

Emma Dudgeon

From: Nigel Connor <NConnor@jdwetherspoon.co.uk>
Sent: 13 October 2022 12:29
To: Stacey Walsham
Cc: Licensing; Barbara Morrice
Subject: New Premises Licence Application - 18-24 The Square, Kenilworth
Attachments: 1. Code of Conduct for Responsible Retailing - May 2022.pdf
Categories: Emma

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Dear Ms.Walsham

Thank you for our comments in respect of the above application and our apologies for the delay in engaging with you.

Dealing with your concerns in turn , I comment as follows:

There are flats above the adjoining premises on both sides, across the road and residences to the rear. With the information that is available on the Licence Application, we foresee potential nuisance to neighbours:-

In connection with the late night refreshment

- *noise of kitchen ventilation plant*
- *noise through the party wall to adjoining premises.*

Note that our kitchens close at 2300 and there will be no food preparation after that time.

The provision of late night refreshment after 2300 will solely be to allow hot drinks which are dispensed from front of house machines and not the kitchen.

I am reluctant to overstep into matters regarding the suitability of the premises themselves for the proposed use rather than their actual operation by Wetherspoon which are perhaps more properly reserved for planning. I understand that a revised application has been lodged which includes an acoustic report which addresses the plant ventilation point in appendix D.

In respect of the party wall issue, I am informed by the premises architects that we intend to provide Sounbloc acoustic plasterboard fixed back to proprietary resilient bars with 100mm acoustic insulation between metal studs fixed back to the affected party wall structure

In connection with of the sale of alcohol

- *noise arising from customers inside the premises, through the party wall to adjacent flats*

Please see above. We of course do not play music which will reduce the risk of sound transmission.

- *noise of customers drinking/smoking outside the premises at night*

We have proposed a condition which precludes use of any outside area between 2100 and 0700 which addresses this point to an extent.

The condition does not preclude smokers from using the street area for smoking but we will ensure that they are monitored and if causing disturbance asked to desist . We will provide signage asking customers to be considerate of neighbours whilst outside and whilst leaving the premises and would be happy to condition its requirement if you felt it necessary.

- *noise of customers entering and leaving the premises late at night.*

To an extent the proposed hours of operation which we believe are those based on the original planning application do limit the risk of late night noise but even within these times we acknowledge the need to ensure that customer disturbance of neighbours is reduced as far as possible.

We have agreed a number of condition with Warwickshire Police as to the effective management of customers on the premises which will encourage good behaviour off them and these are set out below.

1. All front of house staff to be trained in the prevention of underage sales. All such training to be updated as necessary for instance when legislation changes and should include training on how to deal with difficult customers to a level commensurate with their duties. Training completion records shall be retained for a period of 12 months and shall be available for inspection on request by an authorised officer of the Licensing Authority or an officer of the Police.

2. A Challenge 25 scheme shall be adopted and implemented which will require that any customer that appears under the age of 25 is requested to provide acceptable photographic proof of age establishing they are 18 or over before the sale of alcohol to them. Acceptable proof of age shall include identification bearing the customers photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include, but not be limited to, PASS approved proof of age card, photo-card driving licence and passport. Challenge 25 point of sale material shall be displayed within the premises. Refusals under the scheme shall be recorded and records maintained for a period of 12 months and made available to the Police or an authorised officer of the Licensing Authority on request.

3. An incident recording system must be maintained at the premises, records from which shall be persevered for 12 months and made immediately available on request to the Police or an authorised officer of the Licensing Authority , which must record the following: (a) all crimes reported to the venue (b) all ejections of patrons (c) any complaints received (d) any incidents of disorder (e) seizures of drugs or offensive weapons (f) any faults in the CCTV system or searching equipment or scanning equipment (g) any visit by a relevant authority or emergency service.

4. There shall be a lockable 'drugs box' at the premises to which no member of staff, except the DPS shall have access. All controlled drugs (or items suspected to be, or containing controlled drugs) found at the premises must be placed in this box as soon as practicable. Whenever this box is emptied, all its contents must be given to Warwickshire Police for appropriate disposal.

5. The premises to use door staff as appropriate and at necessary times on the basis of regular operational risk assessments and all door staff employed to be on duty no later than 21:00. The premises supervisor will continue to liaise with Police in respect of door staff requirements and take into account their views in the formulation of any risk assessment.

