

Crown copyright and database rights 2024 OS AC0000849991

**Application for the Grant, Renewal, Transfer or  
Variation of a Sexual Entertainment Venue Licence**  
Schedule 3 of the Local Government (Miscellaneous provisions) Act 1982

**Part one of this form is open to inspection by the press and public**

Please read the following instructions first

Before completing this form please read the associated guidance notes. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. Please complete all sections or the application will be deemed incomplete and returned to the applicant.

**Applicants are warned that any person who, in connection with the grant, renewal, transfer or variation of a sexual entertainment licence, makes a false statement which they know to be false in any material respect, or which they do not believe to be true, is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000.**

**Applicants are required to complete part one and part two of the application form, and provide any other documents listed in the form.**

You may wish to keep a copy of the completed form for your records.

**Part One: Details of Application**

**Section A: Type of Application**

Please specify what type of application you are making:

**New**       **Renewal**       **Variation**        
**Transfer**

Licence Number (if applicable): SE-PREM/LIC\00259

**Section B: Premises to be licensed**

Is the application in respect of (tick as appropriate):

**Premises**       **Vehicle**       **Vessel**       **Stall**

Trading name and full postal address of premises to be licensed  
(If this application is in respect of a Vehicle, Vessel or Stall, then the location of where it will be used)

Name:  
Address:

**The Griffin, 125 Clerkenwell Road**

Post Town	London	Postcode	EC1R 5DB
-----------	--------	----------	----------

Premises E-mail address	Premises contact telephone number(s) 0207 242 0606
-------------------------	---

**Section C: Applicant Details**

Please state whether you are applying for a premises licence as:

- a) an individual or individuals  please complete box (1)
- b) a limited company  please complete box (2)
- c) a partnership  please complete box (2)
- d) other  please complete box (2)

**(1): First Individual Applicant Details**

MR <input checked="" type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	OTHER
First names <b>Wayne Edward</b>	Surname <b>Chandler</b>			
Address	<i>Please do not complete if this is a private residential address – this information is provided in Part 2</i> <b>The Griffin, 125 Clerkenwell Road, London, EC1R 5DB</b>			
Age of applicant	Over 18:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

**(1): Second Individual Applicant Details (Insert further pages if necessary for more than 2 applicants)**

MR <input type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	OTHER
First names	Surname			
Address	<i>Please do not complete if this is a private residential address – this information is provided in Part 2</i>			
Age of applicant	Over 18:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

**(2): Other Applicant Details**

Name	
Registered Number	
Description of Applicant	
Registered Address	

 **Section D: Premises Details**

1) What is the nature of the applicant's interest in the premises (please tick as appropriate)

a) Freehold

b) Leasehold

2) If the applicant's interest in the premises is a leasehold one, please state whether it is a:

a) head lease

b) sub lease

3) The name and full add of the landlord (if applicable)

---

4) The name and full address of the superior landlord (if applicable)

---

5) Is the whole of the premises to be used under the licence?

a) Yes

b) No

6) If "no" please state which part of the premises is to be used for the purposes of the licence:  
**Ground Floor and Basement**

---

a) The use to which the remainder of the premises is put  
**Office and Private Accommodation**

---

b) The name(s) of those who are responsible for the management of the remainder of the premises

**Wayne Chandler**

---

7) Is the premises to be used for the purposes of the licence, so constructed or adapted as to permit access to and from the premises for members of the public who are disabled?

a) Yes

b) No

If "No" please state the applicant's proposals for affording such access



7. Is the premises, vehicle, vessel or stall which is to used for the purposes of the licence, in use as a sex establishment at the date of this application?

a) Yes

b) No

If the answer is "Yes" please state the name and full address of the person(s) or body who operated the premises, vehicle, vessel or stall as a sex establishment at the date of this application, and the date (where known) the premises, vehicle, vessel or stall was first used as such

Wayne Edward Chandler, The Griffin, 125 Clerkenwell Road, London, EC1R 5DB  
**The premises has operated as a sex establishment since 1995.**

---

If the answer is "No" please state the purpose(s) it is currently being used for

---

### Section E: Current Licences

1. Is the Premises licensed under any other Act (e.g. the Licensing Act 2003)?

a) Yes

b) No

2. If yes, please provide details of the licence(s), including the name of the Licence Holder and any Designated Premises Supervisor

**Copy premises licence attached. Premises Licence holder and DPS is Wayne Chandler, 125 Clerkenwell Road, London, EC1R 5DB**

**Section F: Business Details**

*Each person named in this section will need to complete Part 2 of the application – Personal Details Form*

1. Under what name will the business be trading?

**The Griffin**

2. If the applicant is a company or other corporate body, please give the names of the applicants directors and company secretary:

Name

Not applicable    **N/A**

---



---



---



---



---



---



---



---

Use additional sheets to continue is necessary

2. Is the whole of the business owned by the applicant, and the applicant does not share the profits of the business with any other person or body?

A) Yes

B) No

If the answer is "No", please state the name(s) of those who will share in the profits of the business. In each case, please state the percentage share of the profits to be taken by each person or body involved in the ownership of the business.

Name	Percentage Share
<b>N/A</b>	

Use additional sheets to continue if necessary

**Section G: Advertising Details**

*When considering types of advertising in this section, please refer to the Councils Standard Conditions on Touting for Business and Premises Appearances, which are attached to the Sex Establishment Policy*

1. What advertisement(s) or display(s) are to be exhibited on the exterior of the premises?

**None**

---

2. Please state the size(s) of any advertisement(s) or display(s) mentioned in the above question

**None**

---

3. Please state any proposals for solicitation of business in public areas. E.g. fliers, business cards, billboard, advertising, personal solicitation or advertising on motor vehicles

**None**

---

### Section H: Operation of the Premises

1. Please state the proposed opening times of the premises, vehicle, vessel or stall:  
(Gives times in a 24h clock format)

Day	Opening	Closing
Monday	11:00	00:00
Tuesday	11:00	00:00
Wednesday	11:00	00:00
Thursday	11:00	00:00
Friday	11:00	01:00
Saturday	11:00	01:00
Sunday	11:00	00:00

2. What means are to be taken to prevent the interior of the premises, vehicle, vessel or stall for which the licence is sought from being visible to passers-by?

**All windows are blacked out.**  
**All doors are non-transparent**  
**The interior is not visible to anyone passing by.**

3. Have you read and understood the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

4. Are you able to comply with the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

If no, please give the reasons why not:

**We have provided amendments and/or deletions to the standard conditions. Please see separate sheet headed "H5"**

5. Please give details of any additional conditions you would like to propose, or conditions you like to amend or remove. The Council will expect applicants to address the following factors:

- a) Preventing nuisance to residents and businesses in the vicinity
- b) Public safety
- c) Preventing crime and disorder
- d) Protecting children from harm
- e) Procedures for checking employees age and right to work in the UK
- f) Procedures for training of all staff in the Code of Conduct for Dancers, and for compliance with licence conditions and requirements
- g) Procedures for notifying customers of the Dancers code of conduct
- h) Systems for monitoring compliance with venues policy for welfare of dancers

**Please see attached sheet headed "H5"**



### Section I: Management of the Premises

*Each person named in this section will need to complete Part 2 of the application – Personal details form*

1. Please give the name of the person who will be responsible for the day to day management of the premises. ("the Manager")

Name: **Wayne Chandler**

Role: **Owner/manager**

2. Will this person be based at the premises and will the management of the premises be their sole and exclusive occupation?

a) Yes

b) No

3. If no, then please give details of how they are responsible for the day to day management, and what other arrangements are in place for the management of the premises.

4. Which person(s) will be responsible for the day to day management in the absence of the Manager (use continuation sheets if necessary)

Name: **Adam Chandler**  
Role: **Assistant Manager**

Name:  
Role:

Name: **Ruth Chandler**  
Role: **Duty Manager**

Name:  
Role:

Name: **Valentinas Popelnickis**  
Role: **Duty Manager**

Name:  
Role:

Name: **Ksymena Talarczyk**  
Role: **Duty Manager**

Name:  
Role:

5. Please confirm that at least one of the people named in this section will be at the premises at all times whilst it is open.

a) Yes

b) No

**Section J: Details of any further information relevant to this application**

Please state below any further information which the applicant would wish to be taken into account when this application is considered (This space may also be used to amplify answers to any previous questions)

Please see attached sheet headed "J"

### Section K: Additional documentary requirements

The applicant must provide the following documentation, in addition to those documents already requested in prior sections of this application form.

	Documents included with this application	Included
1.	The prescribed fee, in the form of a cheque made payable to the London Borough of Camden	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.	Written consent of the lawful occupier of the premises or land who has control over the premises or land	Yes <input type="checkbox"/> No <input type="checkbox"/>
3	Code of practice for dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4	Policy for welfare of dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5	Code of practice for customers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6	A personal details form (Part 2 of the application form) for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7	A basic CRB check for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8	A recent passport size photograph for each person named in the application, each copy bearing the name in block capitals for the person whose likeness it bears.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9	A site/location plan, (scale 1:1250) to show the location of the premises	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10	A premises plan (scale 1:100) of the premises, vehicle, vessel or stall in respect of which the licence is sought, showing: <ol style="list-style-type: none"> <li>a) The internal layout of the premises including stage, bars, cloakroom, WCs, performance areas, dressing rooms, kitchen and any external areas to be used (e.g. smoking areas).</li> <li>b) Public areas and staff/private areas to be clearly defined</li> <li>c) Uses for different areas in the premises (e.g. performance areas, reception etc.)</li> <li>d) Any fixed structures of objects</li> <li>e) All means of ingress and egress from the premises</li> <li>f) Position of CCTV cameras</li> <li>g) The location and type of any fire safety and any other safety equipment</li> <li>h) The location of emergency exits</li> <li>i) The position of ramps, lifts of other facilities for the benefit of disabled people.</li> <li>j) Any parts of the premises that may be inaccessible to disabled people.</li> </ol> <p><i>Other standard metric scales may be acceptable if more practical for the size of the premises.</i></p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11	A drawing (scale 1:100) showing the front elevation as existing (and as proposed if changes are to be made to it) of the premises, vehicle, vessel or stall in respect of which the licence is sought. Other standard metric scales may be acceptable if more practical for the size of the premises.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	<b>Evidence of public notice and service</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>
12	Complete copy of the newspaper advert advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
13	Copy of the notice displayed on or near the premises advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
14	Copy of affidavit or statutory declaration that the notice of application has been displayed on or near the premises, in a place where the notice can be conveniently read by the public as required by paragraph 10(10) schedule 2 to the Local Government (miscellaneous Provisions) Act 1982 (as amended).	Yes <input type="checkbox"/> No <input type="checkbox"/>
15	Evidence of the due service upon the Chief Officer of Police as required by paragraph 10(14), of a copy of this application and its required documentation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

**Section L: Correspondence and Contact Details for the Application**

Please give details of the person who may be contacted in relation to this application

Name: Alex Tomlinson

Organisation: Poppleston Allen

Postal Address: [REDACTED]

Telephone Number: [REDACTED]

Email: [REDACTED]

Position/role: Solicitor for the applicant

(e.g. Solicitors/Agent for the applicant)

**Section M: Private Information**

Is there any information on this form which you do not wish to be seen by members of the public? If so, state which information and the reasons why you do not wish it to be seen. Please note, any requests of this nature will be dealt on a case by case basis, and you will be contacted to discuss further if the information is considered necessary for public disclosure.

None

**Section N: Declaration and signature of applicant**

The declaration must be signed in all cases:

- a) If the applicant is an individual, by that individual
- b) If the applicant is a partnership, by all individuals who are partners
- c) If the applicant is a company, by a director or the company secretary
- d) In any other cases by a duly authorised officer of the applicant

I acknowledge that I have received a copy of the standard conditions applicable to a sex establishment licence within the London Borough of Camden, and declare that the information given within this application form, to the best of my knowledge is true and complete in every respect.

*Please use extra pages if necessary*

Name: **Wayne Chandler**

Position: **Owner**

Signature: [REDACTED]

Date: 10/9/24

## Application for the Grant, Renewal, Transfer or Variation of a Sexual Entertainment Venue Licence

Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982

**Part one of this form is open to inspection by the press and public**

### Please read the following instructions first

Before completing this form please read the associated guidance notes. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. Please complete all sections or the application will be deemed incomplete and returned to the applicant.

**Applicants are warned that any person who, in connection with the grant, renewal, transfer or variation of a sexual entertainment licence, makes a false statement which they know to be false in any material respect, or which they do not believe to be true, is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000.**

**Applicants are required to complete part one and part two of the application form, and provide any other documents listed in the form.**

You may wish to keep a copy of the completed form for your records.

### Part One: Details of Application

#### Section A: Type of Application

Please specify what type of application you are making:

**New**
                 
  **Renewal**
                 
  **Variation**
                 
  **Transfer**

Licence Number (if applicable):      SE-PREMLIC\00259

#### Section B: Premises to be licensed

Is the application in respect of (tick as appropriate):

**Premises**
                 
  **Vehicle**
                 
  **Vessel**
                 
  **Stall**

Trading name and full postal address of premises to be licensed

*(If this application is in respect of a Vehicle, Vessel or Stall, then the location where it will be used)*

Name: The Griffin

Address: 125 Clerkenwell Road

Post  
Town

London

Postcode

EC1R 5DB

Premises E-mail address

Premises contact telephone number(s)  
XXXXXXXXXX



### Section C: Applicant Details

Please state whether you are applying for a premises licence as

- |                                 |                                     |                         |
|---------------------------------|-------------------------------------|-------------------------|
| a) an individual or individuals | <input checked="" type="checkbox"/> | please complete box (1) |
| b) a limited company            | <input type="checkbox"/>            | please complete box (2) |
| c) a partnership                | <input type="checkbox"/>            | please complete box (2) |
| d) other                        | <input type="checkbox"/>            | please complete box (2) |

#### (1): First Individual Applicant Details

MR <input checked="" type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	Other
First names Wayne Edward		Surname Chandler		
Address	<i>Please do not complete if this is a private residential address – This information is provided in Part 2</i> The Griffin, 125 Clerkenwell Road, London, EC1R 5DB			
Age of applicant	Over 18:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

#### (1): Second Individual Applicant Details (Insert further pages if necessary for more than 2 applicants)

MR <input type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	Other
First names		Surname		
Address	<i>Please do not complete if this is a private residential address – This information is provided in Part 2</i>			
Age of applicant	Over 18:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

#### (2): Other Applicant Details

Name	
Registered number	
Description of applicant	
Registered Address	
Post Town	Postcode

### Section D: Premises Details

1. What is the nature of the applicant's interest in the premises (please tick as appropriate)

- a) Freehold   
 b) Leasehold

2. If the applicant's interest in the premises is a leasehold one, please state whether it is a:

- a) head lease   
 b) sub lease

3. the name and full address of the landlord (if applicable)

\_\_\_\_\_

4. the name and full address of the superior landlord (if applicable)

\_\_\_\_\_

5. Is the whole of the premises to be used under the licence?

- a) Yes   
 b) No

6. If "no" please state which part of the premises is to be used for the purpose of the licence:

Ground floor and basement

a) the use to which the remainder of the premises is put

Office and private accomodation

b) the name(s) of those who are responsible for the management of the remainder of the premises

Wayne Chandler

7. Is the premises to be used for the purposes of the licence, so constructed or adapted as to permit access to and from the premises for members of the public who are disabled?

- a) Yes   
 b) No

If "No" please state the applicant's proposals for affording such access

7. Is the premises, vehicle, vessel or stall which is to be used for the purposes of the licence, in use as a sex establishment at the date of this application?

- a) Yes   
 b) No

If the answer is "Yes", please state the name and full address of the person(s) or body who operated the premises, vehicle, vessel or stall as a sex establishment at the date of this application, and the date (where known) the premises, vehicle, vessel or stall was first used as such

Wayne Edward Chandler, The Griffin, 125 Clerkenwell Road, London, EC1R 5DB

If the answer is "No" please state the purpose(s) it is currently being used for

\_\_\_\_\_

### Section E: Current Licences

1. Is the Premises licensed under any other Act (e.g. the Licensing Act 2003)?

- a) Yes   
 b) No

2. If yes, please provide details of the licence(s), including the name of the Licence Holder and any Designated Premises Supervisor

Copy of premises licence attached. The Premises Licence Holder and Designated Premises Supervisor is Wayne Chandler, 125 Clerkenwell Road, London, EC1R 5DB.



**Section F: Business Details**

*Each person named in this section will need to complete Part 2 of the application – Personal Details Form*

1. Under what name will the business be trading?

The Griffin

2. If the applicant is a company or other corporate body, please give the names of the applicants directors and company secretary:

Name

Not applicable

Use additional sheets to continue if necessary

2. Is the whole of the business owned by the applicant, and the applicant does not share the profits of the business with any other person or body?

a) Yes

b) No

If the answer is "No", please state the name(s) of those who will share in the profits of the business. In each case, please state the percentage share of the profits to be taken by each person or body involved in the ownership of the business

Name

Percentage share

Name	Percentage share

Use additional sheets to continue if necessary

**Section G: Advertising Details**

*When considering types of advertising in this section, please refer to the Councils Standard Conditions on Touting for Business and Premises Appearance, which are attached to the Sex Establishment Policy*

**1. What advertisement(s) or display(s) are to be exhibited on the exterior of the premises?**

None

---

**2. Please state the size(s) of any advertisement(s) or display(s) mentioned in the above question**

None

---

**3. Please state any proposals for solicitation of the business in public areas. E.g. fliers, business cards, billboard advertising, personal solicitation or advertising on motor vehicles**

None

---



### Section H: Operation of the Premises

1. Please state the proposed opening times of the premises, vehicle, vessel or stall:  
(Gives times in a 24h clock format)

Day	Opening	Closing
Monday	11:00	00:00
Tuesday	11:00	00:00
Wednesday	11:00	00:00
Thursday	11:00	00:00
Friday	11:00	01:00
Saturday	11:00	01:00
Sunday	11:00	00:00

2. What means are to be taken to prevent the interior of the premises, vehicle, vessel or stall for which the licence is sought from being visible to passers-by?

All windows are blacked out.

All doors are non-transparent.

The interior is not visible to anyone passing by.

3. Have you read and understood the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

4. Are you able to comply with the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

If no, please give the reasons why not:

We have provided amendments and/or deletions to the standard conditions. Please see separate sheet headed "H5".

**5. Please give details of any additional conditions you would like to propose, or conditions you like to amend or remove. The Council will expect applicants to address the following factors:**

- a) Preventing nuisance to residents and businesses in the vicinity
- b) Public safety
- c) Preventing crime and disorder
- d) Protecting children from harm
- e) Procedures for checking employees age and right to work in the UK
- f) Procedures for training of all staff in the Code of Conduct for Dancers, and for compliance with licence conditions and requirements
- g) Procedures for notifying customers of the Dancers code of conduct
- h) System for monitoring compliance with the venues policy for welfare of dancers

Please see attached sheet headed "H5".



