on enforcement issues to avoid duplication and to provide for the most efficient deployment of Council, Police and Fire Authority officers in respect of inspection of licensed premises and the enforcement of licensing law. Contact is also maintained with the Security Industry Authority (SIA) in relation to checks on door supervisors. Multi agency announced and unannounced inspections and visits are and will be undertaken.
- Joint approach to representations: The Council will communicate with the Responsible Authorities to ensure that a partnership approach is taken in consideration of applications and any representation to be made to them where appropriate.
- Information sharing: Haringey is committed to open data principles. Subject to the provisions of the Data Protection Act 1998 and General Data Protection Regulation the Council will share information about licensees, licensed premises and activities associated with them to all partners. Operating schedules, results of compliance checks, and details of enforcement action may also be shared.

3.13 Partnership working with licensees, trade and residents

The promotion of the licensing objectives and achieving common aims relies on a partnership between licence holders, authorised persons, interested parties, responsible authorities and the Council. The Council is keen to work in partnership with licensees and with bodies such as licensee forums, pub watches, business groups, tenants and resident's groups and those representing such groups to develop a prosperous and well managed economy whilst promoting the licensing objectives.

By working closely with trade and resident's groups the Council aims to develop a preventative or early intervention approach to problems that may arise. To do this the Council will:

- Be accessible to these groups.
- Regularly consider and/or canvas the views of Haringey business and resident's groups as and when appropriate.

3.14 Enforcement approach

The Council supports compliant, well-regulated businesses, and as such will operate a clear two step enforcement approach within the circumstances and context of each individual requirement for enforcement action.

The Council prefers a targeted approach to enforcement, where compliant, well-regulated licensed businesses are not generally a focus of enforcement and where licensed businesses that do not meet this standard are supported to become compliant, well-regulated business. Where this is not possible or successful, they will be subject to appropriate and proportionate enforcement measures.

The Council will aim to give licence holders early warning of any concerns/ problems identified at any licensed premises and identify the need for improvement. Repeated or cumulative breaches of licences will potentially lead to a review where the full history of the venue will be examined.

Where a test purchasing exercise is undertaken by the Police and/or Trading Standards for age restricted goods, all licenced premises will be targeted equally.

An intelligence led approach will be adopted and information regarding incidents of violent crime, disorder and nuisance in and around licensed premises will be collated to provide a risk-based approach for inspection and, where appropriate, surveillance.

Enforcement action will be taken in accordance with the principles of the Regulatory Compliance Code, requirements of the Licensing Act and the associated section 182 Guidance.

The Council will consider the fundamental principles recommended by the Better Regulation Task Force for good enforcement and the Hampton report:

- **Proportionality:** for example, action taken should be proportional to the risk presented.
- **Accountability:** ensuring our activities are open to public scrutiny.
- **Consistency:** we will undertake enforcement in a fair and consistent manner.
- **Transparency:** for example, helping duty holders to understand what is expected and distinguishing between statutory requirements and guidance.
- **Targeted:** for example, focusing on activities that give rise to the most serious risks or where hazards are least well controlled.

For more information on the Council's Enforcement Strategies please go to the following Council web page: [Community safety and enforcement policy](#)

3.15 Opening hours

The Council expects and strongly encourages applicants applying to operate between the hours 23:00pm and 10:00 am to consider and assess the potential risks in the locality and the premises operation against the licensing objectives as part of their application.

Evidence shows that in the case of alcohol the hours and days of sale is related to the harm that can be caused by excessive and risky consumption of alcohol. Evidence also indicates that certain hours of sale impacts on certain types of alcohol related harm.

Accordingly, venues which seek to open between 23:00 and 10:00 am are expected to risk assess their proposals, having regard to risks in the locality and those arising from their operation itself, and propose measures to promote each of the licensing objectives. Applicants will be expected (but are not legally bound) to supply such risk assessments alongside their operating schedule to demonstrate compliance with this policy. If they do not do so, it is likely that representations will be received, and that the application may be refused or stringent conditions placed on any licence granted.

Venues operating within these hours will also be expected to consider public nuisance caused by potential noise, anti-social behavior and crime, particularly in relation to the use of outside spaces and during entry, exit and dispersal from the premises.

3.16 Temporary Events

The Council expects that all Temporary Events Notices (TENs) are submitted at least 10 days prior to the event and provide sufficient accompanying information to allow due consideration, including evidence of permission to use space if it is public or council land/venue. It is expected that any existing conditions on a licence will be maintained for the purposes of a TEN. It is also recommended that TENs are submitted as early as possible prior to the event to allow relevant responsible authorities to have appropriate time to consider the TENs.

Temporary Events Notices are intended to allow licensable activities without a premises licence. Only the Police or Environmental Health can object to a TEN. The Council will intervene if the statutory limits on the number of TENs are exceeded.

It is recommended that TENs are submitted as early as possible prior to the event to allow for the relevant responsible authorities to have sufficient time to consider the notice.

If an objection to a late TEN (given with between 5 and 10 working notice) is received a counter notice will be served and the event will not be allowed to go ahead.

When a TEN is submitted the Council expects that the following information will be provided:

- Evidence of permission to use outside space for an event, specifically where the outside space is Council or public land;
- A risk assessment and capacity determination;
- Any other information that is relevant or pertinent to the TENs.

If this information is not provided it is more likely that an objection will be forthcoming.

317 Venue safety and assessment of risk at venues and events

Public Safety is expected to be a key consideration in large venues and higher profile events. This may include conducting a risk assessment to identify risks and mitigation approaches for venues where certain factors or circumstances (such as overcrowding or terrorism) may make the venue unsafe to those present in the premises. Mitigations may also need to consider the role security staff in safety as well as security.

Public Safety in venues is a key consideration for the Council. Incidents occurring at larger venues or events with high attendance are of particular concern to the Council. The Council expects applicants of larger venues or where high attendance events may take place to give particular consideration to measures to promote Public Safety. These may include:

- Conducting a risk assessment and consulting Haringey Licensing and Police;
- Considering the role of security staff in promoting safety as well as security; and,
- Consideration about capacity limits and the ingress and egress of customers.

The Council considers it prudent for licensed premises to prepare for requirements under Martyn's Law'). There will be additional requirements placed on a number of licensees to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. Information and guidance can be found via these links:

https://www.protectuk.police.uk/news-views/watch-new-martyns-law-explainer-video?mtm_campaign=ML%20video&mtm_kwd=email

<https://www.gov.uk/government/publications/terrorism-protection-of-premises-act-2025-factsheets/terrorism-protection-of-premises-act-2025-overarching-factsheet>

<https://homeofficemedia.blog.gov.uk/2025/04/03/martyns-law-factsheet/>

The Council expects relevant applicants to include appropriate measures to meet these obligations in their licensing application.

3.18 Risk Assessments

Where an event involves live performers (for example, musicians, DJs, MCs and other artists) at a licensed premises that is promoted by the licence holder or an outside promoter the Police may require that a risk assessment be completed and submitted in advance to the satisfaction of the Police. This may also include the completion of an after event debrief form. This is to ensure that any crime and disorder, public safety matters or concerns are identified and addressed satisfactorily. Where risk assessments are required, they should be submitted at least 14 days before any proposed event.

