From: **Canaria 1** <

Date: Mon, 19 May 2025, 10:04

Subject: Covering Submission for Licensing Review – The Camden

To: The Camden <

Dear Chair and Members of the Committee,

We respectfully submit this letter and accompanying documentation in advance of the scheduled licensing review hearing concerning **The Camden**.

As detailed in our statement and supporting exhibits, we strongly believe that the review was triggered by a wholly unsubstantiated allegation relating to immigration status, which has since been fully disproven by official records and dismissed during the formal hearing held on **1st May 2025**. In the absence of credible and substantiated evidence, we submit that there are no legitimate grounds to support this continued review under **Section 53A of the Licensing Act 2003**, which sets a high evidentiary threshold for summary action.

We trust the Committee will recognise:

- That the original allegation was not only unfounded, but that it originated from a **former** manager who has, since their departure, made numerous damaging and untrue reports to authorities:
- That no breach of immigration law was found, as supported by Exhibit 1 Employer Right to Work Documentation and Exhibit 2 Employment Policy;
- That where operational concerns have been raised, we have taken swift, comprehensive, and verifiable corrective action, including the appointment of a dedicated Compliance Officer, new manager, enhanced security protocols, a proactive staff training programme, and reinforced engagement with both Police and the Licensing Authority (see Exhibits 3–10);
- That several of the incidents referenced by the Police were either misreported,
 occurred while the venue was closed, or have not been substantiated by shared evidence such as CCTV.

We also wish to highlight our **clear and proactive commitment to community safety and public welfare**, including active dispersal patrols, police cooperation, and our decision to refocus venue operations toward **corporate**, **family**, **and community events** to reduce risk and increase local engagement.

We respectfully ask the Committee to consider the full context of this review, the absence of substantiated breaches, and the significant steps we have taken to operate responsibly and transparently. It is our sincere hope that, in light of the evidence, this matter can now be brought to a fair and proportionate conclusion.

Should any clarification or further material be required prior to the hearing, we remain at the Committee's full disposal.

Yours faithfully

Best regards, Sonia De Leon Designated Premises Supervisor

Admin Team

The Camden Bar

65 Crowndale Road, London NW1 1TN



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Licensing Review Submission - The Camden

Submitted to: Camden Council Licensing Authority

Submitted by: Sonia De Leon

Date: 19th May 2025

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1. Opening Statement

Chair, Members of the Committee,

Thank you for taking your time to address these matters.

We would like to begin by highlighting that, as clearly set out under **Section 53A of the Licensing Act 2003, a summary review can only be initiated** where there is **evidence of serious crime, serious disorder, or both.** This is a high threshold — one that is intentionally reserved for only the most severe and substantiated cases. It is our firm position that the matters raised in this review fall significantly short of meeting that legal and evidential standard.

The core issue that triggered this review was a false and unfounded immigration allegation made by the police against our premises the Camden and our sister venue Kiss. During a formal hearing held on 1st May 2025, clear documentary evidence was presented to the licensing subcommittee — including an official GOV.UK "Prove your right to work" document confirming that the individual in question, Darpan, had legal status to live and work in the UK at the time of being employed. That evidence was definitive, reliable, and should have brought the matter to a close. Exhibit 1-Employer Right to Work Documentation Exhibit 2- right to work employment Policy.

Despite this, the allegation was not only made but pursued without due diligence, and the evidence presented was not properly acknowledged by either the police or the local authority. The review committee rightly found the claim to be unfounded and inconclusive, and no illegal employment or immigration breach was identified. It is wholly improper for this resolved allegation to now be used as a basis for a separate review of this premises.

We do not deny that there were **historic operational issues** — prior to November 2024 — and we have acknowledged those issues directly. However, we must emphasise that every concern raised has been proactively and effectively addressed. Following an extended meeting with the police and licensing team on 11th November 2024, we undertook a comprehensive review of our operations. Since that point, significant changes have been made, including:

- The appointment of new experience compliance officer; Sonia De Leon
- Comprehensive staff retraining, particularly in security and entry procedures not only in place but are actively maintained and monitored.
- A full audit and upgrade of our CCTV system, with procedures in place to guarantee footage is accessible within the statutory 48-hour window;

• The creation of a dedicated communication channel for licensing and police matters.

It is important to note that all alleged breaches — dated 17th August, 22nd September, and 19th October 2024 — occurred before these changes were implemented. Since the changes took effect, there have been no formal complaints or major incidents at the venue. This reflects not only our commitment to improvement but the sustained success of the measures we have put in place.

We must also formally raise our concern regarding material inaccuracies in the police evidence presented for this review. These are not minor technical errors — they reflect a serious lack of care in the preparation of evidence that has the potential to mislead the Committee into interpreting the matters in the wrong way:

Under Section 53A of the Licensing Act 2003, a review must be based on **credible** evidence of serious crime or disorder. However, the evidence presented by the police fails to meet this threshold. Instead, we have been presented with:

1. A zombie allegation: an issue that was disproven, now brought back again.

2. Incorrect Date

The police statement refers to an incident occurring on Sunday, 15th September 2024 but claims a related police call occurred on Thursday, 15th August 2024 — nearly a month earlier. This is plainly incorrect. The correct date is 15th September, as supported by staff reports, internal records, and our exhibits.

3. Inflated Account of Individuals Involved

The same statement asserts that five individuals were involved in a violent incident. Our records — including staff witness statements and internal logs — confirm that only two individuals were involved. There is no supporting CCTV or corroborative evidence for the larger number cited by police.

These errors misrepresent both the seriousness and the scale of the incident, We must formally place on record our concerns regarding substantive inaccuracies contained within the police evidence submitted for this review. These errors are not minor. They reflect a lack of attention to factual detail and raise wider questions about the integrity of the investigative process and the accuracy of information being placed before this Committee.

We are not here to deflect accountability. We are here to demonstrate that we have taken every responsible step expected of a licensed operator. But we also respectfully expect that any evidence brought against us should meet a standard of accuracy, fairness, and professional care. In this case, it has not.

Given the lack of credible evidence supporting the statutory threshold of serious crime or serious disorder — and considering that the original immigration allegation has already been discredited and dismissed — we respectfully submit that this review is both procedurally flawed and substantively unjustified. We ask the Committee to dismiss the application in full and instead continue to engage with us through constructive and appropriate channels. We remain committed to operating The Camden in full compliance with all licensing conditions, and to maintaining an open, collaborative relationship with both the police and licensing authority.

2. Actions taken

Following engagement meetings with the licensing authorities and numerous interactions with the Police licensing team in November 2024. The Camden implemented a wide-ranging set of improvements, including but not limited to:

- **Appointment of Compliance Officer**: The DPS Sonia De Leon has also taken on the role of the venue's Compliance Officer. The DPS is exceptionally qualified for this additional responsibility, as she is a senior operational manager for the local authority. In her role, she is regularly involved in health and safety management, with compliance being one of her key strengths. Her extensive experience in overseeing compliance protocols and ensuring regulatory adherence within a highly regulated environment makes her the ideal candidate to take on the role of Compliance Officer at The Camden Bar.
- Appointment of a New Operational Manager in October 2024. Jose Angel brings a
 wealth of experience in managing large-scale events, including festivals and highcapacity gatherings at various clubs. With expertise as a sound technician, he ensures
 the optimal compliance of all sound legal requirements according to Annex 3 conditions Attached after a hearing by the Licensing Authority 05/09/2012
 Condition 36, made by the Licensing authorities and ensures maintenance of the
 equipment in the venue. Additionally, he has obtained SIA certification, which has
 provided him with a deeper understanding of safety requirements, crowd control, and
 security issues related to both the venue and the surrounding area, including counterterrorism measures. These qualifications further strengthen our commitment to
 ensuring the safety and compliance of our venue.
- Comprehensive training. We fully recognise the importance of staff training, especially regarding customer welfare and vulnerability. All staff have received appropriate training on the "Ask for Angela" scheme, as well as other relevant welfare materials. These materials have been prominently displayed throughout the venue, and staff are regularly reminded of their responsibility to protect vulnerable customers. We have also introduced regular refresher training to keep staff up to date with best practices for handling welfare-related situations. We are committed to ensuring that these systems are not only in place but are actively maintained and monitored. Exhibit demonstrate our commitment to running the venue responsibly and in line with the law. Exhibit 3-Training records, Exhibit 4 Improvement action plane, Exhibit 5- WAVE certificates training emails
- Introduction of a Incident Logging System Exhibit 6- Incident/accident report logs
- Full Retraining of SIA and Bar Staff on Licensing Conditions and Police Cooperation
- Enhanced CCTV System with Daily Functionality Checks Exhibit 7- CCTV logs
- Stricter Entry Control Process and Promoter Management Protocols
- Regular Internal Audits and Risk Assessments Exhibit 8 -Internal Audit, Exhibit 9 -RA

•	Proactive Engagement with the Council and Police on All Licensing Matters Exhibit 10 -email of engagement, Exhibit 10 (1) - Emails of engagement email, Police collaboration work for further improvement

3. Actions taken to abolish alleged breaches of conditions / Chronology of Events

[This section will include a step by step, actions taken to address each police alleged breach of conditions, with references to exhibits.]