## Section I: Management of the Premises

*Each person named in this section will need to complete Part 2 of the application – Personal details form*

1. Please give the name of the person who will be responsible for the day to day management of the premises. ("the Manager")

Name: Wayne Chandler

Role: Owner/Manager

2. Will this person be based at the premises and will the management of the premises be their sole and exclusive occupation?

- a) Yes
- b) No

3. If no, then please give details of how they are responsible for the day to day management, and what other arrangements are in place for the management of the premises.

4. Which person(s) will be responsible for the day to day management in the absence of the Manager (Use continuation sheets if necessary):

Name: Adam Chandler  
Role: Assistant Manager

Name:  
Role:

Name: Ruth Chandler  
Role: Duty Manager

Name:  
Role:

Name: Valentinas Popelnickis  
Role: Duty Manager

Name:  
Role:

Name: Jonathan Birks  
Role: Duty Manager

Name:  
Role:

5. Please confirm that at least one of the people named in this section will be at the premises at all times whilst it is open.

- a) Yes
- b) No

**Section J: Details of any further information relevant to this application**

Please state below any further information which the applicant would wish to be taken into account when this application is considered (This space may also be used to amplify answers to any previous questions)

Please see attached sheet headed "J".

### Section K: Additional documentary requirements

The applicant must provide the following documentation, in addition to those documents already requested in prior sections of this application form.

	Documents included with this application	Included
1	The prescribed fee, in the form of a cheque made payable to the London Borough of Camden.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2	Written consent of the lawful occupier of the premises or land who has control over the premises or land	Yes <input type="checkbox"/> No <input type="checkbox"/>
3	Code of practice for dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4	Policy for welfare of dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5	Code of practice for customers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6	A personal details form (Part 2 of the application form) for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7	A basic CRB check for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8	A recent passport size photograph for each person named in the application, each copy bearing the name in block capitals of the person whose likeness it bears.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9	A site/location plan, (scale 1:1250) to show the location of the premises	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10	<p>A premises plan (scale 1:100) of the premises, vehicle, vessel or stall in respect of which the licence is sought, showing:</p> <ul style="list-style-type: none"> <li>a) The internal layout of the premises including stage, bars, cloakroom, WCs, performance areas, dressing rooms, kitchen, and any external areas to be used (e.g. smoking areas).</li> <li>b) Public areas and staff/private areas to be clearly defined</li> <li>c) Uses for different areas in the premises (e.g. performance areas, reception etc.)</li> <li>d) Any fixed structures or objects</li> <li>e) all means of ingress and egress from the premises</li> <li>f) Position of CCTV cameras</li> <li>g) The location and type of any fire safety and any other safety equipment</li> <li>h) The location of emergency exits</li> <li>i) The position of ramps, lifts or other facilities for the benefit of disabled people.</li> <li>j) Any parts of the premises that may be inaccessible to disabled people.</li> </ul> <p><i>Other standard metric scales may be acceptable if more practical for the size of the premises.</i></p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11	A drawing (scale 1:100) showing the front elevation as existing (and as proposed if changes are to be made to it) of the premises, vehicle, vessel or stall in respect of which the licence is sought. Other standard metric scales may be acceptable if more practical for the size of the premises.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Evidence of public notice and service</b>		
12	Complete copy of the newspaper advert advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
13	Copy of the notice displayed on or near the premises advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
14	Copy of affidavit or statutory declaration that the notice of application has been displayed on or near the premises, in a place where the notice can be conveniently read by the public as required by paragraph 10(10) schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended).	Yes <input type="checkbox"/> No <input type="checkbox"/>
15	Evidence of the due service upon the Chief officer of police as required by paragraph 10(14) schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended), of a copy of this application and its required documentation.	Yes <input type="checkbox"/> No <input type="checkbox"/>



### Section L: Correspondence and Contact Details for the Application

Please give details of the person who may be contacted in relation to this application

Name: Kerry McGowan

Organisation: Poppleston Allen

Postal Address: The Stanley Building, 7 Pancras Square, London, N1C 4AG

Telephone Number: [REDACTED]

Email: [REDACTED]

Position/role: Paralegal on behalf of the Applicant  
(e.g. Solicitor/Agent for the applicant)

### Section M: Private Information

Is there any information on this form which you do not wish to be seen by members of the public? If so, state which information and the reasons why you do not wish it to be seen. Please note, any requests of this nature will be dealt on a case by case basis, and you will be contacted to discuss further if the information is considered necessary for public disclosure.

### Section N: Declaration and signature of applicant

The declaration must be signed in all cases :

- If the applicant is an individual, by that individual
- If the applicant is a partnership, by all individuals who are partners
- If the applicant is a company, by a director or the company secretary
- In any other case by a duly authorised officer of the applicant

I acknowledge that I have received a copy of the standard conditions applicable to a sex establishment licence within the London Borough of Camden, and declare that the information given within this application form, to the best of my knowledge, is true and complete in every respect.

*Please use extra pages if necessary*

Name: Wayne Chandler

Position: Owner

Signature

Date

[REDACTED]  
12/10/2023

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature

Date

## Application for the Grant, Renewal, Transfer or Variation of a Sexual Entertainment Venue Licence

Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982

**Part one of this form is open to inspection by the press and public**

### Please read the following instructions first

Before completing this form please read the associated guidance notes. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. Please complete all sections or the application will be deemed incomplete and returned to the applicant.

**Applicants are warned that any person who, in connection with the grant, renewal, transfer or variation of a sexual entertainment licence, makes a false statement which they know to be false in any material respect, or which they do not believe to be true, is guilty of an offence and liable on summary conviction to a fine not exceeding £20,000.**

**Applicants are required to complete part one and part two of the application form, and provide any other documents listed in the form.**

You may wish to keep a copy of the completed form for your records.

### Part One: Details of Application

#### Section A: Type of Application

Please specify what type of application you are making:

**New**
                 
  **Renewal**
                 
  **Variation**
                 
  **Transfer**

Licence Number (if applicable): SE-PREMLIC\00259

#### Section B: Premises to be licensed

Is the application in respect of (tick as appropriate):

**Premises**
                 
  **Vehicle**
                 
  **Vessel**
                 
  **Stall**

Trading name and full postal address of premises to be licensed

*(If this application is in respect of a Vehicle, Vessel or Stall, then the location where it will be used)*

Name: The Griffin

Address: 125 Clerkenwell Road

Post  
Town

London

Postcode

EC1R 5DB

Premises E-mail address

Premises contact telephone number(s)

### Section C: Applicant Details

Please state whether you are applying for a premises licence as

- |                                 |                                     |                         |
|---------------------------------|-------------------------------------|-------------------------|
| a) an individual or individuals | <input checked="" type="checkbox"/> | please complete box (1) |
| b) a limited company            | <input type="checkbox"/>            | please complete box (2) |
| c) a partnership                | <input type="checkbox"/>            | please complete box (2) |
| d) other                        | <input type="checkbox"/>            | please complete box (2) |

#### (1): First Individual Applicant Details

MR <input checked="" type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	Other
First names		Wayne Edward		
Surname		Chandler		
Address	<i>Please do not complete if this is a private residential address – This information is provided in Part 2</i> The Griffin, 125 Clerkenwell Road, London, EC1R 5DB			
Age of applicant	Over 18:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

#### (1): Second Individual Applicant Details (Insert further pages if necessary for more than 2 applicants)

MR <input type="checkbox"/>	MRS <input type="checkbox"/>	MISS <input type="checkbox"/>	MS <input type="checkbox"/>	Other
First names		Surname		
Address	<i>Please do not complete if this is a private residential address – This information is provided in Part 2</i>			
Age of applicant	Over 18:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

#### (2): Other Applicant Details

Name	
Registered number	
Description of applicant	
Registered Address	
Post Town	
Postcode	

### Section D: Premises Details

1. What is the nature of the applicant's interest in the premises (please tick as appropriate)

- a) Freehold   
 b) Leasehold

2. If the applicant's interest in the premises is a leasehold one, please state whether it is a:

- a) head lease   
 b) sub lease

3. the name and full address of the landlord (if applicable)

\_\_\_\_\_

4. the name and full address of the superior landlord (if applicable)

\_\_\_\_\_

5. Is the whole of the premises to be used under the licence?

- a) Yes   
 b) No

6. If "no" please state which part of the premises is to be used for the purpose of the licence:  
 Ground floor and basement.

\_\_\_\_\_

a) the use to which the remainder of the premises is put

Office and private accomodation.  
 \_\_\_\_\_

b) the name(s) of those who are responsible for the management of the remainder of the premises

Wayne Chandler  
 \_\_\_\_\_

7. Is the premises to be used for the purposes of the licence, so constructed or adapted as to permit access to and from the premises for members of the public who are disabled?

- a) Yes   
 b) No

If "No" please state the applicant's proposals for affording such access



7. Is the premises, vehicle, vessel or stall which is to be used for the purposes of the licence, in use as a sex establishment at the date of this application?

a) Yes

b) No

If the answer is "Yes", please state the name and full address of the person(s) or body who operated the premises, vehicle, vessel or stall as a sex establishment at the date of this application, and the date (where known) the premises, vehicle, vessel or stall was first used as such

Wayne Edward Chandler, The Griffin, 125 Clerkenwell Road, London, EC1R 5DB

If the answer is "No" please state the purpose(s) it is currently being used for

### Section E: Current Licences

1. Is the Premises licensed under any other Act (e.g. the Licensing Act 2003)?

a) Yes

b) No

2. If yes, please provide details of the licence(s), including the name of the Licence Holder and any Designated Premises Supervisor

Copy of premises licence attached. The Premises Licence Holder and Designated Premises Supervisor is Wayne Chandler, 125 Clerkenwell Road, London, EC1R 5DB.



**Section F: Business Details**

*Each person named in this section will need to complete Part 2 of the application – Personal Details Form*

1. Under what name will the business be trading?  
 The Griffin

2. If the applicant is a company or other corporate body, please give the names of the applicants directors and company secretary:  
 Name  
 Not applicable

Use additional sheets to continue if necessary

2. Is the whole of the business owned by the applicant, and the applicant does not share the profits of the business with any other person or body?  
 a) Yes   
 b) No

If the answer is "No", please state the name(s) of those who will share in the profits of the business. In each case, please state the percentage share of the profits to be taken by each person or body involved in the ownership of the business

Name	Percentage share

Use additional sheets to continue if necessary

**Section G: Advertising Details**

*When considering types of advertising in this section, please refer to the Councils Standard Conditions on Touting for Business and Premises Appearance, which are attached to the Sex Establishment Policy*

1. What advertisement(s) or display(s) are to be exhibited on the exterior of the premises?

None

---

2. Please state the size(s) of any advertisement(s) or display(s) mentioned in the above question

None

---

3. Please state any proposals for solicitation of the business in public areas. E.g. fliers, business cards, billboard advertising, personal solicitation or advertising on motor vehicles

None

---

### Section H: Operation of the Premises

1. Please state the proposed opening times of the premises, vehicle, vessel or stall:  
(Gives times in a 24h clock format)

Day	Opening	Closing
Monday	11:00	00:00
Tuesday	11:00	00:00
Wednesday	11:00	00:00
Thursday	11:00	00:00
Friday	11:00	01:00
Saturday	11:00	01:00
Sunday	11:00	00:00

2. What means are to be taken to prevent the interior of the premises, vehicle, vessel or stall for which the licence is sought from being visible to passers-by?

All windows are blacked out.  
All doors are non-transparent.  
The interior is not visible to anyone passing by.

3. Have you read and understood the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

4. Are you able to comply with the Councils standard conditions for sexual entertainment venues?

- a) Yes
- b) No

If no, please give the reasons why not:

We have provided amendments and/or deletions to the standard conditions. Please see separate sheet headed "H5".



5. Please give details of any additional conditions you would like to propose, or conditions you like to amend or remove. The Council will expect applicants to address the following factors:

- a) Preventing nuisance to residents and businesses in the vicinity
- b) Public safety
- c) Preventing crime and disorder
- d) Protecting children from harm
- e) Procedures for checking employees age and right to work in the UK
- f) Procedures for training of all staff in the Code of Conduct for Dancers, and for compliance with licence conditions and requirements
- g) Procedures for notifying customers of the Dancers code of conduct
- h) System for monitoring compliance with the venues policy for welfare of dancers

Please see attached sheet headed "H5".

### Section I: Management of the Premises

*Each person named in this section will need to complete Part 2 of the application – Personal details form*

1. Please give the name of the person who will be responsible for the day to day management of the premises. ("the Manager")

Name: Wayne Chandler

Role: Owner/Manager

2. Will this person be based at the premises and will the management of the premises be their sole and exclusive occupation?

a) Yes

b) No

3. If no, then please give details of how they are responsible for the day to day management, and what other arrangements are in place for the management of the premises.

4. Which person(s) will be responsible for the day to day management in the absence of the Manager (Use continuation sheets if necessary):

Name: Adam Chandler  
Role: Assistant Manager

Name:  
Role:

Name: Ruth Chandler  
Role: Duty Manager

Name:  
Role:

Name: Valentinas Popelnickis  
Role: Duty Manager

Name:  
Role:

Name: Jonathan Birks  
Role: Duty Manager

Name:  
Role:

5. Please confirm that at least one of the people named in this section will be at the premises at all times whilst it is open.

a) Yes

b) No

**Section J: Details of any further information relevant to this application**

Please state below any further information which the applicant would wish to be taken into account when this application is considered (This space may also be used to amplify answers to any previous questions)

Please see attached sheed headed "J".

### Section K: Additional documentary requirements

The applicant must provide the following documentation, in addition to those documents already requested in prior sections of this application form.

	Documents included with this application	Included
1	The prescribed fee, in the form of a cheque made payable to the London Borough of Camden.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2	Written consent of the lawful occupier of the premises or land who has control over the premises or land	Yes <input type="checkbox"/> No <input type="checkbox"/>
3	Code of practice for dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4	Policy for welfare of dancers/performers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5	Code of practice for customers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6	A personal details form (Part 2 of the application form) for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7	A basic CRB check for each person named in the application	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8	A recent passport size photograph for each person named in the application, each copy bearing the name in block capitals of the person whose likeness it bears.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9	A site/location plan, (scale 1:1250) to show the location of the premises	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10	<p>A premises plan (scale 1:100) of the premises, vehicle, vessel or stall in respect of which the licence is sought, showing:</p> <ul style="list-style-type: none"> <li>a) The internal layout of the premises including stage, bars, cloakroom, WCs, performance areas, dressing rooms, kitchen, and any external areas to be used (e.g. smoking areas).</li> <li>b) Public areas and staff/private areas to be clearly defined</li> <li>c) Uses for different areas in the premises (e.g. performance areas, reception etc.)</li> <li>d) Any fixed structures or objects</li> <li>e) all means of ingress and egress from the premises</li> <li>f) Position of CCTV cameras</li> <li>g) The location and type of any fire safety and any other safety equipment</li> <li>h) The location of emergency exits</li> <li>i) The position of ramps, lifts or other facilities for the benefit of disabled people.</li> <li>j) Any parts of the premises that may be inaccessible to disabled people.</li> </ul> <p><i>Other standard metric scales may be acceptable if more practical for the size of the premises.</i></p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11	A drawing (scale 1:100) showing the front elevation as existing (and as proposed if changes are to be made to it) of the premises, vehicle, vessel or stall in respect of which the licence is sought. Other standard metric scales may be acceptable if more practical for the size of the premises.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	<b>Evidence of public notice and service</b>	
12	Complete copy of the newspaper advert advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
13	Copy of the notice displayed on or near the premises advertising the application	Yes <input type="checkbox"/> No <input type="checkbox"/>
14	Copy of affidavit or statutory declaration that the notice of application has been displayed on or near the premises, in a place where the notice can be conveniently read by the public as required by paragraph 10(10) schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended).	Yes <input type="checkbox"/> No <input type="checkbox"/>
15	Evidence of the due service upon the Chief officer of police as required by paragraph 10(14) schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as amended), of a copy of this application and its required documentation.	Yes <input type="checkbox"/> No <input type="checkbox"/>

### Section L: Correspondence and Contact Details for the Application

Please give details of the person who may be contacted in relation to this application

Name: Lisa Inzani

Organisation: Poppleston Allen

Postal Address: The Stanley Building, 7 Pancras Square, London, N1C 4AG

Telephone Number: [REDACTED]

Email: [REDACTED]

Position/role: Solicitor on behalf of the applicant.  
(e.g. Solicitor/Agent for the applicant)

### Section M: Private Information

Is there any information on this form which you do not wish to be seen by members of the public? If so, state which information and the reasons why you do not wish it to be seen. Please note, any requests of this nature will be dealt on a case by case basis, and you will be contacted to discuss further if the information is considered necessary for public disclosure.

None

### Section N: Declaration and signature of applicant

The declaration must be signed in all cases :

- If the applicant is an individual, by that individual
- If the applicant is a partnership, by all individuals who are partners
- If the applicant is a company, by a director or the company secretary
- In any other case by a duly authorised officer of the applicant

I acknowledge that I have received a copy of the standard conditions applicable to a sex establishment licence within the London Borough of Camden, and declare that the information given within this application form, to the best of my knowledge, is true and complete in every respect.

*Please use extra pages if necessary*

Name: WAYNE CHANDLER

Position: OWNER

Signature

Date

[REDACTED]

21/09/22

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature

Date

\_\_\_\_\_



## Section H5: Operation of the Premises.

The applicant has set out below the Council's standard conditions as per its Policy and where appropriate, the applicant has indicated (in italics) it's agreement, proposed amendment/s or deletions. To assist, where appropriate, the applicant has provided further information

### General Conditions

1. The licence holder shall retain control over all portions of the premises as defined on the approved premises plan, and shall not let, licence or part with possession of any part of the licensed premises.

*Agreed, Wayne Chandler is the owner of the premises and the Applicant has full time day to day control of the premises and has done so since 1993*

2. The public shall not be permitted to have access to any part or parts of the licensed premises other than those which have been approved by the London Borough of Camden as per the plan submitted to the Council at the time the licence was granted.

*Agreed as per the attached plan.*

3. No person under the age of eighteen shall be admitted to the licensed premises whilst the Sex Establishment Licence is being used and prominent notices shall be displayed at each entrance to the premises to that effect.

*Agreed. This is already implemented. Please see conditions 15 and 16 on the attached premises licence.*

4. No person aged under eighteen shall be employed to work at the licensed premises in any capacity, or allowed to work in the premises on a self-employed basis.

