



## Borough of Telford and Wrekin

### Licensing Committee

Thursday 18 December 2025

6.00 pm

Council Chamber, Third Floor, Southwater One, Telford, TF3 4JG

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<b>Democratic Services:</b>	<b>Jayne Clarke</b>	<b>01952 383205</b>
<b>Media Enquiries:</b>	<b>Corporate Communications</b>	<b>01952 382406</b>

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<b>Committee Members:</b>	<b>Councillors J Thompson (Chair), H Rhodes (Vice-Chair), C Chikandamina, J Jones, G C W Latham-Reynolds, N Page, R Sahota, P J Scott, K L Tomlinson and R Tyrrell</b> <b>Substitutes Councillors N A M England, G Luter, H Morgan and T J Nelson</b>
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<b>2.0</b>	<b>Declarations of Interest</b>	
<b>3.0</b>	<b>Minutes of the Previous Meeting</b>	<b>3 - 6</b>
	To confirm the minutes of the previous meeting held on 20 October 2025.	
<b>4.0</b>	<b>Statement of Licensing Policy</b>	<b>7 - 66</b>
	To approve the Statement of Licensing Policy.	

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## **LICENSING COMMITTEE**

**Minutes of a meeting of the Licensing Committee held on Monday 20 October 2025 at 6.00 pm in Council Chamber, Third Floor, Southwater One, Telford, TF3 4JG**

**Present:** Councillors J Thompson (Chair), H Rhodes (Vice-Chair), J Jones, N Page, P J Scott, K L Tomlinson and R Tyrrell

**In Attendance:** J Clarke (Senior Democracy Officer (Democracy)), S Hardwick (Lead Lawyer: Litigation & Regulatory), R Phillips (Registrars, Public Protection, Legal & Democracy Service Delivery Manager) and A Singh (Licensing & Night-Time Economy Manager)

**Apologies:** Councillor C Chikandamina and G C W Latham-Reynolds

### **LIC5      Declarations of Interest**

None.

### **LIC6      Minutes of the Previous Meeting**

**RESOLVED** – that the minutes of the previous meeting held on 26 June 2025 be confirmed as a correct record and signed by the Chair.

### **LIC7      Review of the current Statement of Licensing Policy**

The Service Delivery Manager - Registrars, Public Protection, Legal & Democracy presented the review of the current Statement of Licensing Policy and sought authorisation to circulate for consultation the draft Statement of Licensing Policy 2026-2031. The policy would then be submitted to the Committee with any suggested amendments for its adoption at Full Council in January 2026.

The Statement of Licensing Policy was regularly reviewed and revised by Members and the Licensing Act 2003 required the Policy to be reviewed previously every three years, but the requirement had now been changed to every five years.

A consultation had taken place in accordance with Section 182 of the Licensing Act 2003 having regard to Home Office guidance which was fairly common and reflected best practice. The Policy related to all responsibilities under the Licensing Act and included personal licenses, premises licenses, club premises certificates and temporary event notices.



The existing Policy had not changed significantly but it included new sections and updates and incorporated updated s182 guidance that reflected matters the Committee had considered over recent years. The draft Policy introduced reference to the Licensing Security and Vulnerability Initiative (LSAVI) accreditation schemes and acknowledged alternative schemes such as Best Bar None which emphasised best practice around safety for women and vulnerable persons, the increasing use of digital ID and expanded the guidance on the Live Music Act. Members were familiar with the 2012 Act which contained the conditions relating to live music and if issues arose a request could be made to vary the licence, re-impose conditions, limit the licensed hours or remove the licensed music from a premises licence.

Included within the Policy was further information in relation to responsible authorities making it clearer who they were and how they worked within the guidance. It reflected the strong partnership working and aimed to encourage a more joined-up approach. Having a clear policy was important to support any decision the Committee may make such as modifying conditions, excluding licensable activities or revoking a licence. The Policy was a useful tool and ensured decisions were made correctly.

A six-week consultation would be undertaken, and the draft policy had been published on the Council's consultation portal. Stakeholders, including all responsible authorities and licensing premises across the borough would be contacted and a more proactive approach would be taken to encourage responses. Following the consultation, Officers would review all of the submissions received and create a final draft Policy which would come back to Committee to decide whether to recommend to Full Council for adoption.

During the debate, some Members asked, in relation to live music, whether Telford and Wrekin Council applying in its own right was a variance to the previous Policy and, in relation to Section 14 of the Policy, how would the removal of a DPS work for a volunteer committee. Other Members asked if a working group could be set up in order that they could gain more understanding of the Policy and to look at the information that was received during the consultation. It was also asked if the Policy could be put into bite size sections, or a brief summary, in order to encourage local businesses to respond and whether feedback received at the time of applications being made and ongoing feedback was also taken into consideration.

The Licensing & Night-time Economy Manager informed Members that in relation to the Council applying in its own right, there had been no change to the information previously set out in the Policy. A removal of a DPS was something that the Committee could authorise if a premises was taken to a review. In relation to volunteer committees, a community premises would have to apply for a licence and the Committee and appoint a DPS in order that the Committee knew who would be on those premises during events.



The Service Delivery Manager - Registrars, Public Protection, Legal & Democracy informed Members that following a six-week consultation, that responses would be fed into the final draft Policy which would be brought back to Committee and if Members considered this would be useful a workshop could be arranged, but noted the tight timescales to ensure the policy was adopted at Full Council in January to meet the Council's statutory obligations.

In relation to bitesize sections, this seemed to be a practical solution and areas of change to the Policy could be identified. Communications could also be circulated regarding the landing page identifying that there were not wholesale changes and set out the changes in bullet point form. An email communication could also be sent out to relevant consultees containing the details. In order to seek out further engagement, Nighttime Economy Officers could hand out material when undertaking visits during the quieter periods and encourage participation in the consultation. It may also be possible to add the consultation to the agenda of Pub Watch meetings. The Council was doing everything it could to encourage participation as it valued the responses received.

Following the debate, it was unanimously:

**RESOLVED – that a six-week consultation period on the draft Statement of Licensing Policy 2026 – 2031, to arrive at a final draft for consideration by Committee prior to its consideration and adoption at Full Council, be approved.**

The meeting ended at 6.23 pm

**Chairman:** .....

**Date:** Thursday 18 December 2025

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## Borough of Telford and Wrekin

### Licensing Committee

Thursday 18 December 2025

#### Draft Statement of Licensing Policy Consultation, 2026-2031

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<b>Cabinet Member:</b>	Cllr Richard Overton - Deputy Leader and Cabinet Member: Highways, Housing & Enforcement
<b>Lead Director:</b>	Anthea Lowe – Director: Policy & Governance
<b>Service Area:</b>	Policy & Governance
<b>Report Author:</b>	Amitabh Singh - Licensing & Night-Time Economy Manager
<b>Officer Contact Details:</b>	Tel: 01952 383683 <b>Email:</b> Amitabh.Singh@telford.gov.uk
<b>Wards Affected:</b>	All Wards
<b>Key Decision:</b>	Not Key Decision
<b>Forward Plan:</b>	Not Applicable
<b>Report considered by:</b>	Licensing Committee – 18 December 2025

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#### 1.0 Recommendations for decision:

Licensing Committee is recommended to:

- 1.1 Consider the amended Statement of Licensing Policy; and
- 1.2 Agree that Licensing Committee recommends Full Council approve and adopt the amended Statement of Licensing Policy, to be implemented on 26 January 2026.

#### 2.0 Purpose of Report

- 2.1 The statutory five yearly review of the Council's Statement of Licensing Policy, made under the Licensing Act 2003, has been completed following a public consultation an amended policy produced by officers
- 2.2 Members are required to consider the amended Statement of Licensing Policy with a view to recommending its approval and adoption by Full Council.

### 3.0 Background

3.1 Under Section 5 of the Licensing Act 2003 ('the Act'), Telford & Wrekin Council, (the Licensing Authority) must publish a statement of its licensing policy every five years. In carrying out its functions under the Licensing Act 2003, the Licensing Authority will have regard to its policy and to Home Office Guidance issued under section 182 of the Licensing Act 2003 when considering its responsibilities under the Act.

3.2 The Licensing Act 2003 provides for four different types of authorisations as follows:

- Personal licences – to sell or authorise the sale of alcohol from premises in respect of which there is a premises licence;
- Premises licences – to use a premises for licensable activities;
- Club premises certificates – to allow a qualifying club to engage in qualifying club activities; and
- Temporary event notice (TENs) – to carry out licensable activities at a temporary event.

The Licensing Authority is responsible for the administration and determination of applications for the above types of authorisation.

3.3 The policy also sets out the expectations of the Licensing Authority on the ways that the Licensing Authority and licensed premises can work together with other partners to improve the licensing economy of the Borough, both during the day and night.

3.4 This version, if approved, will remain in force until 2031, when it will be subject to review and further consultation as laid down by the legislation, unless a further review or consultation is required in the interim.

3.5 The draft document for the revised Statement of Licensing Policy has been prepared in accordance with the Revised Guidance issued under section 182 of Licensing Act 2003.

3.6 A six-week public consultation of the revised draft document closed on the 5 December 2025.

3.7 All responsible authorities were engaged during the drafting of the policy and their comments incorporated into the draft policy statement. Each of the Responsible Authorities has also received a copy of the draft statement as part of the consultation process.

3.8 All licensed premises and Club licence holders were sent an email with details of the consultation and a link to the draft policy.

3.9 A full list of consultees is attached at **Appendix A**.



## 4.0 Summary of main proposals

4.1 Licensing received seven responses to the consultation, from the following organisations and individuals and are attached at **Appendix B**.

- Public Health requested the following updates to the draft document:

New or amended content:

- Violence Against Women and Girls (VAWG)
- Martyn's Law – Counter Terrorism Measures
- Drink and Needle Spiking

Expanded sections:

- Prevention of Children from Harm: Include recommendations on alcohol deliveries and child sexual exploitation.
  - Role of Public Health: Provide a clearer explanation of Public Health as a Responsible Authority.
  - Cumulative Impact: Add reference to the South Water Night-time Economy.
- The World Heritage Site Coordinator has requested inclusion of a paragraph on the Iron Bridge to ensure consideration of the World Heritage Site's character in licensing decisions.
  - Licensing Security and Vulnerability Initiative (LSAVI) has asked for additional wording to reflect academic research demonstrating the positive impact of LSAVI accreditation on licensed premises in Telford.
  - Public and Councillor Feedback

Three members of the public and one councillor submitted comments on:

- Serving alcohol near lakes or rivers.
- Licensing provisions for Christmas and New Year.
- Use of gender-neutral terms in sections on Women's and Vulnerable Safety and exit strategies.
- Proposal for a standard closing time of 11:00 pm for alcohol retailers.
- Concerns about tables and chairs placed on highways causing nuisance.

4.2 These issues raised are already addressed under the Licensing Act 2003, on a case-by-case basis or separate legislation, such as the Business and Planning Act 2020 for highway furniture. The *Ask Angela* scheme, supported by the Council, remains inclusive for all individuals. Licensed premises are expected to assist all customers regardless of age, sex, race, or sexuality to be safe in licensed premises. The wording on exit strategies has been amended to reflect the feedback.