The Safer Sounds programme run by the Safer Business Network and supported by the Mayor of London can provide more information around running safe events. The website is

www.saferounds.org.uk.

319 Reviews

Responsible Authorities, residents or businesses or a representative of these may apply to the Council to review a premises licence because of concern(s) about the premises in connection with any of the four licensing objectives.

Any request for a review of a premises licence is required to be accompanied by evidence to substantiate the allegations.

When a request for a review is initiated by other persons, the Council is required to first consider whether the representation made is relevant to any of the four licensing objectives and that it is not vexatious or frivolous. Where a Responsible Authority requests a

review it is expected that licensing objectives are considered prior to the review application.

Representations must relate to particular premises for which a premises licence is already held and must be relevant to the promotion of the licensing objectives. The review process is not an opportunity to revisit earlier representations made when the original application for a premises licence was determined, unless these relate to different circumstances.

Where the Council receives a request for an expedited review in accordance with the closure procedures described in Part 8 of the Act, the Council will arrange a hearing in accordance with the regulations set out by the Secretary of State.

The licensing committee, in determining a review application, may exercise the range of powers given to them to promote the licensing objectives.

These include:

- modify conditions of the premises licence (which includes adding new condition(s) or any alteration or omission of an existing condition temporarily or permanently);
- exclude a licensable activity from the scope of the licence;
- remove the designated supervisor;
- suspending the licence for a period not exceeding three months;
- revoke the licence; or,
- to take no action.

The Council will seek to establish the cause or causes of the concern issues and action will be targeted at such causes. Any action taken will be proportionate to the problems involved.

Where a Magistrates Court makes a Closure Order under part 8 of the Licensing Act 2003 (on grounds of disorder) the Council must carry out a review of the licence.

Where a Magistrates Court makes a Closure Order under part 4 of the Anti-Social Behaviour, Policing and Crime Act 2014 (on grounds of the use, supply or production of Class A drugs associated with disorder or serious nuisance) the police will request a review or ask the Council to carry out a review of the licence.

Where a closure order has been made under part 4 of the Anti-Social Behaviour Act 2003 (on grounds of noise) the Council's Environmental Health section will normally request a review of the licence.

Offences under the Licensing Act 2003 include the serving of alcohol to unaccompanied persons under 18. The consumption of alcohol by minors impacts on the health, educational attainment, employment prospects and propensity for crime of young people. The sale of alcohol to persons who are intoxicated is also an offence under the Licensing Act 2003. The Council will treat representations that these offences have occurred seriously when they arise in connection with the granting or review of a premises licence. It will also have regard to other criminal activities which may take place in some types of licensed premises such as:

- sale or distribution of drugs;
- sale or distribution of stolen or counterfeit goods or weapons sale of smuggled tobacco and alcohol;

- prostitution, pimping or procuring;
- use as a base for criminal activity, particularly gangs, organisation of racist activity, unlawful gaming and gambling; and,
- employment of those who do not have the right to work in the UK.

Where reviews arise and the Council determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that the revocation of the licence- even in the first instance - will be seriously considered (s182 Guidance, paragraph 11.26). Revocation also remains an option if other licensing objectives are being undermined.

Comments about applications and reviews are made by way of representations. These can be from a Responsible Authority (such as the Police) or other persons (such as a local resident or residents' group). A representation can be an objection to an application or part of an application or can be in support of an application. Guidance on making representations and applying for a review is available on the Council's website.

The review process is integral to the operation of the Licensing Act 2003.

The Government's intention is for a light touch regulatory regime with regard to the granting of new licences and variations. If problems arise in connection with a premises licence, it is for the responsible authorities and the other persons to apply for a review of the licence. Without such representations, the Council cannot review a licence. Proceedings under the Licensing Act 2003 for reviewing a premises licence are provided as a key protection for the community where problems associated with crime and disorder, public safety, public nuisance or the protection of children from harm are occurring.

3.20 Impact of major entertainment venues

The Council will continue the policy of imposing special conditions on applications on locations for dealing with alcohol-related issues during major events. Haringey hosts various large-scale entertainment venues of international and national importance. Tottenham Football Club Stadium, Finsbury Park and Alexandra Palace are major sources of entertainment in Haringey. Thousands of people enter Haringey on event days and people consume alcohol as a part of their entertainment.

The Council will continue the policy of imposing special conditions in areas for dealing with alcohol-related issues during major event days. The conditions acknowledge the unique role alcohol plays in the overall enjoyment, social and economic activity associated with events whilst balancing the four licensing objectives and the safety and concerns of local residents. These are included earlier in the Policy and include:

- No sale of alcohol one hour before the event, and one hour after.
- Customers shall be discouraged from being allowed to congregate outside the premises.
- No glass bottles shall be handed over the bar but shall be decanted into plastic vessels.
- The DPS shall work in partnership with the Police and comply with any direction given by the most senior Police Officer on duty at the event.
- No alcohol of 'alcopop' type drinks shall be displayed or sold in glass containers with the exception of wines and spirits.
- No more than 4 cans of alcohol can be sold to a customer.

321 Noise disturbance in residential areas

The Council expects applicants to make specific consideration of measures they will introduce to reduce noise disturbance in the proposed premises in a residential or mostly residential area. Many areas of Haringey mixed retail and leisure areas with areas of high residential concentration. To ensure that residents and businesses are able to maintain this balance it is expected the applications made in these areas pay particular attention to how they will limit noise disturbance for residents in the nearby area or in a particular area will add to those problems.

322 Public Space Protection Orders

The Public Space Protection Order for street drinking was applied Borough wide in April 2025. This means that it is an offence for any person to drink alcohol in public place within the borough whilst displaying anti social behaviour. If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- a) not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- b) to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- c) An officer may dispose of anything surrendered to him/her as above.
- d) Issue fixed penalty notices on offenders
- e) Prosecute persistent offenders

3.23 Violence Against Women and Girls

We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around women's safety at night. This includes a duty to capture information and report to the police where appropriate. Haringey supports the Women's Safety Charter from the LGA. All Londoners are able to travel, work and go out safely and confidently at night without fear of being victims of criminal offences.

Haringey recognises tackling Violence against Women and Girls (VAWG) as a priority.

We commit to sharing the Greater London Authority and Mayor's Office of Policing and Crime women's safety campaigns, promoting them within Haringey and across our social media channels. We encourage licensed premises across the borough to participate in and promote locally any London- wide campaigns to keep women safe at night that discourage harassment and encourage reporting.

We encourage all licensed premises to build an atmosphere of transparency and safety for women and other vulnerable people who work at night.

We also recommend licence holders put in place measures to reduce gender-based violence, intimidation and harassment for all staff and customers. This may include 'Ask for Angela', WAVE and specific training for staff. Further details are available at the following links:

- Ask for Angela: <https://www.met.police.uk/AskforAngela>
- WAVE: <https://nbcc.police.uk/crime-prevention/safeguarding/welfare-and-vulnerability-engagement-wave-lesson-plan>

We require all licensed premises to have appropriately trained staff, who are proactive and vigilant around women's safety at night. This includes a duty to capture information and report to the police where appropriate.

We also expect all licensees and applicants to be aware of their responsibilities in relation to drink spiking and refer you to paragraph 2.7 of the Government's Section 182 Guidance that contains the recognised definition of drink spiking.