*Agreed. Checks are carried out by the Applicant in relation to all persons employed at the premises in relation to their employment criteria, e.g. National Insurance Number and form of identification, e.g. passport. It can be confirmed that no persons under the age of 18 are employed at the premises, nor are they permitted to be.*

5. No part of the licensed premises shall be used by prostitutes for the purpose of solicitation or otherwise exercising their calling.

*Agreed. This is not permitted at the premises.*

6. Where the licensee is a body corporate or an unincorporated body any change of director, company secretary or other person responsible for the management of the body is to be notified in writing to the Council within 14 days of such change and such details as the Council may require in respect of any new director, secretary or manager are to be furnished within 14 days of any request in writing from the Council.

*Delete. This is not applicable as the Applicant is an individual.*

7. The premises layout shall allow all public parts of the premises to be easily supervised by premises management, staff and door supervisors at all times save for public toilet areas which shall be checked at least at hourly intervals to ensure such areas are not being used for any improper purposes and are in a clean and useable condition.

*Agreed. Please see attached plan. A record of the toilet check is kept behind the bar*

8. No change of use of any portion of the licensed premises from that approved by the Council shall be made until the Council's consent in writing has been obtained.

*Agreed*

9. No access shall be permitted through the licensed premises to any other premises adjoining or adjacent except in the case of emergency.

*Agreed*

10. No alterations or additions, either internal or external, and whether permanent or temporary, shall be made to the structure, lighting or layout of the licensed premises except with the prior written approval of the Council.

*Agreed*

11. The windows and openings of the licensed premises shall be of material or covered with material which will render the interior of the premises invisible to passers by.

*Agreed. Already in existence.*

12. The external doors to the licensed premises shall be fitted with a device to provide for their automatic closure and such devices shall be maintained in good working order.

*Agreed. We have this already*

13. The licence holder shall ensure that the sex establishment licence or a certified copy shall be prominently exhibited at the premises in a position where it can be clearly seen by patrons of the premises. For the purposes of this section, a certified copy of the licence shall be a copy certified as a true copy by the holder of the licence or his solicitor and appropriately signed and dated with the date the copy was certified.

*Agreed*

#### **Touting for Business**

14. There shall be no touting for business for the premises by way of flyer, persons holding advertising boards, branded vehicles or personal solicitation.

*Agreed*

#### **Premises Appearance**

15. The Council shall not permit the display of any form of imagery or photographs that the Council believes could be construed as offensive to public decency.

*Agreed. None of this is in existence in any event*

16. No display or advertisement of the activities permitted by the sex establishment licence shall be exhibited so as to be visible from outside of the premises except:-

- any notice required to be displayed by law, by these regulations, or by any condition of the sex establishment licence granted by the Council
- the name of the premises as specified in the sex establishment licence
- the hours of opening of the premises
- notice of any admission charge to the premises

unless the Council has given its prior consent in writing that such display or advertisement may be used.

*Agreed*

### **CCTV Conditions**

17. A CCTV system shall be installed and working to the satisfaction of the Police and the Council. The system shall cover the whole of the parts of the premises to which the public have access with the exception of individual toilet cubicles. This shall include external areas of the premises including the area immediately outside any entrance to, or exit from, the premises.

*Agreed. This is already complied with and the cameras are shown on the drawing submitted with the application.*

18. CCTV monitors covering the premises shall be available in the foyer or reception area of the premises where they can immediately be viewed by Police and Council officers during an inspection of the premises. This condition does not preclude further monitors being located in other parts of the premises.

*As the premises do not have a foyer or reception area, at the renewal hearing which took place on 24<sup>th</sup> January 2017, it was agreed by the Committee that this condition would be amended as follows: "CCTV monitors covering the premises must be available near to the entrance of the premises where they can immediately be viewed by Police and Council Officers during an inspection of the premises. This condition does not preclude further monitors being located in other parts of the premises."*

19. Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the licensed premises, advising that CCTV is in operation.

*Agreed. Notices are currently displayed at the premises confirming that CCTV is in operation. They are placed all around the premises.*

20. The CCTV shall record continuously the entire time that any member of the public is present on the licensed sex establishment.

*Agreed. Already in existence.*

21. Recordings shall be of a sufficient quality to clearly identify persons on the recordings

*Agreed. Already in existence.*

22. Recordings shall be retained for a minimum period of 31 days.

*Agreed. Already in existence.*

23. Copies of the recordings shall be made available to the Police and the Council on request.

*Agreed. These are currently available to police and the council should they require them*

24. Any defect in the operation of the CCTV system shall be notified immediately to the Police Licensing Team and the Council in writing and by telephone, and the licence holder shall ensure that repairs to the CCTV system are effected as soon as reasonably practicable.



*Agreed*

25. Where any part of the CCTV system is non operational, the licence holder shall comply with any direction from the Metropolitan Police or the Council not to use certain parts of the licensed premises for the purposes of the Sex Establishment Licence.

*Agreed*

**Additional Conditions for Premises Operating as Sex Shops**

*26 – 30. These are not applicable and should be deleted.*

**Additional Conditions for Sexual Entertainment Venues**

31. The layout of the premises shall be such that performers cannot be seen from outside the premises.

*Agreed*

32. Performers may not stand in lobby, reception or foyer areas or outside the premises entrance for the purposes of greeting customers or encouraging customers to enter the venue.

*Please note that there is no lobby, reception or foyer areas as such and the condition is amended accordingly to: "Performers may not stand outside the premises entrance for the purposes of greeting customers or encouraging customers to enter the venue."*

33. The licence holder shall nominate a Duty Manager for the premises on each occasion they are open to the public and being used for the purposes of providing relevant entertainment.

*Agreed. The duty managers are referred to in the application and one of those will be present at the premises at all times.*

34. The licence holder shall ensure the name of the Duty Manager is displayed in the foyer or reception of the premises so the name can easily be viewed by Police or authorised Council officers carrying out an inspection of the premises, or otherwise by persons using the venue.

*As there is no dedicated foyer or reception area, at the renewal hearing which took place on 24<sup>th</sup> January 2017, it was agreed by the Committee that this condition would be amended as follows: "The licence holder shall ensure the name of the duty manager is displayed prominently at the premises so that the name can be easily viewed by Police or authorised Council Officers carrying out an inspection of the premises, or otherwise by persons using the venue."*

35. The Duty Manager shall be responsible for ensuring the premises operate in accordance with the conditions applicable to the sex establishment licence.

*Agreed*

36. The Duty Manager shall remain on the premises while they are on duty save in the event of an emergency situation.

*Agreed*

37. Door supervisors registered with the Security Industry Authority shall be provided at the premises in sufficient numbers to ensure that:
- each entrance and exit at the premises used by the public are manned by at least two door supervisors
  - all public areas of the premises are continually monitored to ensure the Dancers and Customers Codes of Conduct and any licence conditions are being complied with
  - persons breaching the Customers Code of Conduct or otherwise behaving in a disorderly manner can be safely ejected from the premises.

*We currently have two SIA door supervisors at all times. This has always been sufficient in order for us to trade properly and efficiently at the premises and indeed, there is no additional requirement as per our premises licence*

#### **Requirements for a Code of Conduct for Dancers**

38. There shall be a Code of Conduct for Dancers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.

*Agreed. Please see attached.*

39. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Dancers".

*Agreed. Please see attached.*

40. No change shall be made to the Dancer's Code of Conduct without the prior written consent of the Council and the Metropolitan Police.

*Agreed*

41. The Dancers Code of Conduct must state that dancers who do not comply with the Code of Conduct will face disciplinary proceedings.

*Agreed. Please see attached.*

42. The licence holder shall require all dancers to sign an acknowledgement that they have received a copy of the Dancer's Code of Conduct and have read and understood its contents and shall comply with such Code of Conduct at all times they are working at the premises as dancers.

*Agreed. Please see attached.*

43. The licence holder shall retain original records showing that each dancer has signed to acknowledge receipt of the Dancer's Code of Conduct and Disciplinary Procedure as described above.

*Agreed*

44. A copy of the sections of the Dancer's Code of Conduct relevant to customers shall be prominently displayed in each area of the premises to which the public have access, including toilet areas, and in any area used as a changing/dressing room for dancers.

*Agreed*

45. The premises management and staff (including security staff) shall be aware of the content of the Dancer's Code of Conduct and shall ensure it is complied with.

*Agreed*

**Requirements for a Code of Conduct for Customers**

46. There shall be a Code of Conduct for Customers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.

*Agreed. Please see attached.*

47. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Customers".

*Agreed. Please see attached.*

48. The Code of Conduct for Customers shall be displayed in prominent positions throughout the premises where it is visible to all customers.

*Agreed.*

49. No change shall be made to the Customers Code of Conduct without the prior written consent of the Council and the Metropolitan Police.

*Agreed*

50. The Customer's Code of Conduct must state that customers who do not comply with the Code of Conduct will be ejected from the premises.

*Agreed. Please see attached.*

51. The premises management and staff (including security staff) shall be aware of the content of the Customer's Code of Conduct and shall ensure it is complied with.

*Agreed. Please see attached*

52. Where a customer breaches the Customers Code of Conduct, this shall be recorded in the incident log.

*Agreed.*

53. If management are made aware of a customer repeatedly breaching the rules of the Customers Code of Conduct, they shall eject that customer from the premises.

*Agreed. Please see attached.*

**Disciplinary Procedure**

54. A disciplinary procedure shall be in place to deal with dancers who breach the Dancer's Code of Conduct. The disciplinary procedure shall be detailed in writing and a copy of it provided to each dancer who works at the premises.

*Agreed. Please see attached*

55. The licence holder shall require all dancers to sign an acknowledgement that they have been provided with a copy of the house Disciplinary Procedure and have read and understood its contents.

*Agreed. Please see attached*

56. The Disciplinary Procedure shall not include provision to "fine" dancers or otherwise impose pecuniary penalties. Action taken may include verbal or written warnings, suspension of the dancer's right to perform at the premises, or revocation of the dancer's right to perform at the premises.

*Agreed*

**Sexual Entertainment Venues - Code of Conduct for Dancers**

57. The Dancer's Code of Conduct shall include the following conditions as a minimum:
- a. Dancers may not intentionally touch a customer during a performance.
  - b. Dancers may not permit a customer to touch them during a performance.
  - c. Dancers may not straddle the customer.
  - d. If a customer attempts to touch or speak to a dancer inappropriately, the dancer shall stop the performance and advise the customer of the rules of the Code of Conduct. If the customer persists in inappropriate behaviour, the dancer shall stop the performance and inform premises management immediately.
  - e. Dancers may not intentionally touch the genitals, anus or breasts of another dancer, nor knowingly permit another dancer to touch their genitals, anus or breasts.
  - f. Dancers shall not solicit for gratuities or payment for sexual favours.
  - g. Dancers shall not engage in any act of prostitution, i.e. the receiving of gratuities or payment for sexual favours.
  - h. Dancers may not perform any act which simulates masturbation, oral sex or sexual intercourse, including the insertion of any object, including their own finger, in to the anus or vagina.
  - i. Dancers may not touch their own breasts, anus or genitals with their fingers, lips or tongue.
  - j. Dancers may not be in the company of a customer unless it is in an area of the premises that is open to the public.
  - k. Dancers shall not perform if under the influence of alcohol or drugs.
  - l. If a customer engages in acts of masturbation or other sexual behaviour, the dancer shall cease the performance immediately and inform the premises management.
  - m. Dancers shall use the dressing room facilities provided for their exclusive use to change for their performance.
  - n. Dancers shall only use the smoking area provided specifically for their use.
  - o. Dancers shall only use the sanitary facilities specifically provided for their use.
  - p. Dancers shall not leave the premises or otherwise be visible outside the premises, including for smoking breaks, unless dressed in suitable attire, e.g. outerwear consisting of coat or top and skirt or trousers so lingerie or other performance costume is not visible.



q. All dancers shall comply with this Code of Conduct. Any failure to adhere to the Code of Conduct shall render the dancer subject to the house Disciplinary Rules, a copy of which has been provided to each dancer.

*Agreed, This is included in the Code of Conduct for Dancers and appears in this document attached to the application.*

#### **Sexual Entertainment Venues - Code of Conduct for Customers**

58. The Customers Code of Conduct shall include the following conditions as a minimum:
- a. Customers may not touch dancers during a performance.
  - b. Customers may not make lewd or offensive remarks to dancers.
  - c. Customers may not harass or intimidate dancers.
  - d. Customers may not ask dancers to perform any sexual favour.
  - e. Customers may not perform acts of masturbation or indulge in other sexual behaviour.
  - f. Any customer failing to adhere to the Customers Code of Conduct will be ejected from the premises.

*All agreed. Please see attached*

#### **Private Booths**

59. Private booths shall not be provided at the licensed premises.

*Agreed.*

#### **Dancers Private Work Areas**

60. A designated dressing room area shall be provided for dancer's exclusive use. Such dressing room shall be secured so as not to be accessible to members of the public and shall be sufficient to enable dancers to change privately.

*Agreed*

61. Dancers shall be provided with their own sanitary facilities separate from those used by customers.

*Agreed*

62. A secure external area shall be provided for dancers to smoke without coming into contact with customers.

*Agreed*

#### **Dancers Welfare Policy**

63. The licence holder shall have a Dancers Welfare Policy in place at the premises.

*Agreed. Please see attached*

64. The Policy shall, as a minimum, state that

- any dancer concerned about the behaviour of a customer shall report the incident immediately to the Duty Manager who shall take immediate action to resolve the matter
- staff members must constantly supervise the behaviour of customers at the premises and shall intervene where any customer is breaching the Code of Conduct for Customers or is otherwise causing alarm or distress to a dancer
- any customer behaving inappropriately will be ejected from the venue
- dancers shall be provided with free drinking water on request
- dancers shall not be required to drink alcohol

*Agreed. Please see attached*

### **General Provisions**

65. The licence holder shall obtain a photocopy of the passport of each dancer that works at the premises and shall certify the copy as being a true copy by signing and dating the photocopy together with their name and job title.

*Agreed*

66. The licence holder shall undertake reasonable checks to ensure each dancer is eligible to work in the United Kingdom and shall not allow dancers ineligible to work in the UK to work at the premises.

*Agreed*

67. The licence holder shall maintain written records of all dancers working at the premises. The records shall show the dancer's full name, home address, date of birth and a certified photocopy of their passport and the date the dancer was provided with the Dancers Code of Conduct and Disciplinary Procedure. Such records shall be kept on the licensed premises and produced for inspection by Police and authorised Council officers on request. Any instances of the dancer breaching the Dancers Code of Conduct shall be recorded on the dancer's record showing the date and time of the incident and details of the breach that occurred.

*Agreed.*

68. Dancers under the age of eighteen shall not be permitted to work at the premises.

*Agreed*

69. Dancers shall not be permitted to perform if they are clearly under the influence of alcohol or drugs.

*Agreed*

70. The licence holder shall ensure that an incident log is maintained at the premises. The incident log shall, as a minimum, give details of:

- any ejections from the premises
- any refused admissions
- any refused sales

- any inappropriate behaviour by guests
- any failure in the CCTV system
- any incidents of crime or disorder
- any complaints made by the public, guests or dancers

*Agreed*

71. The record shall show the date, the time of the incident, the name of the staff member reporting the incident, a brief description of the customer involved/name of dancer where appropriate and brief details of the incident and any action taken by the staff.

*Agreed*

72. The incident log shall be completed as soon as reasonably practicable after any incident has occurred.

*Agreed*

73. The incident log shall be kept in a place where it can be easily accessed by staff working at the premises and all staff shall be aware of the location of the incident log and the need to complete it in the case of any of the circumstances described above.

*Agreed*

74. The licence holder shall ensure the incident log is checked periodically and at least at monthly intervals to ensure that staff are completing the incident log.

*Agreed*

75. The incident log shall be made available for inspection to Police or authorised Council officers on request.

*Agreed*

#### **Additional Rules for Premises Used as Sex Cinemas**

*76 - 91 These are not applicable and therefore should be deleted.*

## **Application for the grant, renewal, transfer or variation of a Sexual Entertainment Venue Licence**

### **Section J: Details of any further information relevant to this application**

Please state below any further information which the applicant would wish to be taken into account when this application is considered. (This space may also be used to amplify answers to any previous questions).

#### **Licensing history of the Premises**

1. In March 1993 Wayne Chandler was granted a Justices Full On Licence in relation to these premises.
2. In November 1994 a Public Entertainment Licence issued by the London Borough of Camden was granted allowing the premises to trade until 12 midnight with public entertainment by way of DJs specifically on Friday and Saturday evenings and the licence was granted for the premises to trade until midnight, Monday through to Saturday inclusive.
3. In mid 1995 dancers were employed at the Griffin and performed on a part time basis. The dancers performed striptease and thereafter in mid 1996 the dancers performed on a full time basis at the premises as per the Public Entertainment Licence
4. In October 1998 Camden Council renewed the Public Entertainment Licence
5. In November 2005 an application was made by Wayne Chandler for a Premises Licence, which was granted.
6. In October 2010 an application was made to vary the Premises Licence to extend the hours of trading until 01:00 hours. This application was refused by Camden's Licensing Sub-committee due to one resident objecting to the application
7. In February 2011 an application for a variation of the Premises Licence was made to vary the hours of trading throughout the premises until 01:00 hours, Monday to Sunday inclusive. The application was granted in part in that the hours were extended on Fridays and Saturdays.
8. In October 2011 an application to vary the premises licence was made and granted without objection, to allow regulated entertainment until 01:00 hours, Friday to Saturday, with a closing time of 01:20, Friday and Saturday.
9. In March 2017 an application to vary the layout at the premises was made and granted without objection. The application sought to vary the layout following the relocation of the dancer's facilities from the first floor to the basement.
10. In January 2019 an application to renew the SEV and to vary the layout of the ground floor only of the premises was made and granted.
11. Wayne Chandler has always had a good relationship with his neighbours, some of whom have supported the above applications.