6. The premises licence holder shall ensure that CCTV is installed and maintained to the satisfaction of the Police and Licensing Authority. Images from the CCTV system shall be preserved for a minimum 31 day period . There shall

be sufficient members of trained staff available during the hours of operation of the premises to be able to download evidence at the request of the Police or an Authorised Officer of the Council.

7. In the event of a system malfunction, the Licence holder or a nominated person must as soon as practically possible notify the Licensing Authority and Warwickshire Police Licensing Department. Details of such malfunction must be recorded in the premises incident book.

We also tend to find that our premises are rarely if ever , anywhere peak occupancy at close of business. They are busier earlier in the evening around 1900 to 2130 for food and thereafter there is a gradual drift away of customers either home or to later opening venues which provide entertainment.

Provision of door staff will be by way of risk assessment but when on duty , they will assist in the dispersal of customers away from the premises.

I attach for your information , a copy of our Code of Conduct for Responsible Retailing which sets out how we promote the licensing objectives which you may find of interest.

I am on leave for the next two days but will be happy to discuss with you further on my return next week.

Yours sincerely

Nigel Connor
Legal Director and Company Secretary
JD Wetherspoon PLC
07818 232529

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J D Wetherspoon plc

CODE OF CONDUCT FOR RESPONSIBLE RETAILING
– ENGLAND, SCOTLAND AND WALES

Updated May 2022

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Overview

J D Wetherspoon ('Wetherspoon') began trading in 1979. Over time, we have developed a sophisticated range of practices and procedures aimed at providing a safe and convivial environment in which our customers can enjoy the wide range of facilities which we offer. The implemented procedures, the result of careful consideration by our experienced team of directors, managers and professional advisers, are subject to constant review and improvement.

Overall, our aim is to provide a distinctive kind of pub which attracts a broad customer range. We aim to retain the congenial atmosphere of the traditional pub and couple it with features found in modern cafés, restaurants and bars. We achieve this successfully through a combination of high-quality design, good management and the provision of an all-day menu and quality product range.

Wetherspoon was the first company to develop a code of conduct for responsible retailing. It sets out the operational procedures which we, as a company, have put in place to ensure that we are actively promoting the four licensing objectives in England and Wales:

1. prevention of crime and disorder
2. public safety
3. prevention of public nuisance
4. protection of children from harm

..and the five licensing objectives in Scotland:

1. preventing crime and disorder
2. securing public safety
3. preventing public nuisance
4. protecting and improving public health
5. protecting children from harm

At all times, we operate to ensure that our commercial imperatives do not override the core values set out in the code. To ensure that it reflects best practice, the code, developed in April 2004 and last updated in May 2022, is regularly reviewed as a result of our experience in dealing with local authorities, police forces and various other statutory bodies.

The code applies to England, Scotland and Wales and is divided into sections, one for each of the above licensing objectives, with specific practices and procedures identified under the relevant objective. There is, however, considerable overlap between our practices and the objectives, meaning that some of our procedures address more than one of the objectives simultaneously. For example, staff training procedures address all licensing objectives, while the CCTV policy meets both the crime prevention and public nuisance prevention objectives.

Our approach has always been to work closely with statutory authorities and local residents to ensure the licensing objectives' active promotion. We appreciate that the success of the licensing régime depends on the continuation of strong partnerships among the licensed trade, responsible authorities and local communities.

1 Prevention of crime and disorder

1.1 Food

- 1.1.1 The provision of good-quality food at reasonable prices is at the core of our business. A breakfast menu is available in our premises from opening until 11.30am, with the full menu until 11pm (where permitted), seven days a week.
- 1.1.2 Food has become an increasingly important element of our operation, in particular since the introduction of the smoking ban. Our experience is that a smoke-free pub provides a much more conducive atmosphere in which to eat, especially for families with children. Food and soft drinks account for over 45% of the total sales across all pubs. Taking account of bar purchases made in association with table meals, diners now account for approximately two-thirds of sales.
- 1.1.3 The majority of our pubs opens at 8am, with some even earlier to cater for customers who want to join us for breakfast. We pioneered the availability of breakfasts across all of our pubs. Weekly, we sell over 700,000 breakfast items and over one million hot drinks, including Lavazza coffee, tea and hot chocolate.
- 1.1.4 Curry Club® and Steak Club® are available in all pubs. These promotions are typical of our approach to responsible drinks retailing, where we link drinks promotions with the sale of affordable food. In addition, most of our main meals on the menu now include a drink. Customers are offered a drink included with their meal and can choose any drink within the selected range. Those choosing a non-alcoholic drink are charged a lower price.
- 1.1.5 We always use high-quality ingredients and increasingly offer regional dishes and UK-sourced products. For example, we use free-range eggs with the British Lion quality mark from the United Kingdom, cod and haddock from Marine Stewardship Council-approved fishing grounds, 100% British and Irish beef, 100% British and Irish pork sausages, 100% British chips, 100% Rainforest Alliance-certified coffee and tea and 100% Fairtrade sugar sticks.
- 1.1.6 Our award-winning children's menu is available in all pubs. Several of the children's meals use only organic ingredients. There are no preservatives, added sugar, artificial colours or flavours in any of children's menu's meals. All meals come with fresh fruit, as well as milk, orange juice drink or water as the drink options. We provide nutritional information about the meals offered on the children's menu to help parents to make informed choices about what their children are eating.