(https://assets.publishing.service.gov.uk/media/65a8f578ed27ca000d27b1f9/Revised_guidance_issued_under_section_182_of_the_Licensing_Act_2003_-_December_2023.pdf)

3.25 Violence Against Vulnerable People in the Night Time Economy

We expect all licensed premises to build an atmosphere of transparency and safety for those who may be vulnerable working or taking leisure in the night time economy.

This should include the full diversity of people in the night time economy, include the full range of gender and identified gender, relationships, age, race and any other demographic characteristic.

We also recommend licence holders put in place measures to reduce vulnerability based violence, intimidation and harassment for all staff and customers. This may include WAVE and specific training for staff. Further details are available at the following links:

- WAVE: <https://nbcc.police.uk/crime-prevention/safeguarding/welfare-and-vulnerability-engagement-wave-lesson-plan>

We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around women's safety at night. This includes a duty to capture information and report to the police where appropriate.

We also expect all licensees and applicants to be aware of their responsibilities in relation to drink spiking and refer you to paragraph 2.7 of the Government's Section 182 Guidance that contains the recognised definition of drink spiking.

[Revised guidance issued under section 182 of the Licensing Act 2003 \(February 2025\) \(accessible version\) - GOV.UK](#)

3.26 Street drinking

In areas where street drinking has been identified as a problem by Authorities, new applicants and those applying for variations are required to demonstrate how their premises will not contribute to street drinking in those areas.

Applicants may wish to seek guidance from Licensing, Community Safety and Police partners as to specific measures that may be appropriate for their specific location. However, some general examples of good practice include:

- Reducing the strength approaches having voluntary bans on high strength low cost alcohol. Voluntary bans are aimed to tackle the problems associated with street drinking by removing from sale low price, high-strength alcohol products through voluntary bans implemented by local retailers. Street drinkers often consume high strength alcohol. The scheme follows increasing evidence of the harm caused by this type of alcohol to vulnerable drinkers, and also the crime, disorder and nuisance caused by street drinkers. The models used vary from place- to-place but tend to target alcohol products above 6% alcohol by volume (ABV) as well as sale of miniatures, although some have focused on a slightly lower ABV or lower cost products.
- The Council encourages and supports applicants to outline any voluntary ban in their operating schedule or voluntary conditions offered as part of their licence application.
- Visible labels identifying the premises.
- Use of different coloured or labelled bags for sales of alcohol.
- Ensuring street drinkers do not congregate outside the premises.
- Ensuring drinkers do not consume alcohol on the premises, also not having the paraphernalia to allow that (e.g. Single plastic drinking vessels or bottle openers near the till area).
- No sale of miniatures.
- Keeping the premises locality clear of litter.

3.27 Late Night Refreshment

Under the Licensing Act 2003, the sale of hot food and hot drinks for consumption on or off the premises to the public between the hours of 11pm and 5am is a licensable activity. This includes premises that provide equipment for food and non-alcoholic drink sold to the public to be heated up prior to being consumed.

The Council advises any applicants for a premises licence who provide hot food and non-alcoholic drink after 11 pm to give a detailed account of how they will promote the four licensing objectives and, in particular, the prevention of crime and disorder and the prevention of public nuisance.

This Council will have due regard to any representations from Responsible Authorities and “other persons” to the grant or variation of a licence to provide hot food and non-alcoholic drink to the public. It will also look particularly closely at any measures proposed by the applicant to promote the licensing objectives.

3.28 Shisha

A number of shisha premises have Late Night Refreshment Licences which permit the sale of hot food and hot drinks between the hours of 11pm and 5am. Currently, there is no strong evidence to support limiting LNRL's in shisha premises however evidence is being collected to determine the suitability of licence conditions on such places in the future.

Where an applicant, for either Late Night Refreshment or the sale of alcohol, is also planning to sell shisha for consumption on the premises the Council expects that the application will evidence how they will address any potential public nuisance caused by shisha smoking and also to demonstrate compliance with other regulatory regimes (e.g. Smokefree Regulations).

The licensing objectives still apply in these circumstances and the Council expects applicants to

provide clarity on the measures that they will take to ensure that the licensing objectives are upheld.

329 Venue capacity limitations

When determining applications for a licence, consideration of venue capacity will be taken into account. This is to help the Council limit the potential for large venues becoming problem hot spots. This will apply to those venues that fit or likely to fit within the description of high-volume vertical drinking establishments where applicable. Applicants are required to submit robust crime & disorder proposals in their operating schedules as well as noise dispersal policies.

The Council accepts that a lot of the problems that may occur in large premises may be controlled by good management practices. However, controlling the numbers of customers allowed into the premises may also assist in promoting all of the licensing objectives, primarily crime & disorder.

The Council will consider capacity conditions where this may be beneficial in promoting the licensing objectives.

330 Health

Health is not a licensing objective, but the Council is aware that there is a significant negative impact on the health of our residents caused by alcohol, reflected in hospital admissions and deaths from alcohol related illnesses, alcohol induced violence and domestic violence. Significant alcohol related hospital accident and emergency admissions and ambulance pick-ups are indicative of problems and may result in reviews of premises licences where these can be related to specific premises.

The Council will consider the impact on the health and public health of Haringey residents as part of its considerations and duties relating to the sale and supply of alcohol.

The evidence base for the impact alcohol has on the health and wellbeing of local areas is strong.

For a full review of the evidence the Public Health England evidence review is available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/583047/alcohol_public_health_burden_evidence_review.pdf

Since 2012 the Haringey Director of Public Health has been a Responsible Authority and is able to make representations on applications and initiate reviews. The Haringey Director of Public Health has access to data and evidence that is useful and informative for the development of policy, the consideration of applications and the conduct of reviews. This includes:

- evidence on the impact of alcohol on the physical and mental health of residents, particularly children;
- data on hospital admissions for alcohol related illness and injury;
- data from London Ambulance Service on alcohol related ambulance attendances; and,
- data and evidence from local alcohol services, such as out-reach and treatment services.

When such evidence and data is presented it will be considered and where links are made to any of the four licensing objectives it will be taken into account by the Licensing Sub-Committee in reaching its decision if applicable.

The Haringey Director of Public Health expects that applicants to be aware of the proximity of the premises they are seeking a licence to substance misuse treatment facilities and other medical facilities. The Haringey Director of Public Health, as a Responsible Authority under the Act, is minded to consider an objection where an application is likely to be in close proximity to a substance misuse treatment facility or other sensitive medical facility.

3.31 Outside spaces

Outside spaces are an increasingly popular part of licensed premises, particularly in summer where there is more demand for outside drinking and eating. The outside spaces that are also used by patrons who smoke are expected to comply with Smokefree regulations. These outside spaces at premises need robust management to reduce the potential nuisance being caused to others located in proximity to the venue.

Beer gardens, roof terraces, pavements and other outdoor areas in licensed premises are expected to comply with appropriate conditions to ensure there is minimal disruption to residents in proximity to the licenced premises.