#### **London Borough of Camden Sex Establishment Policy ("the Policy")**

1. Where appropriate, the relevant requirements of the Policy have been identified.
2. Para 44: Given that these premises can demonstrate that during the twelve months prior to the commencement of the transitional period (i.e. November 2010 to November 2011) that it has been regularly providing sexual entertainment that previously failed to be licensed under the Licensing Act 2003, the presumption to refuse as set out in paragraph 42 of the 'London Borough of Camden Sex Establishment Policy' ("the Policy"), does not apply



3. Re para 46: the policy states that the Council will take into account whether the location of The Griffin is "appropriate", having regard to whether the premises are located within "the vicinity", i.e. a radius of 250 metres of a number of other premises. Other premises include:-
- (a) school or other facilities frequented by children such as playgrounds and playgroups;
  - (b) places of worship;
  - (c) public leisure facilities (including parks and open spaces);
  - (d) community buildings (including libraries);
  - (e) residential premises; and
  - (f) other establishments (policy paragraphs 46-4

7). The Griffin is located within 250 metres of:-

- (a) Two childrens' nurseries (Sure Start Childrens Centre, 1a Rosebery Avenue, London EC1 and Sir Christopher Hatton Primary School, 38 Leystall Street, London EC1).
- (b) St Peter's Italian Church (Clerkenwell Road, London EC1R 5EN).
- (c) a park/open space within the surrounds of the Peabody Estate off Farringdon Lane, London EC1 (and also at Gray's Inn Gardens, during permitted times).
- (d) a library (Holborn Library, 32-38 Theobald's Road, London WC1).
- (e) residential estates and blocks (including the Peabody Estate, Bourne Estate and other residential blocks fronting Clerkenwell Road and Rosebery Avenue, London EC1); and
- (f) a sex establishment (Secrets), 3 Gray's Inn Road, London WC1.

Although being in proximity to the locations identified above and in particular a significant number of residents, in its history, The Griffin has only received a very modest number of complaints, not all of which have been substantiated. On the contrary, a number of residents and businesses have supported The Griffin.

4. Re para 52: The Policy allows the Council to consider additional factors even if other premises fall outside the vicinity. The application of those factors would entitle the Council to have regard to, amongst other matters:-
- (a) The likely level of users of nearby premises passing by The Griffin.
  - (b) Whether the opening times of The Griffin coincide with the relevant times nearby premises are used; and
  - (c) Any comments received from persons about the grant of the licence to The Griffin  
It is important to note that local business have supported The Griffin in their application for variation in February 2011; that the Applicant received support from local businesses as The Griffin has been in situ for many decades and has always served the community. The Applicant has been the licensee within Camden division since 1993 and has an exemplary record.

There have never been any applications to revoke the former Justices Licence nor the Public Entertainment Licence granted prior to November 2005 by Camden Council. These were always renewed. Council records will show that there has not been any review of the current premises licence, nor any revocation proceedings, nor have there been any complaints

received from the police. There is no record of any breaches of the conditions attached to the Premises Licence. In relation to all the applications there have not been any representations made by the police. Indeed, the police have always commented that these premises have never caused them a problem whatsoever. There have not been any incidents of crime and disorder in relation to any recorded crime and indeed the premises have never been highlighted as having recorded crime.

The applicant is hands on at the premises invariably on a day to day basis, together with all the other managers and there is always a manager at the premises on a day to day basis. The security and door staff have been with the premises in excess of 10 years which demonstrates continuity, knowledge and understanding of the workings of the premises.

The Applicant has always assisted the Police with their enquiries in relation to crime at other locations.

5. Re para 49: A further sheet is attached (H5) on which we have listed all the conditions which we propose, any amendments or deletions. Where possible, the applicant has sought to comply with the Council's standard conditions. Where this has not been possible due to the layout of the premises, this has been explained..
6. Re para 50: Please see the documentation submitted with the application with regard to Codes of Practice for Dancers and the Welfare Policy to demonstrate that relevant consideration has been given to the protection of performers and their physical and psychological welfare. In fact these premises have several dancers who have worked at the premises in excess of 10 years.
7. Re para 51: The premises operate with a clear and transparent charging criteria, there is no entrance fee.

In relation to the stage shows, each customer is required to pay £1 per stage show. This is collected before the dancer has performed the stage show.

Table dances, which are individual dances with an individual customer, are £15 before 5 p.m. and £20 after 5 p.m and are carried out on a one to one basis. There are clear notices displayed over the entire premises of the charging criteria and customers are advised of this once they ask for a table dance. The system is very simple, these are the only charges made and it is very clear to the customer what charges are made.

8. Re para 52: Other factors the Council will consider when determining the applications:-

- (a) Whether users of nearby premises are likely to have to pass by the sex establishment.

As we have indicated there is no external signage, the interior of the premises cannot be viewed from outside and there is no literature at all disseminated by the premises. In all the years of trading there has never been a complaint or any comment made in relation to passing the premises.

- (b) Whether advertising inside a sex establishment can be viewed from the outside.

There is no advertising

- (c) Whether the name of the sex establishment clearly indicates the nature of the activities that take place there.

The Griffin has been in situ for many, many years and has had sexual entertainment since 1995. To all intents and purposes it is known that these premises provide these facilities.

- (d) Whether the times the sex establishment is open coincide with the times relevant nearby premises are used.

The premises operate within standard licensing times and to the Applicant's knowledge have never caused a problem during the times that it has operated.

- (e) Queuing arrangements

For persons wishing to gain admission to the sex establishment, there are no queues. The premises have not experienced queuing and this has never been a problem.

- (f) Whether planning consent exists for the proposed use

These premises have been a public house and licensed premises for in excess of 20 years and are not aware of any specific planning permission, as the premises would not have had a planning use at that time in any event. The premises have operated as such for in excess of the statutory period of 10 years and therefore would be able to establish the use as required by planning.

- (g) Whether there are any planned developments in the area that may render the locality unsuitable for a sex establishment.

Enquiries have been made of Camden Authority and it has been indicated that there are no planned developments at present.

- (h) It can be confirmed that the Applicant is of good character.

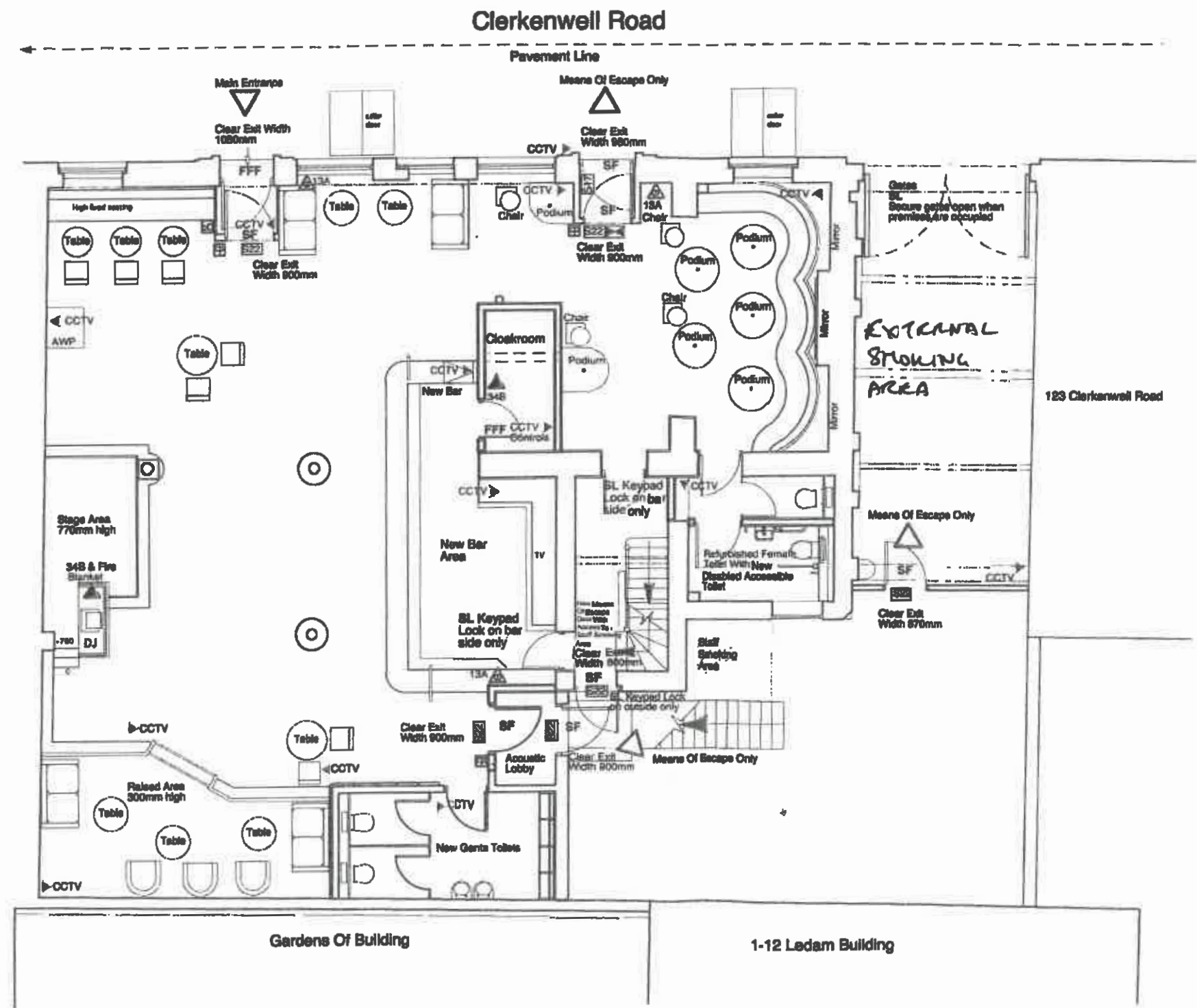
- (i) It will be demonstrated in the Application that the Applicant is able to comply with the standard conditions required for such a licence.

- (j) The premises have disabled access and a disabled toilet and indeed have disabled clientele (paragraph 52 of the Policy).












9. Re para 55: In relation to the planning requirement, this has been dealt with above. This is a premises that has always operated as a public house and has had sexual entertainment since 1995. The premises operate within their planning requirements and in any event have established use.

#### **Further relevant information**

10. This application is to Renew the current Sexual Entertainment Venue licence.



**Legend**  
Based on LFB Fire Safety Guidance Note GN71 Appendix A - key to Plan Symbols.

-  Fire Alarm Call Point with Fire Action Safety Sign adjacent.
-  Security lock (door, which may be provided)
-  Doors which are to be free from all fastenings (other than a ball or roller bearing or a lever handled latch). This is to ensure that the door is always available for escape from either side
-  Control panel sounders.
-  Doors to have only simple fastenings which is easily and immediately operable by a person on their way out without the use of a key, e.g., barrel bolts, night latch, lever handle, etc.
-  Fire exit, exit or emergency exit notice graphic symbol.
-  Fire exit notice internally illuminated.
-  Secure door open when premises are occupied.
-  13A Water Fire Extinguisher
-  34B Carbon Dioxide Fire Extinguisher
-  CCTV



**Ground Floor Proposals**

**Monahan Blythen Hopkins**  
architects

125 Clerkenwell Road London EC1Y 1DE. Tel: 020 7626 0916 Email: info@mbharchitects.co.uk

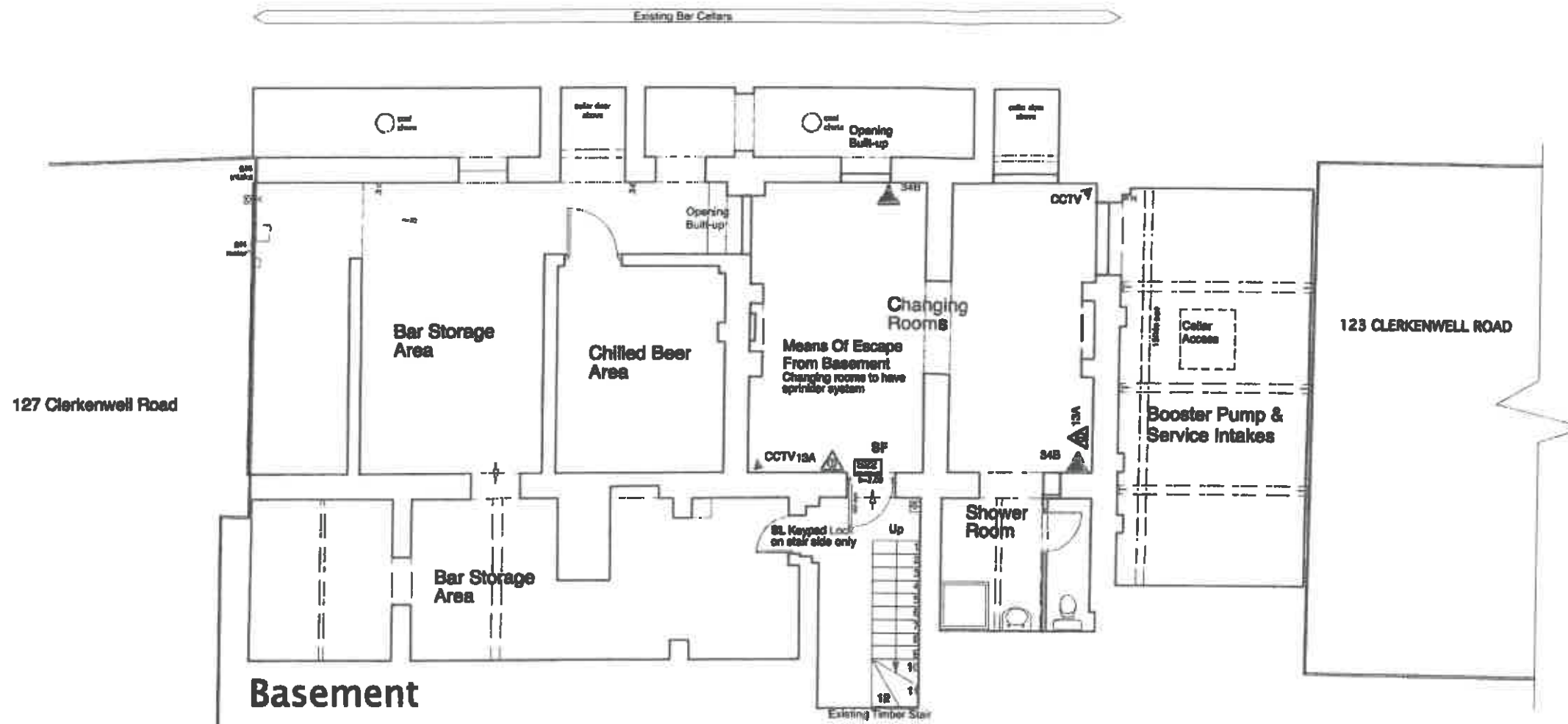
Client : Barwick Limited  
Job Title : 125 Clerkenwell Road  
Drawing: Ground Floor Plan (Licensing)

Scale : 1:100 @ A3 Date : Sept 2018  
Dwg No: 125CR/1.GF Rev :

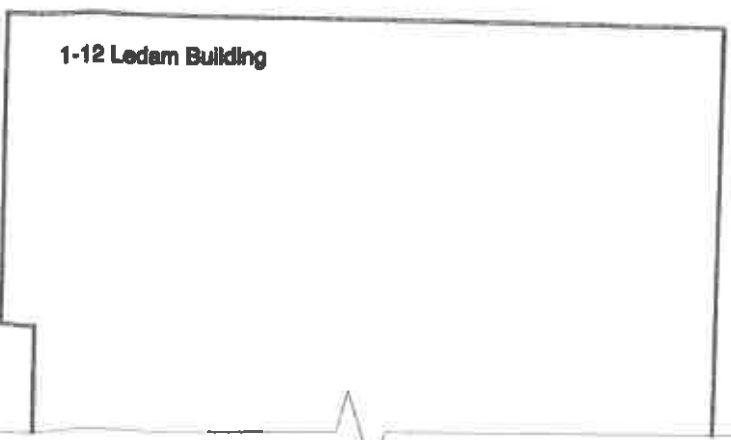
All dimensions shall be checked on site and must conform to the Drawing  
Drawn by: [Signature] Checked by: [Signature]



# Basement Plan



**Basement**



<b>Morgan Stanley Hopkins</b>		
<small>125 Clerkenwell Road London EC1A 3DF. Tel 020 7863 6010 Email: <a href="mailto:admin@mshhs.co.uk">admin@mshhs.co.uk</a></small>		
Client : <b>Barwerk Limited</b>		
Job Title : <b>125 Clerkenwell Road</b>		
Drawing: <b>Basement Floor Plan (Licensing)</b>		
Scale : <b>1:100 @ A3</b>	Date : <b>Sept 2018</b>	<small>All dimensions shall be checked on site and not based on drawings. Copyright Morgan Stanley Hopkins Partnership Ltd</small>
Dwg No: <b>125CR/LB</b>	Rev :	

## **The Griffin Dancers' Welfare Policy**

- 1. We will strive to ensure that the customers and dancers comply with all the conditions of their Codes of Conduct to produce a comfortable working environment.**
- 2. Although the longest shift is only 4 hours, we allow the dancers to take regular breaks.**
- 3. There is a seating area with a fridge to store their food and drink and a microwave.**
- 4. Dancers shall be provided with free drinking water on request.**
- 5. We have central heating to keep the dancers warm during cold periods, as well as air conditioning and fans in the changing area for times when the weather is warmer.**
- 6. The dancers have their own shower and wash basin in their changing area.**
- 7. In our seating area for the dancers we also provide a PC with internet connection, as well as lockers for safe storage of belongings.**
- 8. All dancers are familiar with our fire drill and safe dispersal policy.**
- 9. All dancers are familiar with our Health and Safety Policy**
- 10. The dancers book their own taxis home (Uber) and as soon as it is confirmed that the car is outside, the dancer takes the cab home.**
- 11. Any dancer concerned about the behaviour of a customer shall report the incident immediately to the Duty Manager, who shall take immediate action to resolve the matter.**
- 12. Staff members must constantly supervise the behaviour of customers at the premises and shall intervene where any customer is breaching the code of conduct for customers or is otherwise causing alarm or distress to a dancer.**
- 13. Any customer behaving inappropriately will be ejected from the venue.**
- 14. Dancers shall not be required to drink alcohol.**



# **Disciplinary Procedure**

**The Griffin**

**125 Clerkenwell Road, London, EC1R 5DB**

## **Table of Contents**





1. Policy Statement
2. Who is covered by the procedure
3. What is covered by the procedure
4. Confidentiality
5. Investigations
6. Criminal Charges
7. Suspension
8. Notification of a hearing
9. The right to be accompanied
10. Procedure at disciplinary hearings
11. Disciplinary Penalties
12. The effect of a warning
13. Appeals against disciplinary action

### **1. Policy Statement**

The aims of this Disciplinary Procedure and its associated Code of Conduct are to set out the standards of conduct expected of all staff and to provide a framework within which managers can work with employees to maintain satisfactory standards of conduct and to encourage improvement where necessary.



It is our policy to ensure that any disciplinary matter is dealt with fairly and that steps are taken to establish the facts and to give employees the opportunity to respond before taking any formal action.

This procedure does not form part of an employee's contract of employment and it may be amended at any time. We may also vary this procedure, including any time limits, as appropriate in any case.

## **2. Who is Covered by the Procedure**

The procedure applies to all dancers regardless of length of service.