This document provides a formal response to each alleged breach raised by the Police Licensing Team and Camden Council between July and December 2024, relating to the Camden.

Each alleged breach is addressed in sequence, providing factual clarification, acknowledging any failings and outlining corrective actions taken to ensure future compliance and public safety.

a. Monday 8th July 2024 - Email

Police Licensing Team received an email from The Camden confirming a change of management at The Camden

b. Saturday 27th July 2024 - Police Licensing visit and Observations

On Saturday 27th, we acknowledge the visit by Police Licensing Officers and their observations regarding door security and last entry procedures at the time.

Since our meeting with the police in November 2024 the new management has taken immediate actions to replace SIA members of Staff who did not adhere to the conditions of the License.

To improve the level of security further we have taken steps to remove the SIA company we contracted from September 2024 to March 2025

Since April 2025, We recruited our own SIA certified - Self Employed Team, who have been given the correct training instructions to manage and maintain the conditions of the premises license.

Regarding the smell of cannabis, the venue does not tolerate drug use. All security staff are briefed to monitor and report suspected use, especially in the smoking area.

We have since reinforced expectations with all promoters and enhanced monitoring of outdoor areas and our new security team has implemented a strict search policy as part of the prevention of serios crime and disorder which *include thorough ID, metal detector, body and bag checks of each individual before allowing entry to the venue*, All illegal substances are completely prohibited and should customers be found in possession of any illegal substances, will be detained, drugs will be ceased and reported to the police Immediately. *Exhibit 11 - Weapons & Drugs Seizure Policy and procedures*.

As for customers lingering after refusal, we acknowledge that crowd control is essential and have since updated our dispersal policy, increasing staff presence outside during peak times and improving communication with local venues to discourage loitering. We prohibit the use of alcohol outside of the venue by not allowing customers to bring their drinks outside, we monitor this by having an SIAs monitoring the exits and with "No drinks allowed outside" signs to encourage customers. For larger crowds Security staff use barriers to help direct customers away from the premises and we offer assistance with calling cabs *Exhibit 12- dispersal policy*.

c. Wednesday 31st July 2024 - Meeting

We confirm this meeting took place with Police Licensing and that Mr Ray clarified the employment status of bar staff and the DPS. While they are classed as self-employed, records of their shifts and identification are kept for internal and legal purposes. We have reviewed the method and duration of record retention to align with best practice and licensing expectations.

Issues raised regarding dispersals and external activities on 6th and 27th July — including nitrous oxide use — are taken seriously. Although these activities occurred in public spaces and cannot be directly linked to The Camden, we understand the impact on our venue's reputation and community safety. We have taken steps with our security team to cover wider external areas during dispersal times and to alert police immediately if ASB is observed, we have also implemented regular night patrols by our manager during our events specially during the evenings to ensure our customers are not causing disturbances to the local neighbourhood and surrounding areas although we have not seen any of our customers during our patrols we have observed that Camden Town is a high attraction for the use of Nitrous Oxide also commonly known as Balloons, as a result of this, during our patrols our Manager does find several canisters every weekend which we dispose off on behalf of the Local community, we are aware of the problem that Camden Town faces with this issue in general, we are committed to help the community and the local authorities in the prevention of serious crime and disorder.

We acknowledge the suspected last entry breach on July 27th and are cooperating fully with requests for CCTV footage. As stated previously, changes to our entry protocols and staff training were implemented shortly thereafter. Additionally, following our meeting with the licensing authorities and the police on August 13, 2024, we volunteered to provide CCTV footage from 1 to 2 AM for several weeks to demonstrate our commitment to adopting best practices.

• d. Thursday 1st August 2024 - Email

CCTV request

We accept the importance of timely responses and have since implemented a daily system check of all external cameras and created a standardised protocol to retrieve and share footage securely within required timelines.

Although we haven't seen the video evidence of large crowds outside The Camden, we take our dispersal policy seriously, we ensure all crowds are dispersed safely and according to the conditions of the license.

e. Monday 5th August - Email

Mr Ray volunteered footage of the new dispersal regime, but the emailed link did not allow viewing. This was later confirmed to be because it was not uploaded

Mr Ray attempted to provide footage of the updated dispersal regime via a link, which unfortunately failed to upload properly due to a technical issue. This was not a refusal to comply, and we immediately informed the Police Licensing Team of the error.

A list of upcoming events was sent, and we acknowledge that more detail was needed. We have since revised our internal procedures for submitting events to ensure that risk assessments can be conducted appropriately, including details of promoters, music styles, expected capacity, and SIA deployment.

f. Thursday 8th August - Email

Camden Council rejected a TEN (for 25th & 26th August)

Camden Council rejected the TEN application on the grounds of incorrect completion. While we acknowledge the importance of accurate documentation, we do not consider the incorrect completion of a TEN to be a matter of sufficient concern to warrant inclusion in a submission application.

The request for CCTV footage from Saturday 27th July was noted and accepted. We acknowledge the ongoing concern around this date and have since improved our processes to ensure that all CCTV footage is retained securely and made available within the required timeframe.

g. Monday 12th August - Email

A neighbouring venue sent Police footage from the weekend of Saturday 3rd August 2024 showing a group of males fighting outside The Camden. Despite the disorder, Police have been unable to find evidence on 999 call logs of any staff member at The Camden phoning to report this to the MPS, despite being advised to always do so. Mr Ray confirmed that the CCTV upload for Saturday 27th July 2024 was not actioned until Monday 12th August.

Condition breach: • 61. Copies of recordings must be made available to the Police and/or Licensing Authority on request within 48 hours of the request being made.

The allegation refers to CCTV footage provided by a neighbouring venue showing a group of males fighting "outside The Camden," and claims that no 999 call was made by Camden staff despite prior police advice.

First and foremost, we must point out that the venue was closed during the alleged incident, the incident in question was never shared with our management at the relevant time, nor has it been provided by the police for verification. To date, we have not been given a copy of this footage. We are able to confirm that the individuals involved were indeed not patrons of The Camden, nor can we verify if the incident even occurred directly outside our venue. No evidence

has been provided to support the assertion that the individuals involved in the altercation were associated with our venue.

As a direct result to this unfounded report or allegation, The police's claim that no 999 call was made does not confirm inaction—but a lack of due diligence when dealing with such serious allegations, Our team consistently calls emergency services when there is an incident serious enough to warrant police presence, that meets the threshold for a police call or report. There is no evidence this was such a case.

Regarding the CCTV from 27th July 2024, this was uploaded on 12th August due to internal management transitions. No formal or urgent request for the footage was made during that time, and no criminal incident has been linked to that.

h. Tuesday 13th August 2024 - Meeting

Present was the Mr Ray, Manager and DPS from The Camden. Camden Council Licensing Officers initiated this meeting due to noise complaints.

This meeting was attended by Mr Ray, the venue Manager, and the DPS, following concerns about noise. During this meeting, we acknowledged the concerns raised and reaffirmed our intention to work collaboratively with both Police and Council Licensing teams.

Since the implementation of the new management structure in November 2024, we have implemented:

- Full compliance of noise levels according to **Annex 3 conditions Attached after a hearing by the Licensing Authority 05/09/2012, Condition 36**: For clarification, please refer to license.
- Additional training for all SIA and management staff on last entry procedures
- A revised checklist to monitor compliance with all license conditions, especially around CCTV, SIA logs, and dispersal
- We have a dedicated SIA Staff member to Monitor all doors at all times to control noise, as stated on Annex 3 Condition: 36 of the premises license licenses while entertainment levels is taking place.

These steps reflect our commitment to addressing concerns and improving operational standards.

i. Saturday 17th August - Police Licensing Visit

Mr Ray and Manager at The Camden were handed a **NOTIFICATION OF ALLEGED OFFENCES** having breached the following

conditions: •48. There shall be no new patrons admitted to the venues after 0100 Hours - On the Saturday 10th August patrons were still being admitted into the venue after 01:00. This followed footage showing the breach being sent to Police. Condition •61. Copies of recordings must be made available to the Police and/or Licensing Authority on request within 48 hours of the request being made - On the Thursday 8th August after three attempts footage was not supplied within 48 hours. Footage from all cameras outside had not been supplied as per the request.