Where smoking, eating and drinking takes place outside, the Council expects applicants to provide comprehensive details in their operating schedule on:

- the location of outside areas to be used;
- how the outside areas will be managed to prevent:
 - a) noise;
 - b) smell; and,
 - c) pavement obstructions.
- the arrangements for clearing, tables and chairs; and,
- preventing nuisance from smoke fumes to residents living in close proximity to smoking areas.

Where outside spaces are used for eating, and where children may be present, the Council expects applicants to provide detail on how smoking areas will be segregated from the general use areas. Where the use of outside spaces by the patrons of a licensed premises is unplanned and makes use of the pavement there is need for specific consideration. Members of the public can sometimes feel intimidated and crowds of drinkers spilling out onto the street may cause obstruction. Safety issues can arise with drinkers and members of the public being forced to use the road. Wherever, possible drinking should be contained within areas that are part of licensed premises, such as beer gardens, terraces or, where a street trading licence has been granted by the Council for tables and chairs, on the public highway.

Applications for the use of tables and chairs on the highway are not within the remit of this policy. In the event that the hours under any such licence do not match those on a licence issued under the Licensing Act 2003 the earlier hours will apply.

Where applicants wish to place tables and chairs on a public highway, they will require to be licensed for such an activity by the Council.

Where applicants intend to use private land for alfresco meals or refreshments, they will be required to explain how possible nuisance or crime and disorder from late night use of table and chairs will be controlled. This may include such matters as restricting music or other forms of entertainment, providing additional supervision or installing CCTV. The Noise Team recommend in general that outside areas (e.g. beer gardens) should not be used after 22:00 hours.

3.32 Dispersal and entry

Licensed premises should take all reasonable measures to ensure that dispersal of patrons from the premises and entry of patrons into the premises uphold the licensing objectives. Section 182 guidance makes it clear that licensing should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of those with responsibility for managing and controlling licensed premises. However, licensees should take all reasonable steps to prevent the occurrence of crime and disorder and public nuisance immediately outside their premises, for example on the pavement, in a beer

garden or in a smoking shelter to the extent that these matters are within their control. Licence holders should also consider the impact that patrons or others congregating around entry points to their premises have on the licensing objectives, particularly in relation to the general public. Licence holders should take all reasonable measures to ensure that both dispersal from their premises and entry into the premises uphold the licensing objectives.

The Council recognises that it is difficult for licence holders to have influence over their patrons once they have left the immediate vicinity of their premises, however, disturbance caused by patrons, if linked to the operation of the premises, where contrary to the licensing objectives, can be a reason for the Council to take action.

3.33 Delivery Services and dark kitchens

There has been a significant increase in the number of applications for licenses relating to delivery services, these tend to fall into three groups:

- Premium specialist product mail-order type services;
- Food delivery services (both meal and grocery) that include alcohol delivery but are primarily food lead; and,
- Dark kitchens providing for delivery only food and beverage services;
- Convenience type alcohol delivery services that are targeted at convenience for those drinking at home.

Although these types of services are not provided for in the Licensing Act 2003 or in the s182 guidance in any way differently from other licensed premises they do provide their own unique circumstances that need to be addressed. In particular, the Council has concerns with the potential for the following:

- Age verification at both purchase point and delivery point;
- The safety of delivery drivers at point of delivery;
- Safety of the premises from which orders are taken and sent out for delivery; and,
- Possible public nuisance caused by delivery drivers collecting deliveries from the licensed premises.

The Council expects licence applications for delivery services that include the delivery of alcohol to take into account issues relating to reducing public nuisance related to delivery vehicles, ensuring the security of premises and delivery drivers, and protecting children by applying rigorous age checks at both purchase point and at point of delivery.

The Council is likely to place the following conditions on to a premises licence for delivery services where it is appropriate and relevant to the individual licence application:

- A standard age verification check shall be undertaken on entering the website.
- A signature at the point of delivery **should** be obtained. No delivery shall be left without a signature.
- Alcohol shall only be delivered to a residential or business address and **not** to a public place.
- Every third-party courier delivery box shall be labelled with the words "Age Restricted Product".
- Any delivery driver or third-party courier will be required to have appropriate age verification training, particularly they will be required to have training on refusal of supply where age verification is not provided. This will need to be demonstrated by the applicant at application stage, and at any point where the delivery driver or courier service is changed.

- A refusals log will be maintained for deliveries and be available to the Council on request.
- A log of all deliveries shall be maintained and be available to the Council on request.
- Appropriate security will be in place at the premises as agreed with Police.
- Measures for minimising noise and disturbance caused by the dispatch of deliveries to be identified in the operating schedule.

Each of these measures will need to be demonstrated to the Council as part of the application.

The Council also recommends that applicants seeking a licence where delivery of alcoholic beverages is to take place consider the following guidance from the Retail of Alcohol Standards Group: <https://rasg.org.uk/online-sales-guidance/>.

Where a number of dark kitchens operate in a single premises the Council has a preference that the premises holds a licence that covers all the operators within the premises. This would provide consistency and address high turnover in operators.

3.34 Age verification and test purchasing

The Council expects all licenced premises to have the specific age verification measures outlined below in place and will conduct test purchasing operations to test and assure compliance with the minimum purchase age requirements. If sales to children are made action will be taken by the Council. Age-verification measures, and test purchasing to assure these are robust and well-operated by licenced premises are the core measure to ensuring the licensing objective for the protection of children is met. Trading Standards in the Council have the lead responsibility for undertaking Controlled Test Purchase Operations.

To support the age-verification process the Council strongly recommended that premises have the following measures in place to ensure age verification for sales:

- That “Challenge 25” is supported as part of the age verification scheme established. The scheme requires the production of evidence of age (comprising any PASS accredited card or passport or driving licence) from any person appearing to staff engaged in selling or supplying alcohol to be under the age of 25 and who is attempting to buy alcohol.
- That evidence of the scheme (in the form of documented procedures) is maintained and made available for inspection by authorised officers.
- That all staff involved in the sale of alcohol shall be trained in the age verification scheme and records of such training shall be retained on the premises and made available for inspection by authorised officers.
- That an incident log shall be maintained, and details of all age-related refusals recorded. This book shall be reviewed monthly by the DPS and any actions taken recorded in the book and signed off by the DPS. This log shall be retained on the premises and made available for inspection by authorised officers.
- That a personal licence holder shall be on the premises at all times that alcohol is supplied.
- That the DPS shall ensure that, as far as is reasonably practical, alcohol is displayed in an area which can be constantly monitored or supervised by staff, separate from goods likely to be purchased by persons under 18.

Haringey Trading Standards operate a policy of carrying out test purchasing for under age sales of alcohol. If sales are made to children action will be taken. This may be a review of the licence, or a request to include additional conditions on the licence designed to assist the management to counter attempts by children to buy alcohol. Any additional conditions felt appropriate will be subject to discussion with licence holders. The Council may also, as a Responsible Authority, apply for reviews of premises licences when appropriate. If deficiencies in operating schedules of current licences become apparent the Council will initially usually ask the licence holder to remedy this by way of an application for a minor variation. If this is not undertaken, then a review may be necessary to impose conditions on the licence. This process does not preclude prosecutions for offences under the Licensing Act.

335 Authority and Designated Premises Supervisor

Every supply of alcohol under a premises licence must be made or authorised in writing by someone holding a personal licence. Every premises with a licence must have one person holding a personal licence specified as the Designated Premises Supervisor (DPS).