1.2 Responsible drinks retailing

- 1.2.1 Wetherspoon takes extremely seriously the issue of responsible drinks retailing. We understand that we are in the business of selling alcohol, yet strive to operate in such a way that we create a safe and welcoming atmosphere which encourages people to behave well and consume alcohol in a responsible fashion. We work closely with the statutory authorities to ensure that any local initiatives designed to achieve these goals are fully supported by our pubs. We look for new ways to ensure that the facilities and promotions offered in our pubs do not encourage the excessive consumption of alcohol, along with its associated health harms and antisocial behaviour.

- 1.2.2 The provision of food for a high percentage of our trading hours is a vital component of our approach to responsible drinks retailing. The consumption of food both before and during the consumption of alcohol is widely recognised to slow down alcohol's absorption into the blood stream. We encourage adults to drink in moderation and to enjoy alcoholic beverages in a sensible manner by monitoring drinks ordered and being served to customers.
- 1.2.3 We do not engage in irresponsible drinks promotions. We do not offer all-inclusive promotions, where customers can drink unlimited amounts for a set fee. Also, we do not offer promotions enticing customers with free alcoholic drinks, such as buy-one-get-one-free promotions. The majority of drinks promotions forms part of our food promotions.
- 1.2.4 We sell a wide range of soft drinks, fruit juices, tea and coffee. Where drinks from part of a promotion, we always offer a range of drinks including ones of different alcoholic strengths, soft drinks, tea and coffee. The mandatory condition requiring the provision of small measures is fully complied with. We ensure that low-alcohol and non-alcoholic beverages, reasonably priced, are prominently advertised on our 'table talker' menus and app.
- 1.2.5 We concentrate on the provision of cask-conditioned beers and sell more than any other pub company. There are 242 Wetherspoon pubs listed in CAMRA's publication The Good Beer Guide 2021 [2020: 248 pubs] - a larger proportion, we believe, than any other substantial pub company. Throughout the year, we run national and regional ale festivals showcasing local microbrewers, as well as larger provincial brewers. There are 867 pubs (99%) accredited by Cask Marque for the quality and consistency of the real ales which they serve. Real ale typically attracts a broader, often older, cross-section of customers. This broad customer base creates a pub atmosphere which we believe leads to better-behaved customers.
- 1.2.6 We are the only pub company in the United Kingdom to produce a comprehensive, bi-monthly customer magazine (Wetherspoon News). The print-run per issue is 500,000 copies, with an estimated readership of over 2 million (four readers per copy). Wetherspoon News is distributed nationally in all pubs, hotels, the company's head office and via the Wetherspoon app and website. It is provided free of charge to customers. The magazine is an invaluable method of communicating responsible retailing messages to our customers. We also devote a proportion of this publication to recognising and highlighting those staff who have worked hard to promote responsible retailing and sensible drinking messages in their pubs. In addition, we encourage charities such as the Drinkaware Trust and National Pubwatch to contribute articles and information.
- 1.2.7 We recognise the importance of informing customers about the alcoholic strength of products and unit measurements. All drinks menus and marketing information display the ABV content for all draught ales, lagers, spirits and bottled beers and ciders. Since October 2014, drinks menus also display the unit alcohol content per drink, making us the first major pub company to provide this information.
- 1.2.8 We adopt a socially responsible approach to marketing. We ensure that low-alcohol and/or non-alcoholic beverages are prominently advertised alongside alcoholic alternatives.