4.4 The submissions received have been considered by the Service Delivery Manager and Licensing Manager, and the draft document has been amended where

appropriate. (These amendments are shown in red in the policy document.) The revised Statement of Licensing Policy is attached at **Appendix C**.

- 4.3 The draft document for the revised Statement of Licensing Policy has been prepared in accordance with the revised guidance issued under section 182 of Licensing Act 2003.

## **5.0 Alternative Options**

It is a legal requirement placed upon the authority to publish a statement of its licensing policy every five years. Were the Council not to agree a revised statement of licensing policy, the Council would be in breach of its statutory obligations.

## **6.0 Key Risks**

- 6.1 A failure to review and consult in respect of the Statement of Licensing Policy as required by the Licensing Act 2003 could lead to decisions made by either the Licensing Committee, or Officers under delegated authority, being appealed or challenged by way of judicial review due to the Council's failure to comply with their statutory duty. This would be accompanied by the associated costs and reputational risk involved with this. Having identified this risk, processes and procedures have been put in place to ensure that the review of the Statement of Licensing Policy is carried out in a manner and within a timescale that should minimise such a risk so far as possible

## **7.0 Council Priorities**

- 7.1 The recommendations in this report, support the following Council policies:

- Everyone benefits from a thriving economy; and
- All neighbourhoods are a great place to live.

## **8.0 Financial Implications**

- 8.1 The cost of the consultation exercise to be undertaken on the amendments made to the Statement of Licensing Policy will be met from budgets within Public Protection. Licence fees are made by Statutory Regulation and cannot be calculated by the Licensing Authority.

## **9.0 Legal and HR Implications**

- 9.1 The Licensing Authority is required to act in accordance with the provisions of the Licensing Act 2003, statutory guidance issued by the Secretary of State, and Council's Statement of Licensing Policy, in its determination of applications
- 9.2 Section 5 of the Licensing Act 2003 provides that a Licensing Authority must determine and publish a Statement of Licensing Policy every five years.

## **10.0 Health, Social and Economic Implications**

- 10.1 None arising from this report; however, Public Health and other relevant bodies or individuals have had the opportunity to provide comments and information as part of the consultation process. Those very useful comments have been fed into the revised draft which Members are now asked to consider.

## **11.0 Economic Benefits**

- 11.1 There are potential economic benefits to the changes outlined within this report which potentially may create more jobs and employment within the Borough.

## **12.0 Equality and Diversity Implications**

- 12.1 There are no direct equality or diversity implications arising directly from this report although many of the inclusions within the draft statement of licensing policy will ensure that all licence holders conduct themselves in full accordance with equality legislation.

## **13.0 Climate Change and Environmental Implications**

- 13.1 Not applicable for the purposes of this report

## **14.0 Background Papers**

- 1 Licensing Act 2003
- 2 Revised Guidance issued under S.182 of the Licensing Act 2003

## **15.0 Appendices**

- A Consultees List
- B Email responses to Consultation
- C Draft Statement of Licensing Policy 2026-2031

## **16.0 Report Sign Off**

<b>Signed off by</b>	<b>Date sent</b>	<b>Date signed off</b>	<b>Initials</b>
Legal	10/12/2025	10/12/2015	SH

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## Appendix A

Telford & Wrekin Council elected members
Telford & Wrekin Council Club Premises Certificate holders
Telford & Wrekin Council Premises Licence holders
Town and Parish Councils
Members of the Public
Musicians' Union
Shropshire Chamber of Commerce
The Drinkaware Trust
UK Hospitality
British Institute of Innkeeping(BII)
Pubwatch – 2 in Telford
The Association of Convenience Stores(ACS)
Federation of Licensed Victuallers Associations
All Responsible authorities
LSAVI
Ask Angela
British Board of Film Classification (BBFC)
British Beer and Pub Association (BBPA)

Re: Review of Statement of Licensing Policy

We are currently reviewing our Statement of Licensing Policy in respect of the Licensing Act 2003.

Under the Licensing Act 2003 ('the Act'), the council is the licensing authority and is responsible for licensing and overseeing licensable activities as set out in the Act. The Licensing Act 2003 requires the council to prepare and publish a statement of licensing policy with respect to its licensing functions at least every five years.

You are invited to submit any comments you have in relation to the policy by: 4 December 2025

## Appendix A

The draft policy can be viewed here or by visiting our offices at: Darby House, Lawn Central Telford TF3 4JA or Southwater One, Southwater Square, Southwater Way, Telford, TF3 4JG by appointment email [licensing@telford.gov.uk](mailto:licensing@telford.gov.uk) or call 01952 381818

Comments can be sent in writing to the Council at Licensing Darby House, Lawn Central Telford TF3 4JA or by email to [LicensingConsultation@telford.gov.uk](mailto:LicensingConsultation@telford.gov.uk)

We would like to thank you for taking time to participate in this consultation exercise and look forward to receiving your comments.

Thanks,  
Licensing Team  
Registrars, Public Protection, Legal & Democracy  
Telford & Wrekin Council  
Telephone: 01952 381818  
[www.telford.gov.uk](http://www.telford.gov.uk)

Dear Licence Holder,

Thank you for your enquiry regarding the Draft Statement of Licensing Policy 2026–2031.

The draft policy largely continues the approach set out in the 2021–2026 version but includes a number of updates, including:

- Updated local data and Council priorities.
- Accreditation Schemes and Women and Vulnerable Persons Safety best practices
- Update on Accredited Proof of Age Schemes to include Digital ID

## Appendix A

- Further information of the Live Music Act 2012
- A stronger focus on public safety and safeguarding, particularly around vulnerability, drink spiking and harassment.
- New references to good practice schemes such as Ask for Angela, WAVE Training, and the Licensing Security & Vulnerability Initiative (LSAVI).
- Clearer guidance on the roles and expectations of Responsible Authorities (Police, Fire, Environmental Health, Trading Standards, Immigration).

Please note that this is only a brief summary. The draft policy contains additional revisions and updated wording throughout, so we would encourage all licence holders to read the full document carefully to understand how it may apply to their premises.

The draft policy can be viewed here:

[Telford & Wrekin Council – Draft Statement of Licensing Policy 2026–2031](#)

Consultation is open until Thursday 4 December 2025. Comments can be submitted by email to [LicensingConsultation@telford.gov.uk](mailto:LicensingConsultation@telford.gov.uk) or in writing to:  
Licensing Team, Darby House, Lawn Central, Telford, TF3 4JA.

Kind regards,  
Licensing Team  
Telford & Wrekin Council  
[licensing@telford.gov.uk](mailto:licensing@telford.gov.uk)

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Good morning,

We really appreciate you sighting us on the draft policy and for inclusion of reference to Licesning SAVI at -

**"5.3 Accreditation Schemes Licensed premises offering on-sales are encouraged to participate in locally available accreditation schemes, such as the Licensing and Vulnerability Initiative (LSAVI). These schemes support venues in creating safer, more secure environments for both patrons and staff".**

In terms of strengthening the reference, would you please consider adding a further line to say '**Academic research conducted across Telford shows that the Licensing Security and Vulnerability Initiative (Licensing SAVI) is having a positive impact on crime reduction across the area. The outcomes show that the majority of Licensing SAVI users have found the assessment to be a constructive experience for their licensed premises, with many reporting a positive impact on the feeling of safety at their venue. This is supported by reductions in crime figures since the implementation of the scheme**'.

We are extremely proud of our work supporting you in Telford & Wrekin and feel the independent academic evidence, provides a strong argument about the benefits of the scheme.

Huge thanks,

■

■ | Business Manager

Licensing Security & Vulnerability Initiative

## Appendix B

Dear Licensing,

Being a personal licence holder since 2007 (although not actively a DSL or doing much in the way of licensed activities these days) I wanted to make a few of comments.

It is positive to see "the proper use of point of sale promotions" under the prevention of crime and disorder as my experience in the licensing trade several years ago included me having an argument with the Diageo rep who wanted me to do promotions on doubles. I told her that I would rather people drink singles with mixers as it takes the same amount of time to drink a double but the person gets intoxicated quicker therefore I would have to stop serving them. She would not have it but I stated it was my licensed premises and therefore my decision.

I'm also glad that "The Licensing Authority recommends the adoption of the Challenge 25 policy." Even at the age of 34 I was asked for ID to buy a lottery ticket which I think was a compliment but also gave me confidence that the place was checking ID. I have previously attended a venue in Bridgnorth that asked me for ID which I hadn't got and refused to serve me alcohol which was great again as they followed the law. Also, some venues refuse to accept the PASS scheme, is this something that is ever checked on in Telford and Wrekin?

I think in the Good Practice section, "Ensure safe exit strategies for female patrons" should be replaced by "ensure safe strategies for those in concerning situations" as it's not just females who can get into problems when at establishments. In a similar way "Train all front-of-house staff on women's safety and harassment

protocols" should include all people. Speaking as someone who has been spiked more than once, I have been grateful to staff who were able to protect me but I have male friends who were not so helped as staff thought they were drunk not drugged. The title "Women and Vulnerable Persons Safety" does not need to include women specifically as it almost feels like victim blaming.

Pubwatch is a vital organisation that ensures those who cause trouble cannot just move to the next pub. It should be mandatory for premises on Southwater due to the number of establishments. Is it something that is added to premises licenses where there have been incidents?

## Appendix B

Overall, it looks like a robust document. Thank you.

[REDACTED]

Dear Licensing Team,

Thank you for your recent e-mail regarding the licensing policy.

Here are our comments as requested.

Is there a special provision in the licensing policy for Christmas Eve and New Years Eve if they fall on a Saturday night?

At present entertainment and bar should not go past midnight because it goes into Sunday.

Personally we applied and paid for a special license when this happened, but I think most venues never bothered and just carried on as normal into Sunday.

My suggestion would be that the Council either do a blanket approval of all premises when this happens, or advertise it more that premises do need to apply for a license for this.

Thank you for reading.

I have copied the committee of Newport Navy Club into this e-mail so that they are up to date with all correspondence.

Yours Sincerely,

[REDACTED]

Hi,

## Appendix B

Thank you for sharing the review of the licensing policy.

The only point I would like to make & I am not sure it's relevant is there any actions to take if severing alcohol near too dangerous locations such as rivers or lakes. Are there any special or additional requirements to be considered when serving alcohol near these locations?

I hope this helps.

Thank you.

Regards,

[REDACTED]

[REDACTED]

Cllr

When dealing with sale of alcohol from shops there should be a standard time of closing the a sale of alcohol until 11 pm is to say the least excessive especially on a Sunday and is likely to attract a nuisance

When giving permission for pavement chairs and tables it should be stated if this is going to cause a nuisance when other pedestrians are passing especially with prams and wheelchairs it is difficult for any member to make a judgment based on the information supplied

Hi [REDACTED]

## Appendix B

As requested I had a look through the Policy and suggested a very minor amendment. I have also provided the following wording for the licensing policy. Really my main aim is to ensure that applicants are considering their contribution to the character of the WHS and not doing anything that would be detrimental to its Outstanding Universal Value, which is what keeps us as a WHS. I've tried to keep it from being too restrictive and up to deciding officers discretion.