The Council recommends that all persons employed on licenced premises who are engaged in the sale and supply of alcohol be encouraged to attend regular training programmes to raise awareness of their responsibility and particularly of the offences contained within the Act. Training programmes that raise awareness of the issues relating to drugs and violence in licenced premises are necessary. Suitable training should be extended to all staff involved in managing or supervising the premises. All training undertaken should be recorded and signed by the designated Premises supervisor.

It is recommended that persons employed on premises providing entertainment for children shall be trained in basic child protection and safety, and if appropriate have the necessary CRB checks.

Every supply of alcohol under a premises licence must be made or authorised by a person who holds a personal licence. The Licensing Act does not require the presence of a personal licence holder at all material times but if any sales are made when a personal licence holder is not present, then they must have been authorised by somebody who holds a personal licence.

Every premise licenced for the sale of alcohol must have one personal licence holder specified as Designated Premises Supervisor (DPS). This will normally be the person with day-to-day responsibility for running the premises.

The Council recognises that there is no requirement for the DPS to be at the premises throughout the hours of licensable activities, however, the DPS must be able to ensure that all four licensing objectives are properly promoted and that each premise complies with licensing law and licence conditions. The Council expects that a DPS will be able to demonstrate knowledge of both the local geographic area and the patrons the premises attracts. The DPS should be sufficiently conversant in English to be able to properly communicate with patrons.

The Council expects that when the DPS is not present on the premises written authorisation will have been given to other members of staff, and that one of these members of staff will be on the premises. Such authorisation should be in writing and be displayed with the premises licence.

It is considered good management practice to ensure that a personal licence holder/DPS is available at all hours that the premise is open to the public. It is regarded as good management practice that a personal licence holder/DPS be physically on the premises from 23:00 onwards.

3.36 No sales below permitted price

A ban on selling alcohol below a “permitted price” has been in place since 28 May 2014. This was introduced through the Licensing Act 2003 (Mandatory Conditions) Order 2014. The permitted price is defined as the level of alcohol duty plus VAT.

All premises are required on request by the Licensing Authority to demonstrate that any alcohol is being sold at a price not less than the permitted price: i.e. the level of alcohol duty plus VAT.

Premises are expected not to offer or publicise irresponsible promotions which encourage irresponsible drinking.

Where any relevant representations which demonstrate a clear causal link between sales promotions or price discounting and levels of crime and disorder on or near the premises, it will be appropriate for the Licensing Authority to consider the imposition of a new condition prohibiting irresponsible sales promotions or the discounting of prices of alcoholic beverages at those premises. Each case will be considered on its own merits. Any future legislation or legislative guidance on minimum unit pricing per unit of alcohol sold will apply.

3.37 Compliance with existing regulatory regimes

The Council expects all applicants to be able to evidence, upon application, lawful compliance with all other relevant regulatory regimes. It is expected that any licensee will be operating in full compliance with all relevant regulatory regimes. To avoid any overlap between regulatory regimes the Council expect that all applicants can evidence that they are in full compliance with other relevant regulatory regimes and to undertake that they will remain so as responsible operators.

3.38 Gaming machines

Certain premises which are subject to premises licences with a licence to supply alcohol are entitled to have one or two gaming machines available for use within their premises. To do this the licence-holder needs to notify the Council. Cafes, restaurants and other types of premises are not permitted to have gaming machines onsite.

The automatic entitlement is only available to licensed premises if they satisfy all of the following requirements:

- the premises are licensed to supply alcohol, for consumption on those premises
- the premises contain a bar
- the premises are not subject to any licence conditions limiting the supply of alcohol to people having meals on the premises.

Gaming machines are categorised according to how much they can gamble and the maximum prize available.

The automatic entitlement allows a maximum of two gaming machines from categories C and D available for use.

If more than two gaming machines are required at a premises, an Alcohol Licensed Premises Gaming Machine Permit must be obtained. The licensee is expected to ensure they have adequate space within the premises and the machines should be located in clear site of staff.

Applicants may wish to view the codes of practice for more information.

<https://www.gamblingcommission.gov.uk/PDF/LCCP/Licence-conditions-and-codes-of-practice.pdf>

339 Scheme of delegation

Delegations of functions under Licensing Act 2003

The Council's Licensing Committee is responsible for discharging the majority of the Council's licensing functions under the Licensing Act 2003. The notable exceptions are the final approval of the Council's Statement of Licensing Policy which is reserved for Full Council. In practice, and in accordance with relevant statutory provisions, all those decisions which can be, have been delegated to officers. Further, the Alcohol and Entertainment Licensing Sub-Committee is responsible for considering and determining applications and other matters which cannot be determined by officers. That Sub-Committee can also consider and determine any other matters referred to it for determination by officers (e.g. matters which can be considered by officers but which is considered more appropriate for the Sub-Committee to do so).

Matter to be dealt with	Licensing Sub-Committee	Officers
Application for personal licence	Where a Police objection has been received	Where an objection was not received
Application for provisional statement	Where representations have been received and not withdrawn	Where representations were not received or have all been withdrawn
Application for premises licence / club premises certificate	Where representations have been received and not withdrawn	Where representations were not received or have all been withdrawn
Application to vary premises licence / club premises certificate	Where representations have been received and not withdrawn	Where representations were not received or have all been withdrawn
Application to vary designated premises supervisor	Where a Police objection has been received	Where an objection was not received
Request to be removed as designated premises supervisor		All cases
Application for transfer of premises licence	Where a Police objection has been received	Where an objection was not received
Application for interim authority notice	Where a Police objection has been received	Where an objection was not received
Application to review premises licence/ club premises certificate	All cases	
Decision whether a representation is irrelevant, frivolous or vexatious		All cases
Making of representation when the Council is consulted by neighbouring licensing authority.	All cases	

Determination of an application to vary premises licence at community premises to include alternative licence condition	If Police objection	All other cases
Consideration of a police objection to a temporary event notice	All cases	
Decision to consult other responsible authorities on a minor variation application		All cases
Determination of a minor variation application		All cases

Revocation of a club licence		All cases
Revocation of a personal licence	All cases	
Revocation for a club premises certificate where a club is deemed by the Council to no longer satisfy the conditions for being a qualifying club	All cases	

Section 4: Appendices

Appendix 1: What to expect from a Licensing Sub Committee hearing.

Appendix 2: Pool of Model conditions

Appendix 3: Glossary of Licensing terms

Section 4

Appendix 1: What to expect from a Licensing Sub-Committee Hearing

Hearing procedure for Licensing Sub-Committee

Full information on the procedure is sent to all parties prior to the hearing. The information below is a summary of that information.

Parties to the hearing must notify the Council's Licensing team within prescribed timescales (these vary according to the type of hearing) that they intend to attend and/or be represented at the hearing and whether any witnesses will be attending on their behalf.

The hearing will operate as follows (subject to the discretion of the Chair of the Licensing Sub-Committee)

1. A total of 5 minutes speaking time is normally allowed for each party. Any preliminary points will be treated separately.
2. In the form of a discussion led by the Committee; cross examination will not normally be permitted.
3. Where there is more than one representation raising the same or similar grounds, those parties should consider nominating a single representative to address the Sub-Committee on their behalf at the hearing.
4. Parties to the hearing may be permitted to ask questions of any other party or witness.
5. Parties to the hearing may be required to answer specific questions from members of the committee, objectors and responsible authorities seeking clarification of information.