We acknowledge receipt of a Notification of Alleged Offences on this date in relation to two license conditions:

- Condition 48 (Last Entry at 01:00): We accept bad practice on 10th August where entry
 continued past 01:00. As previously stated, this has now been addressed as part of the
 work of the new management with updated entry logs, earlier crowd control barriers,
 and strict instruction to all staff regarding enforcement. No further breaches have
 occurred since these measures were implemented.
- Condition 61 (CCTV Footage Within 48 Hours): We again acknowledge the delay in providing footage for 27th July. Although the footage was eventually provided, it did not meet the required timeframe. Our revised system now ensures footage is downloaded and shared promptly, with back-up support for all technical uploads.

j. Sunday 15th September - Violent crime at The Camden

On the Thursday 15th August Police received a call from the London Ambulance Service & Mr Ray reporting that a male had been assaulted by 5 suspects and was bleeding from the head. Staff detained one of the suspects who was arrested. However, staff witnesses refused to provide statements to Police investigators. A lack of statements and assistance seriously undermines investigations and the crime and disorder licensing objective

We must formally place on record our concerns regarding substantive inaccuracies contained within the police evidence submitted for this review. These errors are not minor. They reflect a lack of attention to factual detail and raise wider questions about the integrity of the investigative process and the accuracy of information being placed before this Committee.

1. Material Inaccuracy – Incorrect Date

• The police statement refers to a violent incident occurring on Sunday, 15th September 2024, but also asserts that a police call relating to the same matter took place on Thursday, 15th August 2024 — some four weeks earlier. This is plainly incorrect. The incident in question occurred on 15th September, as supported by the venue's internal incident report, staff accounts, and contemporaneous records *Exhibit 6 (1) -15 Sep 2024 Incident and accident report*

It is unclear how such a discrepancy was introduced into formal evidence, and it undermines confidence in the reliability of the overall statement.

2. Factual Discrepancy – Number of Individuals Involved

The statement also asserts that five individuals were involved in the disorder. This is not supported by any evidence available to us. Our internal report and staff witness accounts — prepared immediately after the incident — confirm that only two individuals were involved. There is no CCTV or other corroborative evidence (to our knowledge) supporting the claim of five. Again, the failure to properly verify such a basic factual point prior to submission is concerning.

These errors — the incorrect date and the unsupported expansion of those involved — have the effect of misrepresenting the incident's seriousness and scale. They also suggest that the preparation of evidence may have fallen below the standard expected when serious licensing outcomes are under consideration.

We ask the Committee **to treat the police statement with appropriate caution**, and to recognise that the venue has met its duty to preserve and provide accurate documentation. The correct and factual account has been set out in our submission, and is fully supported by the exhibits provided.

While we remain committed to working constructively with the authorities, we also expect that the evidence relied upon in this process meets the standards of accuracy, fairness, and professional care. We submit that in this case, that threshold has not been met.

k.Tuesday 24th September - **BREACH OF CONDITION** Police requested CCTV footage from external cameras covering the external area on Sunday 22nd September between 01:00 and 01:30. This footage request was not actioned. Mr Ray informed Officers on Saturday 28th September that he believed it was a duplication from the incident on the Sunday 15th September. However the dates were different.

We acknowledge that CCTV footage requested for Sunday 22nd September between 01:00 and 01:30 was not submitted. Mr Ray's understanding that the request was a duplication of a prior incident (from 15th September) was mistaken, and we accept that this misjudgement resulted in non-compliance.

We have since introduced an internal request log, with all footage requests now tracked, verified, and escalated if necessary. This new process removes ambiguity and ensures footage is submitted accurately and in line with conditions.

L. Saturday 28th September - Police Licensing visit

- Condition 38. The venue must employ a minimum of 4 SIA registered door supervisors from 2000 Hours until close on every Friday and Saturday
- Condition 47. Police must be called to any incident of disorder within the premises or relating to customers from the venue.

- Condition 65. The CCTV system must be checked on a daily basis to ensure it is fully working and this must be logged and signed by the person checking the system. The log must be produced immediately on request of the Police or Licensing Authority.
- Condition 66. An incident log book must be maintained on the premises at all times it remains open to the public and must be made available immediately on request of the Police or Licensing authority

Condition 38 - Minimum SIA Staffing

It is correct that, at the time of the visit, the Manager was acting in a dual capacity, performing managerial duties while holding a valid SIA licence. It is legally permissible for individuals with SIA certification to carry out relevant duties, even while acting in a managerial capacity. While we aim to ensure that dedicated SIA staff are assigned to their roles during all operational hours, there are occasions — particularly during lower-risk events or non-peak periods — when the Manager may support operational needs by fulfilling both managerial and SIA duties. This occurs only when the venue is otherwise fully staffed (e.g., bar team, floor staff), allowing for adequate supervision across all functions without compromising safety or compliance.

Furthermore, we encourage the Designated Premises Supervisor (DPS) and operational managers to undertake SIA training. This is not to enable them to routinely act as door supervisors, but rather to enhance their understanding of security protocols, safeguarding responsibilities, terrorism awareness, and general crowd management. This knowledge equips our leadership team to make better-informed decisions and ensures a higher standard of operational oversight, especially in situations requiring security awareness or rapid response.

Condition 47 - Police Not Contacted for Disorder

We dispute any deliberate breach. Staff responded to the incident appropriately and judged that police attendance was not immediately necessary based on the situation as it unfolded. However, to remove ambiguity, we have now implemented a stricter internal escalation process. All future incidents potentially amounting to disorder will be referred to the DPS and operational manager where appropriate, the police will be contacted without delay.

Condition 65 - CCTV Check Log Not Available and Condition 66 - Incomplete Incident Log

While we dispute that all observations amount to alleged breaches, we acknowledge operational shortcomings and have acted promptly to correct them.

m. Thursday 3rd October 2024 - Email Police made request for CCTV footage

Please see refer to previews response in point k.

n. Friday 11 October 2024 - Phone call

Manager from The Camden phoned after several emails disclosing issues at the Camden, particularly his concerns over upcoming events and questioned whether the venue were able to manage the risk of disorder

We acknowledge the concerns raised by the individual who contacted the Police Licensing Team on October 11th, 2024. It is crucial to clarify that this individual was no longer in a managerial role at The Camden as off beginning of November 2024, due to significant concerns regarding his competence and adherence to professional standards and the serious breaches of compliance under his management not to mention various false allegation's made against The Camden and other venues owned by Mr Wray including a very serious false immigration allegation he made to the licensing authorities, to date this has affected the current relationship with the local authorities, we believe this was a direct attempt to tarnish the establishments reputation and directly affect the efforts made by the Management team to take action on the recommendations made by the local authority's and the police. Undoubtedly the lack of capability from this individual to comply with the conditions of the license, as mentioned by the Police and the council on previous meetings, it was clear that our business needed to make a restructure of compliance, while we are aware of the seriousness of the breaches made under his management, we took all matters raised very seriously and we addressed all the issues raised while this individual was Managing the establishment under a false representation of knowledge on Club Management and Compliance, which he clearly failed to uphold, let it be known for the record this is the main reason why we are still hearing this case.

We want to emphasise that any statements or actions from this individual should not be considered as honest or accurate representations of The Camden's current management or operational practices. Since his departure, we have taken comprehensive steps to enhance our operations and ensure that we adhere to the highest standards of safety and compliance.

Our focus has been on implementing new management practices, appointing compliance officers, and shifting our event focus towards community-oriented and corporate events as well as well as providing a safe space for socialising, for local and visiting communities.

We trust this clarification provides a full context and reassures all stakeholders of our unwavering commitment to a safe and compliant venue.

o. Saturday 12th October 2024 - Email

Staff sent Police CCTV footage but cameras did not appear to work

We acknowledge that CCTV footage was submitted on this date, but that several cameras were not working. This failure was due to a technical issue identified in our camera system which has since been repaired.

To ensure ongoing compliance:

- A full technical audit of the CCTV system was completed in October 2024
- Non-functioning cameras were replaced

 A daily log and verification process is now in place, with records retained and made available to licensing authorities upon request

This action ensures that full, reliable footage will be available for all future incidents or investigations.

p. Monday 14th October 2024 - Email

Officers received CCTV footage of what appears to be an attempted robbery involving customers of the Camden. One of the males brandishes a knife, a small scuffle ensues, and the knife is dropped. Victim runs off over the road and the suspect is restrained by his friends. The Camden Security (it appears) walk over to see what has happened. Manager on duty at the time did not call Police despite knowing that it happened. This incident took place on the Friday 30th August 2024.