Thanks,

[REDACTED]

[REDACTED]

World Heritage Site Coordinator

Suggested wording:

This Licencing Authority includes the Ironbridge Gorge World Heritage Site (WHS). Careful consideration must be taken to balance the needs of the area's economy with the areas character which contributes to its Outstanding Universal Value. Premises should have an awareness of their contribution to the WHS and are encouraged to seek ways to contribute to the good management of the area. Premises should seek to avoid encouraging behaviours which would have an overall negative impact upon the WHS's character or enjoyment by its users.

[REDACTED]

Thank you for giving Public Health the opportunity to comment on the new draft SOLP. The team have done a great job on reviewing the draft and making suggestions through the PH/DA lenses. Thanks you to the HP and PH teams, in particular Sonya for her work on this and collaboration with Ami and team.

## Appendix B

Please see attached our suggestions for amendments that reflect Public Health context, drug & alcohol and DA strategies and the Council's overall objectives – as well as the Government's new Guidance on Licensing Policy.

### In summary we suggest the following:

- Create a separate section under Public Safety for Violence Against Women and Girls.
- Create a separate section under Public Safety for Drink & Needle Spiking.
- Create a separate section under Public Safety for Counter Terrorism measures.
- Expand the current section on Cumulative Impact to include a reference to the South Water Nighttime Economy.
- Expand Prevention of Children from Harm by inclusion of recommendations on Alcohol Deliveries and Child Sexual Exploitation.
- Expand the explanation of Public Health as a Responsible Authority.

Details of suggested content for these sections are in the attached document.

Happy to discuss of course

Helen Onions

Director of Public Health

### Suggested amendments to the draft T&W SOLP 2025 – Public Health

#### Overview of recommendations:

- Create a separate section under Public Safety for Violence Against Women and Girls.
- Create a separate section under Public Safety for Drink & Needle Spiking.
- Create a separate section under Public Safety for Counter Terrorism measures.
- Expand the current section on Cumulative Impact to include a reference to the South Waterfront Nighttime Economy.

## Appendix B

- Expand Prevention of Children from Harm by inclusion of recommendations on Alcohol Deliveries and Child Sexual Exploitation.
- Expand the explanation of Public Health as a Responsible Authority.

.....  
Suggested text for recommendations: NOTE: any **BOLD** text is from the draft SOLP

- Violence against women and girls

The Licensing Authority are committed to ensuring the Borough is a safe and welcoming place for everyone, regardless of their gender, ethnicity, sexuality, beliefs or background. **Telford & Wrekin Council expects all licensed premises to foster an environment of transparency, safety, and inclusivity, particularly for women and vulnerable individuals participating in the night-time economy, whether as staff or patrons.**

This Policy aims to ensure that vulnerability and women's safety is an important consideration in decision-making in licensing matters. The Licensing Authority will ensure that guidance is sought from relevant authorities on the prevalence, prevention and reporting of sexual harassment and misconduct and gender-based violence.

Operators are strongly encouraged to develop a Safeguarding and Vulnerability policy for their business and ensure that sufficient measures are in place to protect and provide support to customers. Resident and visitor safety, especially the safety of those using the night-time economy, is an important factor that the Licensing Authority, applicants, and licence holders must take into consideration.

Sexual Harassment: Procedures and policies for how to handle perpetrators of sexual harassment should be included in the operating schedule/conditions. These will of course differ from premises to premises but ensure that they reflect a zero-tolerance attitude towards harassment and discrimination. These can range from removal from the premises to a ban from the premises for an extended period.

Licence holders should ensure that there are clear guidelines on how to handle complaints made by targets of sexual harassment, including safe exit strategies for anyone feeling unsafe in the venue.

In addition, the Ask for Angela initiative aims to ensure that anyone who is feeling vulnerable or unsafe can get discreet support. The Council supports this initiative and expects that, when a trained member of staff hears the code-phrase, they should understand that the person needs support and will be able to respond in an appropriate, discreet way. This could be offering them an alternative way out of the venue, calling them a taxi or in a more serious situation, altering venue security and/or the Police. More information can be found here: <https://askforangela.co.uk/>

Training: Licence holders are expected to provide training to all staff on these policies and procedures, including casual and security staff.

More information can be found at: [Tackling violence against women and girls strategy - GOV.UK](#)

- Drink and needle spiking

Drink spiking is when someone puts drugs or alcohol into a person's drink without their knowledge or consent. It can include putting alcohol into a non- alcoholic drink, adding extra alcohol to an alcoholic drink or slipping prescription or illegal drugs into an alcoholic or non-21 alcoholic drink. It can be difficult to tell whether a drink has been spiked, as substances used for spiking usually have no taste, odour, or colour.

Needle spiking (sometimes referred to as injection spiking) is where someone surreptitiously injects, with a hypodermic needle, (or other form of administration e.g. combi-pen) a victim with a substance.

Spiking is a crime and yet Charity Stamp Out Spiking estimates 97% of people do not report spiking incidents to the police. Spiking can lead to secondary offences being committed - most commonly sexual offences when the victim is female, and theft when the victim is male.

The Licensing Authority understands that many licensed premises work incredibly hard to ensure that their customers can enjoy a night out safely and deter perpetrators. Nevertheless, we also consider that more could and should be done to prevent and report spiking incidents. We recommend that licence holders consider the production of a drugs (including Spiking) protocol or policy for their premises which should ensure a safeguarding approach is taken in respect of all incidents related to spiking and embed a culture of "believe, reassure and request assistance" for those making reports.

More information can be found at: Guidance issued by the Secretary of State under section 182 of the Licensing Act 2003, British Beer & Pub Association, Drugs & Pubs: A guide to keeping a drug free pub.

In the absence of a specific protocol or policy on spiking, all licensed premises should ensure all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. It is important and helpful for the prevention and detection of spiking incidents if personnel at licensed premises can:

- Ensure the health and safety of the customer, which could be by calling emergency services, ensuring they are with trusted friends who will look after them, offering assistance if needed, and providing a safe space for the customer
- Obtain full details of the affected person reporting the incident, including a description of what they are wearing as officers will want to track them on CCTV



## Appendix B

- Provide as detailed a description of the suspected perpetrator as possible
- Provide an approximate time of the incident and the location within the premises
- Secure the drinking vessel(s) that is suspected as containing the 'drug' so this can be tested later
- Seize any drinking vessel that the suspect may have been using
- Ensure appropriate training is provided to relevant members of staff
- Review searching procedures and amend as necessary, as well as reviewing how often toilets are inspected, where victims of spiking may be found
- Premises should also review the functionality of any CCTV and ensure it is not obscured
- Consider providing information (such as posters) regarding drink spiking in the premises
- Consider if it would be useful to provide anti-spiking bottle stoppers and protective drink covers.

The Licensing Authority also recommends that licence holders and authorised clubs take into consideration the Home Office report understanding and tackling spiking – published 19th December 2023 [Report: Understanding and tackling spiking \(accessible\) - GOV.UK](#)

The Licensing Authority will consider placing additional conditions on licences to safeguard patrons against spiking, noting that conditions placed on licences need to be both proportionate and enforceable. We will also use our powers to impose conditions or revoke premises licenses, where venues do not take sufficient measures to protect and provide support to customers in spiking incidents.

- Counter Terrorism

The Terrorism (Protection of Premises) Act 2025, or Martyn's Law, received Royal Assent on 3 April 2025. This legislation, once fully implemented, will place a requirement on those responsible for certain premises and events to take appropriate action to reduce the risk of harm to their workers and the public. To ensure a proportionate approach, it is expected that procedures and measures that are reasonably practicable are put in place.

Where 800 or more individuals (including staff) may be reasonably expected at the premises at the same time, they will be 'enhanced duty' premises unless the Act provides otherwise.

## Appendix B

Qualifying premises where between 200 and 800 individuals (including staff) may be reasonably expected at the premises at the same time, will be 'standard duty' premises.

Those responsible for 'standard duty' premises will be required to have in place, so far as is reasonably practicable, appropriate public protection measures.

Many licensed premises in the Borough will fall below these thresholds, but the Licensing Authority expects all premises to have procedures in place that may be reduce the risk of physical harm to individuals if an act of terrorism occurred at the premises or in the immediate vicinity.

The procedures should include:

- All people employed at the premises whose job includes being alert to the terrorist threat are aware of:
  - a. The current terrorist threat level
  - b. What that level means in relation to the possibility of an attack.
- Risk assessments for public entertainment venues to include consideration of the risk of a terrorist attack and the different types of attack.
- All persons responsible for security are briefed at every event about the current threat level and risk of terrorist attack.
- All public-facing staff must be clear about what to do if the public report suspicious activity or unusual behaviour to them. All suspicious behaviour by customers or members of the public close to the venue must be noted and be reported promptly so that investigations can be made, and action taken, if appropriate.
- All public facing staff know the appropriate actions to take in the event of an incident which may include, but is not limited to, a marauding terrorist attack, unattended/suspicious items, vehicle borne attack.
- Staff training should incorporate the freely accessible ACT E-learning and the SCaN for All eLearning resources. [ProtectUK | Home](#)

We encourage licensed premises owners to make use of the information and guidance available on the Protect UK platform including use of the Protect UK App. [ProtectUK | Home](#)

The aim of these requirements is to improve staff preparedness and responses. The Act does not require physical alterations to premises or the purchase of equipment for the purpose of having these procedures in place. Further information can be found at: [Terrorism \(Protection of Premises\) Act 2025: factsheets - GOV.UK](#)

The Council's approach to Martyn's Law is available at:

<https://www.telford.gov.uk/health-protection/emergencies/dealing-with-specific-risks/terrorism/protect-and-prepare/>

## 6. Cumulative Impact

**The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter which the Licensing Authority can consider. This should not, however, be confused with 'need' which relates more to the commercial demand for a particular type of premises. The issue of 'need' is therefore a matter for planning consideration or for the market to decide. Where there is a significant number of licensed premises concentrated on an area, the cumulative impact of those premises on the promotion of the licensing objectives is something which the Licensing Authority may take into account.** At the time of this Policy's creation the South Water Front area of Telford is expanding and developing into a focus for the Borough's Night Time Economy. However, **a Cumulative Impact Policy will only be considered after assessing the available evidence from relevant Responsible Authorities and after consultation with relevant individuals and organisations. This will be kept under review.**

### 9.4 The Protection of Children from Harm.

Recommend adding exploitation to the intro paragraph:

**The Protection of Children from Harm. The Licensing Authority is committed to ensuring the protection of children from physical, moral and psychological harm, and exploitation, whilst recognising the great variety of premises for which licences may be sought. These will include theatres, cinemas, restaurants, pubs, nightclubs, cafes, takeaway outlets, community halls and schools.**

AND adding the following sections on Alcohol Deliveries and Child Sexual Exploitation

Alcohol Deliveries: The Licensing Authority considers there are risks associated with delivery services for alcohol.

An applicant seeking a licence that will enable them to provide alcohol as part of an alcohol delivery service should include in their operating schedule the procedures, they intend to implement to ensure that:

- The person they are selling alcohol to is at least 18 years of age.
- The alcohol is delivered to a person who is at least 18 years of age.

## Appendix B

- A clear document trail of the order process from order, dispatch from the licensed premises and delivery to the customer is maintained (with times and signatures) and available for inspection by an authorised officer.
- The time the alcohol is sold and the time the alcohol is delivered is within the hours stated on the licence for the sale of alcohol.
- Age verification procedures are implemented at both point of sale and delivery stages, with a Challenge 25 policy implemented at the point of delivery.
- Retailers should ensure that delivery staff, including third party delivery services, have been given appropriate training in procedures relating to requesting and identifying proof of age and implement these procedures as standard.