The typical order of the hearing is as follows:

1. Chair will ask all parties and witnesses to introduce themselves and this should include a brief explanation of the purpose of their attendance.
2. Officers present the report.
3. Committee members ask questions of officers.
4. Applicant speaks.
5. Applicant's witnesses speak (with permission of Chair).
6. Committee members ask questions of applicants and their witnesses (only applies to witnesses who have been given permission to speak).
7. Other parties speak.
8. Other parties' witnesses speak (with permission of Chair).
9. Committee members ask questions of the other parties to the hearing and their witnesses (only applies to witnesses who have been given permission to speak).
10. Applicant (with exception and with permission of Chair) asks questions of the other parties to the hearing and their witnesses.
11. Other parties to the hearing (with exception and with permission of Chair) ask questions of the applicant/other parties to the hearing and their witnesses.

12. Closing remarks from all parties.
13. Committee retires to make their decision.
14. Legal adviser informs the hearing of any advice that they have given to the committee during the decision-making process.
15. Committee announces decision and gives reasons.
16. After the hearing, officers will write to all parties to confirm the committee's decision.

Appendix 2: Pool of model conditions

When submitting an application under the Licensing Act 2003 for a new premises licence, club premises certificate, or to vary either of these authorisations, it is important that applicants clearly outline how they will promote the four licensing objectives within the operating schedule of their application.

The four licensing objectives are:

- The prevention of crime and disorder.
- Public safety.
- The prevention of public nuisance.
- The protection of children from harm.

Haringey London Borough Council's Licensing Authority has provided the following list of licensing conditions to assist applicants with potential conditions that can help their business promote the four licensing objectives, while also ensuring consistency in wording throughout the borough.

The conditions provided should not be seen as 'standard conditions' to be automatically applied to all premises licences and club premises certificates. Instead, they are intended to offer a variety of possible conditions that may be relevant depending on specific circumstances. The wording of these conditions may need to be adjusted to fit a particular purpose.

While all premises licences and club premises certificates are subject to Mandatory Conditions prescribed by the Licensing Act 2003, it should be noted that each application submitted to the Licensing Authority shall be judged on its own merits. There is no one-size-fits-all approach when consulting on applications made under the Licensing Act 2003. It is important to find the right balance between promoting the four licensing objectives and implementing conditions that fit the business model. Each condition put forward within an application should be proportionate, justifiable, and capable of being met.

In practice, this means that applications for different business models should align with the nature of their business. For instance, an application for a newsagent should differ from one for a nightclub. This should be reflected in the appropriate control measures implemented to promote the four licensing objectives within their operating schedule.

The proposed pool of conditions is not intended to be an exhaustive list. There is an expectation that applicants possess the knowledge and awareness of the steps necessary to promote the four licensing objectives.

Furthermore, the pool should not limit any applicants, responsible authorities, or any other persons from proposing alternative or additional conditions if they believe it is necessary. Likewise, it does not restrict the Council's Licensing Sub-Committee from imposing conditions following a hearing.

The Council understands that certain applications will be for time limited "one off events". It is therefore advisable that you contact licensing @haringey.gov.uk.

Further to this, the Council has included conditions pertaining to applications that intend to permit on-sales of alcohol within the Spurs footprint, aiming to welcome patrons attending events at the Stadium. This has been done with input from the Metropolitan Police.

It should be noted that any conditions proposed by applicants within their initial application will be added to their premises licence unless they are deemed unnecessary and fall outside the scope of the four licensing objectives. The Section 182 guidance states that conditions that duplicate other legislation should not be added to a premises licence (e.g., a condition stating "All employees shall have the correct right to work documentation before undertaking

employment” is unnecessary as this is already required by the Immigration Act 2016).

Applicants and premises licence holders should be mindful that failure to adhere to any of the conditions stipulated within their premises licence could result in committing a criminal offence each time they undertake licensable activities. This is pursuant to Section 136(1)(a) of the Licensing Act 2003 (Unauthorised licensable activities), as any licensable activity would not be in accordance with the lawful authorisation of their premises licence.

Offences committed under the Licensing Act 2003 and/or non-compliance with conditions could result in the premises licence being called into review, where it could ultimately be revoked. Furthermore, persons liable for any offences committed under the Licensing Act 2003 in relation to their permitted authorisation could also face an unlimited fine and/or imprisonment for up to 6 months if prosecuted.

The prevention of crime and disorder.

General:

1. The premises shall install, operate, and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days.
2. CCTV footage shall be made available to the Police and any authorised Officers from Haringey Council upon request. CCTV footage shall be provided on removable media (i.e., USB, hard drive, CD etc..) within 48 hours of request.
3. The CCTV system shall display on any recordings, the correct date and time of the recording.
4. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises with further CCTV cameras covering the areas stipulated on the premises plan.
5. The CCTV system shall capture the entirety of any external area either used by the premises or used by patrons.
6. A member of staff who is conversant with the operation of the CCTV system shall always be available at the premises whilst the premises are open to the public.
7. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
8. An incident log shall be kept at the premises, and made available for inspection on request to an authorised officer of Haringey Council or the Police, which will record the following:
 - a) any incidents of crime and disorder. *(Delete as appropriate)*
 - b) any customers barred from the premises. *(Delete as appropriate)*
 - c) any ejections from the premises. *(Delete as appropriate)*
 - d) seizures of drugs or offensive weapon *(Delete as appropriate)*
 - e) any complaints received. *(Delete as appropriate)*
 - f) any faults in the CCTV system *(Delete as appropriate)*
 - g) any visit by a relevant authority or emergency service. *(Delete as appropriate)*

9. Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.
10. Staff training shall be undertaken by all members of staff involved with licensable activities. Additionally, all staff shall undergo refresher training every 12 months which shall also be recorded. Staff training shall include the following topics:
 - Age verification policy (*Delete as appropriate*)
 - CCTV operation (*Delete as appropriate*)
 - Conflict management (*Delete as appropriate*)
 - Operating procedures (*Delete as appropriate*)
 - Proxy Sales (*Delete as appropriate*)
 - Permitted hours and relevant conditions (*Delete as appropriate*)
 - Regular robbery awareness and cash minimisation (*Delete as appropriate*)
11. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager.
12. A copy of staff training shall be available upon request by Police and authorised officers from Haringey Council.

Pubs, bars & nightclubs:

13. A minimum of xx SIA licensed door supervisors shall be on duty after xx:xx on Monday/ Tuesday/ Wednesday/ Thursday/ Friday/ Saturday/ Sunday. (*Delete as appropriate*)
14. At least X SIA licensed door supervisors shall be at the entrance of the premises after xx:xx Monday/ Tuesday/ Wednesday/ Thursday/ Friday/ Saturday/ Sunday. (*Delete as appropriate*)
15. All SIA licenced door supervisors shall wear clothing that can be clearly and easily identified.
16. A log shall be kept of the SIA door supervisors working on any night to include their full name, date of birth, Security Industry Authority licence number, company and booking on-off times. A copy of SIA door supervisor log shall be available upon request by Police and authorised officers from Haringey Council.
17. The premises licence holder shall undertake a written search policy as a preventative measure to negate patrons from bringing in any prohibited drugs, weapons, or any other unlawful item onto the premises.
18. An ID scanning system or electronic/biometric verification technology approved in writing by the licensing authority must be operated at the premises at all times it is open to the public. All persons entering the premises must provide verifiable ID and record their details on the system.