## **3. What is covered by the procedure?**

This procedure is used to deal with misconduct. It does not apply to cases involving genuine sickness absence, proposed redundancies or poor performance. In those cases reference should be made to the appropriate policy or procedure.

Minor conduct issues can often be resolved informally between you and your line manager. These discussions should be held in private and without undue delay whenever there is cause for concern. Where appropriate, a note of any such informal discussions may be placed in your personnel file but will be ignored for the purposes of any future disciplinary hearings. In some cases an informal verbal warning may be given, which will not form part of your disciplinary records. Formal steps will be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

You will not normally be dismissed for a first act of misconduct, unless we decide it amounts to gross misconduct or you have not yet completed your probationary period.

If you have difficulty at any stage of the procedure because of a disability, you should discuss the situation with your line manager.



#### **4. Confidentiality**

Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved. All employees must treat as confidential any information communicated to them in connection with an investigation or disciplinary matter.

You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure.

You will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against you, unless we believe that a witness' identity should remain confidential.

#### **5. Investigations**

The purposes of an investigation is for us to establish a fair and balanced view of the facts relating to any disciplinary allegations against you, before deciding whether to proceed with a disciplinary hearing. The amount of investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents.

Investigative interviews are solely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary hearing has been held.

You do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a companion if it helps you to overcome any disability, or any difficulty understanding English.

You must cooperate fully and promptly in any investigation. This will include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending investigative interviews if required.

#### **6. Criminal Charges**



Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding where to take formal disciplinary action.

We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment.

## **7. Suspension**

In some circumstances we may need to suspend you from work. The suspension will be for no longer than is necessary to investigate the allegations and we will confirm the arrangements to you in writing. While suspended you should not visit our premises or contact any of our clients, customers, suppliers, contractors or staff, unless you have been authorized to do so by Wayne Chandler.

Suspension of this kind is not a disciplinary penalty and does not imply that any decision has already been made about the allegations. Pay and benefits during suspension will be calculated as set out in your contract.

## **8. Notification of a Hearing**

Following any investigation, if we consider there are grounds for disciplinary action, you will be required to attend a disciplinary hearing. We will inform you in writing of the allegations against you, the basis for those allegations, and what the likely range of consequences will be if we decide after the hearing that the allegations are true. We will also include the following where appropriate:

- a) A summary of relevant information gathered during the investigation



- b) A copy of any relevant documents which will be used at the disciplinary hearing; and
- c) A copy of any relevant witness statements, except where a witness' identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

We will give you written notice of the date, time and place of the disciplinary hearing. The hearing will be held as soon as reasonably practicable, but you will be given a reasonable amount of time, usually seven days, to prepare your case based on the information we have given you.

### **9. The Right to be accompanied**

You may bring a companion to any disciplinary hearing or appeal hearing under this procedure. The companion may either be a trade union representative or a companion of your choice. You must tell Wayne Chandler who your chosen companion is, in good time before the hearing.

A companion is allowed reasonable time off from duties without loss of pay but no-one is obliged to act as a companion if they do not wish to do so.

If the choice of your companion is unreasonable we may ask you to choose someone else. For example:

- a) If in our opinion your companion may have a conflict of interest or may prejudice the meeting; or
- b) If your companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards

### **10. Procedure at Disciplinary Hearings**

If you or your companion cannot attend the hearing you should inform us immediately and we will arrange an alternative time. You must make every effort to attend the hearing, and failure to attend without good reason may be treated as misconduct in itself. If you fail to attend without good reason or are



persistently unable to do so (for example health reasons), we may have to take a decision based on the available evidence.

The hearing will be chaired by Wayne Chandler and another Manager will also be present. You may bring a companion with you to the disciplinary hearing (see paragraph 9)

At the disciplinary hearing we will go through the allegations against you and the evidence that has been gathered. You will be able to respond and present any evidence that has been gathered. You will be able to respond and present any evidence of your own. Your companion may make representations to us and ask questions, but should not answer on your behalf. You may confer privately with your companion at any time during the hearing.

You may ask relevant witnesses to appear at the hearing if we need to carry out any further investigations such as re-interviewing witnesses in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

We will inform you in writing of our decision and our reasons for it, usually within one week of the disciplinary hearing. Where possible we will also explain this information to you in person.

## **11. Disciplinary Penalties**

The usual penalties for misconduct are set out below. No penalty should be imposed without a hearing. We aim to treat employees fairly and consistently, and a penalty imposed on another employee for similar misconduct will usually be taken into account but should not be treated as a precedent. Each case will be assessed on its own merits.

**Stage 1 – Verbal warning.** Provided or authorized by a manager for a first act of misconduct.

**Stage 2 - First written warning.** A first written warning may be authorized by a Manager. It will usually be appropriate where there are no other active written warnings on your disciplinary record.





**Stage 3 – Final written warning.** A final written warning may be authorized by Wayne Chandler. It will usually be appropriate for:

- a) Misconduct where there is already an active written warning on your record; or
- b) Misconduct that we consider sufficiently serious to warrant a final written warning even though there are no other active warnings on your record.

**Stage 4 – Dismissal.** Dismissal may be authorized by Wayne Chandler. It will usually only be appropriate for:

- a) Any misconduct during your probationary period:
- b) Further misconduct where there is an active final written warning on your record; or
- c) Any gross misconduct regardless of whether there are active warnings on your record. Gross misconduct will usually result in immediate dismissal without notice or payment in lieu of notice (summary dismissal). Examples of gross misconduct are set out in our Code of Conduct.

**Alternatives to dismissal.** In some cases we may at our discretion consider alternatives to dismissal. These may be authorized by a manager and will usually be accompanied by a final written warning, these examples include:

- a) Loss of shifts
- b) Loss of prime shifts

## **12. The Effect of a Warning**

Written warnings will set out the nature of the misconduct, the change in behavior required, the period for which the warning will remain active, and the likely consequences of further misconduct in that active period.

A first written warning will usually remain active for six months and a final written warning will usually remain active for 12 months. In exceptional cases verging on gross misconduct, a final written warning may state that it will remain active indefinitely. Your conduct may be reviewed at the end of a



warning's active period and if it has not improved sufficiently we may decide to extend the active period.

After the active period, the warning will remain permanently on you personnel file but will be disregarded in deciding the outcome of future disciplinary proceedings.

### **13. Appeals against Disciplinary Action**

If you feel that disciplinary action taken against you is wrong or unjust you should appeal in writing, stating your full grounds of appeal, to a Manager within one week of the date on which you were informed of the decision.

If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. However, if your appeal is successful you will be reinstated with no loss of continuity or pay.

If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing.

We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

Where possible, the appeal hearing will be conducted impartially by a manager who has not been previously involved in the case. The manager who conducted the disciplinary hearing will also usually be present. You may bring a companion with you to the appeal hearing (see paragraph 9).

We may adjourn the appeal hearing if we need to carry out any further investigations in the light of any new points you have raised at the hearing. You



will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

Following the appeal hearing we may:

- a) Confirm the original decision;
- b) Revoke the original decision; or
- c) Substitute a different penalty

We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.



## **Code of Conduct for Dancers**

### **Camden SEV Standard Conditions to be adhered to at all times**

**Dancers may not intentionally touch a customer during a performance.**

**Dancers may not permit a customer to touch them during a performance.**

**Dancers may not straddle the customer.**

**If a customer attempts to touch or speak to a dancer inappropriately, the dancer shall stop the performance and advise the customer of the rules of the Code of Conduct. If the customer persists in inappropriate behaviour, the dancer shall stop the performance and inform premises management immediately.**

**Dancers may not intentionally touch the genitals, anus or breasts of another dancer, nor knowingly permit another dancer to touch their genitals, anus or breasts.**

**Dancers shall not solicit for gratuities or payment for sexual favours.**

**Dancers shall not engage in any acts of prostitution i.e. the receiving of gratuities or payment for sexual favours.**

**Dancers may not perform any act which simulates masturbation, oral sex or sexual intercourse, including the insertion of any object, including their own fingers, in the anus or vagina.**

**Dancers may not touch their own breasts, anus or genitals with their fingers, lips or tongue.**

**Dancers may not be in the company of a customer unless it is in an area of the premises that is open to the public.**

**Dancers shall not perform if under the influence of alcohol or drugs.**

**If a customer engages in acts of masturbation or other sexual behaviour, the dancer shall cease the performance immediately and inform the premises management.**

**Dancers shall use the dressing room facilities provided for their exclusive use to change for their performance.**

**Dancers shall only use the smoking area provided specifically for their use.**



Dancers shall only use the sanitary facilities specifically provided for their use.

Dancers shall not leave the premises or otherwise be visible outside the premises, including for smoking breaks, unless dressed in suitable attire, e.g. outerwear consisting of coat or top and skirt or trousers, so lingerie or other performance costume is not visible.

All dancers shall comply with this Code of Conduct. Any failure to adhere to the Code of Conduct shall render the dancer subject to the house Disciplinary Rules, a copy of which has been provided to each dancer.

### **Morning Calls – This is very important**

You must telephone the office on 02072420606 between 10am and 11am to check in for your shift on each day you have been given a shift.

You need to telephone the office on Thursday between 11am and 12 noon and you will be informed of your shifts for the following week.

Failure to check in will mean the loss of that day's shift and the next day as well.

If you are sick, unable to work for whatever reason or running late for a shift, please telephone the office at check in time and let them know.

Failure to give available may mean that there will be no shifts available on that day.

### **Your Appearance**

You must pay attention to your appearance and ensure you are well turned out on every shift.

This means clean brushed hair, neatly applied make up and first class selection of costumes.

You must vary your music constantly and change your outfits at least 4 times during a shift.



### **Behaviour**

You must be very careful what you drink during your shift. Anyone found becoming drunk, in possession of or under the influence of drugs will be sent home immediately and will have their employment terminated with immediate effect.

If you have a problem with a customer or another dancer you must speak to the manager immediately.

Anyone caught carrying out any illegal activity on the premises, including stealing, will have their employment terminated with immediate effect.

### **Table Dancing (TD)**

TD's are £10 before 5pm and £15 after 5pm, and are strictly on a one to one basis.

If you have two or more customers who wish to have a TD together, then you will need to ask two or more dancers to be included in the TD, as there always needs to be at least 1 dancer to each customer. A customer may tip a dancer more money if he wants, however you are not allowed to undercut the price of the TD.

The TD must be for a minimum of four minutes.

During the TD no customer is to have any physical contact with a dancer in any way.

Please remember at all times this is a striptease. Kneeling, sitting or lying on the floor whilst table dancing is not permitted.

TD's may only be performed in the TD area, not at the bar or on the man floor.

Do not start a TD until the customer is seated and always remember to get the money before the TD commences.

If a customer is rude in anyway or touches you during a TD, stop the dance immediately and seek the assistance of a manager or door supervisor.

Random checks will be carried out at all times to make sure that both dancers and customers are acting in accordance with the terms of the licence and codes of conduct.

Anyone who does not comply with tis Code of Conduct will be sent home immediately and repeat offenders will have their employment terminated.





### **Stage Shows**

**When you arrive for your shift, please check in at the bar to obtain your number.**

**You are required to be at the bar 30 minutes before your shift starts to get yourself ready. You must be ready and on the floor by the given start time.**

**Collections will be carried out before you go on stage and your collection will take place when the dancer before you starts their dance.**

**Each customer is required to tip each dancer £1 for each stage show.**

**Generally it is easier to start with the crowd at the back and work your way forwards. If you get stuck with a customer who may not have the correct change or is haggling, then simply carry on and return to the customer afterwards.**

**When the DJ calls you to the stage you are to go immediately. You must keep to the DJ's timetable, as running late can cause problems with the timetable later on.**

**If you have a problem with a customer, please refer this to a manager immediately. It is important that you remain calm at all times, please smile and be friendly, and we will ensure that the problem is dealt with ASAP. Please do not discuss the problem you may have had with a customer earlier to another customer.**

**Please be aware of when customers are coming in a leaving. If someone has just come in at the end of your dance, then clearly please allow them to get a drink and some change. If a customer is there and is not paying for the floor show, as is required, please let a manager know.**

**You can cash your coins at the bar for notes at any time. Please be aware of how busy the bar area can get and it would be helpful if you can cash you coins when it is less busy. Please note you must cash up before you leave.**

**No dancer is to leave early without the manager's permission.**

**The dancer must stay on the floor until the last dancer on your shift is on the stage. The dancer shall not start a shift until the last dancer from the previous shift is on the stage and the dancer will not be permitted to work on after their shift has finished. The dancer is not permitted to stay back drinking with customers after their shift has finished.**



**Shifts**

There are three shifts, early, mid and late.

If you are here for the early shift you must be here by 12:30 at the latest. On this shift you can choose your number, the earlier you arrive, the more choice you will have as to when you dance.

On the mid shift you are required to be here no later than 30mins before your shift, to put your name in a jug provided and your number will be selected at random. If you do not arrive within this time you will have to dance first. If you cannot get changed in time, you will lose the opportunity to perform your first dance.

On the late shift you must be here 30 minutes before to put your name in a jug provided and your number will be selected at random. If you are not here half an hour before you will be required to dance last.

Although the longest shift is only four hours, we require that you take regular breaks.

**Important Telephone Numbers**

Griffin Office 0207 242 0606

Griffin Bar 0207 405 3855



# **CUSTOMERS CODE OF CONDUCT**

**Customers may not touch the dancers during a performance or at any other time.**

**Customers may not take any pictures.**

**Customers may not harass or intimidate the dancers.**

**Customers may not make lewd or offensive remarks to dancers.**

**Customers may not ask dancers to perform any sexual favour.**

**Customers may not perform acts of masturbation or indulge in other sexual behaviour.**

**Customers must make a minimum contribution of £1 to every dancer before stage performances.**

**Any customer failing to adhere to the Customers Code of Conduct will be ejected from the premises.**



**Sex Establishment Licence  
London Borough of Camden**

**Part 1 – Licence**

**Licence Number: SE-PREMLIC\00259**

**Type of Premises: Sexual Entertainment Venue**

**Expiry Date of Licence: 31st October 2022**

**Premises: The Griffin  
125 Clerkenwell Road  
London  
EC1R 5DB**

**Licence Holder: Mr Wayne Chandler  
The Griffin  
125 Clerkenwell Road  
London  
EC1R 5DB**

**Permitted Times:**

	Start	Finish
Monday	11:00	00:00
Tuesday	11:00	00:00
Wednesday	11:00	00:00
Thursday	11:00	00:00
Friday	11:00	01:00
Saturday	11:00	01:00
Sunday	11:00	00:00

**Conditions**

This licence is granted subject to the Council's standard Sex Establishment Conditions, unless expressly removed or varied as specified in Part 2 of this licence, and any additional conditions in Part 2 of this Licence .

**Signed on behalf of the Director, Culture & Environment**

**Date Licence Renewed: 01/12/2021 APP\SE-RENEW\103183 & 106700**

THIS PAGE IS INTENTIONALLY BLANK

**Sex Establishment Licence  
London Borough of Camden**

**Part 2 – Special Conditions**

**Licence Number: SE-PREMLIC\00259**

In the event of any conflict between these conditions and any special conditions contained in this schedule, the special conditions shall prevail.

**Standard Conditions Removed from the Licence:**

None

**Standard Conditions Varied on the Licence:**

Condition 18 amended to:

CCTV monitors covering the premises must be available near to the entrance of the premises where they can immediately be viewed by Police and Council officers during an inspection of the premises. This condition does not preclude further monitors being located in other parts of the premises.

Condition 34 amended to:

The licence holder shall ensure that the name of the Duty Manager is displayed prominently at the premises so the name can easily be viewed by Police or authorised Council officers carrying out an inspection of the premises, or otherwise by persons using the venue.'

Condition 64, is amended to include an additional bullet point of:

- Dancers shall not be required to drink alcohol.

**Additional Conditions:**

The Dancers' Welfare Policy shall state that dancers shall not be required to drink alcohol.

That the management be asked to ensure that there is CCTV coverage of all areas of the premises that can be accessed by members of the public and that a plan showing the location of all CCTV cameras be submitted to the Licensing Authority on completion of the works currently taking place.

THAT the following additional condition be added to the licence:- 'No curtain of any description shall be used in the premises.'



THIS PAGE IS INTENTIONALLY BLANK

**Sex Establishment Licence****London Borough of Camden****Part 3 – Management Details****Licence Number: SE-PREMLIC\00259****The Manager**

(The person responsible for the day to day management of the premises)

Name: Wayne Chandler

Role: Manager

**Other Managers:**

(The person(s) responsible for the day to day management of the premises in the absence of the manager)

Name: Adam Chandler

Role: Assistant Manager

Name: Ruth Chandler

Role: Duty Manager

Name: Valentinas Popelnickis

Role: Duty Manager

Name:

Role:

Name:

Role:

Name:

Role:

THIS PAGE IS INTENTIONALLY BLANK

**Sex Establishment Licence: Part 4 – Premises Plans**

THIS PAGE IS INTENTIONALLY BLANK



## **Sex Establishment Licence - London Borough of Camden**

### **Part 5 – Standard Conditions**

Unless otherwise specified in the Licence:

- a) Conditions 1 to 25 apply to all apply to all Sex Establishment Licences.
- b) Additional conditions from number 26 onwards only apply to the relevant type of Sex Establishment as indicated by the section headings, with those being “Sex Shops”, “Sexual Entertainment Venues” and “Sex Cinemas”

In these conditions, the expressions "sex cinema", "sex shop", "sex article", and "sexual entertainment venue" have the meaning ascribed to them in Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Police and Crime Act 2009. "The Council" means the Council of the London Borough of Camden. "Licence holder" means the person or organisation named as the holder of the sex establishment licence for the premises granted by the London Borough of Camden for the time being in force. "Licensed premises" means the premises licensed by the London Borough of Camden to be used as a sex establishment.

In the event of any conflict between these conditions and any special conditions contained in a licence relating to a sex establishment, the special conditions shall prevail.

#### General Conditions

1. The licence holder shall retain control over all portions of the premises as defined on the approved premises plan, and shall not let, license or part with possession of any part of the licensed premises.
2. The public shall not be permitted to have access to any part or parts of the licensed premises other than those which have been approved by the London Borough of Camden as per the plan submitted to the Council at the time the licence was granted.
3. No person under the age of eighteen shall be admitted to the licensed premises whilst the sex establishment licence is being used and prominent notices shall be displayed at each entrance to the premises to that effect.
4. No person aged under eighteen shall be employed to work at the licensed premises in any capacity, or allowed to work in the premises on a self-employed basis.
5. No part of the licensed premises shall be used by prostitutes for the purpose of solicitation or otherwise exercising their calling.
6. Where the licensee is a body corporate or an unincorporated body, any change of director, company secretary or other person responsible for the management of the body is to be notified in writing to the Council within 14 days of such change and such details as the Council may require in respect of any new director, secretary or manager are to be furnished within 14 days of any written request by the Council.
7. The premises layout shall allow all public parts of the premises to be easily supervised by premises management, staff and door supervisors at all times, save for public toilet areas which shall be checked at least at hourly intervals to ensure such areas are not being used for any improper purposes and are in a clean and useable condition.