**Child Sexual Exploitation:** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

It is the responsibility of premises licence holders and their managers to make sure that suitable control measures are in place at licensed premises for the protection of children from harm.

**Hotels and hostels:** These venues often have children staying at their premises who are accompanied by an adult. As such, they can play an important role in protecting children from harm but can also be used as a place to exploit and abuse victims of child sexual exploitation. The licence holder and staff have an important part to play in safeguarding children and young people. Therefore, sufficient procedures and suitable training must be provided to staff on age restricted sales.

### 16.9 Public Health

**FROM: ‘Public Health Public Health is a Responsible Authority under the Act. Although “health” is not a licensing objective, health bodies hold certain information which other Responsible Authorities do not, but which would assist the Licensing Authority in carrying out its licensing functions, especially in relation to the Public Safety and Crime and Disorder objectives. ‘**

**TO:** The Licensing Authority recognises there is no Public Health licensing objective and therefore is limited in its ability to conduct its licensing function to promote public health. The licensing function can only be carried out to promote the four licensing

objectives as set out by the Licensing Act 2003. Nevertheless, the Licensing Authority recognises the potential impact of alcohol on the public health of the residents of Telford & Wrekin. This can have a big impact on the National Health Service and medical providers locally.

Therefore, the Licensing Authority believes that this Statement of Licensing Policy needs to be placed in context with the alcohol-related harms that are apparent in Telford & Wrekin. The Licensing Authority takes the issue of public health extremely seriously and would expect applicants and licence holders to familiarise themselves with any local issues that may be detrimental to the public health of people living in, working in and visiting the Borough.

The Secretary of State's Guidance states that health bodies can make representations based on any of the four licensing objectives. The Licensing Authority considers data:

- Around hospital admissions due to alcohol consumption,
- That shows a correlation between anti-social behaviour and excessive alcohol consumption in different localities,
- That references violence related to alcohol or the night-time economy in general,
- That links high alcohol consumption to a particular area, and
- That demonstrates a negative impact on the physical, moral and psychological safety and welfare of children and vulnerable persons,

to all be relevant to the promotion of the licensing objectives.

Any or all this evidence could provide grounds for Public Health in their role as a Responsible Authority to make a representation based on any of the licensing objectives.

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Telford & Wrekin  
Co-operative Council

Protect, care and invest  
to create a better borough

## Licensing Act 2003

### Statement of Licensing Policy

2026-2031

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## 1. Introduction

Telford & Wrekin Council (the Council) is situated in the ceremonial County of Shropshire which contains one other Unitary Council, Shropshire Council. The borough has a population of 191,915 living in approximately 80,000 households, covering 112 square miles. It is made up of a mixture of urban and rural areas.

The Council area is a mixture of urban and rural districts, which includes the market town of Newport on the north-east corner of the borough, the Ironbridge World Heritage Site to the west of the borough, seven conservation areas in the borough, and the central retail area of Telford town centre.

Telford & Wrekin is a place of socio-economic contrasts with parts of the borough amongst the most deprived nationally - comparable with inner cities – and other areas amongst the least deprived nationally.

More information on Local Area Profiles can be found on the [Council's website](#).

Telford & Wrekin Council is a Co-operative Council, working together with our residents, partners and local organisations to collectively deliver the best we can for Telford and Wrekin. We believe that how we do things is just as important as what we do.

The Council Plan 2022 has the following five strategic priorities:

1. Every child, young person and adult lives well in their community.
2. Everyone benefits from a thriving economy.
3. All neighbourhoods are a great place to live.
4. Our natural environment is protected, and the Council is taking a leading role in tackling the climate emergency.
5. a community-focussed, innovative council providing efficient, effective and quality services.

More information on the Council's Plan and Priorities can be viewed online at <https://www.telford.gov.uk/about-my-council/co-operative-council/council-plan-and-priorities/>

Licensed entertainment makes a valuable contribution towards the continuing development of Telford and Wrekin and provides a vital boost to the local economy of the area through tourism and cultural development. However it is also recognised that such entertainment can lead to increased noise, nuisance and crime and disorder if not properly controlled.

The aim of this policy is to find a balance between securing the safety and amenity of the residential and business communities in Telford & Wrekin while responsibly maintaining and encouraging entertainment and cultural facilities in the Borough.

## **2. Purpose and Scope of the Policy**

Under Section 5 of the Licensing Act 2003 (the Act), Telford & Wrekin Council, (the Licensing Authority) must publish a statement of its licensing policy every five years. This policy will explain how the Licensing Authority intends to exercise its licensing functions under the Act.

This version will remain in force until 2031, when it will be subject to review and further consultation as laid down by the legislation, unless such review or consultation is required in the interim.

This policy outlines the process for assessing and determining applications under the Licensing Act 2003. It also sets out the expectations of the Licensing Authority on the ways that the Licensing Authority and licensed premises can work together with other partners to improve the licensing economy of the Borough, both during the day and night.

The Act provides for four different types of authorisation as follows:

- Personal licences – to sell or authorise the sale of alcohol from premises in respect of which there is a premises licence.
- Premises licences – to use a premises for licensable activities
- Club premises certificates – to allow a qualifying club to engage in qualifying club activities.
- Temporary event notice (TENs) – to carry out licensable activities at a temporary event

The Licensing Authority is responsible for the administration and determination of applications for the above types of authorisation.

In carrying out its functions the Licensing Authority will have regard to this policy and to Home Office Guidance issued under [section 182 of the Licensing Act 2003](#).

The Licensing Authority will at all times take into account the four licensing objectives. These are –

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

This policy cannot detail all factors that influence the achievement of the licensing objectives, or all control measures that may be appropriate. This policy covers a wide variety of premises and associated activities including theatres, cinemas, restaurants, public houses, nightclubs, private members clubs, village halls, community centres and public open spaces, as well as shops, stores and supermarkets, off licences, late night food premises, and vehicles selling late night refreshment.

The Licensing Act 2003 is not a mechanism for the control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and beyond the direct control of those responsible for managing such premises. There are a number of other mechanisms available for addressing problems away from a licensed premises. These include but are not restricted to:

- Planning control;
- Provision of CCTV surveillance in town and district centres;
- Taxi ranks and transport links to enable departure from centres;
- Powers of local authorities to deal with statutory nuisance;
- Powers of local authorities to designate parts of the local authority area as places where alcohol may not be consumed publicly;
- Police enforcement of the general law concerning disorder and anti-social behaviour, including the issue of fixed penalty notices.

Unless relevant representations are received from Responsible Authorities or other persons, there is no provision for a licensing authority to impose conditions on a licence other than according to the voluntary steps which the applicant proposes to make in their application. These will be attached to the licence once granted together with the mandatory conditions and will be worded so that they are precise and enforceable.

If no representations are made in respect of an application, this Licensing Authority is obliged to issue the licence on the terms sought and the licence will be deemed as granted by the Licensing Act 2003.

### **3. Duplication**

This Licensing Authority recognises that the licensing process should not duplicate statutory requirements, powers, provisions or restrictions provided for in other legislation and will avoid duplication of this kind. Legislation that may be relevant is set out below:

- Gambling Act 2005
- Environmental Protection Act 1990
- Noise Act 1996
- Clean Neighbourhoods and Environmental Act 2005
- Regulatory Reform (Fire Safety) Order 2005
- Health and Safety at Work Act 1974
- Anti-social Behaviour, Crime and Policing Act 2014

- Equality Act 2010

#### **4. Night Time Economy and Integrated Strategies**

The night-time economy encompasses a range of activities for inhabitants of and visitors to the Borough. It comprises pubs and clubs, cinemas, theatres, cafés and restaurants etc. It is supported by public transport, taxis, and many public services such as the police, council services such as cleaning, refuse collection, planning, and licensing, community safety and partners such as Street Pastors and the Town Centre Management. It also impacts upon the health service.

The growth of the night time economy as a whole has been taken into account in the revision of this policy, and in particular the continuing expansion of various areas of the Telford & Wrekin area, such as the Southwater and the Station Quarter Development

There is a wide range of related legislation, and local and national policies, strategies, responsibilities and guidance documents which complement this Licensing Policy and should be taken into account when reading this policy.

The Licensing Authority is committed to working in close partnership and to share information with the Responsible Authorities which are laid down in the Licensing Act 2003, with The Safer Telford & Wrekin Partnership, with licence and certificate holders and with other relevant parties to realise its aim to make the Borough a safer place to live, work and visit.

Many integrating strategies may not be directly related to the promotion of the licensing objectives, but may impact, indirectly, upon them. Therefore the co-ordination and integration of policies, strategies and initiatives is vital to support and uphold the licensing objectives.

Telford & Wrekin Council strategies and policies are available to view either on the Council website [www.telford.gov.uk](http://www.telford.gov.uk) or by contacting the relevant team within the Council.

This Policy is part of Telford & Wrekin Council's wider corporate vision, of a community in which everyone's quality of life is improved in a responsible way, which takes account of the effects on future generations, and where no individual, family, group or area is so excluded as to be unable to participate in its economic, social, political, physical and cultural life.

The Council's Licensing Committee will receive reports, when appropriate, on the strategic issues facing other relevant services including: -

- The needs of the local tourist economy
- The cultural strategy for the local area
- The employment situation in the area and the need for new investment and employment where appropriate
- Planning and transport.

- Impact of alcohol on the health of the residents in the borough

#### **4.1 Alcohol Harm Reduction Strategies**

The Licensing Authority supports and encourages applicants to adopt the provisions of the Telford & Wrekin Drug and Alcohol Strategy produced by the Community Safety Partnership and the Government Alcohol Harm Reduction Strategy. A link to the policy can be found below:

<https://www.telford.gov.uk/media/3dcfzz5c/appendix-1-for-telford-and-wrekin-alcohol-and-drugs-strategy-2024-2029.pdf>

#### **4.2 Planning Policy and Strategy**

The purpose of the Local Plan is to explain what type of place the Borough of Telford & Wrekin is today, the type of place we aspire to be in the future and to provide a framework to help manage change and development until 2031.

A link to the policy can be found below:

[https://www.telford.gov.uk/media/zvodresh/telford\\_and\\_wrekin\\_local\\_plan\\_2011\\_2031\\_adopted\\_jan\\_2018.pdf](https://www.telford.gov.uk/media/zvodresh/telford_and_wrekin_local_plan_2011_2031_adopted_jan_2018.pdf)

### **5 Good Practice**

National and local crime and health statistic evidence shows that the consumption of alcohol is a significant contributory factor to levels of crime and disorder and it affects public health. Good management and practice procedures in licensed premises can and do make an important contribution to lessening that impact.

The Licensing Authority will encourage licence and certificate holders to work together to share good practice and information to help them achieve the licensing objectives.

#### **5.1 Pubwatch**

Membership of schemes such as Pubwatch will be actively promoted and supported by both the Licensing Authority and the Police.

#### **5.2 Good Practice Guides**

Licence and certificate holders will also be encouraged to take into account the wide range of initiatives detailed in the various good practice guides published by trade associations and other interested bodies such as The Portman Group's Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks.