It was also disclosed that following a violent altercation on the 07th July 2024 a male was injured inside the club and at this point the venue ejected everyone. A call was made to Police but staff closed the venue and did not engage or approach Police. CCTV request made for cameras 5, 10 and 11 for the 13th October between 01:30 and 02:00. This request was not completed, and a **BREACH OF CONDITION**

We acknowledge the reference to an attempted robbery involving a knife outside The Camden on 30th August 2024. However, we must clarify that the venue was closed during this incident, we have not seen the CCTV footage that the Police have referred to, and we are uncertain about the specifics of the incident they are describing. As of now, we have not been provided with this footage, and without reviewing the footage ourselves, we are unable to comment on the incident.

Additionally, we question how the Police can be certain that the individual involved is a customer of The Camden, as no supporting evidence has been provided to confirm this. It would be standard practice for the Police to share the relevant footage with us for review, which would allow us to assess the situation more thoroughly.

While we do recall the incident on 7th July 2024, where it was alleged that staff failed to engage with Police, the manager at the time advised that the incident did not warrant police attention and the police call was made by a member of staff who over reacted to the situation due to the lack of knowledge as to how to deal with de-escalation.

While we genuinely regret the trust our establishment placed on the previous management to uphold of compliance, we have taken progressive action and implemented the following corrective actions:

- Security staff have received updated training on mandatory police notification protocols as well as compliance to the license conditions.
- A written policy has been issued outlining that all incidents involving weapons or serious violence must be immediately reported to Police.
- Incident reporting procedures have been reinforced, with accountability logs created to track staff compliance

q. Tuesday 15th October 2024 - Violent crime at The Camden

Officers received CCTV footage of what appears to be an attempted robbery involving customers of the Camden. One of the males brandishes a knife, a small scuffle ensues and the knife is dropped. Victim runs off over the road and the suspect is restrained by his accomplices. The Camden Security (it appears) walk over to see what has happened. Manager on duty at the time did not call Police despite knowing that it happened. This incident took place on the Friday 30th August 2024.

We must express serious concern regarding the structure, accuracy, and evidential integrity of the police statement submitted in relation to this alleged incident.

1. Confusion Over Dates and Incident Reference

The statement is internally contradictory. It refers to a "violent crime at The Camden" dated Tuesday, 15th October 2024, but goes on to describe an incident which is then stated to have occurred on Friday, 30th August 2024. It is not made clear whether the 15th October date refers to the date of report, date of CCTV review, or is simply an error. The **lack of clarity** undermines the reliability of the document and makes it difficult to determine what precise allegation is being put forward.

2. Ambiguity and Lack of Proper Allegation

The language used ("it appears", "walk over to see what has happened") suggests that even the reporting officer is unsure of the sequence of events, the individuals involved, or the knowledge and actions of venue staff. There is no clear allegation of a specific licensing breach, nor any evidence included to support the assertion that "the manager on duty... did not call the Police despite knowing that it happened." If this is intended to be a breach of licence condition or suggest a failure in management, it must be stated explicitly and evidenced properly.

3. No Prior Disclosure of CCTV to the Premises

To date, no CCTV footage relating to this alleged incident has been shared with the premises by the police. We have therefore been unable to review or verify the incident described and cannot accept the account as accurate without first-hand viewing. We are willing to cooperate fully with any investigation, but proper procedure requires that relevant evidence be disclosed in a timely manner.

This report, like others addressed in our submission, contains **multiple internal inconsistencies and fails to meet the evidential standard required in a licensing review**. We respectfully request that the Committee treat the statement with appropriate caution and rely instead on verified evidence and factual accounts. We remain fully committed to working collaboratively with the Licensing Authority and the Police and to ensuring that The Camden continues to operate to the highest possible standards of public safety and compliance.

r. Saturday 18th October 2024 - Police Licensing visit Several breaches of premises license identified and staff instructed on what to do to improve

Please refer to the closing statement.

s. Thursday 24th October 2024 - Meeting

Meeting held at Council Offices with Council Licensing Officer. **NOTIFICATION OF ALLEGED OFFENCES** handed to Mr Ray for breaches above. Advice and guidance given to Mr Ray

t. Monday 1th November 2024 - Meeting

Meeting held at Council Offices with Council Licensing Officer. Mr Ray and his team provided Officers with policies and outlined changes he had implemented.

We must formally place on record our concerns regarding substantive inaccuracies contained within the police evidence submitted. Correction to Meeting Date – Monday, 11th November 2024.

We are pleased to report that this meeting was an extensive and productive session with both the Licensing Team and the Police Licensing Team. During the meeting, we had the opportunity to present and share many of the policies and procedures we have implemented following the departure of the previous manager. This included a more intense involvement from the Designated Premises Supervisor (DPS) and taking the role of compliance officer and the appointment of a new operational manager.

We were very pleased to receive an email from Dominic on 26th November 2024, in which he highlighted his impression of the significant improvements we had made in such a short period. Additionally, following the meeting, we immediately implemented several suggestions made by both the Police and the Licensing Team to further improve our operations. *Exhibit -4 Improvement action plan*.

u. Saturday 21st December 2024 - Police Licensing visit: Ask for Angela/WAVE materials and police evidence bags for drug seizures.

4. Concerns timeline

27th July 2024

Condition 48 Condition 61

10 th August 2024

Condition 48

15 th August 2024

Staff detained suspect

30th August 2024

Unable to provide comments No CCTV footage received, clarity on incident from police not clear

28th September 2024

Condition 38, unfulfilled Condition 47, unfulfilled Condition 65, CCTV footage reques Condition 65 incident log not prov

5. Exhibits / Appendices

- Exhibit 1 Employer Darpan right to work from the Home Office documentation
- Exhibit 1(1) Statement for staff member Gursimarat sinbh- garrys
- Exhibit 2 Right to work employment policy
- Exhibit 3 Staff training
- Exhibit 4 Improvement Action Plan
- Exhibit 5 WAVE certificate email
- Exhibit 6 Incident/Accident rep
- Exhibit 6 (1)15 Sep 2024 Incident and accident report
- Exhibit 7 CCTV logs
- Exhibit 8 Internal Audit
- Exhibit 9 Risk Assessment (RA)
- Exhibit 10 Emails of engagement email, Police congratulations from our improvement
- Exhibit 10 (1) Emails of engagement email, Police collaboration work for further improvement
- Exhibit 11 Weapons & Drugs Seizure Policy and procedures
- Exhibit 12 Dispersal Policy
- Exhibit 13 Refusal entrance and after 1 non patrons records

6. Conclusion and Request for Review and amendment of Licensing Conditions

The Camden acknowledges that there have been operational shortcomings in the past. However, these have been fully addressed through decisive action, strengthened procedures, and substantial improvements in compliance and daily management. Since November 2024, the venue has operated without serious incidents or formal complaints — a clear indication that the changes made are both effective and ongoing.

The core allegation prompting this review — an alleged immigration offence — has already been thoroughly investigated during a formal hearing on 1st May 2025, where it was found to be unfounded and inconclusive. No further evidence has since emerged, and it is therefore inappropriate for this matter to be revisited during the current review.

We must also raise concern about the standard and reliability of some of the material presented by the authorities. Several errors have been identified — including incorrect dates, conflicting descriptions of incidents, and a reliance on statements that amount to hearsay rather than verified fact. *Please refer to alleged breaches J and Q*.

This undermines the integrity of the review process and does not meet the threshold for a fair or proportionate determination.

Where minor breaches have occurred, they have been acknowledged and swiftly addressed through meaningful reforms. We have introduced clearer CCTV procedures, reinforced staff training, and implemented more robust compliance oversight. Additionally, a secure and more contained smoking area is in place to better manage that space, and an ID has been put in place, security metal detectors for use during high-risk events to enhance entry security.

We are also committed to ongoing engagement with the authorities. To that end, we are happy to hold by monthly meetings with Police Licensing and the Council's Licensing Team, ensuring strong communication, early problem-solving, and consistent monitoring of our operations.

To suspend or revoke The Camden's licence in this context would be wholly disproportionate. It would disregard the significant progress made, rely on inconsistent or unsubstantiated grounds, and unfairly impact a business that contributes positively to the local community — supporting over 13 jobs and a wide network of nearby enterprises.

We therefore respectfully urge the committee to reject the review, acknowledge the improvements already in place, and allow The Camden to continue operating responsibly and cooperatively, in line with all licensing objectives.

Request for Review and Amendment of Licensing Conditions

We, the management of The Camden Bar, respectfully submit this request for a review of certain conditions attached to our premises license. It is our contention that some of the current conditions, **imposed in 2012**, **no longer align with the operational realities** of the venue, nor do they reflect the modern approach to risk management and event planning that we have adopted.

In light of the significant operational changes we have implemented and the improved safety and compliance measures we have introduced, we seek to have certain conditions reviewed and amended to better reflect the current operational profile of the venue and to better help prevent any breaches of license conditions. We believe these adjustments will allow us to run the venue more efficiently while continuing to maintain safety and compliance effectivily.