8. No change of use of any portion of the licensed premises from that approved by the Council shall be made until the Council's consent in writing has been obtained.
9. No access shall be permitted through the licensed premises to any other premises adjoining or adjacent except in the case of emergency.
10. No alterations or additions, either internal or external, and whether permanent or temporary, shall be made to the structure, lighting or layout of the licensed premises except with the prior written approval of the Council.
11. The windows and openings of the licensed premises shall be of material or covered with material which will render the interior of the premises invisible to passers by.
12. The external doors to the licensed premises shall be fitted with a device to provide for their automatic closure and such devices shall be maintained in good working order.
13. The licence holder shall ensure that the sex establishment licence or a certified copy shall be prominently exhibited at the premises in a position where it can be clearly seen by patrons of the premises. For the purposes of this section, a certified copy of the licence shall be a copy certified as a true copy by the holder of the licence or his solicitor and appropriately signed and dated with the date the copy was certified.

#### Touting for Business

14. There shall be no touting for business for the premises by way of flyer, persons holding advertising boards, branded vehicles or personal solicitation.

#### Premises Appearance

15. The Council shall not permit the display of any form of imagery or photographs that the Council believes could be construed as offensive to public decency.
16. No display or advertisement of the activities permitted by the sex establishment licence shall be exhibited so as to be visible from outside of the premises except:-
  - any notice required to be displayed by law, by these regulations, or by any condition of the sex establishment licence granted by the Council
  - the name of the premises as specified in the sex establishment licence
  - the hours of opening of the premises
  - notice of any admission charge to the premises

unless the Council has given its prior consent in writing that such display or advertisement may be used.

17. A CCTV system shall be installed and working to the satisfaction of the Police and the Council. The system shall cover the whole of the parts of the premises to which the public have access, with the exception of individual toilet cubicles. This shall include external areas of the premises including the area immediately outside any entrance to, or exit from, the premises unless the Council has given its prior consent in writing that such display or advertisement may be used.

#### CCTV Conditions

18. CCTV monitors covering the premises shall be available near to the entrance of the premises where they can immediately be viewed by Police and Council officers during an inspection of the premises. This condition does not preclude further monitors being located in other parts of the premises.
19. Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the licensed premises, advising that CCTV is in operation.
20. The CCTV shall record continuously the entire time that any member of the public is present on the licensed sex establishment.
21. Recordings shall be of a sufficient quality to clearly identify persons on the recordings
22. Recordings shall be retained for a minimum period of 31 days.
23. Copies of the recordings shall be made available to the Police and the Council on request.
24. Any defect in the operation of the CCTV system shall be notified immediately to the Police Licensing Team and the Council in writing and by telephone, and the licence holder shall ensure that repairs to the CCTV system are effected as soon as reasonably practicable.
25. Where any part of the CCTV system is non operational, the licence holder shall comply with any direction from the Metropolitan Police or the Council not to use certain parts of the licensed premises for the purposes of the sex establishment licence.

#### **Additional Conditions for Sex Shops**

26. No sex articles shall be displayed in such a manner that they can be seen by persons outside the sex establishment.
27. The licensee shall ensure that no employee or any other person shall seek to obtain custom for the sex establishment by means of personal solicitation outside or in the vicinity of the premises.
28. Any change of staff employed at the licensed premises shall be notified in writing to the Council within 14 days of the change.
29. All sex articles and other things displayed within the licensed premises shall be clearly marked to show to persons who are inside the premises the respective prices being charged (inclusive of VAT).

30. All goods offered for sale, hire, exchange or loan shall be available for inspection prior to supply and a notice to this effect is to be prominently displayed within the premises.

### **Additional Conditions for Sexual Entertainment Venues**

31. The layout of the premises shall be such that performers cannot be seen from outside the premises.
32. Performers may not stand in lobby, reception or foyer areas or outside the premises entrance for the purposes of greeting customers or encouraging customers to enter the venue.
33. The licence holder shall nominate a Duty Manager for the premises on each occasion they are open to the public and being used for the purposes of providing relevant entertainment.
34. The licence holder shall ensure that the name of the Duty Manager is displayed prominently at the premises so the name can be easily viewed by Police or authorised Council officers carrying out an inspection of the premises, or otherwise by persons using the venue
35. The Duty Manager shall be responsible for ensuring the premises operate in accordance with the conditions applicable to the sex establishment licence.
36. The Duty Manager shall remain on the premises while they are on duty save in the event of an emergency situation.
37. Door supervisors registered with the Security Industry Authority shall be provided at the premises in sufficient numbers to ensure that:
  - each entrance and exit at the premises used by the public are manned by at least two door supervisors
  - all public areas of the premises are continually monitored to ensure the Dancers and Customers Codes of Conduct and any licence conditions are being complied with
  - persons breaching the Customers Code of Conduct or otherwise behaving in a disorderly manner can be safely ejected from the premises

### **Requirements for a Code of Conduct for Dancers**

38. There shall be a Code of Conduct for Dancers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.
39. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Dancers".
40. No change shall be made to the Dancer's Code of Conduct without the prior written consent of the Council and the Metropolitan Police.
41. The Dancers Code of Conduct must state that dancers who do not comply with the Code of Conduct will face disciplinary proceedings.

42. The licence holder shall require all dancers to sign an acknowledgement that they have received a copy of the Dancer's Code of Conduct and have read and understood its contents and shall comply with such Code of Conduct at all times they are working at the premises as dancers.
43. The licence holder shall retain original records showing that each dancer has signed to acknowledge receipt of the Dancer's Code of Conduct and Disciplinary Procedure as described above.
44. A copy of the sections of the Dancer's Code of Conduct relevant to customers shall be prominently displayed in each area of the premises to which the public have access, including toilet areas, and in any area used as a changing/dressing room for dancers.
45. The premises management and staff (including security staff) shall be aware of the content of the Dancer's Code of Conduct and shall ensure it is complied with.

### **Requirements for a Code of Conduct for Customers**

46. There shall be a Code of Conduct for Customers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.
47. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Customers".
48. The Code of Conduct for Customers shall be displayed in prominent positions throughout the premises where it is visible to all customers.
49. No change shall be made to the Customers Code of Conduct without the prior written consent of the Council and the Metropolitan Police.
50. The Customer's Code of Conduct must state that customers who do not comply with the Code of Conduct will be ejected from the premises.
51. The premises management and staff (including security staff) shall be aware of the content of the Customer's Code of Conduct and shall ensure it is complied with.
52. Where a customer breaches the Customers Code of Conduct, this shall be recorded in the incident log.
53. If management are made aware of a customer repeatedly breaching the rules of the Customers Code of Conduct, they shall eject that customer from the premises.

### **Disciplinary Procedure**

54. A disciplinary procedure shall be in place to deal with dancers who breach the Dancer's Code of Conduct. The disciplinary procedure shall be detailed in writing and a copy of it provided to each dancer who works at the premises.
55. The licence holder shall require all dancers to sign an acknowledgement that they have been provided with a copy of the house Disciplinary Procedure and have read and understood its contents.

56. The Disciplinary Procedure shall not include provision to “fine” dancers or otherwise impose pecuniary penalties. Action taken may include verbal or written warnings, suspension of the dancer’s right to perform at the premises, or revocation of the dancer’s right to perform at the premises.

### **Sexual Entertainment Venues - Code of Conduct for Dancers**

57. The Dancer’s Code of Conduct shall include the following conditions as a minimum:
- a. Dancers may not intentionally touch a customer during a performance.
  - b. Dancers may not permit a customer to touch them during a performance.
  - c. Dancers may not straddle the customer.
  - d. If a customer attempts to touch or speak to a dancer inappropriately, the dancer shall stop the performance and advise the customer of the rules of the Code of Conduct. If the customer persists in inappropriate behaviour, the dancer shall stop the performance and inform premises management immediately.
  - e. Dancers may not intentionally touch the genitals, anus or breasts of another dancer, nor knowingly permit another dancer to touch their genitals, anus or breasts.
  - f. Dancers shall not solicit for gratuities or payment for sexual favours.
  - g. Dancers shall not engage in any act of prostitution, i.e. the receiving of gratuities or payment for sexual favours.
  - h. Dancers may not perform any act which simulates masturbation, oral sex or sexual intercourse, including the insertion of any object, including their own finger, in to the anus or vagina.
  - i. Dancers may not touch their own breasts, anus or genitals with their fingers, lips or tongue.
  - j. Dancers may not be in the company of a customer unless it is in an area of the premises that is open to the public.
  - k. Dancers shall not perform if under the influence of alcohol or drugs.
  - l. If a customer engages in acts of masturbation or other sexual behaviour, the dancer shall cease the performance immediately and inform the premises management.
  - m. Dancers shall use the dressing room facilities provided for their exclusive use to change for their performance.
  - n. Dancers shall only use the smoking area provided specifically for their use.
  - o. Dancers shall only use the sanitary facilities specifically provided for their use.
  - p. Dancers shall not leave the premises or otherwise be visible outside the premises, including for smoking breaks, unless dressed in suitable attire, e.g. outerwear consisting of coat or top and skirt or trousers so lingerie or other performance costume is not visible.
  - q. All dancers shall comply with this Code of Conduct. Any failure to adhere to the Code of Conduct shall render the dancer subject to the house Disciplinary Rules, a copy of which has been provided to each dancer.



### **Sexual Entertainment Venues - Code of Conduct for Customers**

58. The Customers Code of Conduct shall include the following conditions as a minimum:
- a. Customers may not touch dancers during a performance.
  - b. Customers may not make lewd or offensive remarks to dancers.
  - c. Customers may not harass or intimidate dancers.
  - d. Customers may not ask dancers to perform any sexual favour.
  - e. Customers may not perform acts of masturbation or indulge in other sexual behaviour.
  - f. Any customer failing to adhere to the Customers Code of Conduct will be ejected from the premises.

### **Private Booths**

59. Private booths shall not be provided at the licensed premises.

### **Dancers Private Work Areas**

60. A designated dressing room area shall be provided for dancer's exclusive use. Such dressing room shall be secured so as not to be accessible to members of the public and shall be sufficient to enable dancers to change privately.
61. Dancers shall be provided with their own sanitary facilities separate from those used by customers.
62. A secure external area shall be provided for dancers to smoke without coming into contact with customers.

### **Dancers Welfare Policy**

63. The licence holder shall have a Dancers Welfare Policy in place at the premises.
64. The Policy shall, as a minimum, state that
- any dancer concerned about the behaviour of a customer shall report the incident immediately to the Duty Manager who shall take immediate action to resolve the matter
  - staff members must constantly supervise the behaviour of customers at the premises and shall intervene where any customer is breaching the Code of Conduct for Customers or is otherwise causing alarm or distress to a dancer
  - any customer behaving inappropriately will be ejected from the venue
  - dancers shall be provided with free drinking water on request
  - Dancers shall not be required to drink alcohol

### **General Provisions**

65. The licence holder shall obtain a photocopy of the passport of each dancer that works at the premises and shall certify the copy as being a true copy by signing and dating the photocopy together with their name and job title.

66. The licence holder shall undertake reasonable checks to ensure each dancer is eligible to work in the United Kingdom and shall not allow dancers ineligible to work in the UK to work at the premises.
67. The licence holder shall maintain written records of all dancers working at the premises. The records shall show the dancer's full name, home address, date of birth and a certified photocopy of their passport and the date the dancer was provided with the Dancers Code of Conduct and Disciplinary Procedure. Such records shall be kept on the licensed premises and produced for inspection by Police and authorised Council officers on request. Any instances of the dancer breaching the Dancers Code of Conduct shall be recorded on the dancer's record showing the date and time of the incident and details of the breach that occurred.
68. Dancers under the age of eighteen shall not be permitted to work at the premises.
69. Dancers shall not be permitted to perform if they are clearly under the influence of alcohol or drugs. Dancers shall not be required to drink alcohol.
70. The licence holder shall ensure that an incident log is maintained at the premises. The incident log shall, as a minimum, give details of:
  - any ejections from the premises
  - any refused admissions
  - any refused sales
  - any inappropriate behaviour by guests
  - any failure in the CCTV system
  - any incidents of crime or disorder
  - any complaints made by the public, guests or dancers
71. The record shall show the date, the time of the incident, the name of the staff member reporting the incident, a brief description of the customer involved/name of dancer where appropriate and brief details of the incident and any action taken by the staff.
72. The incident log shall be completed as soon as reasonably practicable after any incident has occurred.
73. The incident log shall be kept in a place where it can be easily accessed by staff working at the premises and all staff shall be aware of the location of the incident log and the need to complete it in the case of any of the circumstances described above.
74. The licence holder shall ensure the incident log is checked periodically and at least at monthly intervals to ensure that staff are completing the incident log.
75. The incident log shall be made available for inspection to Police or authorised Council officers on request.

#### **Additional Rules for Premises Used as Sex Cinemas**

76. No film shall be exhibited unless:

- (i) it has been passed by the British Board of Film Classification as a U, PG, 12, 15, 18 or RESTRICTED (18) film and no notice of objection to its exhibition has been given by the Council, or
  - (ii) the film has been passed by the Council as U, PG, 12, 15, 18 or RESTRICTED(18) with the London Borough of Camden being the name of the Council.
77. If the licence holder is notified by the Council in writing that it objects to the exhibition of a film specifying the grounds of objection, such film shall not be exhibited.
78. Not less than 28 days notice in writing shall be given to the Council of any proposal to exhibit any film which has not been classified as specified above. Such a film may only be exhibited if consent has been obtained from the Council in writing and in accordance with the terms of any such written consent.
79. When the programme includes a film in the 12, 15 or 18 category no person appearing to be under the age of 12, 15 or 18 as appropriate shall be admitted to any part of the programme.
80. If the Council does not agree with the category of any film as passed by the British Board of Film Classification, it may alter the category or prohibit the showing of the film.
81. On notice of alteration of category being given by the Council to the licence holder, the film shall thereafter be treated as being in the altered category and the conditions applicable to the exhibition of films in the altered category shall be observed.
82. Immediately before each exhibition at the premises of a film (other than a current newsreel) passed by the British Board of Film Classification there shall be exhibited on the screen for at least 10 seconds in such a manner as to be easily read by all persons in the auditorium a reproduction of the certificate of the Board or, as regards a trailer, of the statement approved by the Board indicating the category of the film.
83. For a film passed by the Council, notices shall be conspicuously displayed both inside and outside the premises so patrons entering can easily read them. The notices shall state without the addition of any other words:

**LONDON BOROUGH OF CAMDEN**

*(Here insert title of film)*

has been passed by the London Borough of Camden as  
*(here insert the definition of the category and the category assigned)*

84. Where a trailer is to be exhibited advertising a film passed by the Council, the notice shall state:

**LONDON BOROUGH OF CAMDEN**

\* .....trailer advertising +.....film

*(\*Here insert the category of the trailer)*

*(+Here insert the category of the film)*

85. Every poster, advertisement, photograph, sketch, synopsis or programme relating to a film (other than a current news-reel) exhibited, or to be exhibited at the *premises*, shall indicate clearly the category of the film.
86. The licence holder shall ensure that an incident log is maintained at the premises. The log shall, as a minimum, give details of:
  - a. any ejections from the premises
  - b. any refused admissions
  - c. any refused sales
  - d. any inappropriate behaviour by guests
  - f. any failure in the CCTV system
  - g. any incidents of crime or disorder
  - h. any complaints made by the public or guests
87. The record shall show the date, the time of the incident, the name of the staff member reporting the incident, a brief description of the customer involved where appropriate and brief details of the incident and any action taken by the staff.
88. The incident log shall be completed as soon as reasonably practicable after any incident has occurred.
89. The incident log shall be kept in a place where it can be easily accessed by staff working at the premises and all staff shall be aware of the location of the incident log and the need to complete it in the case of any of the circumstances described above.
90. The licence holder shall ensure the incident log is checked periodically and at least on intervals of one month apart to ensure that staff are completing the incident log.
91. The incident log shall be made available for inspection to Police or authorised Council officers on request.

**From:** [licensing\\_inbox](#)  
**To:** [Paru\\_Bhudia](#)  
**Subject:** FW: Objection to The Griffin License Renewal  
**Date:** 08 October 2024 13:53:05  
**Attachments:** [1000060673.jpg](#)  
[1000060671.jpg](#)  
[1000060686.jpg](#)  
[1000060684.jpg](#)  
[1000060680.jpg](#)  
[1000060690.jpg](#)  
[1000060688.jpg](#)

---

Mohammed Rahman  
Licensing Support Officer

Telephone: 020 7974 0761

---

**From:** [REDACTED]  
**Sent:** Monday, October 7, 2024 5:20 PM  
**To:** licensing\_inbox <[licensing@camden.gov.uk](mailto:licensing@camden.gov.uk)>  
**Subject:** Objection to The Griffin License Renewal

You don't often get email from [REDACTED]. [Learn why this is important](#)

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

I am writing to object to the renewal of The Griffin, 125 Clerkenwell Road EC1R 5DB Sexual Entertainment License by MR. Wayne Chandler.

The club attracts dozens of pimps outside on weekends & pimps outside in the middle of the afternoon approaching young boys.

The club has a sign on it's door "Beware of illegal minicabs. Avoid at all costs".

Minicab is the front pimps use.

I've seen pimps approach young boys in the daytime.

I study nearby & have to avoid this road.

Most reviews refer to women like cattle:

**"Watching a middle aged overweight woman straddle the pole"**

"I can't believe they still employ this old woman"

"different races, however not every girl has a good body shape"

The reviews of women would be sex discrimination & sexual harassment in any other context. The club doesn't condemn the abusive comments about women in replies.

quick as possible. She said dance is for 5 minutes but she closed it after 1min. Never go with her. In the private room, I saw other girls much better performance and felt sorry because I went with Sara.