#### **5.3 Accreditation Schemes**

Licensed premises offering on-sales are encouraged to participate in locally available accreditation schemes, such as the Licensing and Vulnerability Initiative (LSAVI). Research conducted across Telford in 2024, has shown that LSAVI users have found the assessment to be a constructive experience for their licensed premises, with many reporting a positive impact on the feeling of safety at their venue. This is supported by reductions in crime figures since the implementation of the scheme'. These schemes support venues in creating safer, more secure environments for both patrons and staff.

#### **5.4 Women and Vulnerable Persons Safety**

The Licensing Authority are committed to ensuring the Borough is a safe and welcoming place for everyone, regardless of their gender, ethnicity, sexuality, beliefs or background. Telford & Wrekin Council expects all licensed premises to foster an environment of transparency, safety, and inclusivity, particularly for women and vulnerable individuals participating in the night-time economy, whether as staff or patrons.

This Policy aims to ensure that vulnerability and women's safety is an important consideration in decision-making in licensing matters. The Licensing Authority will ensure that guidance is sought from relevant authorities on the prevalence, prevention and reporting of sexual harassment and misconduct and gender-based violence.

Operators are strongly encouraged to develop a Safeguarding and Vulnerability policy for their business and ensure that sufficient measures are in place to protect and provide support to customers. Resident and visitor safety, especially the safety of those using the night-time economy, is an important factor that the Licensing Authority, applicants, and licence holders must take into consideration.

Procedures and policies for how to handle perpetrators of sexual harassment should be included in the operating schedule/conditions. These will of course differ from premises to premises but ensure that they reflect a zero-tolerance attitude towards harassment and discrimination. These can range from removal from the premises to a ban from the premises for an extended period.

Licence holders should ensure that there are clear guidelines on how to handle complaints made by targets of sexual harassment, including safe exit strategies for anyone feeling unsafe in the venue.

In addition, the Ask for Angela initiative aims to ensure that anyone who is feeling vulnerable or unsafe can get discreet support. The Council supports this initiative and expects that, when a trained member of staff hears the code-phrase, they should understand that the person needs support and will be able to respond in an appropriate, discreet way. This could be offering them an alternative way out of the venue, calling them a taxi or in a more serious situation, altering venue security

and/or the Police. More information can be found here:

<https://askforangela.co.uk/>

Licence holders are expected to provide training to all staff on these policies and procedures, including casual and security staff.

More information can be found at: **Tackling violence against women and girls strategy - GOV.UK**

### **Preventing Harassment and Violence**

- License holders are strongly encouraged to implement measures that reduce vulnerability-based violence, intimidation, and harassment. This includes:
- Staff training on safeguarding and intervention (e.g. WAVE training)
- Adoption of schemes such as Ask for Angela
- Clear reporting procedures for incidents

### **Staff Responsibilities**

- All licensed premises must ensure staff are:
- Appropriately trained in safeguarding and harassment response
- Vigilant and proactive in identifying and addressing safety concerns
- Prepared to report incidents to the police where appropriate

### **Voluntary Measures**

Applicants are encouraged to include conditions in their operating schedules, especially those addressing drink spiking and harassment.

To demonstrate commitment to safety, venues should:

- Display high-visibility posters discouraging harassment and encouraging reporting
- Take all reports of harassment seriously and act appropriately
- Support individuals who report harassment or intimidation
- Train all front-of-house staff on women's safety and harassment protocols
- Ensure safe exit strategies for all patrons

## **5.5 Drink and Needle Spiking**

Drink spiking is when someone puts drugs or alcohol into a person's drink without their knowledge or consent. It can include putting alcohol into a non- alcoholic drink, adding extra alcohol to an alcoholic drink or slipping prescription or illegal drugs into an alcoholic or non-21 alcoholic drink. It can be difficult to tell whether a drink has been spiked, as substances used for spiking usually have no taste, odour, or colour.



Needle spiking (sometimes referred to as injection spiking) is where someone surreptitiously injects, with a hypodermic needle, (or other form of administration e.g. combi-pen) a victim with a substance. Spiking is a crime and yet Charity Stamp Out Spiking estimates 97% of people do not report spiking incidents to the police. Spiking can lead to secondary offences being committed - most commonly sexual offences when the victim is female, and theft when the victim is male.

The Licensing Authority understands that many licensed premises work incredibly hard to ensure that their customers can enjoy a night out safely and deter perpetrators. Nevertheless, we also consider that more could and should be done to prevent and report spiking incidents. We recommend that licence holders consider the production of a drugs (including Spiking) protocol or policy for their premises which should ensure a safeguarding approach is taken in respect of all incidents related to spiking and embed a culture of “believe, reassure and request assistance” for those making reports.

More information can be found at: Guidance issued by the Secretary of State under section 182 of the Licensing Act 2003, British Beer & Pub Association, Drugs & Pubs: A guide to keeping a drug free pub. In the absence of a specific protocol or policy on spiking, all licensed premises should ensure all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. It is important and helpful for the prevention and detection of spiking incidents if personnel at licensed premises can:

- Ensure the health and safety of the customer, which could be by calling emergency services, ensuring they are with trusted friends who will look after them, offering assistance if needed, and providing a safe space for the customer
- Obtain full details of the affected person reporting the incident, including a description of what they are wearing as officers will want to track them on CCTV
- Provide as detailed a description of the suspected perpetrator as possible
- Provide an approximate time of the incident and the location within the premises
- Secure the drinking vessel(s) that is suspected as containing the ‘drug’ so this can be tested later
- Seize any drinking vessel that the suspect may have been using
- Ensure appropriate training is provided to relevant members of staff
- Review searching procedures and amend as necessary, as well as reviewing how often toilets are inspected, where victims of spiking may be found
- Premises should also review the functionality of any CCTV and ensure it is not obscured

- Consider providing information (such as posters) regarding drink spiking in the premises
- Consider if it would be useful to provide anti-spiking bottle stoppers and protective drink covers.

The Licensing Authority also recommends that licence holders and authorised clubs take into consideration the Home Office report understanding and tackling spiking – published 19th December 2023 [Report: Understanding and tackling spiking \(accessible\) - GOV.UK](#) The Licensing Authority will consider placing additional conditions on licences to safeguard patrons against spiking, noting that conditions placed on licences need to be both proportionate and enforceable. We will also use our powers to impose conditions or revoke premises licenses, where venues do not take sufficient measures to protect and provide support to customers in spiking incidents.

## 5.6 Accredited Proof of Age ID and Challenge Schemes

It is a mandatory condition for photographic proof of age evidence to be requested by licence holders and all other relevant employees, from any person who appears to be under 18 years of age and is seeking access to premises or seeking to purchase or consume alcohol on the premises.

Such acceptable evidence shall include a photograph of the customer, and will be either a passport, photographic driving licence, MOD90 (military ID) or proof of age card carrying a “PASS” (Proof of Age Standards Scheme) hologram logo. Any digital proof of age credential issued by a provider accredited under the National Proof of Age Standards Scheme (PASS) will be accepted as valid proof of age under this policy.

The Licensing Authority recommends the adoption of the Challenge 25 policy. This is a safeguarding measure requiring that anyone who appears to be under the age of 25 is asked to provide valid identification when:

- Seeking access to licensed premises, or
- Attempting to purchase or consume alcohol.

This approach helps ensure that alcohol is not sold to individuals under the legal age and supports licensees in meeting their responsibilities under the Licensing Act 2003.

## 5.7 Counter Terrorism

The Terrorism (Protection of Premises) Act 2025, or Martyn’s Law, received Royal Ascent on 3 April 2025. This legislation, once fully implemented, will place a requirement on those responsible for certain premises and events to take appropriate action to reduce the risk of harm to their workers and the public. To ensure a proportionate

approach, it is expected that procedures and measures that are reasonably practicable are put in place.

Where 800 or more individuals (including staff) may be reasonably expected at the premises at the same time, they will be 'enhanced duty' premises unless the Act provides otherwise.

Qualifying premises where between 200 and 800 individuals (including staff) may be reasonably expected at the premises at the same time, will be 'standard duty' premises.

Those responsible for 'standard duty' premises will be required to have in place, so far as is reasonably practicable, appropriate public protection measures.

Many licensed premises in the Borough will fall below these thresholds, but the Licensing Authority expects all premises to have procedures in place that may be reduce the risk of physical harm to individuals if an act of terrorism occurred at the premises or in the immediate vicinity.

The procedures should include:

- All people employed at the premises whose job includes being alert to the terrorist threat are aware of:
  - The current terrorist threat level
  - What that level means in relation to the possibility of an attack.
  - Risk assessments for public entertainment venues to include consideration of the risk of a terrorist attack and the different types of attack.
- All persons responsible for security are briefed at every event about the current threat level and risk of terrorist attack.
- All public-facing staff must be clear about what to do if the public report suspicious activity or unusual behaviour to them. All suspicious behaviour by customers or members of the public close to the venue must be noted and be reported promptly so that investigations can be made, and action taken, if appropriate.
- All public facing staff know the appropriate actions to take in the event of an incident which may include, but is not limited to, a marauding terrorist attack, unattended/suspicious items, vehicle borne attack.
- Staff training should incorporate the freely accessible ACT E-learning and the SCan for All eLearning resources. [ProtectUK | Home](#)

We encourage licensed premises owners to make use of the information and guidance available on the Protect UK platform including use of the Protect UK App. [ProtectUK | Home](#)

The aim of these requirements is to improve staff preparedness and responses. The Act does not require physical alterations to premises or the purchase of equipment for the purpose of having these procedures in place. Further information can be found at: [Terrorism \(Protection of Premises\) Act 2025: factsheets - GOV.UK](#)

The Council's approach to Martyn's Law is available at: <https://www.telford.gov.uk/health-protection/emergencies/dealing-with-specific-risks/terrorism/protect-and-prepare/>

## **5.8 The British Beer and Pub Association (BBPA)**

The BBPA have consolidated good practice, including good practice on combating violence in licensed premises, into a number of guides to assist the trade on the following subjects:

- Managing Safety in Bars, Clubs and Pubs
- Security in design
- Drugs and pubs
- Control of Noise at Work

This information and materials on responsible drinking and the Proof of Age Standards Scheme (PASS) can be downloaded or accessed from their website at [www.beerandpub.com](http://www.beerandpub.com). This website also has links to a large number of other useful websites.

## **5.9 Responsible Management**

The Licensing Authority seeks to promote the responsible and professional management of premises and events by licence or certificate holders as it recognises that effective control and supervision of premises and events is a key factor in achieving all the licensing objectives.

## **5.10 Designated Premises Supervisor**

The sale of alcohol, because of its wider impact on the community, carries with it a greater responsibility than that associated with the provision of entertainment and late night refreshment. The main purpose of a Designated Premises Supervisor (DPS) is to ensure that there is always a named individual who can be readily identified at the premises.

This person will play a pivotal role in terms of management and supervision of the premises, although they are not legally required to be on the premises at all times.

It is good practice, when a DPS is not at the premises, for them to provide written authority to staff detailing that sales are authorised. Where possible, it is also good practice to have more than one personal licence

holder amongst the staff. If a DPS leaves a premises, it is important for the Premises Licence Holder to apply to vary the DPS at the premises as soon as possible so that the Licensing Authority and other responsible authorities can identify the person in day to day control at the premises.