Condition 34: Children Not Allowed in the Premises

We request the removal of this restriction as we now host family-friendly and community-focused events. We have implemented comprehensive training for bar staff on alcohol regulations and ensure responsible adult supervision during such events. This would allow us to host events that contribute positively to the local community while maintaining the safety and well-being of all attendees.

Condition 37: SIA Door Supervisors Requirement

We request a modification of this condition, which requires a minimum of two SIA-registered door supervisors every Sunday to Thursday. For low-risk events, we believe a dynamic risk assessment should determine the number of door supervisors required, allowing us to allocate resources more efficiently while still ensuring the safety and security of the venue. As we are increasingly hosting more corporate and community-focused events, which are typically lower-risk, we feel that a more flexible approach to door supervision would be appropriate.

Condition 38: Minimum of Four SIA-Registered Door Supervisors

Similarly, we request a review of this condition, as it does not always align with the type of events we are now hosting. For low-risk events, especially corporate and community events, we propose that the decision on the number of door supervisors required be based on a dynamic risk assessment carried out by the venue's management and head of security. The number of SIA staff will be determined according to the specific needs of each event. This approach would allow us to use our resources more effectively and ensure a more tailored and responsive security presence.

Condition 48: No New Patrons Admitted After 1:00 AM

While we fully support Condition 48, as it serves the important purpose of filtering out patrons who may not be in the best state to partake licensed activities in the premises, we would like to request flexibility over the exemption for genuine ticket holders and guests for all types of events who come to support the events genuinely. Specifically, for ticket holders who have already purchased entry in advance and also show no signs of intoxication, we would like for the licensing authority to extend entry after 1:00 am following a dynamic risk assessment and amend the last entry to 2am. This assessment will be carried out by the management team in collaboration with the head of security to evaluate whether admitting an specific event ticket holder after this time is appropriate. This flexibility will help us to accommodate our loyal patrons, prevent unnecessary confrontations with customers over such early last entry, considering we are a venue which is open till 4am weekends, the change of condition will also help to filter customers who have signs of drug use or intoxication, better use of time management to keep the premises secure and ensure the smooth running of ticketed events, without compromising the safety and integrity of the venue.

Late Events on Sundays and Bank Holidays

We also request that late events on Sundays (when the Monday is a bank holiday) be treated the same as a Saturday, with the ability to run events late into the night without the need for a temporary event notice (TEN). At present, we are required to apply for a TEN for such events, but we believe that, given the nature of our venue, it should be incorporated into our license conditions, as we are a nightclub and operate similarly on these Sundays as we do on Saturdays.

This change would help streamline operations and avoid unnecessary paperwork for events that should be treated equivalently to a Saturday.

The Camden is evolving towards hosting more family, corporate and community-oriented events whilst ensuring better management of high-risk and late-night dance events. This shift is an important part of our ongoing strategy, and we believe it is time to reflect these changes in our license conditions. We are confident that these updates will help us continue to run a safe, compliant, and successful venue that is a valuable asset to the local community.

We appreciate your consideration of these requests and look forward to your support in updating the conditions to align with the direction of our business. We are happy to provide further details or evidence to assist with this review.

Employee Information Form

Personal Information:

Last Name: Darpan First Name: Address: Telephone Original Passport Seen **YES**- NO (Right to Work) Person to notify in case of emergency: Name: Jay ______Relationship: Friend Telephone Additional Comments: Date: 1 Sep 2024 Signature: Employee #: Start Date: 1 Sep 2024



They have no

DARPAN

They have permission to work in the UK until 20 August 2028, subject to the conditions and restrictions below.

Conditions

They must work for the employer who sponsored them.

They can:

- · only work in the job they are sponsored for as their main job
- work overtime in the job they are sponsored for subject to the working time regulations
- complete the notice period for a job they were doing when they applied for their current visa

Voluntary work

They can:

- do unpaid voluntary work for a charity, voluntary organisation, statutory body, or an associated fundraising body
- · only be paid for reasonable expenses when doing voluntary work

Additional part-time work

While they are working in the job they are sponsored for, they can also do part-time work.

Part-time work must:

- · be in an eligible Skilled Worker occupation
- only be done for up to 20 hours per week in total, even if they have more than one part-time job
- only be done outside the contracted hours of the job they are sponsored for - part-time work cannot take priority over their sponsored job

Rotate U

Your immigration status

Name
Darpan
Date of birth
Nationality ND
Status
Skilled Worker Route
Valid from
11 August 2023
Valid until
20 August 2028
National Insurance number

Exhibit 1(1) Statement for staff member Gursimarat

I went to Kiss to meet my friend Darpan at approximately 11:30 pm when we were approached by police officers. Without any initial explanation, they began requesting our personal identification, driver's license, and personal liquor license. In response, Darpan contacted Tony to come to the location and provide the necessary documentation. I was not on duty that evening; nonetheless, the officers prevented us from leaving the premises.

Approximately thirty minutes later, Tony arrived and addressed the officers' inquiries. During the entire encounter, I had difficulty understanding what was being communicated. Eventually, the officers left without further issue.

A few days later, on a Saturday morning, I received a phone call from Kat, who informed me that the police were allegedly looking for me under the suspicion that I did not hold a valid visa and was working illegally. At the time, I was attending a CSCS training lecture. The news left me deeply shaken, and I was unable to concentrate for the remainder of the session.

Kat further mentioned that approximately ten immigration officers had visited, inquiring about both myself and Darpan. I hold a valid Graduate Work Permit visa, which allows me to work full-time legally in this country. Therefore, I was extremely confused and distressed by the allegations.

During that period, I repeatedly checked my work permit status online for reassurance. I wished to speak directly with an immigration officer to clarify the matter, but I did not have a direct contact number. I had already provided my contact number, email address, and residential address to the licensing officer, and I assumed that if there were any concerns regarding my status, I would be contacted directly. However, no one reached out to me, nor did any officer visit my residence.

This experience was mentally and emotionally exhausting. I invested significant time, effort, and financial resources to obtain a degree and gain professional experience here. Being treated as if I were a criminal, despite following the legal process, was deeply disheartening. Had I known such an ordeal would occur, I would have reconsidered

coming to this country. I no longer feel comfortable staying in a place where I am subjected to such treatment and disrespect.

When I first started working here I provided all my right to work documents and everything was done accordingly so that I was legally allowed to start employment.

Gursimarat

Signature

Right to work Policy

Right to Work Procedure for Recruiting Casual Staff

1. Pre-Employment Checks

• **Initial Screening**: During the interview, ask candidates to bring original documents proving their right to work in the UK.

2. Document Verification

- **Check Original Documents**: Verify the authenticity of the documents in the presence of the applicant. Acceptable documents include:
 - Passport
 - o Biometric Residence Permit
 - o Other documents listed by the Home Office¹.
- Online Right to Work Check: For those with a biometric residence permit, biometric residence card, or status under the EU Settlement Scheme, use the Home Office online service with a share code².

3. Record Keeping

- Make Copies: Photocopy or scan the documents, ensuring the copies are clear and legible.
- Record the Date: Note the date the check was conducted on the copies.
- Retention: Keep these records for the duration of the individual's employment and for two years after they stop working for you².

4. Follow-Up Checks

• Time-Limited Right to Work: If the employee has a time-limited right to work, schedule follow-up checks before their permission expires².

5. Training and Awareness

- **Staff Training**: Train management staff on right to work checks and the importance of compliance.
- **Regular Updates**: Stay informed about changes in immigration laws and update procedures accordingly.

6. Compliance and Audits

Audits: Conduct regular audits to ensure all staff have the correct right to work documentation.