♡ 👤 5

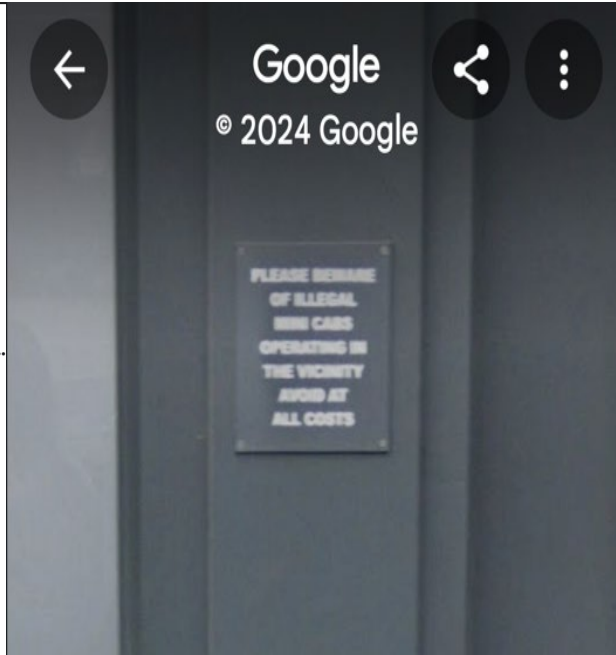


**The Griffin 125 Clerkenwell Ro...**  
a year ago

Sorry you wasn't happy with your visit.

If Sarah cut your dance short you should have took this up with her first and if you were still not happy you could have spoken to the manager on duty.

We would have investigated your situation.






←  **John Williams**  
12 reviews

★★★★★ (i) 6 years ago

Went on a Wednesday afternoon. 6 girls, rate them 7-9. The 7's tried harder with the dancing, and you saw "more" but all dancers ended nude. 20 or so guys in the place. Half weren't interested and just seemed there for the happy hour

←  **Thomas H**  
7 reviews

★★★★★ (i) 7 months ago

Overall, there are a bunch of girls inside this club, including different races, however not every girl has a good body shape, and their dancing is not good enough.

♥️ 🙏 3

 **The Griffin 125 Clerkenwell Ro...**  
7 months ago

 **Richard Mills**  
10 reviews

★★★★★ a year ago

Great night, free entry. Pound in the pot for the dancers and £20 for a private dance. Bouncers and dj were sound and robin and Sarah were exquisite dancers with the best arses you could ask for. Top night and will visit again when back in london

♥️ 🙏 2

 **The Griffin 125 Clerkenwell Ro...**  
a year ago

Thanks for great review Richard, we

 **Scott Moor**  
1 review

★☆☆☆☆ a year ago

First time there and never again. We were a group of 4 and hoping for an evening of entertainment. The woman with the large nose behind the bar was so rude and aggressive, we left after one warm pint after watching a middle aged overweight woman straddle the pole. Dreadful place.

**Tom Schittler**

1 review

 a year ago

This place has really gone down hill, mainly due to the incredibly rude and miserable old woman behind the bar. She continues to annoy all customers to the extent that most leave. I can't believe they still employ this old woman.



## Establishment Licence - London Borough of Camden

### Part 5 – Standard Conditions

Unless otherwise specified in the Licence:

- a) Conditions 1 to 25 apply to all apply to all Sex Establishment Licences.
- b) Additional conditions from number 26 onwards only apply to the relevant type of Sex Establishment as indicated by the section headings, with those being “Sex Shops”, “Sexual Entertainment Venues” and “Sex Cinemas”

In these conditions, the expressions "sex cinema", "sex shop", "sex article", and "sexual entertainment venue" have the meaning ascribed to them in Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Police and Crime Act 2009. "The Council" means the Council of the London Borough of Camden. "Licence holder" means the person or organisation named as the holder of the sex establishment licence for the premises granted by the London Borough of Camden for the time being in force. "Licensed premises" means the premises licensed by the London Borough of Camden to be used as a sex establishment.

In the event of any conflict between these conditions and any special conditions contained in a licence relating to a sex establishment, the special conditions shall prevail.

#### General Conditions

1. The licence holder shall retain control over all portions of the premises as defined on the approved premises plan, and shall not let, license or part with possession of any part of the licensed premises.
2. The public shall not be permitted to have access to any part or parts of the licensed premises other than those which have been approved by the London Borough of Camden as per the plan submitted to the Council at the time the licence was granted.
3. No person under the age of eighteen shall be admitted to the licensed premises whilst the sex establishment licence is being used and prominent notices shall be displayed at each entrance to the premises to that effect.
4. No person aged under eighteen shall be employed to work at the licensed premises in any capacity, or allowed to work in the premises on a self-employed basis.
5. No part of the licensed premises shall be used by prostitutes for the purpose of solicitation or otherwise exercising their calling.
6. Where the licensee is a body corporate or an unincorporated body, any change of director, company secretary or other person responsible for the management of the body is to be notified in writing to the Council

within 14 days of such change and such details as the Council may require in respect of any new director, secretary or manager are to be furnished within 14 days of any written request by the Council.

7. The premises layout shall allow all public parts of the premises to be easily supervised by premises management, staff and door supervisors at all times, save for public toilet areas which shall be checked at least at hourly intervals to ensure such areas are not being used for any improper purposes and are in a clean and useable condition.
8. No change of use of any portion of the licensed premises from that approved by the Council shall be made until the Council's consent in writing has been obtained.
9. No access shall be permitted through the licensed premises to any other premises adjoining or adjacent except in the case of emergency.
10. No alterations or additions, either internal or external, and whether permanent or temporary, shall be made to the structure, lighting or layout of the licensed premises except with the prior written approval of the Council.
11. The windows and openings of the licensed premises shall be of material or covered with material which will render the interior of the premises invisible to passers by.
12. The external doors to the licensed premises shall be fitted with a device to provide for their automatic closure and such devices shall be maintained in good working order.
13. The licence holder shall ensure that the sex establishment licence or a certified copy shall be prominently exhibited at the premises in a position where it can be clearly seen by patrons of the premises. For the purposes of this section, a certified copy of the licence shall be a copy certified as a true copy by the holder of the licence or his solicitor and appropriately signed and dated with the date the copy was certified.

#### Touting for Business

14. There shall be no touting for business for the premises by way of flyer, persons holding advertising boards, branded vehicles or personal solicitation.

#### Premises Appearance

15. The Council shall not permit the display of any form of imagery or photographs that the Council believes could be construed as offensive to public decency.
16. No display or advertisement of the activities permitted by the sex establishment licence shall be exhibited so as to be visible from outside of the premises except:-
  - any notice required to be displayed by law, by these regulations, or by any condition of the sex establishment licence granted by the Council
  - the name of the premises as specified in the sex establishment licence
  - the hours of opening of the premises

- notice of any admission charge to the premises

unless the Council has given its prior consent in writing that such display or advertisement may be used.

17. A CCTV system shall be installed and working to the satisfaction of the Police and the Council. The system shall cover the whole of the parts of the premises to which the public have access, with the exception of individual toilet cubicles. This shall include external areas of the premises including the area immediately outside any entrance to, or exit from, the premises unless the Council has given its prior consent in writing that such display or advertisement may be used.

#### CCTV Conditions

18. CCTV monitors covering the premises shall be available near to the entrance of the premises where they can immediately be viewed by Police and Council officers during an inspection of the premises. This condition does not preclude further monitors being located in other parts of the premises.
19. Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the licensed premises, advising that CCTV is in operation.
20. The CCTV shall record continuously the entire time that any member of the public is present on the licensed sex establishment.
21. Recordings shall be of a sufficient quality to clearly identify persons on the recordings
22. Recordings shall be retained for a minimum period of 31 days.
23. Copies of the recordings shall be made available to the Police and the Council on request.
24. Any defect in the operation of the CCTV system shall be notified immediately to the Police Licensing Team and the Council in writing and by telephone, and the licence holder shall ensure that repairs to the CCTV system are effected as soon as reasonably practicable.
25. Where any part of the CCTV system is non operational, the licence holder shall comply with any direction from the Metropolitan Police or the Council not to use certain parts of the licensed premises for the purposes of the sex establishment licence.

#### **Additional Conditions for Sex Shops**

26. No sex articles shall be displayed in such a manner that they can be seen by persons outside the sex establishment.

27. The licensee shall ensure that no employee or any other person shall seek to obtain custom for the sex establishment by means of personal solicitation outside or in the vicinity of the premises.
28. Any change of staff employed at the licensed premises shall be notified in writing to the Council within 14 days of the change.
29. All sex articles and other things displayed within the licensed premises shall be clearly marked to show to persons who are inside the premises the respective prices being charged (inclusive of VAT).
30. All goods offered for sale, hire, exchange or loan shall be available for inspection prior to supply and a notice to this effect is to be prominently displayed within the premises.

### **Additional Conditions for Sexual Entertainment Venues**

31. The layout of the premises shall be such that performers cannot be seen from outside the premises.
32. Performers may not stand in lobby, reception or foyer areas or outside the premises entrance for the purposes of greeting customers or encouraging customers to enter the venue.
33. The licence holder shall nominate a Duty Manager for the premises on each occasion they are open to the public and being used for the purposes of providing relevant entertainment.
34. The licence holder shall ensure that the name of the Duty Manager is displayed prominently at the premises so the name can be easily viewed by Police or authorised Council officers carrying out an inspection of the premises, or otherwise by persons using the venue
35. The Duty Manager shall be responsible for ensuring the premises operate in accordance with the conditions applicable to the sex establishment licence.
36. The Duty Manager shall remain on the premises while they are on duty save in the event of an emergency situation.
37. Door supervisors registered with the Security Industry Authority shall be provided at the premises in sufficient numbers to ensure that:
  - each entrance and exit at the premises used by the public are manned by at least two door supervisors
  - all public areas of the premises are continually monitored to ensure the Dancers and Customers Codes of Conduct and any licence conditions are being complied with
  - persons breaching the Customers Code of Conduct or otherwise behaving in a disorderly manner can be safely ejected from the premises

### **Requirements for a Code of Conduct for Dancers**

38. There shall be a Code of Conduct for Dancers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.



39. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Dancers".
40. No change shall be made to the Dancer's Code of Conduct without the prior written consent of the Council and the Metropolitan Police.
41. The Dancers Code of Conduct must state that dancers who do not comply with the Code of Conduct will face disciplinary proceedings.
42. The licence holder shall require all dancers to sign an acknowledgement that they have received a copy of the Dancer's Code of Conduct and have read and understood its contents and shall comply with such Code of Conduct at all times they are working at the premises as dancers.
43. The licence holder shall retain original records showing that each dancer has signed to acknowledge receipt of the Dancer's Code of Conduct and Disciplinary Procedure as described above.
44. A copy of the sections of the Dancer's Code of Conduct relevant to customers shall be prominently displayed in each area of the premises to which the public have access, including toilet areas, and in any area used as a changing/dressing room for dancers.
45. The premises management and staff (including security staff) shall be aware of the content of the Dancer's Code of Conduct and shall ensure it is complied with.

#### **Requirements for a Code of Conduct for Customers**

46. There shall be a Code of Conduct for Customers in place at the venue that has been agreed in writing by the licence holder, the Council and the Metropolitan Police.
47. The Code of Conduct shall, as a minimum, contain the conditions set out in the section below entitled "Sexual Entertainment Venues - Code of Conduct for Customers".
48. The Code of Conduct for Customers shall be displayed in prominent positions throughout the premises where it is visible to all customers.
49. No change shall be made to the Customers Code of Conduct without the prior written consent of the Council and the Metropolitan Police.
50. The Customer's Code of Conduct must state that customers who do not comply with the Code of Conduct will be ejected from the premises.
51. The premises management and staff (including security staff) shall be aware of the content of the Customer's Code of Conduct and shall ensure it is complied with.
52. Where a customer breaches the Customers Code of Conduct, this shall be recorded in the incident log.
53. If management are made aware of a customer repeatedly breaching the rules of the Customers Code of Conduct, they shall eject that customer from the premises.

#### **Disciplinary Procedure**

54. A disciplinary procedure shall be in place to deal with dancers who breach the Dancer's Code of Conduct. The disciplinary procedure shall be detailed in writing and a copy of it provided to each dancer who works at the premises.
55. The licence holder shall require all dancers to sign an acknowledgement that they have been provided with a copy of the house Disciplinary Procedure and have read and understood its contents.
56. The Disciplinary Procedure shall not include provision to "fine" dancers or otherwise impose pecuniary penalties. Action taken may include verbal or written warnings, suspension of the dancer's right to perform at the premises, or revocation of the dancer's right to perform at the premises.

### **Sexual Entertainment Venues - Code of Conduct for Dancers**

57. The Dancer's Code of Conduct shall include the following conditions as a minimum:
  - a. Dancers may not intentionally touch a customer during a performance.
  - b. Dancers may not permit a customer to touch them during a performance.
  - c. Dancers may not straddle the customer.
  - d. If a customer attempts to touch or speak to a dancer inappropriately, the dancer shall stop the performance and advise the customer of the rules of the Code of Conduct. If the customer persists in inappropriate behaviour, the dancer shall stop the performance and inform premises management immediately.
  - e. Dancers may not intentionally touch the genitals, anus or breasts of another dancer, nor knowingly permit another dancer to touch their genitals, anus or breasts.
  - f. Dancers shall not solicit for gratuities or payment for sexual favours.
  - g. Dancers shall not engage in any act of prostitution, i.e. the receiving of gratuities or payment for sexual favours.
  - h. Dancers may not perform any act which simulates masturbation, oral sex or sexual intercourse, including the insertion of any object, including their own finger, in to the anus or vagina.
  - i. Dancers may not touch their own breasts, anus or genitals with their fingers, lips or tongue.
  - j. Dancers may not be in the company of a customer unless it is in an area of the premises that is open to the public.
  - k. Dancers shall not perform if under the influence of alcohol or drugs.
  - l. If a customer engages in acts of masturbation or other sexual behaviour, the dancer shall cease the performance immediately and inform the premises management.
  - m. Dancers shall use the dressing room facilities provided for their exclusive use to change for their performance.
  - n. Dancers shall only use the smoking area provided specifically for their use.
  - o. Dancers shall only use the sanitary facilities specifically provided for their use.
  - p. Dancers shall not leave the premises or otherwise be visible outside the premises, including for smoking breaks, unless dressed in suitable attire, e.g. outerwear consisting of coat or top

and skirt or trousers so lingerie or other performance costume is not visible.

- q. All dancers shall comply with this Code of Conduct. Any failure to adhere to the Code of Conduct shall render the dancer subject to the house Disciplinary Rules, a copy of which has been provided to each dancer.

### **Sexual Entertainment Venues - Code of Conduct for Customers**

58. The Customers Code of Conduct shall include the following conditions as a minimum:
- a. Customers may not touch dancers during a performance.
  - b. Customers may not make lewd or offensive remarks to dancers.
  - c. Customers may not harass or intimidate dancers.
  - d. Customers may not ask dancers to perform any sexual favour.
  - e. Customers may not perform acts of masturbation or indulge in other sexual behaviour.
  - f. Any customer failing to adhere to the Customers Code of Conduct will be ejected from the premises.

### **Private Booths**

59. Private booths shall not be provided at the licensed premises.

### **Dancers Private Work Areas**

60. A designated dressing room area shall be provided for dancer's exclusive use. Such dressing room shall be secured so as not to be accessible to members of the public and shall be sufficient to enable dancers to change privately.
61. Dancers shall be provided with their own sanitary facilities separate from those used by customers.
62. A secure external area shall be provided for dancers to smoke without coming into contact with customers.

### **Dancers Welfare Policy**

63. The licence holder shall have a Dancers Welfare Policy in place at the premises.
64. The Policy shall, as a minimum, state that
- any dancer concerned about the behaviour of a customer shall report the incident immediately to the Duty Manager who shall take immediate action to resolve the matter
  - staff members must constantly supervise the behaviour of customers at the premises and shall intervene where any customer is breaching the Code of Conduct for Customers or is otherwise causing alarm or distress to a dancer
  - any customer behaving inappropriately will be ejected from the venue
  - dancers shall be provided with free drinking water on request
  - Dancers shall not be required to drink alcohol

### **General Provisions**

65. The licence holder shall obtain a photocopy of the passport of each dancer that works at the premises and shall certify the copy as being a true copy by signing and dating the photocopy together with their name and job title.

66. The licence holder shall undertake reasonable checks to ensure each dancer is eligible to work in the United Kingdom and shall not allow dancers ineligible to work in the UK to work at the premises.
67. The licence holder shall maintain written records of all dancers working at the premises. The records shall show the dancer's full name, home address, date of birth and a certified photocopy of their passport and the date the dancer was provided with the Dancers Code of Conduct and Disciplinary Procedure. Such records shall be kept on the licensed premises and produced for inspection by Police and authorised Council officers on request. Any instances of the dancer breaching the Dancers Code of Conduct shall be recorded on the dancer's record showing the date and time of the incident and details of the breach that occurred.
68. Dancers under the age of eighteen shall not be permitted to work at the premises.
69. Dancers shall not be permitted to perform if they are clearly under the influence of alcohol or drugs. Dancers shall not be required to drink alcohol.
70. The licence holder shall ensure that an incident log is maintained at the premises. The incident log shall, as a minimum, give details of:
  - any ejections from the premises
  - any refused admissions
  - any refused sales
  - any inappropriate behaviour by guests
  - any failure in the CCTV system
  - any incidents of crime or disorder
  - any complaints made by the public, guests or dancers
71. The record shall show the date, the time of the incident, the name of the staff member reporting the incident, a brief description of the customer involved/name of dancer where appropriate and brief details of the incident and any action taken by the staff.
72. The incident log shall be completed as soon as reasonably practicable after any incident has occurred.
73. The incident log shall be kept in a place where it can be easily accessed by staff working at the premises and all staff shall be aware of the location of the incident log and the need to complete it in the case of any of the circumstances described above.
74. The licence holder shall ensure the incident log is checked periodically and at least at monthly intervals to ensure that staff are completing the incident log.
75. The incident log shall be made available for inspection to Police or authorised Council officers on request.