19. There shall be no entry by patrons to the premises after xx:xx hours.
20. There shall be no re-entry after xx:xx hours except for smokers who will be permitted re-entry via a hand stamp system.
21. There shall be at least xx members of staff on site after xx:xx hours.
22. There shall be no glass vessels permitted outside the area defined on the premises plan.
23. There shall be no glass permitted in the outside seating area, and all drinks must be decanted into either toughened glass, polycarbonate material or any other type of plastic vessel.
24. All drinks must be decanted into either toughened glass, polycarbonate material or any other type of plastic vessel.
25. All staff shall be made aware of the Ask for Angela/Clive Campaign or any other similar initiative. Posters shall be displayed at the premises to raise awareness for customers.

Restaurants:

26. Alcohol sold for consumption on the premises shall only be made by waiter service to seated customers, shall be ancillary to the provision of table meal.
27. Alcohol sold for consumption on the premises shall only be made by waiter service to seated customers, and there shall be no sales of alcohol at bar/service area.
28. There shall be no vertical drinking at the premises and all alcohol shall be consumed by seated patrons.
29. Alcohol sold for consumption off the premises shall be in sealed containers only and supplied ancillary to a meal.

Newsagents, off-licences, and supermarkets:

30. There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.
31. There shall be no single cans or bottles of beer or cider shall be sold at the premises.
32. There shall be no miniatures under XXcl of spirits or wine sold at the premises.
33. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
34. The premises licence holder shall display notice warning customers against drinking on the street in line with Haringey Council's Public Spaces Protection Order.

Public safety.

General:

1. The maximum number of persons (including staff members) allowed on the premises at any given time shall not exceed xx persons.
2. The premises licence holder shall ensure that a suitable method of calculating the number of people present during licensable activities is in place.
3. All entry and exit points (including fire exits) shall be free from any obstructions.
4. The premises licence holder shall ensure that an in date first aid kit shall always be available at the premises with a trained first aider on duty whilst the premises is undertaking licensable activities.

Large pubs, bars & nightclubs:

5. The premises licence holder shall produce an Evacuation Plan, Crowd Management Plan, Entry/Exit Plan (*Delete as appropriate*). These plans will be reviewed on a yearly basis and shall be made available to officers of Haringey Council and the Police upon request.

The prevention of public nuisance.

General:

1. Clear and legible notices shall be prominently displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
2. The placing of bottles into receptacles outside the building shall not be permitted between xx:xx hours & xx:xx hours the following morning.
3. Deliveries shall only be made to the premises between xx:xx and xx:xx hours.

Pubs, bars, nightclubs, and restaurants:

4. There shall be no licensable activities or consumption of alcohol permitted in any external area after xx:xx hours on any day.
5. Ingress and egress notwithstanding, all doors and windows shall remain shut beyond xx:xx hours.
6. Ingress and egress notwithstanding, all doors and windows shall remain shut during any regulated entertainment.
7. Any amplified music and/or speech shall not be permitted in the external areas.
8. The premises licence holder shall make available and publish an up-to-date telephone number for residents to make contact if there are any issues relating to noise.

Takeaways

9. All orders placed shall be made by way of arranged collection or delivery while the premises is undertaking licensable activities.
10. During licensable activities, the premises shall be closed to walk-in customers, except for those already collecting pre-placed orders.
11. There shall be no provision for customers to consume their meal on the premises during the hours permitted for licensable activities.

The protection of children from harm

General:

1. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or proof of age card with the PASS Hologram.
2. A Challenge 25 notice shall be conspicuously displayed at the point of sale.
3. A notice stating “No proof of age – No sale” shall be displayed at the point of sale.
4. A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Haringey Council and the Police.

Newsagents, off-licences, and supermarkets:

5. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.
6. The premises licence holder shall ensure that all tills in operation at the premises automatically provide age-related prompts to staff to check the age of the buyer when alcoholic products are passed through the till, or entered onto the till, for sale.
7. The DPS shall produce a written list of all staff members who are authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.

Pubs & bars

8. There shall be no unaccompanied children under the age of 18 permitted at the premises after xx:xx hours.
9. There shall be not children under the age of 18 permitted at the premises after xx:xx hours.

Online Sales Provision

1. **Age Verification:** The opening page on the website shall require the visitor to confirm that they are over 18 years old and to confirm their date of birth before they can continue. Any online orders shall be processed with online age verifications that are appropriate to and in accordance with PAS 1296:2018 (Online age checking. Provision and use of online age check services).
2. **Sales Channels:** There shall be no telephone sales of alcohol. Any sales of alcohol shall only be made through the company website, company application, or legitimate delivery company.
3. **Delivery Contracts:** The premises licence holder shall ensure that there is a valid contract in place between themselves and any delivery company in which a robust age verification policy is undertaken.
4. **Minimum Age for Delivery Drivers:** The minimum age for any delivery drivers shall be 18.
5. **Customer Information:** The customer must provide their full name and address (including postcode) when placing an order.
6. **Delivery Restrictions:** The premises licence holder shall ensure that all orders containing alcohol shall only be delivered to a residential or business address and not to a public place. All deliveries must be completed by way of a signature or photo.
7. **Warning Notices:** Prior to or at the time an order is placed, warning notices shall be presented to the person placing the order that they must be over 18 years of age to lawfully buy alcohol and that any attempted proxy sales would be considered a criminal offence.
8. **Incident Log:** An incident log shall be kept at the premises and always made available for inspection upon request by an authorised officer of Haringey Council or the Police. The incident log shall record the following:
 - (a) Any complaints received in respect of activities at the premises or resulting from orders dispatched from the premises.
 - (b) Any incidents occurring at the premises or in relation to orders dispatched from the premises.
 - (d) Any visit to the premises by a relevant authority or emergency service.
 - (e) Any faults with the CCTV system.
9. **Delivery Refusals:** All delivery drivers shall refuse delivery if:
 - (a) The person receiving the delivery is underage or does not have acceptable identification.
 - (b) Appears to be under the influence of alcohol or drugs.
 - (c) Appears to be a proxy sale.
 - (d) If the person seeking to accept the delivery does not appear to live at, or have the right to be at, the premises address (i.e., waiting on the street outside).
10. **Refusal Log:** The premises licence holder shall ensure that a log is kept recording all refusals of alcohol sales. The log shall contain the time/date of the refused sale, a description of the customer, the address of the customer, the name of the staff member/delivery driver who refused the sale, and the reason the sale was refused.
11. **Return of Undelivered Orders:** If delivery is not made for any reason, the driver shall return the order to the warehouse.
12. **Terms & Conditions:** The right to refuse the sale of alcohol shall be stipulated within the company's terms & conditions.
13. **Public Access:** Members of the public shall not be permitted access to the premises to buy, collect, browse, or be supplied directly with alcohol at any time.