Exhibit 3 - Staff Training Log

Staff	Recognize Signs of Intoxication & Responsible Serving Practices	De-Escalation Techniques	De-Escalation Techniques	Evacuation plan	Accident reporting	Crime and disorder	Wave training
Gursimarat	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	23-Nov-24	Pending
Prachi	23-Nov-24	23-Nov-24	23-Nov-24	23-Nov-24	23-Nov-24	23-Nov-24	Pending
Hassan	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	05-Dec-24
Darpan	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	05-Dec-24
Kat	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	16-Nov-24	05-Dec-24

Exhibit 4 – Action Work Plan

Issue	Action/Solution		Owner	RAG Status	Comments
Body cams inadequate	SD cards to be replaced or formatted and date stored in the PC. Create a folder organised by date	30/10/24	Jose	Off truck	14/11 25 completed
Completing log	Toilet check every 30 min from 11 pm	30/10/24	Hassan	Completed	
Risk Assessment	Risk assessment to cover building and activities	02/11/24	Sonia	Completed	
Fire evacuation Plan		31/10/24	Sonia	Completed	
Contact details	Near fire brigade contact details needed Nearest defibrillator	04/11/24	Inram	Completed	
	Clicker	31/10/24	Imran	Completed	
Equipment to be ordered	2 more Boby cams	31/10/24	Imran	Completed	
	Adequate SD cards	31/10/24	Imran	Completed	
H&S	Find out and inform all staff where the nearest defibrillator machine and add to the contact list	04/11/24	Sonia	Completed	
	Fire evacuation	05/11/24	Jose	Completed	
	Refusal entrance log	05/11/24	Jose	Completed	h.
	Waste collection	05/11/24	Jose	Completed	
	CCTV Log	05/11/24	Jose	Completed	
Training to be delivered	Refusal entrance log	05/11/24	Jose	Completed	į.
	Weapon and drugs seizure log	05/11/24	Jose	Completed	
	Fire inspection check list	05/11/24	Jose	Completed	
	Safety check log for manager	31/10/24	Jose	Completed	
	Fire Log for manager	31/10/24	Jose/Imra n	Completed	

	Completing incident report	31/10/24	Jose	Completed	
	Completing refusal entrance log	31/10/24	Jose	Completed	
	Fire test log for manager	31/10/24	Jose/Imra n	Completed	
	Dispersal policy	31/10/24	Jose	Completed	
	Completing incident report	31/10/24	Jose	Completed	
	Completing refusal entrance log	31/10/24	Jose	Completed	
	Dispersal policy	31/10/24	Jose	Completed	
Oversee that Security enforce	No entre after 1 PM	31/10/24	Jose	Completed	
emorce	Record non patrons entrances after 1 PM	31/10/24	Jose	Completed	
	Emergency evacuation	31/10/24	Jose	Completed	
	Refuse entrance to intoxicating patron	31/10/24	Jose	Completed	
Promoters communication Implementing these measures minimises miscommunication, improve the customer experience during the event, and boost the likelihood of rebooking.	Include our no glass policy - specially for dry hire events Highlight that security does NOT do ticket scanning or wrist bands Only a maximum of 2 mics can be used through our receiver, if they want more it can be arranged as a add-on highlight our derspersal policy- half hour before the end of each event lighting increases, music volume reduced. Stress the 1 am entrace poicy	16/12/24	Sales team	In progress	

Incident/accident report The Camden

INCIDENT REPORT FORM

Use this form to report accidents, injuries, medical situations, criminal activities, traffic incidents, or student behavior incidents. If possible, a report should be completed within 24 hours of the event.

Date of Report:

I. PERSON INVOLVED.

Full Name: Unknow

Address: Unknown

Identification: □ Driver's License No.
□ Passport No.
□ Other:

Phone: E-Mail:

II. THE INCIDENT.

Date of Incident: 15 Sep 2024

Time: 2:45 aprox XAM □ PM

Location: The Camden 65 Crowndale Road Nw1 1TN

Describe the Incident: [DESCRIBE THE INCIDENT]

On 14th September, at approximately 2:45 am, during a routine washroom

On 14th September, at approximately 2:45 am, during a routine washroom patrol, the club runner, Hassan, observed a physical altercation between two male individuals. Both individuals appeared visibly angry and were hitting each other.

Hassan immediately proceeded to inform the security team, who swiftly intervened. The security personnel separated the two individuals, preventing further escalation. Both individuals were escorted to separate rooms, where they were monitored by security guards to ensure the situation remained under control.

One of the individuals sustained some injuries and was promptly assessed by staff. First aid was administered while waiting for paramedics, who arrived shortly after. In the meantime, the club contacted the police and provided them with the necessary information, the reference number given by the police is

Both individuals were detained at the club under the supervision of security staff until the police arrived. The police took control of the situation upon arrival, and both individuals were handed over to them for further investigation.

Incident/accident report The Camden

No further incidents were reported following the police intervention.

III. INJURIES.

Was anyone injured? x Yes □ No

If yes, describe the injuries: [DESCRIPTION OF INJURIES]

Male 1:

- 1. Bruising: A visible bruise was present on the left side of Male 1's forehead.
- 2. **Swelling**: Mild swelling was observed around the site of impact, raised slightly and extending to the surrounding areas of the forehead.

Male 2:

- 1. Bruising: A bruise was visible on Male 2's right cheek,
- 2. **Mouth Bleeding**: Male 2 sustained a minor injury to the inside of his mouth, with visible bleeding from the lower lip.

Were there witnesses to the incident? ☐ Yes X No

If yes, enter the witnesses' names and contact info: [NAMES OF WITNESSES]

IV. POLICE / MEDICAL SERVICES.

<u>Police Notified?</u> X Yes \square No <u>If yes, was a report filed?</u> X Yes \square No

Was medical treatment provided? X Yes □ No □ Refused

If yes, location of the medical treatment: X On-site X Hospital □ Other: [OTHER]

V. PERSON FILING REPORT.

Signature: ____Sonia De Leon Date: ___16 Sep2024_____

Print Name: _____

Action from incident:

Action plan

Following the altercation on 14th September at Camden Club, a review of the incident has identified several areas for improvement.

1. CCTV Footage Preservation

- Objective: Ensure the preservation of CCTV footage of incidents in a timely and secure manner.
- Action: Implement a protocol for saving and securing relevant CCTV footage immediately following any incident.

Please send this form completed to:

Incident/accident report The Camden

• Procedure:

- All staff must notify the designated CCTV operator immediately after any serious incident.
- CCTV footage must be reviewed, saved, and securely backed up within a few hours of the incident.
- Timeline: Implement within 1 week.
- Responsibility: CCTV Operator and Operations Manager to oversee the process.

2. Timely and Detailed Incident Reporting

- Objective: Improve the accuracy and timeliness of incident records.
- Action: Standardise an incident report form to be completed immediately following any incident. Include details such as time, location, individuals involved, security actions taken, and police report or medical response.
- Timeline: Implement within 1 week.
- Responsibility: Operations Manager to create and distribute the form, and train staff.

3. Debriefing Staff After Incidents

- Objective: Ensure all staff involved in or witnessing an incident are properly debriefed.
- Action: Introduce mandatory debriefing sessions for all staff involved within 24 hours of any serious incident. This will include:
 - A review of events leading to the incident.
 - Actions taken by security and staff.
 - Lessons learned to improve future response.
- Timeline: Immediate implementation.
- Responsibility: Operations Manager and Head of Security to conduct debriefs.

4. Amendment of Risk Assessment

- Objective: Update the club's risk assessment based on lessons learned from the incident.
- Action: Conduct a full review of the club's current risk assessment to:

Incident/accident report The Camden

- o Identify any new risks or threats revealed by the incident.
- Implement additional control measures to prevent future altercations (e.g., increased patrols, enhanced security presence in high-risk areas).
- Timeline: Complete the review and update within 2 weeks.
- Responsibility: Health & Safety Officer and Head of Security.
- 6. Training on Incident Reporting and Response
 - Objective: Ensure all staff are trained in proper incident reporting, response protocols, and maintaining timely records.
 - Action: Organize mandatory training sessions focused on:
 - o The importance of real-time documentation.
 - o Effective communication with security and management.
 - o The procedure for preserving CCTV evidence and notifying authorities.
 - Timeline: Training to be completed within 1 month.
 - Responsibility: Club Manager and Security Team.
- 7. Audit and Review of Incident Logs
 - Objective: Ensure ongoing compliance with timely and accurate incident reporting.
 - Action: Conduct monthly audits of all incident reports and CCTV footage records. Review these to ensure timely filing, completeness, and proper followup.
 - Timeline: Monthly audits starting from next month.
 - Responsibility: Operations Manager.

