

Appendix B

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,

[REDACTED]

[REDACTED] | Business Manager

Licensing Security & Vulnerability Initiative

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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?

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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,

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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 serving 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]

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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.

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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.

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- 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/>

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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

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- 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.

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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](#)

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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.

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- 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

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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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