It should be noted that this does not remove any criminal liability for staff for offences under the Act, such as serving under age persons, or persons already intoxicated.

### **5.11 Supervision and Training**

The Licensing Authority also recognises the importance of good supervision and training of both staff and management and will encourage the gaining of qualifications from relevant accredited associations such as the British Institute of Inn Keeping Awarding Body and others.

## **6. Cumulative Impact**

The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter which the Licensing Authority can consider. This should not, however, be confused with 'need' which relates more to the commercial demand for a particular type of premises. The issue of 'need' is therefore a matter for planning consideration or for the market to decide.

Where there is a significant amount of licensed premises concentrated on an area, the cumulative impact of those premises on the promotion of the licensing objectives is something which the Licensing Authority may take into account.

**At the time of this Policy's creation the South Waterfront area of Telford is expanding and developing into a focus for the Borough's Night Time Economy.**

A Cumulative Impact Policy will only be considered after assessing the available evidence from relevant Responsible Authorities and after consultation with relevant individuals and organisations. This will be kept under review.

## **7. Early Morning Restriction Order and Late Night Levy**

At this time, Telford & Wrekin Council has made the decision that there is no evidence that an Early Morning Restriction Order (EMRO) should be introduced in any part of its area. If evidence is received that an EMRO would be the appropriate measure to tackle alcohol related problems in the area, then that evidence will be placed before Full Council.

Telford & Wrekin Council has decided that the introduction of a Late Night Levy is not appropriate at this time.

## **8. Licensable Activities**

This policy relates to all '**licensable activities**' as defined by the Act, namely:

- sale by retail of alcohol

- supply of alcohol to club members
- provision of regulated entertainment
- provision of late night refreshment (the supply of hot food and/or hot drink from any premises between 11pm and 5am).

## **8.1 Sale by retail of alcohol and supply of alcohol to club members**

All sales of alcohol or supply of alcohol to members of a club or their guests must be licensed under the authorisation of a premises licence, a club premises certificate or a temporary event notice.

### **8.1.1 Garages and service stations:**

Applications for the sale of alcohol at such premises should include evidence of primary use. This is to enable the Licensing Authority to determine the nature of the premises considering Section 176 of the Act which prohibits the sale or supply of alcohol from premises that are used primarily as a garage or are part of a premises used mainly as a garage.

If there is insufficient evidence to establish primary use the Licensing Authority may defer determining the application until such time as primary use issues may be resolved to their satisfaction.

## **8.2 Regulated entertainment**

The descriptions of entertainment in the Licensing Act are:

- a performance of a play
- an exhibition of a film
- an indoor sporting event
  - boxing or wrestling entertainment (which includes a contest, exhibition or display which combines boxing or wrestling with one or more martial arts ("combined fighting sports"))
- a performance of live music
- any playing of recorded music
- a performance of dance
  - or entertainment of a similar description to a performance of live music, any playing of recorded music or a performance of dance.

When considering whether an activity constitutes the provision of regulated entertainment each case will be treated on its own merits. Organisers of events should check with the Licensing Authority if in doubt.

### **8.2.1 Live Music, Dancing and Theatre**

The Licensing Authority is aware of the need to encourage and promote a broad range of entertainment, particularly live music and dancing as well as a range of traditional theatre performances for the wider cultural benefit of communities generally.

### **8.2.2 Live Music Act 2012**

With the implementation of the Live Music Act 2012 no licence is required for the following activities:

- a performance of unamplified live music between 08.00 and 23.00 on any day on any premises.
- a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
- a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
- a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
- a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital

In carrying out its licensing functions, care will be taken by the Licensing Authority to avoid measures which might deter live music, dancing or theatre by imposing indirect costs of a disproportionate nature.

In order to encourage the growth of cultural diversity within the Borough of Telford & Wrekin, the Council, acting separately from the Licensing Authority, may consider whether to apply for a premises licence in its own name for public areas such as market squares, village greens, parks, public buildings etc.

This would mean that performers or entertainers wishing to perform in such places would no longer have to apply for a licence



themselves although permission would still be required from the Council as the licence holder for any proposed regulated entertainment in the areas identified.

As the owners of the public spaces, the Council service that deals with such areas may wish hirers for events to comply with terms and conditions of hire.

It should be noted that these terms and conditions are outside the control of the Licensing Authority and are a matter for the parties involved.

### **8.2.3 Sexual Entertainment**

Telford & Wrekin Council has a Policy in place regarding Sexual Entertainment Venues (SEVs) which can be accessed on the Council website, [www.telford.gov.uk](http://www.telford.gov.uk). A premises can provide sexual entertainment no more than eleven times within 12 months, not longer than 24 hours on each occasion and more than one month between each event before requiring a Sex Establishment Licence for an SEV.

Where a premises holds a Sex Establishment Licence which has similar conditions to those on the premises licence, then the more rigorous conditions will apply.

### **8.2.4 Films**

The public exhibition of all films must either be classified by the British Board of Film Classification (BBFC) or authorised by the Licensing Authority under the powers of the Licensing Act 2003. If you wish to show a film at a venue in Telford & Wrekin and the film is not already classified by the BBFC then you must in the first instance email [licensing@telford.gov.uk](mailto:licensing@telford.gov.uk) in order to apply for the film to be classified by Telford & Wrekin Council. Films are classified in accordance with the Council's Policy for Determining Film Classifications

## **9. Completing Operating Schedules**

As part of the application process applicants will be expected to address each of the licensing objectives in their operating schedules having regard to the type of premises, the licensable activities to be provided, the operational procedures, the nature of the location and the needs of the local community.

The Licensing Authority expects applicants to undertake risk assessments as part of the considerations when completing their operating schedules around how to mitigate and manage the risks to the promotion of the licensing objectives around their licensed premises. Whilst there is no requirement to do



so under the Act, applicants may find it useful to share this risk assessment with Responsible Authorities before submitting their application.

Applicants are encouraged to make themselves aware of and be able to demonstrate when setting out the steps they propose to take to promote the licensing objectives, that they understand the layout of the local area and physical environment and any relevant planning and transportation policies, tourism and cultural strategies or local crime prevention strategies which may help to mitigate potential risks.

This Licensing Authority includes the Ironbridge Gorge World Heritage Site (WHS). Careful consideration must be taken to balance the needs of the area's economy with the area's character which contributes to its Outstanding Universal Value. Premises should have an awareness of their contribution to the WHS and are encouraged to seek ways to contribute to the good management of the area. Premises should seek to avoid encouraging behaviours which would have an overall negative impact upon the WHS's character or enjoyment by its users.

Additional measures may be appropriate on occasion, such as a special event (e.g. popular live band) or promotion (e.g. during major sporting occasions), which may attract larger, different audiences and which may impact on the licensing objectives.

Reference should be made in an applicant's operating schedule, where applicable, to such occasions and any additional measures planned to achieve the licensing objectives. Addressing key issues within the operating schedule on the application form can help alleviate concerns of responsible authorities and other persons and may make the application less likely to attract representations.

Each application made to the Licensing Authority under the Licensing Act 2003 will be considered on its own merits in the context of the four licensing objectives.

## **9.1 The Prevention of Crime and disorder**

The promotion of this objective places a responsibility on licence/certificate holders to become key partners in achieving a positive outcome. Following the carrying out of a risk assessment, applicants will be expected to demonstrate that suitable and sufficient measures have been identified and will be implemented and maintained, to minimise or prevent crime and disorder, in and around the vicinity of their premises.

The emphasis should be on deterring and preventing crime and disorder to provide a safe environment for both customers and staff.

In addition to responsible management and supervision, appropriate training with regard to the responsibilities under the Licensing Act 2003 and the adoption of good practice set out above, the Licensing Authority expects applicants to consider and address the following specific control measures.

This should be done within the operating schedules where these are relevant with regard to their particular premises and/or activities and where existing legislation does not provide adequately for the prevention of crime and disorder;

- number of people attending the premises
- customer profile, including age of patrons and potential for underage drinking
- condition, design and layout of the premises
- potential for misuse of drugs and abuse of alcohol including drunkenness
- potential for anti-social behaviour
- nature of the activities to be provided
- the hours of operation and hours of opening if different
- the location of the premises including proximity to other licensed premises
- physical environment of the premises including both internal and external elements, e.g. external lighting and litter bins. This is particularly relevant when planning the design of new premises or the refurbishment or alteration of existing premises.
- provision of effective CCTV in and around the premises
- documentation in relation to admission to premises and/or age related sales
- the employment of Security Industry Authority licensed door staff, including female door staff, where appropriate.
- provision of toughened glass or plastic glasses and bottles
- provision of bottle bins within premises
- the provision of secure deposit boxes for confiscated items
- provision of appropriate communication systems including links to the police and other licence or certificate holders e.g. the use of text/radio pagers
- prohibition on the removal of alcohol in open containers from the premises
- the setting of maximum occupancy levels
- the proper use of point of sale promotions
- the provision of appropriate signage
- the provision of appropriate furniture for patrons
- relevant control measures as contained in the Safer Clubbing guidance e.g. various drug control measures, provision of safe transport home.

This list is not intended to be an exhaustive list but is indicative of matters that may be relevant.

## 9.2 Public Safety

The Licensing Authority is committed to ensuring that the safety of any person visiting or working in licensed premises is not compromised.

Following the carrying out of a risk assessment an applicant will be expected to demonstrate, in their operating schedule, that suitable and sufficient measures have been identified and will be implemented and maintained to ensure public safety both in and around the vicinity of their premises. Such measures should be relevant to the individual style and characteristics of their premises and activities.

In addition to responsible management and supervision, appropriate training with regard to the responsibilities under the Licensing Act 2003 and the adoption of good practice set out above, the Licensing Authority expects applicants to consider and address the following specific control measures. This should be done within the operating schedules where these are relevant and having regard to their particular premises and/or activities and where existing legislation does not provide adequately for public safety;

- the provision of sufficient, suitably trained persons employed or engaged to secure the safety of the premises and patrons
- suitable facilities for disabled people and people with special needs
- provision of flame-retardant curtains, hangings, decorations and upholstery
- provision of various safety measures, including fire and electrical safety
- proof of regular testing (and certification where appropriate) of procedures, appliances, systems etc. relevant to public safety
- the provision of crowd management measures e.g. queuing
- the provision of first aid facilities
- the use of special effects
- the provision of special measures resulting from particular types of entertainment e.g. indoor sport events, hypnotism, and facilities for dancing by patrons
- the provision of access for emergency vehicles
- relevant control measures contained in the Safer Clubbing guidance
- liaison with public transport providers
- the number of people attending the premises
- the condition, design and layout of the premises, including the means of escape in case of fire
- the nature of the activities to be provided (whether licensable or not), in particular the sale or supply of alcohol, and including whether those activities are of a temporary or permanent nature
- the hours of operation and hours of opening if different
- customer profile e.g. age, disability, special needs etc.

This list is not intended to be an exhaustive list but is indicative of matters that may be relevant

### **9.3 The Prevention of Public Nuisance**

Licensed premises have a significant potential to impact adversely on communities through the public nuisance which can arise from their operation.

The Licensing Authority recognises the need to maintain and protect the living and working amenity and environment of residents and businesses whilst balancing these against the interests of licence or certificate holders and of those attending licensed premises.