OFFICE USE ONLY

Report received by: [NAME] Date: [DATE]

Follow-up action taken:

Action Taken: [DESCRIBE]

Incident/accident report The Camden	



CCTV check log
if not operating it needs to be reported to the police

Date	Time	Name	Signature	Comments
16-03-25	18:35	J75E		I.G.W.0
17-03-25	19:17	,1050		ICWO
20-03-25	18:00	dose		ICWO
21-03-25	15:26	JOSE		2600
22-0325	21:00	ASSE		ICHO
23-03-65	15:00	close		ICWO
05-0475	1:00	JOSE		ICWO
11-04-25	1:00	06€		IGWD
12-04-25	11:00	d05€		7000
17-04-25	17:00	0050		IGWO
18-04-25	12:0-	JOSE		IGWO
19-04-25	-	C 08E		ICWO
20-04-25	THE RESERVE AND ADDRESS OF THE PARTY OF THE	386		TGWO
21-04-25		052		IGWO
22-04-25		J958		ILWI
25-04-25		BOSE		ICWO
76-4-25	CONTRACTOR OF THE PARTY OF THE	POSE		IGWO
		hie		ICWO
77-04-25		JOSE		TCWS
Y-05,25				76w-0
12-05-25		CASE		TEWD
23-05-25		1052		TCWO
4-06-25		C-DEE		IGW D
5-05-25	14:00	GOSE	_	
0-05-25	17:24	(050		TGW D
1-05-25		0990		76W O
6-05-25	19:20	JASE		IGWO
		1950		7600
3-05-U	17- 33	-		

Internal Audit Document: Nightclub Compliance Checklist

Date:5 Apr 2025

Auditor: Sonia de leon

Nightclub Name: The Camden

. Health and Safety

- Fire Safety Compliance:
 - Fire extinguishers accessible and functional:
 - Yes-No
 - Comments:

•

- Emergency exits clearly marked and unobstructed:
 - Yes- No
 - Comments:
 - There was one small chair half covering the back fire door. This was removed straight away
- Regular fire drills conducted:
 - Yes-No
 - Comments: Aim to do one every 3 months
- First Aid Kits Available:
 - Yes-No
 - Comments: every shit we have a minimum of 2 for small capacity event and 6 for larger ones
 - Cleanliness and Sanitation:
 - Restrooms clean and stocked:
 - Yes-No
 - Comments:
 - General cleanliness of premises:

Yes- No
 Comments: staff room bin not empty out

Personnel:

• Security Personnel:

2. Security

- Adequate number of security staff:
 - Yes-No
 - Comments:
- Staff trained in conflict resolution:
 - Yes- No
 - Comments:
- Surveillance Systems:
 - Functional CCTV cameras:
 - Yes-No
 - Comments:
 - Regular monitoring of surveillance footage:
 - Yes-No
 - Comments:

3. Employee Compliance

- Staff Training:
 - Regular training on health and safety:
 - Yes-No
 - Comments:
 - Training on alcohol service regulations:
 - Yes-No
 - Comments:

•

 Emp 	loyee	Record	s:
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- · Up-to-date employee records:
 - Yes- No
 - Comments:

4. Customer Service

Customer Feedback:

- System in place for collecting customer feedback:
 - Yes- No
 - Comments:
 - Handling Complaints: all complaints- feedback up to date
- Procedures for handling customer complaints:
 - Yes- No
 - Comments:

5. Local Authority Complaints and Actions Taken

- · Complaints Received:
 - Yes- No
 - Comments:
- Actions Taken:
 - Yes- No
 - Comments:



Introductory Note

Welcome to the risk assessment for The Camden. This document aims to identify potential hazards and assess risks associated with our operations to ensure a safe and enjoyable environment for our patrons and staff.

This assessment covers various aspects, including alcohol service, crowd management, security measures, and health protocols. By evaluating these factors, we aim to implement effective strategies to mitigate risks and promote a responsible and enjoyable experience for everyone.

We are committed to continuous improvement and regularly reviewing our practices to ensure the highest standards of safety and service.

No	Tasks, Activities, Hazards or Potential Risks	Risk Rating Low Mid High		Measures		Rating / Mid ligh	Action monitored by whom?	Action completed by?
1	Manual handling of equipment			 Use of correct lifting equipment, training of staff on correct lifting methods, adequate staff for heavy items. Check route to movement for potential hazards. Using personal safety equipment during set-up and taking down. 			General manager	Event Day (Pre- Event)
2	Electric Sockets			 Each appliance and lead to be tested annually for safety (PAT) Each appliance and lead to be given a physical inspection for damage prior to use Mains sockets not be overloaded 			Maintenance manager	Event Day (Pre- Event)
3	Trip Hazards			During set-up and dismantling, equipment to be kept in one area which members of public & other staff do not have access.			Event manager/ head technician	Event Day (Pre- Event)

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		x	 Avoiding cable runs on pedestrian walkways and across doorways at floor levels Use of cable mats or cloth tape to secure cable runs on floors Use of existing structure above head heigh for cable runs Use of high visibility hazards tape for projector tripod stands legs, bars or rods. 			
4	Falling Objects		 Use recommended clamps for appliances Ensuring load on trussing overhead bars does not exceed manufactures='s specification Use of safety cables, wires or chains as a secondary safety measure on lighting stands and trussing. Using fixed support points within existing structure of venue for additional security. 		Event manager/ head technician	Event Day (Pre- Event)
5	Stairs		Use sufficient, trained staff for loads carried up/ down stairs		Event manager/ head technician	Event Day (Pre- Event)
6	Noise		 Volume to be control via a noise level controller to be set at a maximum of Door kept closed Speakers to be located away from audience and where possible above head height. 		Event manager/ head technician	During the event
7	Fire		 Ensuring no equipment blocks fire escape routes. DJ staff to familiarise themselves with the venue fire & emergency procedures. Assisting venue staff in the event of an evacuation with PA safety announcements. 		Maintenance manager	During the event
8	Lone working		Opening and closing of venue to be done by a minimum of two staff member		 Event manager	Pre-Event (1-2 Weeks Before)

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9	Violence and Aggression		3. 4. 5.	All Door Security staff in Hot Spot areas to be SIA trained. Private security contractor in place in Hot Spot areas to support. Venue management trained on how to deal with violent/aggressive situation. All front staff member trained in Violence at Work Trained provided to reduce risk incurring in cash handling tasks No tolerance to violence at work policy Staff member not to out themselves to risk Additional Risk Assessment to take place for individual's events		DSP and Event manger	Event Day (Pre- Event) and during
10	Walk out and Ejection		1. 2. 3.	Staff Trained on de-escalation Techniques, communication Skills. Clear policies regarding acceptable behaviour within the club and communicate these policies to patrons through visible signage. This signage for Code of Conduct and Exit Procedures Engaging with patrons can help prevent issues before they escalate. Welcoming Atmosphere to create an inviting environment where patrons feel comfortable and valued, reducing the likelihood of negative behaviour.		Event manager / head of security	During the event
11	Smoke and fog effects		1. 2.	Only to be operated by personnel properly trained on usage. Only to be operated in accordance to manufactures instructions.		Head technician	Event Day (Pre- Event) and during

Risk Assessment Method

In order to assess a risk associated to a hazard, two factors need to be considered:-

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i - the possible consequence of the outcome

Realistically, what is the worst likely outcome? This method defines four categories of Consequence: -

1	Insignificant No injury
2	Minor minor injuries needing first aid
3	Moderate up to three days absence
4	Major more than seven days absence
5	Catastrophic Fatality or permanent Disability

ii - the likelihood of the outcome to occur

How likely is it that the severe outcome will occur? Five categories are defined: -

1	Very Unlikely
2	Unlikely
3	Fairly Likely
4	Likely
5	Very Likely

Once those two factors are assessed, the matrix on the next page can be used to determine the level of risk. This information will then be used to prioritise any control measures necessary to eliminate or reduce the risk to an acceptable level.

Risk Assessment Method (continuing).

<u>Matrix</u>

Catastrophic	5	10	15	20	25
Major	4	8	12	16	20
Moderate	3	6	9	12	15

Minor	2	4	6	8	10
Insignificant	1	2	3	4	5
	Very Unlikely	Unlikely	Fairly Likely	Likely	Very Likely

17+VERY HIGH	Unacceptable risk - immediate action required
12-17 HIGH	Risk reduction required - high priority
7-11 MEDIUM	Medium risk - action required so far as is reasonably practicable
2-6 LOW	Low priority - further risk reduction may not be feasible or cost effective
1 Very Low	Low risk - no further action required

Assessed by Sonia De Leon	Signature	
Date of Assessment: 29 Oct 24		

Sonia De Leon – Oct 2024 V2 Page 5 of 6

Sonia De Leon – Oct 2024 V2 Page 6 of 6



Apologies for the delay in getting these minutes typed up. I have summarised a lot as listing the complaints/breaches might be a bit excessive, and they have been documented in other meetings.

At this point I want to take the opportunity to say that we were impressed by the work put in by the team at this meeting, it was clear that you have done some research and considering these were the first versions of the documents they covered almost everything. We gave you a few points that you may want to include, they are in the attached letter.

As always, if you have any issues feel free to contact us.

Kind regards,

PC Dominic Hallam 1908 CN - Camden Licensing Team

Kentish Town Police Station, 12a Holmes Road, NW5 3AE



Date: Thursday 5th December 10am – 12 noon. Held at The Camden, 65 Crowndale Road NW1 1TN.