#### **Additional Rules for Premises Used as Sex Cinemas**

76. No film shall be exhibited unless:

- (i) it has been passed by the British Board of Film Classification as a U, PG, 12, 15, 18 or RESTRICTED (18) film and no notice of objection to its exhibition has been given by the Council, or
  - (ii) the film has been passed by the Council as U, PG, 12, 15, 18 or RESTRICTED(18) with the London Borough of Camden being the name of the Council.
77. If the licence holder is notified by the Council in writing that it objects to the exhibition of a film specifying the grounds of objection, such film shall not be exhibited.
78. Not less than 28 days notice in writing shall be given to the Council of any proposal to exhibit any film which has not been classified as specified above. Such a film may only be exhibited if consent has been obtained from the Council in writing and in accordance with the terms of any such written consent.
79. When the programme includes a film in the 12, 15 or 18 category no person appearing to be under the age of 12, 15 or 18 as appropriate shall be admitted to any part of the programme.
80. If the Council does not agree with the category of any film as passed by the British Board of Film Classification, it may alter the category or prohibit the showing of the film.
81. On notice of alteration of category being given by the Council to the licence holder, the film shall thereafter be treated as being in the altered category and the conditions applicable to the exhibition of films in the altered category shall be observed.
82. Immediately before each exhibition at the premises of a film (other than a current newsreel) passed by the British Board of Film Classification there shall be exhibited on the screen for at least 10 seconds in such a manner as to be easily read by all persons in the auditorium a reproduction of the certificate of the Board or, as regards a trailer, of the statement approved by the Board indicating the category of the film.
83. For a film passed by the Council, notices shall be conspicuously displayed both inside and outside the premises so patrons entering can easily read them. The notices shall state without the addition of any other words:

**LONDON BOROUGH OF CAMDEN**

*(Here insert title of film)*

has been passed by the London Borough of Camden as  
*(here insert the definition of the category and the category assigned)*

84. Where a trailer is to be exhibited advertising a film passed by the Council, the notice shall state:

**LONDON BOROUGH OF CAMDEN**

\*.....trailer advertising +.....film  
*(\*Here insert the category of the trailer)*  
*(+Here insert the category of the film)*

85. Every poster, advertisement, photograph, sketch, synopsis or programme relating to a film (other than a current news-reel) exhibited, or to be exhibited at the *premises*, shall indicate clearly the category of the film.
86. The licence holder shall ensure that an incident log is maintained at the premises. The log shall, as a minimum, give details of:
  - a. any ejections from the premises
  - b. any refused admissions
  - c. any refused sales
  - d. any inappropriate behaviour by guests
  - f. any failure in the CCTV system
  - g. any incidents of crime or disorder
  - h. any complaints made by the public or guests
87. The record shall show the date, the time of the incident, the name of the staff member reporting the incident, a brief description of the customer involved where appropriate and brief details of the incident and any action taken by the staff.
88. The incident log shall be completed as soon as reasonably practicable after any incident has occurred.
89. The incident log shall be kept in a place where it can be easily accessed by staff working at the premises and all staff shall be aware of the location of the incident log and the need to complete it in the case of any of the circumstances described above.
90. The licence holder shall ensure the incident log is checked periodically and at least on intervals of one month apart to ensure that staff are completing the incident log.
91. The incident log shall be made available for inspection to Police or authorised Council officers on request.



## 1. Comments of the Borough Solicitor

- 1.1 The purpose of Camden's Sex Establishments Policy is to make it clear to applicants that wider considerations will be taken into account when determining applications. It is also intended to guide the Licensing Sexual Entertainment Venues Panel when considering applications. However, the Panel must always consider each application on its own merits and allow exceptions to the normal policy where the circumstances of the application justify allowing an exception. The burden is on the applicant to show that they comply with the Policy.
- 1.2 In accordance with the provisions set out in section 27 of Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982
- a) an applicant for the grant, renewal or transfer of a licence under this Schedule whose application is refused;
  - b) an applicant for the variation of the terms, conditions or restrictions on or subject to which any such licence is held whose application is refused;
  - c) a holder of any such licence who is aggrieved by any term, condition or restriction on or subject to which the licence is held; or
  - d) a holder of any such licence whose licence is revoked, may at any time before the expiration of the period of 21 days beginning with the relevant date appeal to the Magistrates' Court acting for the relevant area.
- 1.3 An applicant whose application for the grant or renewal of a licence is refused, or whose licence is revoked, on any ground specified in paragraph 12(1) shall not have a right to appeal under this paragraph unless the applicant seeks to show that the ground did not apply to him.
- 1.4 An applicant whose application for the grant or renewal of a licence is refused on either ground specified in paragraph 12(3)(c) or (d) shall not have the right to appeal under this paragraph.
- 1.5 Where a licence is revoked or an application for the renewal of a licence is refused, the licence shall be deemed to remain in force
- a) until the time for bringing an appeal under this paragraph has expired and, if such an appeal is duly brought, until the determination or abandonment of the appeal; and
  - b) where an appeal relating to the refusal of an application for such a renewal is successful and no further appeal is available, until the licence is renewed by the appropriate authority.
- 1.6 Where
- a) the holder of a licence makes an application to vary the terms of a licence; and
  - b) the Panel impose any term, condition or restriction other than one specified in the application, the licence shall be deemed to be free of it until the time for bringing an appeal under this paragraph has expired.
- 1.7 Where an appeal is brought under this paragraph against the imposition of any such term, condition or restriction, the licence shall be deemed to be free of it until the determination or abandonment of the appeal.

1.8 The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. Decisions on licensing matters are actions of a public authority and must be compatible with Convention rights. Consequently, Members of the sub-committee must be aware of the rights contained in the Convention (particularly those set out below) when making licensing decisions.

(a) Article 6: Right to a fair trial

In the determination of his civil rights and obligations, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

(b) Article 8: Right to respect for private and family life

Everyone has a right to respect for his or her private life, his home and correspondence.

(c) Article 1 of the First Protocol: Protection of property

Every natural or legal person is entitled to the peaceful enjoyment of his possessions, including a licence. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

(d) Article 10: Freedom of Expression

Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. This Article shall not prevent States from requiring the licensing of broadcasting, television or cinema enterprises.

The exercise of these freedoms since it carries with it duties and responsibilities may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interests of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health and morals, for the protection of the reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary.

(e) Article 14: Prohibition of discrimination

The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

1.9 When formulating policy local authorities must have regard to the Equality Act 2010. The Act provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including licensing powers. Members of the panel must be mindful of this duty when determining all licensing applications.

## The section 149 Public Sector Equality Duty

- (1) A public authority must, in the exercise of its functions, have due regard to the need to
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to
  - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - (c) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
  - (d) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to
  - (a) tackle prejudice, and
  - (b) promote understanding.
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

## 2. Financial Comments

- 2.1 There are no financial implications concerning this report. The Director of Finance has been consulted in the preparation of this report and has no further comments to add.

# Equalities Impact Assessment

Camden Council

## What is an Equality Impact Assessment?

An Equality Impact Assessment (“EIA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010\*. To meet the Council’s statutory duty the EIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

The Council has a strong tradition of ensuring equality both in terms of service delivery and within its workforce. To help us maintain this tradition it is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an ‘add-on’. If equality analysis is done at the end of a process it will often be too late for changes to be made.

The courts place significant weight on the existence of some form of documentary evidence of compliance with the Public Sector Equality Duty\* when determining judicial review cases. Having an EIA as part of the report which goes to the decision makers and making reference to the EIA within that report helps to demonstrate that we have considered our public sector equality duty and given “due regard” to the effects the decision will have on different groups.

The EIA must be considered at an early stage of the formation of a policy/decision and inform its development, rather than being added on at the end of the process. The EIA form should be completed and updated as the policy / decision progresses and reviewed after the policy or change has been implemented.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please note all sections must be completed. However the obligation is to have due regard and it may be that while an issue requires the completion of an EIA, the matters at hand may not lend themselves to some of the obligations, for example fostering good relations. As long as this has been properly considered it is legitimate to conclude that this cannot be applied in a particular case.

\*Please read the notes at the end of this document.

Name of proposed decision/policy being reviewed:

The renewal of the Sex Establishment Licence for The Griffin, 125 Clerkenwell Road  
EC1R 5DB

### Question 1

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

Members of the SEV Licensing Panel are being asked to consider the applications to renew the Sex Entertainment Venue Licence.

The Council seek to ensure all operators of Sex Establishments run their premises well, in accordance with general law, within the terms of their licence, and that they do not cause harm or nuisance to residents, business and other premises in the locality of the venue.

When considering the applications, the SEV Licensing Panel will take into account Camden's Sex Establishment Policy, the suitability of the applications, venue and locality. The SEV Licensing Panel will also take into consideration any comments received during the consultation period and consider each application on its own merits.

The SEV Licensing Panel have the option to either grant the renewal applications as applied for, refuse the applications or grant the renewal applications with modifications such as additional conditions or reduction of hours

### Notes to Question 1

- Summarise briefly and precisely just what the decision is about. In particular what changes will happen if this decision is agreed and put into effect? What happens now and what will happen in the future? What will be different?
- **Do not cut and paste the report or policy** but concisely restate it, considering equalities issues directly against the facts
- **Focus on the impacts on people** e.g. the users of any facility or service.

**Question 2**

Who will be affected by this decision and how?

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

When determining the applications, the SEV Licensing Panel will need to take a number of factors into consideration. These factors include the locality of the venue and the surrounding premises specifically those identified as sensitive (such as schools, places of worship, charities, hospitals and leisure facilities (this list is not exhaustive).

Any decision made by the SEV Licensing Panel will need to ensure that the Sex Establishment does not cause harm, nuisance and/or crime and disorder to any of the protected groups, this can be done by the adding of conditions to the licence such as; no touting, no promoting of sexual images on the exterior of the premises, queue management. This is to ensure that the venue does not look appealing to children and young adults or is offensive to members of the public. Camden Council have made it a mandatory requirement that the premises have a code of conduct for both customers and performers and that these are prominently displayed throughout the Establishment and adhered to at all times. The Establishment must also have a performer's welfare policy to ensure the safety and mental health/wellbeing of those working at the premises.

The Council mitigate any disproportionate impacts by attaching conditions, renewing the licence on a yearly basis and our enforcement officers together in partnership with the MET Police regularly inspecting the premises.



## Notes to Question 2

- Here use data to show who could be affected by the decision. Consider who uses the service now and might use it in the future. Think about the social mix of the borough and of our workforce.
- If available use profile of service users and potential users / staff by protected groups: (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation). You could consider the following:
  - Take up of services, by protected group if available;
  - Recommendations from previous inspections or audits;
  - Comparisons with similar activities in other departments, councils or public bodies;
  - Results of any consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
  - Potential barriers to participation for the different protected groups;
  - National, regional and local sources of research or data – including statutory consultations;
  - Workforce equality data will be provided by your HR change adviser for organisational change / restructure EIAs and
  - For organisational change / restructure EIAs include the results of any consultation or meetings with staff or trade unions.
- **Do not simply repeat borough wide or general service equality data** – be as precise and to the point as possible.
- If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:
  - Any relevant groups who have not yet been consulted or engaged;
  - Whether it is possible to breakdown existing data or consultation results by different protected groups;
  - If you are conducting an organisational change / restructure EIA and there are data gaps consider asking affected staff to update their details on Oracle.
- We are under a legal duty to be properly informed before making a decision. If the relevant data is not available we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required.
- Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact?
- Consider indirect discrimination (which is a practice, policy or rule which applies to everyone in the same way, but has a worse effect on some groups and causes disadvantage) - for example not allowing part-time work will disadvantage some groups or making people produce a driver's licence for ID purposes.

**Question 3**

Does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

When making the decision to grant or refuse the renewal of the Sex Establishment Licence, the SEV Panel will consider how their decision will protect all people that may be affected by the activities carried out at the Sex Establishment and the risk of harm that may arise.

In order to limit discrimination and promote equality, the SEV Licensing Panel have the option to impose additional conditions to the licence to either restrict activities at the premises to ensure good management or they can refuse the application.

The Council continuously look to engage with The Griffin and support the performers, staff and customers as well as engaging with the surrounding premises who may be affected by the activities of the Sex Establishment.

### Notes to Question 3

- Here, think about our other duties (see the notes at the end) and do the proposals impact (positive and or negative) upon those wider duties and aspirations?
- What might say a reduction in the hours of a facility that mainly serves a particular group have on our wider duties?
- Examples of eliminating discrimination: Taking action to ensure that services are open to all groups – e.g. targeting help at particular deprived sections of the community or funding services who work to prevent discrimination
- Does take up of the activity differ between people from different protected groups?
- Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?
- Are some groups less satisfied than others with the activity as it currently stands?
- Is there a greater impact on one protected group, is this consistent with the aims of the activity?
- For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser
- If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR) and their views
- Are there any further changes that could be made to deliver service improvements or make the activity more responsive?

**Question 4**

If there is an adverse impact, can it be avoided?

If it can't be avoided, what are we doing to mitigate the impact?

**[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]**

It has been identified that there is a potential for an adverse impact when making the decision to renew or refuse the Sex Establishment Licence for The Griffin. The adverse impact is not one that can be avoided due to the adult nature of the activities that take place within the premises.

The Council can limit any adverse impact by adding appropriate conditions to the Sex Establishment Licence or they have the discretion to refuse the applications.

The Council will routinely carrying out inspections at the Sex Establishment and work closely with the MET Police and other services to ensure the Sex Establishment operates within the law and terms of the Licence and promote and safeguard the welfare of those working at and using the Sex Establishment.

#### Notes to Question 4

- Assuming there is an impact, what are we going to do about it? We need to make sure the **decision makers understand the impacts**
- All our policies and decisions should be designed to eliminate discrimination and contribute to our other obligations such as promoting good relations.
- If it can't be avoided can it be mitigated in some other way?
- There might be decisions elsewhere or perhaps additional spending on other services which could reduce the impact. Beware of simply saying that we will direct service users to other services or resources without considering the feasibility of doing so or the knock-on effect for those services
- We don't have to completely eliminate a negative impact, but we must identify it and try to mitigate it and the **decision makers must be in a position to fully understand the implications of their decision and balance off the competing interests** – e.g. the impact against the need to make savings and balance our budget

**Question 5**

Could any part of the proposed activity discriminate unlawfully?  
Can we advance equality of opportunity via this decision/policy?  
Can we foster good relations via this decision/policy?

**[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]**

The Council have not identified any unlawful discrimination associated with this application for the renewal of the Sex Establishment Licence, however, this will be kept under review.

The SEV Licensing Panel promote equality when making their decision following consideration of all the evidence including any representations made by attaching appropriate conditions to the Licence, granting the Licence on varied terms or refusing the applications. The applicant must renew the licence on a yearly basis so that it can be reviewed and assessed on a regular basis. In addition the Council's enforcement officers, together in partnership with the MET Police, regularly inspect the premises.

### Notes to Question 5

- **There may be decisions or policies where this is not going to be applicable. Explain this briefly in the box above. The important point is that it is carefully considered.**
- Suggest positive steps that can be achieved towards our statutory obligations to remove or minimise disadvantages suffered because of protected characteristics, e.g. taking steps to meet the needs of people from the different backgrounds when they are different to the needs of others, encouraging participation from groups when participation is disproportionately low
- Advancing equality of opportunity - (NB this does not apply to marriage and civil partnership). **This is a “positive duty”** which requires public authorities to consider taking proactive steps to root out discrimination and harassment and advance equality of opportunity in relation to their functions—from the design and delivery of policies and services to their capacity as employers. The duties require us to give consideration to taking positive steps to dismantle barriers. Advancing equality of opportunity might require treating some groups differently e.g. targeting training at disabled people to stand as councillors.
- **The legislation requires when we have due regard in terms of advancing equality of opportunity to:**
  - a. **Remove/minimises disadvantage suffered by those who share a characteristic and is connected to it**
  - b. **Take steps to meet the different needs of those who share a characteristic**
  - c. **Encourage those who share a characteristic to participate in public life or any other activity when participation is disproportionately low.**
- Advancing opportunity includes the fact that the steps needed to meet the needs of disabled persons take into account the disabled persons’ disabilities
- We are required to have “due regard” to the need to foster good relations between people who share a relevant protected characteristic and people who do not share it. This involves having due regard, in particular, to the need to tackle prejudice, and promote understanding.

### Examples

- An employer to provide staff with education and guidance, with the aim of fostering good relations between its trans staff and its non-trans staff.
- A school to review its anti-bullying strategy to ensure that it addresses the issue of homophobic bullying, with the aim of fostering good relations, and in particular tackling prejudice against gay and lesbian people.
- Local authority (Not Camden) to introduce measures to facilitate understanding and conciliation between Sunni and Shi’a Muslims living in a particular area, with the aim of fostering relations between people of different religious beliefs.
- Our work to encourage Bangladeshi tenants involvement in TA’s.



EIA prepared by: Paru Bhudia

Date: 15/01/2025

EIA checked by: William Sasu

Date: 21/01/2025

EIA approved by: pp.  \_\_\_\_\_

Date: 21/01/2025

(Relevant Director Sponsor)

### What to do upon approval

For organizational change: If your EIA relates to internal staff, please send to your HR Business Adviser.

For all other EIAs: Please upload onto Sharepoint via this link:

[Equality Impact Assessment Library](#)

# Explanatory Notes

---

## What is our Public Sector Equality Duty (PSED)?

Under section 149 all public authorities must, in the exercise of their functions, have 'due regard' to the need to:

1. Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act; EqA 2010 (section 149(1)(a)).
2. To advance equality of opportunity between people who share a relevant protected characteristic and those who don't; This involves having due regard to the need to:
  - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (section 149(4)); and
  - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

**Section 149(6)** makes it clear that compliance with the PSED in section 149(1) may involve treating some people more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by or under the EqA 2010 (this includes breach of an equality clause or rule or breach of a non-discrimination rule (section 149(8))).

### (Section 149(3), EqA 2010.)

3. Foster good relations between people who share a relevant protected characteristic and those who don't (section 149(1)(c)) (which involves having due regard to the need to tackle prejudice and promoting understanding) (section 149(5), EqA 2010)..

**Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation.**

- In respect of the first aim only i.e. reducing discrimination, etc. the protected characteristic of marriage and civil partnership is also relevant.
- In meeting the needs of disabled people we have a duty to take account of their disability and make reasonable adjustments to our services and policies where appropriate.
- We must be able to demonstrate that we have considered and had due regard to all three parts of this duty. We must also look for anything that directly or indirectly discriminates.

## What do we mean by “due regard”?

- This is not a question of ticking boxes, but should at the heart of the decision-making process.
- decision-makers must be made aware of their duty to have due regard – so understand the legal requirements on them;
- There should be an analysis of the data – who is this going to affect and how will it put against the legal requirements
- We need to have thought about these duties both before and during consideration of a particular policy and we need to be able to demonstrate that we have done so
- The Duty is “non-delegable” so it is for the decision maker themselves to consider with assistance from the report and officer analysis. What matters is what he or she took into account and what he or she knew so it is important to have the relevant papers accompanying the report. The report should make explicit reference to the EIA. the duty is continuing so while this guide is aimed at the point of decision we should at appropriate points review our duties against the decision/policy
- The decision maker must assess the risk and extent of any adverse impact and the ways in which such risk may be eliminated before the adoption of a proposed policy or decision has been taken
- Officers reporting to or advising decision makers must not merely tell the decision maker what he/she wants to hear but need to be “rigorous in both enquiring and reporting to them”
- The duty should be reconsidered if new information comes to light

“

What is due regard? In my view, it is the regard that is appropriate in all the circumstances. These include on the one hand the importance of the areas of life of the members of the disadvantaged ... group that are affected by the inequality of opportunity and the extent of the inequality; and on the other hand, such countervailing factors as are relevant to the function which the decision-maker is performing”

**Lord Justice Dyson**

”

**We need to take a sensible and proportionate approach to this based on the nature of the decision or policy being reviewed**