Stadium Event Days

General

1. During Stadium event days, the premises shall only take one set of football supporters (Fan Zone) on the production of a valid match day ticket. The designated team shall be allocated by the Metropolitan Police after a risk assessment has been conducted.
2. During Stadium event days, a minimum of xx SIA licensed door supervisors shall be on duty xx hours before the commencement of the main billed event time and/or advertised kick off time.
3. During Stadium event days, at least xx SIA licensed door supervisors shall be at the entrance of the premises xx hours before the commencement of the main billed event time and/or advertised kick off time.
4. During Stadium event days, at least xx SIA licensed door supervisors shall remain on duty until at least 30 minutes after the premises is closed for licensable activities.
5. During Stadium event days, there shall be a suitable mix of genders of SIA licenced door supervisor on duty.
6. The premises licence holder shall produce a specific Stadium event day dispersal policy. This policy shall be made available to the Police and any authorised Officers from Haringey Council upon request.
7. On Stadium event days there shall be at least xx members of staff present and working at the premises (excluding any SIA licenced door supervisors).
8. During Stadium event days, the premises shall cease the sale of alcohol one hour before the commencement of the main billed event and/or advertised kick off time. The sale of alcohol shall not resume until xx minutes after the start of the main billed event and/or advertised kick off time.
9. During stadium event days, customers shall not be permitted to take any drinks outside the area defined on the premises plan.
10. During stadium event days, a personal licence holder shall be always present whilst the premises are undertaking licensable activities.
11. During Stadium event days, all drinks shall be decanted into either toughened glass, polycarbonate material or any other type of plastic vessel.
12. During Stadium football event days, the premises shall not show any live televised domestic or international football matches.
13. During Stadium event days, there shall no be children under the age of 18 permitted at the premises unless accompanied by a responsible adult.
14. During Stadium event days, the DPS or relevant duty manager shall work in partnership with the Police and if necessary, comply with any direction given by a senior Police Officer, or Licensing

Authority, on duty at the event. These directions may include:

- a. Cease the sale of alcohol for a specified amount of time. This shall be monitored, and the supply of alcohol reinstated as soon as is possible.
- b. Closing the entire premises for a specified amount of time. This shall be monitored, and the premises reopened as soon as possible.

Pubs/bars

1. During Stadium event days, all moveable furniture in designated external areas shall be removed.
2. During Stadium event days, customers shall not be allowed to congregate outside (licensable area) the premises.

Restaurants

1. On Stadium event days, alcohol shall only be supplied as an accompaniment to a substantial meal, whilst seated at a table.
2. On Stadium event days, signage shall be displayed at suitable points in the premises stating that alcohol shall only be supplied ancillary to a seated table meal.

Licensed premises to comply with any direction given by a senior Police Officer, or Licensing Authority, on duty at the event. These directions may include:

- c. Cease the sale of alcohol for a specified amount of time. This shall be monitored, and the supply of alcohol reinstated as soon as is possible.
- d. Closing the entire premises for a specified amount of time. This shall be monitored, and the premises reopened as soon as possible.

Pubs/bars

3. During large event/Football days, all moveable furniture in designated external areas shall be removed.
4. During large/football event days, customers shall not be allowed to congregate outside (licensable area) the premises.
5. The area and the entrance into the external area shall be suitably supervised by a minimum of one SIA supervisor or staff member.

Restaurants

3. On football/event days, alcohol shall only be supplied as an accompaniment to a substantial

meal, whilst seated at a table.

4. On football/ event days, signage shall be displayed at suitable points in the premises stating that alcohol shall only be supplied ancillary to a seated table meal.
5. On football/ event days, vertical drinking shall not be permitted at the premises and all alcohol shall be consumed by seated patrons.
6. On football/ event days no pavement licensed area shall have effect.

Appendix 3: Glossary of Licensing terms

DPS	The Designated Premises Supervisor (DPS) is the personal licence holder specified in the premises licence. All premises licensed to sell alcohol will have an identified personal licence holder, known as the DPS. The purpose of the DPS is to ensure there is always one specified individual who can be identified as a person in a position of authority at a licenced premises. The DPS does not have to be on the premises at all times.
Late TENS	Late Temporary Event Notices. These refer to TENS applications received less than 10 full working days of the proposed event. If there is an objection to a late TEN, the event will be immediately vetoed. There is no option for a hearing, nor to appeal against the decision.
Licensable activities	Licensable activities are the sale of alcohol, the supply of alcohol by or on behalf of a club to, or to the order of, a member of the club, the provision of regulated entertainment and the provision of late night refreshment. Any of these activities is likely to require prior authorisation (a premises licence, a club premises certificate or a temporary event notice).
Licensing authority	Licensing authorities are usually local authorities and are responsible for licensing functions under the Licensing Act 2003.
Licensing Committee	Licensing Committees are appointed to carry out the functions of licensing authorities. They are made up of Local Authority Councillors. The Committees delegate a number of their functions to sub-committees and to Licensing Authority officers.
Licensing objectives	The Licensing Act 2003 sets out four licensing objectives which must be taken into account when a Local Authority carries out its functions. They are: 1. the prevention of crime and disorder, 2. public safety, 3. prevention of public nuisance, and 4. the protection of children from harm
Live Music Act	The Live Music Act 2012 regulates live performances, not recorded music. According to the Licensing Act 2003 (Descriptions of Entertainment) (Amendment)_Order 2013) A licence is not required for the following: • activities provided they take place between 08:00-23:00 on any day; • performance of a play in the presence of any audience of no more than 500 people; • an indoor sporting event in the presence of any audience of no more than 1,000 people; • most performances of dance where the audience comprises no more than 500 people
Statement of Licensing Policy	Section 5 of the Licensing Act 2003 requires each Licensing Authority to prepare and publish a Statement of its Licensing Policy every five years. The Policy has full regard to the Act, secondary regulations made under the Act

	and section 182 Guidance issued under S182 of the Licensing Act 2003, as issued from time to time by the Home Office. A Licensing Authority may depart from its own policy if the individual circumstances of any case merit such a decision in the interests of the promotion of the licensing objectives.
Operating schedule	An Operating Schedule is required as part of an application for a Premises Licence or Club Premises certificate. The Operating Schedule sets out: • What licensable activities will take place • Days of the week and hours when these will take place • The steps undertaken to promote the licensable activities If the license is granted, the information in the Operating Schedule becomes the conditions of the licence.
Review	The Licensing Act 2003 offers the ability to bring a premises to review where they are operating in a manner which is in contravention of one or more of the licensing objectives. The application for the review may be made by 'responsible authorities' such as the Police, Fire Authority, or the Council's Noise team, or 'other persons', for example people who live or work near a venue and are affected by it. The individual or organisation applying for the review must demonstrate how the operation of the individual premises is in contravention of one or more of the Licensing objectives. The application for the review will trigger a Hearing of the Licensing Committee, unless an agreement is reached by all parties on the future operation of the premises, and the Licensing Authority agrees to waive the requirement for the Hearing as a result.
Section 182 Guidance	Section 182 of the Licensing Act 2003 provides that the Secretary of State must issue and, from time to time, may revise guidance to Licensing Authorities on the discharge of their functions under the Act.