If you can please complete the 2 minute Microsoft form via the link https://forms.office.com/e/UTk0Ufx8nl-? origin=lprLink

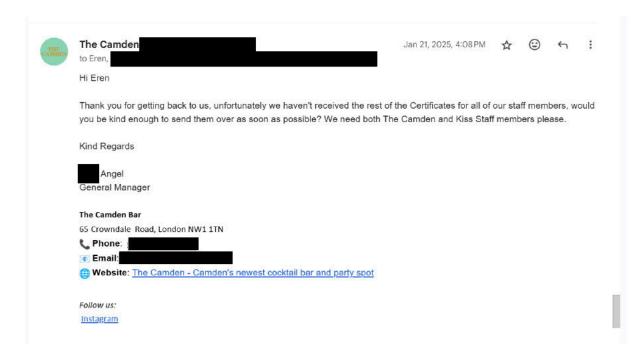
If you have booked a space for yourself and a colleague, can you please also ask them to complete the form individually.

Kind Regards

Sarah Williams Licensing Officer

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WEAPON & DRUG SEIZURE POLICY AND PROCEDURES

This document establish procedures for identifying, handling, and reporting weapon and drug-related incidents, as well at to protect patrons, staff, and property by minimizing the risk associated with weapons and illicit substances.

Scope

• Applies to all staff, including security personnel, bartenders, and management.

POLICY

- All staff enforces a strict no-weapons and no-drug policy. Any items found or individuals involved in these activities will be subject to immediate action.
- All staff should receive training on identifying potential weapon and drug possession and handling confrontational or suspicious individuals.
- All staff should prioritise safety and discretion. Confronting patrons should be left to trained security personnel whenever possible.

4. PROCEDURES

4.1 Identifying Weapons and Drugs

- **Weapons**: Security personnel should be trained to identify concealed weapons during entry checks and on the premises.
- Drugs: Staff should be trained to recognise signs of drug use or sale, such as unusual behaviours exchanges in bathrooms or secluded areas, and suspicious packages

4.2 Entry Screening

- All patrons may be subject to a security check upon entry, including:
- Bag checks for prohibited items.
- Pat-downs or metal detector scans as permitted by law.
- Signage should inform patrons of this policy and the prohibition of drugs and
- weapons.

4.3 Seizure Procedure

Discovery by Staff:

- If a staff member suspects or discovers drugs or weapons, they must immediately notify security or management.
- Avoid direct confrontation if not necessary; let security handle the situation.

Security Action:

- Politely but firmly ask the patron to step aside to discuss the item in question.
- If drugs or weapons are found, security should:
- Confiscate the items.
- Escort the patron off the premises or detain them if law enforcement intervention is required.
- Document the seizure in the incident log (see "Documentation" below).

Law Enforcement:

- Contact local law enforcement if a weapon or significant amount of drugs is seized.
- Keep the seized items in a secure area until law enforcement arrives.

4.4 Handling Confrontational Situations

- Remain calm and avoid escalating the situation.
- Avoid physical contact unless absolutely necessary, and defer to security personnel.
- Security should follow conflict de-escalation techniques and call law enforcement if required.

4.5 Documentation and Incident Reporting

- All seizures and incidents must be documented in the bar's **Incident Log** immediately after the event, including:
- Date and time of the incident.
- Description of the item seized.
- Name and contact of involved patrons (if available).
- Actions taken, including whether law enforcement was involved.

 Retain documentation for a set period in accordance with local laws and data privacy requirements.

5. Follow-up and Review

- Management Review: Conduct periodic reviews of seizure incidents to identify patterns and improve procedures.
- **Staff Training**: Provide refresher courses and debriefing sessions following any serious incident to reinforce policies and address challenges.

The Camden October 2024

DISPERSAL POLICY

The Camden

65 Crowndale Road London, NW1 1TN

LICENSING ACT 2003

Key Definitions:

- Customers those who have visited the Premises for the purpose of Licensable Activities
- **Dispersal** the manner in which Customers and Staff leave the Premises and the immediate vicinity
- Licensable Activities as per the Licensing Act 2003
- Licensing Authority London Borough of Camden
- Licensing Objectives as per the Licensing Act 2003
- **Permitted Hours** the hours for Licensable Activities as per the Premises Licence
- Policy this Dispersal Policy
- Premises The Camden, 65 Crowndale Road Nw1 1TN
- Premises License APP\PREMISES-NEW\1624
- Premises Licence Holder Bilberry Garden Entertainment Ltd
- Quiet Marshals members of Staff employed by the Premises Licence Holder specifically to assist with the Dispersal of Customers
- Responsible Authority as per the Licensing Act 2003
- Responsible Authority Officer an officer of a Responsible Authority
- SIA door supervisors licensed by the Security Industry Authority
- **Staff** those who are employed by the Premises Licence Holder for the purpose of providing Licensable Activities

Objective:

To promote the Licensing Objectives, particularly the Prevention of Public Nuisance, the Premises Licence Holder will utilize this Policy to ensure that Dispersal from the Premises and the immediate vicinity takes place in an orderly fashion.

The Premises Licence Holder will do this by:

- Utilizing a wind-down period at the end of Permitted Hours to assist with Dispersal. The wind-down period may include, for example, stopping or slowing sales of alcohol, increasing the lighting, stopping or slowing any music being played at the Premises.
- 2. Making sure that Staff are suitably briefed and trained in this Policy.
- 3. Making sure that any externally contracted SIA are suitably briefed and trained in this Policy.
- 4. Making sure that Staff are aware of the relevant transport links and are able to deal with queries from Customers.
- 5. Making sure that any externally contracted SIA are aware of the relevant transport links and are able to deal with queries from Customers.
- 6. Maintaining contact details for taxi firms.
- 7. Asking Customers who appear to be waiting for a taxi to wait inside the Premises.
- 8. Displaying appropriate and proportionate signage at exits from the Premises asking Customers to respect the needs of local residents and to release the Premises and the immediate vicinity quickly and quietly.
- 9. Utilizing Staff to reinforce the message conveyed by the above-mentioned signage.
- 10. Not permitting Customers to take drinks with them when leaving the Premises.
- 11. Utilizing Quiet Marshals as and when required to assist with Dispersal.
- 12. Requesting that SIA remain outside the premises for an appropriate and proportionate period after the last customer has left the Premises to ensure complete Dispersal.

- 13. Recording any issues with Dispersal (whether caused by the Premises or not) as per the Premises' incident recording procedures.
- 14. Reminding Staff and SIA leaving the Premises after their shifts that they too need to respect the needs of local residents and leave the Premises and the immediate vicinity quickly and quietly.
- 15. Ensuring that a copy of this Policy is kept at the Premises and made available for inspection by Responsible Authority Officers.
- 16. Keeping this policy under review and updating it as necessary.

Local Transport Links:

- The nearest Taxi rank is located on Camden High Street.
- The designated local Taxi company is Mornington Cars, 2 Milbrook Place, Nw1 2JA
- 02073833208
- The nearest London Underground station is Mornington Crescent, which is served by the Northern Line and Camden town Station is a short walk which is also served by the Northern Line.
- The nearest National Rail station is Euston Station and Kings Cross St Pancras both of which are a 15 minute walk from the venue and served by national rail services including Thameslink and the following tube lines Circle, Hammersmith and City, Northern, Piccadilly and Victoria.
- The nearest Bus Stop is Mornington Crescent, which is served by the following routes 24, 27, 29, 134, N5. N20, N27, N29 and N279.
- Public transport information can be obtained from the following websites and social media accounts:

www.tfl.gov.uk - @TfL

REFUSE ENTRANCE LOG

Date 18/61/2024 Time /:35 AM

Name (if provided) ID Details /5 GUETS

Description gender, approximate age, clothing, etc

A MYTURE OF MALES AUD FEMALES

Reason for Refusal

- Lack of valid ID or underage
- o Signs of intoxication.
- Attempt to enter with prohibited items.
- Aggressive or disrespectful behaviours.
- Violation of dress code

6 Other I AM NO ENTRE POLICY

Interaction with Individual

- · person was compliant, -
- hostile
- uncooperative.

Staff Name: bse

Role: MAUACE

Other Observations

If relevant, include any other observations, such as whether the individual waited of venue or left without incident

Signature

ENTRANCE AFTER 1 PM Non Patrons

Date 04/01/25

Time / : 05

Name Tushor Khatai / Minhajul I

10 number SHOWS AT ENTRANCE

Reason DJF fOR THE EVENT PHOTOGRAPHER

Staff Name: JOSE



Role: MANA

Signature

REFUSE ENTRANCE LOG

Date 29/11/24

me 14 1:55

Name (if provided) ID Details James

nes, Jermaine

Description gender, approximate age, clothing, etc

DJS AND PERLOWERS

Reason for Refusal

- Lack of valid ID or underage
- Signs of intoxication.
- Attempt to enter with prohibited items.
- Aggressive or disrespectful behaviours.
- Violation of dress code

o Other

Interaction with Individual

- person was compliant,
- · hostile
- uncooperative.

Staff Name: 1058

Role: Nousere

Other Observations

If relevant, include any other observations, such as whether the individual waited outside the venue or left without incident

Signature