It is recognised that noise is a major concern for residents and workers in premises close to licensed premises.

The Licensing Authority recognises that different people have different levels of tolerance to the unavoidable activities involved in the everyday provision of entertainment and refreshment.

The Licensing Authority, upon receipt of relevant representations, will look carefully at the impact of licensed premises with regard to noise and disturbance in the vicinity of the premises, especially where entertainment takes place late at night and during other times when the activities may be more intrusive.

Following the carrying out of their risk assessment, applicants will be expected to demonstrate in their operating schedule that suitable and sufficient measures have been identified. These should be implemented and maintained in order to minimise or prevent public nuisance, in its broadest terms, in and around the vicinity of their premises. Such measures should be relevant to the individual style and characteristics of their premises and activities.

Applicants may also wish to consult publications such as the Institute of Acoustics' Good Practice Guide on the Control of Noise from pubs and clubs 2003 and good practice guides issued by trade associations, particularly where licensable activities are to take place between 11pm and 7am.

In addition to responsible management and supervision, appropriate training with regard to the responsibilities under the Licensing Act 2003 and the adoption of good practice set out above, the Licensing Authority expects applicants to consider and address the following specific control measures.

This should be done within the operating schedules where these are relevant having regard to their particular premises and/or activities and

where existing legislation does not provide adequately for the prevention of public nuisance.

These may include:-

- the location of the premises and proximity to residential properties
- the number of people attending the premises
- the hours of operation and opening (especially between 23.00 – 07.00hrs)
- the nature of the activities to be provided, including whether they are temporary or permanent and whether they are to be held inside or outside the premises
- the design and layout of the premises and the presence of any noise limiting features
- the provision of measures to control the use of fireworks, pyrotechnics etc.
- rowdy behaviour
- disposal of waste and bottle bins, litter collection and bins
- plant and machinery
- food preparation including cleaning of premises and equipment
- use of gardens, play areas, car parks, open air areas and temporary structures
- suitability of collection and delivery points and times if these are during a period when disturbance may be caused
- the provision of measures to prevent disturbance caused by patrons, staff and vehicles, including taxis, delivery and refuse vehicles etc. arriving at or leaving the premises, especially between 23.00 and 7.00
- the need for any additional measures resulting from the proximity of the premises to residential and business properties or other noise sensitive premises, e.g. nursing homes, hospitals, hospices or places of worship
- the provision of measures to control litter, fly posting and unauthorised signs in the vicinity of the premises,
- the provision of measures to control the emission of noxious smells from the premises
- the provision of a dispersal policy
- the provision of a 'wind down period'

This list is not intended to be an exhaustive list but is indicative of matters that may be relevant.

#### **9.4 The Protection of Children from Harm.**

The Licensing Authority is committed to ensuring the protection of children from physical, moral, psychological harm and exploitation, whilst recognising the great variety of premises for which licences may be sought. These will include theatres, cinemas, restaurants, pubs, nightclubs, cafes, take-away outlets, community halls and schools.

Each application and the situation in relation to each premises will be considered on its own merits.

In cases where it is considered appropriate, options available for limiting access by children could include:

- a limit on the hours when children may be present
- a limitation or exclusion when certain activities are taking place
- the requirement to be accompanied by an adult
- access being limited to parts of the premises only
- age limits.

Examples of areas which may give rise to concern in respect of children include premises:

- where nudity or entertainment of an adult or sexual nature is provided
- where there is a strong element of gambling taking place
- with a known association with drug taking or dealing
- where there have been convictions for serving alcohol to those under 18
- with a reputation for underage drinking

#### **9.4.1 Alcohol Deliveries**

An applicant seeking a licence that will enable them to provide alcohol as part of an alcohol delivery service should include in their operating schedule the procedures, they intend to implement to ensure that:

- The person they are selling alcohol to is at least 18 years of age.
- The alcohol is delivered to a person who is at least 18 years of age.
- A clear document trail of the order process from order, dispatch from the licensed premises and delivery to the customer is maintained (with times and signatures) and available for inspection by an authorised officer.
- Age verification procedures are implemented at both point of sale and delivery stages, with a Challenge 25 policy implemented at the point of delivery.
- Retailers should ensure that delivery staff, including third party delivery services, have been given appropriate training in procedures relating to requesting and identifying proof of age and implement these procedures as standard.
- All deliveries of alcohol shall only be delivered to a premises address with a valid postcode and will only be delivered directly to that property.

### 9.4.2 Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

It is the responsibility of premises licence holders and their managers to make sure that suitable control measures are in place at licensed premises for the protection of children from harm.

**Hotels and hostels:** These venues often have children staying at their premises who are accompanied by an adult. As such, they can play an important role in protecting children from harm but can also be used as a place to exploit and abuse victims of child sexual exploitation. The licence holder and staff have an important part to play in safeguarding children and young people. Therefore, sufficient procedures and suitable training must be provided to staff on age restricted sales.

## 10. Licensing Hours

There are no fixed restrictions on terminal hours for any particular areas of Telford & Wrekin. Such a restriction would cause the migration of customers from one area to another and create the circumstances that this legislation aims to avoid. Staggered dispersal of customers is an important factor in reducing friction at late night food outlets, taxi ranks and other sources of transport in the areas.

In general, the Licensing Authority will deal with the issue of licensing hours on the individual merits of each application. The Licensing Authority cannot restrict opening hours unless it receives representations to an application and it is relevant to the promotion of the licensing objectives to do so, or unless it does so under the authority of an Early Morning Restriction Order (EMRO).

It is for the applicant to show in their operating schedule what measures they will take to address crime and disorder issues. They will need to ensure that they do not cause nuisance or disturbance to their neighbours in the immediate vicinity of the premises, to protect the public at their premises and to protect children from harm. The later the terminal hour applied for, the greater the need to address these issues.

When considering applications for premises licences, the Licensing Authority will take into account an applicant's request for terminal hours in the light of;

- a) environmental quality e.g. noise and light pollution

- b) residential impact and amenity
- c) the character and nature of a particular area
- d) the nature of the proposed activities to be provided at the premises

Applicants should note however, that stricter conditions, particularly in terms of licensing hours to control noise, are likely to be imposed in the case of premises situated in largely residential areas where relevant representations have been received and are suitably proven.

Shops, stores and supermarkets will generally be permitted to sell alcohol for consumption off the premises during the normal hours they intend to open for shopping purposes. However, in the case of individual premises which are known to be a focus of disorder and disturbance then, subject to proven and relevant representations, some limitation on licensing hours may be appropriate.

## **11. Licence Conditions**

Each application will be considered on its individual merits. Only those conditions appropriate to meet the licensing objectives will be imposed.

When submitting operating schedules, applicants will be required to outline the measures which are being taken in order to meet the four licensing objectives. These measures will then be incorporated into conditions which will be attached to a premises licence. Any conditions proposed by the applicant which duplicate other regulatory regimes or are not enforceable may not be incorporated into the conditions on the licence. When conditions are written onto the licence, they will be clear, enforceable and expressed in plain language so that they can be easily understood by those expected to comply with them.

Some licences may contain conditions which are no longer enforceable or are now covered by other legislation. These conditions can only be removed from a licence by way of a minor or full variation, and so the Licensing Authority recommends that any premises which is intending to submit a variation takes the opportunity to look at the conditions on their licence and consider the removal of any conditions which are no longer enforceable, are covered by other legislation or are no longer relevant to the operation of the premises.

Each application will be unique and any additional conditions, beyond the existing legislative requirements and those proposed on the operating schedule, will only be attached after receipt of relevant representations, and where it is reasonable and proportionate to do so to promote the licensing objectives. Any such conditions will take into account the nature of the premises and the scale and type of activity to be provided.

## **12. Relevant Representations**

For a representation to be taken into account it must concern at least one of the licensing objectives and relate to the premises for which the application has been made. Where made by an Other Person, the Licensing Authority will



determine if the representation is relevant. It may be rejected if it is considered irrelevant, frivolous and/or vexatious. Less weight may be given to any representations which are anonymous or are from a false address.

All relevant representations received from Responsible Authorities or Other Persons will be considered by the Licensing Authority. Other Persons may request a representative to act on their behalf. This could be a legal representative, a friend, an MP or Councillor. A relevant representation may be comments in support of an application as well as objections to an application.

A Councillor who is a member of the Licensing Committee will be advised not to become involved in making either written or oral representations on behalf of constituents regarding licensing matters. They may refer the person to a fellow Councillor.

The Licensing Authority **cannot** impose any conditions unless a relevant representation has been received and conditions will only be imposed following a hearing of the Licensing Sub Committee where the Licensing Authority must be satisfied, that any additional conditions are appropriate for the promotion of the Licensing Objectives. Where all parties agree that a hearing of the Licensing Sub Committee can be dispensed with, the Licensing Authority will follow its *“Procedure where All Parties have Agreed to Dispense with Need for Hearing under The Licensing Act 2003.”*

### **13. Minor variations**

An application for a small variation to a premises licence or club premises certificate that will not impact adversely on the licensing objectives can be made by way of a minor variation.

Each application will be decided upon its own individual merits and the decision to consult with each Responsible Authority will be made based upon the content of the minor variation requested. These decisions will be made with regard to the Guidance issued by the Home Office under Section 182 of the Licensing Act 2003 and the minor variation guidance issued on the Home Office website [www.gov.uk](http://www.gov.uk). It is advised that an applicant reads this guidance before making an application to ensure that their licence can be changed by the minor variation process rather than applying for a full variation.

### **14. Removal of Requirement for a Designated Premises Supervisor (DPS)**

Instead of being required by way of a mandatory condition to appoint an individual as a Designated Premises Supervisor (DPS), volunteer committees managing community premises can take joint responsibility for the sale of alcohol in community premises.

Management Committees wishing to apply for the removal of the mandatory condition will need to demonstrate clearly to the Licensing Authority how the

premises is managed, its Committee structure and how alcohol sales are to be properly supervised within the Committee/Management structure.

Community Premises will include church halls, chapels, community and village halls and similar buildings. If there is any doubt whether a premises is a community premises or not, the Licensing Authority will deal with the matter on a case by case basis with the main consideration being how the premises is predominantly being used, for example :

- are they genuinely made available for community benefit most of the time
- are they accessible by a broad range of persons and sectors of the local community
- are they being used for purposes which are for the benefit of the community as a whole

## **15. Temporary Event Notices**

There are two types of Temporary Event Notices (TEN) – a standard TEN and a late TEN. If the Police or Environmental Health object to a late TEN, there is no provision for a hearing of the Licensing Sub-Committee and the licensable activities will not be authorised.

A statutory period of 10 clear working days prior to an event is the minimum notice that must be given to the Licensing Authority and the Police for a standard TEN, and between 5 and 9 clear working days for a Late TEN. This is exclusive of the day on which the notice is served and the day on which the event is to start.

Addresses for serving the Licensing Authority, the Police and Environmental Health with copies of a TEN can be found at [www.telford.gov.uk](http://www.telford.gov.uk).

The serving of a notice of a temporary event does not mean that the premises or event is exempt from the requirements of all other relevant legislation. Premises users/event organisers are required to ensure the licensing objectives are still promoted.

It should be noted that the Police and Environmental Health are the only Responsible Authorities which may make representations to a temporary event notice, and can only do so if to allow the event would undermine the licensing objectives. The Licensing Authority cannot attach any terms or conditions on such events unless a representation has been received. The only conditions which can be imposed on a TEN following receipt of a representation are those conditions which are currently on a premises licence or club premises certificate. They may only be imposed on a TEN at a hearing, unless the authority, the premises user and the responsible authority making the representation agree that a hearing is not necessary.

## **16. Responsible Authorities and Other Persons**

Any Responsible Authority and/or Other Person may make representations about an application, variation, minor variation or a review of a premises licence or club premises certificate or grant of a provisional statement.

The following are the Responsible Authorities. Their contact details can be found at [Telford & Wrekin Council | Introduction](#) .

- The Licensing Authority
- The Chief Officer of Police (West Mercia Police)
- The Fire Authority (Shropshire Fire and Rescue)
- The enforcing authority for Health and Safety
- Planning (Telford & Wrekin Council)
- Environmental Health Pollution Control (Telford & Wrekin Council)
- The Local Safeguarding Children Board (Telford & Wrekin Council)
- Trading Standards (Telford & Wrekin Council)
- The local authority's Director of Public Health (Telford & Wrekin Council)
- Home Office Immigration Enforcement

This list may be amended by the Home Office through changes to legislation.

### **16.1 The Licensing Authority**

The Licensing Authority as a Responsible Authority may make representations about an application or request a review of a licence. In these circumstances, the Licensing Authority will ensure that there is a clear separation of responsibilities between the Officer making the representation and the Officer presenting the report to Committee.

The Licensing Authority would not normally make a representation or request a review of a licence where the evidence clearly shows that this could be done by another Responsible Authority or other person. An example of when the Licensing Authority might intervene in this way could be when a number of small unconnected incidents occur which on their own would not be enough for one person to make a complaint, but when taken together show breaches of licence conditions or undermine the Licensing Objectives.

### **16.2 The Chief Officer of Police (West Mercia Police)**

West Mercia Police is the principal authority responsible for enforcing matters related to crime and disorder. In accordance with the Licensing Act 2003, WMP is one of the two responsible authorities empowered to respond to Temporary Event Notices (TENs), considering all four licensing objectives

### **16.3 Fire Authority**

Shropshire Fire and Rescue plays a key role in ensuring public safety within licensed premises. Their guidance is designed to help applicants and responsible persons comply with legal duties and maintain a safe environment for patrons.

### **16.4 Health and Safety**

Health and safety enforcement is a joint responsibility between the Council's Environmental Health team and the Health and Safety Executive (HSE). Generally, the Council oversees the majority of premises, while the HSE is responsible for Council-owned properties. The primary objective is to safeguard the health, safety, and welfare of employers, employees, and members of the public who work at or visit licensed premises.

### **16.5 Planning**

The Licensing Authority will ensure that the planning, building control and licensing regimes are properly separated to avoid duplication and inefficiency.

Applications for premises licenses for permanent commercial premises should normally be from businesses with planning consent for the property concerned.

Licensing applications should not be a re-run of the planning application, and the granting by the Council's Licensing Committee of any variation of a licence which involves a material alteration to a building will not relieve the applicant of the need to apply for planning permission or building control approval where appropriate.

Applicants are recommended to make inquiries of the local planning and building control departments where applicable.

It should be noted that there is no legal basis for a Licensing Authority to refuse a licence application because it does not have planning permission.

If planning permission imposes a terminal hour which is different to the licensing hours, the earlier operating time must be observed.

### **16.6 Environmental Health**

Applicants are expected to provide details of any proposed noise control measures, especially where regulated entertainment is planned between 11:00 pm and 8:00 am. This is particularly important for premises located in predominantly residential areas.

Where necessary, licence conditions may be imposed. These will be tailored to the specific premises and will reflect the nature of the licensable activities proposed.

While each application is assessed on its individual merits, it should be noted that restricting hours of operation can be an effective measure in preventing public nuisance. This is especially relevant in residential areas with a history of noise complaints from nearby residents.

## **16.7 The Local Safeguarding Children Board**

Independent Safeguarding is the body deemed competent by the Licensing Authority to advise on the protection of children from harm will be given an opportunity to consider and comment upon all relevant applications under the Licensing Act 2003.

## **16.8 Trading Standards**

The sale of age restricted products, in this case alcohol, remains a priority for Trading Standards. Their aim is to ensure that:

- Owners of licensed premises, Premises Licence Holders and Designated Premises Supervisors are aware of their obligations in law and those associated with this policy.
- That non-compliant licensed premises are helped to achieve compliance.
- That there is restricted access to cheap alcohol by removing from sale counterfeit, illicit and non-duty paid alcohol and tobacco.

Trading Standards will:

- Promote Challenge 25 for all age restricted products including alcohol and tobacco.
- Assess compliance by undertaking regular, planned underage sales test purchasing exercises of all age restricted products.
- Operate a risk rating scheme for licensed premises, so that those premises of highest risk can be focussed on.
- Maximise the use of intelligence to target non-compliant premises, areas where anti-social behaviour is linked to the sale of alcohol and areas of high alcohol misuse.
- Work with businesses and partner agencies in areas where anti-social behaviour is linked to the sale of alcohol by proxy sales, to raise awareness, increase compliance and reduce associated anti-social behaviour.

The sale of illicit/counterfeit and non-duty paid alcohol and tobacco products continues to have a very serious impact on the local economy. Licence holders found to be selling illicit alcohol and/or tobacco products may be liable to prosecution and could have their licence to sell alcohol reviewed by the Licensing Sub Committee under the prevention of crime and disorder objective. Under these circumstances the authority will also

consider amending licence conditions as well as whether the revocation of the premises licence is also appropriate.

## **16.9 Public Health**

Public Health is a Responsible Authority under the Act. Although “health” is not a licensing objective, health bodies hold certain information which other Responsible Authorities do not, but which would assist the Licensing Authority in carrying out its licensing functions, especially in relation to the Public Safety and Crime and Disorder objectives. The Licensing Authority takes the issue of public health extremely seriously and would expect applicants and licence holders to familiarise themselves with any local issues that may be detrimental to the public health of people living in, working in and visiting the Borough.

The Secretary of State’s Guidance states that health bodies can make representations based on any of the four licensing objectives.

The Licensing Authority considers data:

- Around hospital admissions due to alcohol consumption,
- That shows a correlation between anti-social behaviour and excessive alcohol consumption in different localities,
- That references violence related to alcohol or the night-time economy in general,
- That links high alcohol consumption to a particular area, and
- That demonstrates a negative impact on the physical, moral and psychological safety and welfare of children and vulnerable persons, to all be relevant to the promotion of the licensing objectives.

Any or all this evidence could provide grounds for Public Health in their role as a Responsible Authority to make a representation based on any of the licensing objectives.

## **16.10 Home Office – Immigration Compliance and Enforcement (ICE)**

Immigration Compliance and Enforcement (ICE) teams conduct intelligence-led operations in accordance with immigration legislation. As part of the licensing process, applications are reviewed to determine whether applicants are residing legally in the UK and are entitled to work in licensable activities.

Enforcement actions are carried out in collaboration with other Responsible Authorities, reflecting a commitment to cooperative working and ensuring compliance with legal requirements.

## **17 Licensing Processes**

The Licensing Authority's licensing functions will be carried out by the Licensing Committee, supported by a Licensing Sub Committee and by officers acting under delegated authority. Where there are no relevant representations made to applications, in the interests of efficiency and effectiveness, the processing of application will be carried out by officers

## **18. Review of a Premises Licence or Club Premises Certificate**

The Licensing Authority is keen to work in partnership to achieve the promotion of the licensing objectives and Responsible Authorities will attempt to give licensees early warning of any concerns identified at their premises.

Where problems persist, a Responsible Authority or Other Person can apply for the review of a licence or club premises certificate. Other persons includes any individual, body or business entitled to make representations. Advice on applying for the review of a premises licence can be found on the Home Office website at [www.gov.uk](http://www.gov.uk).

The Licensing Authority will administer the process and determine its outcome at a hearing where an evidential basis for the concerns and allegations made will need to be submitted.

The Act provides the Licensing Authority with a number of actions it can take when determining a review application:

- modify the licence conditions
- exclude a licensable activity
- remove the Designated Premises Supervisor
- suspend the licence for a period of up to 3 months
- revoke the licence

Any action taken by the Licensing Sub Committee will be an appropriate and proportionate response.

## **19. Non-Payment of Annual Fee**

Under the Police Reform and Social Responsibility Act 2011, the Licensing Authority must suspend premises licences and club premises certificates if the annual fee has not been paid. Whilst the licence is suspended, no licensable activities may take place at the premises, and the suspension will be lifted upon payment of the annual fee. Continuing to provide licensable activities whilst a licence is suspended is an offence and may leave the licence holder open to prosecution.

A letter will be sent to the licence holder reminding them that the annual fee is due, however it is always the responsibility of the licence holder to ensure that the annual fee is paid by the due date, regardless of whether a reminder has been received or not. If the due date has been reached, and payment has not

been made, a warning letter will then be sent to the licence holder to remind them that the annual fee is still outstanding and that the licence will be suspended seven days from the date of the letter. A letter will be sent to the licence holder and to the premises after seven days to say that the licence has been suspended until payment of the outstanding fee has been received.

If the Licence Holder believes there is an administrative error related to the annual fee, or the Licence Holder wishes to dispute the annual fee, the Licence Holder must contact the Licensing Authority on or before the due date of the annual fee. If the issue of the administrative error is not resolved during the following 21 day period, the licence will be suspended.

## **20. Enforcement**

The Licensing Authority recognises the interests of both citizens and businesses, and will work closely with partners to assist licence holders to comply with the law and the four licensing objectives. However, proportionate but firm action will be taken against those who commit serious offences or consistently break the law.

Telford & Wrekin Council has published a Public Protection Enforcement Policy which can be found on the website, [www.telford.gov.uk](http://www.telford.gov.uk) that is based around the principles of targeting, consistency, transparency and proportionality as set out in the Regulator's Compliance Code.

The approach to regulatory enforcement and inspection will be fair, proportionate and flexible enough to allow economic progress in the area. The Council will implement a compliance monitoring regime which will be based on the risk profile of the premises and intelligence received.

The Licensing Authority will continue to seek to work actively with the Responsible Authorities in enforcing Licensing legislation.

The Public Protection Officers will investigate allegations of unlicensed activities and to ensure compliance of licence conditions. It should be noted that, in some instances, the issues concerned may be better addressed by other legislation, or by a licence review. In these instances the matter will be referred to the appropriate service area or regulatory body.

### **Contact Details**

For information, advice and guidance relating to licensing and the application process please contact;

Licensing Service  
Telford & Wrekin Council,  
Telephone: 01952 381818  
Email: [licensing@telford.gov.uk](mailto:licensing@telford.gov.uk)  
Website: [www.telford.gov.uk](http://www.telford.gov.uk)



For providing assistance with completing your application form, Telford & Wrekin Council operates a “Check and Send” Service. Further information on this service is available at [www.telford.gov.uk](http://www.telford.gov.uk).

Further information on all matters relating to the Licensing Act 2003 is available on the Home Office website at [www.gov.uk](http://www.gov.uk).

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