1.3 Price structure

- 1.3.1 Wetherspoon offers competitive prices across the full range of products and not just alcoholic drinks. This approach has always been an attractive part of our offer from the customer's point of view. In our view, customer behaviour is influenced primarily by strong management, highly trained staff and a robust approach to responsible drinks retailing, rather than by the pricing of alcoholic products. We do keep under review, however, the pricing structure of our alcoholic and non-alcoholic products - ensuring that we are encouraging sensible drinking... at all times.
- 1.3.2 Our approach to the sale of alcohol is to concentrate on the range and quality of the products on offer, rather than to use price as an incentive. Our approach has been both welcomed and supported by the police and other statutory authorities around the United Kingdom.
- 1.3.3 In Scotland, all promotions are in accordance with the mandatory conditions of the Licensing (Scotland) Act 2005.

1.4 Highly trained staff

- 1.4.1 The company has a very strong culture of thorough induction training and ongoing refresher training, including e-learning and other interactive methods. Training is provided for all employees, regardless of their role, age or hours of work. It is widely recognised that the level and quality of staff training are a significant factor in controlling customers' behaviour on licensed premises. Our employees are extensively trained on their obligations under licensing law, particularly the legal requirement not to serve drunks and the restrictions of the sale and consumption of alcohol to, and by, persons aged under 18 years.
- 1.4.2 Our training systems have been consistently praised by employees and by the industry, including the receipt of numerous awards.
- 1.4.3 Training of our management personnel is conducted on a modular basis, with continuing assessment throughout their employment period. Bar staff training is carried out primarily on site by management personnel, coupled with online training modules.
- 1.4.4 An essential element in having well-trained staff is our ability to retain our employees. Turnover of pub managers is less than half the industry average. Moreover, the majority of all management employees began with Wetherspoon as an hourly paid employee and, typically, anyone appointed to run one of our pubs for the first time is likely to have been employed by the company for at least five years.
- 1.4.5 The quality of our training, recruitment and employment practices has been recognised by Wetherspoon being awarded (in 2020) Top Employer in the United Kingdom - now for 17 consecutive years.

1.5 Management structure

- 1.5.1 The pub management structure is designed to encourage responsible customer behaviour. Each pub has, on average, eight managers, with most of these holding personal licence qualifications or working towards them. There is always at least one manager, usually at least two, on duty in every pub throughout trading hours; at peak times, there will be designated managers supervising the bar and 'walking the floor'.

- 1.5.2 Pub managers are supported by an area manager who reports, in turn, to a regional or general manager. The operations director maintains regular contact with management at all levels. This management structure ensures that any employees who have a question or require further support can ask for assistance immediately from their management team. Area managers look after an average of 12 pubs each - this is lower, on average, when compared with area managers in competitors' pub companies.

1.6 Preventing drunkenness and disorderly behaviour

- 1.6.1 Several steps have been taken to ensure that the facilities and promotions offered in pubs do not encourage the excessive consumption of alcohol. All employees are provided with thorough induction training and refresher training on the 'Don't Do Drunk' policy. This policy is designed to ensure that alcohol is not served to anyone who is, or appears to be, drunk or to anyone trying to purchase alcohol on their behalf. Employees are trained to assess continually the state of sobriety of any customer purchasing alcoholic drinks or consuming alcohol on the premises. As part of this training, employees are advised that, if they feel uncomfortable dealing with a situation, they must notify the pub manager and ask for assistance. Management teams are trained to support the decision of any employee not to serve a customer who appears to be drunk or disorderly.

We monitor the effectiveness of this training by reviewing the use of the 'Refusal' button on the EPOS till system (pressed whenever a customer is refused alcohol) and from feedback provided by enforcement authorities, customers and company representatives. Adherence to the 'Don't Do Drunk' policy is closely monitored through regular visits to pubs at any time during trading hours by area managers, head-office managers and independent 'mystery' visitors.

- 1.6.2 All employees are trained to notify the pub manager immediately if any customer becomes insulting, threatening or aggressive. If such disorderly behaviour does occur on our premises, the pub management team will take immediate action to diffuse the situation. If the individual refuses to leave the premises then, if necessary, the police will be called to assist in the ejection. Customers may also be barred to prevent further incidents occurring, in accordance with the company barring policy. A barring is recorded in the barring log/folder and stored securely in the locked office.
- 1.6.3 Details of disorderly/banned customers are circulated to other licensed venues via Pubwatch (or similar local partnership scheme). We will always support 'Banned from One - Banned from All', or similar initiatives, which seek to ensure a consistent approach by licensed premises in a town, or city, to refuse entry to anyone included on Pubwatch's 'banned list'.

1.7 Zero tolerance to drug use

- 1.7.1 Wetherspoon operates a zero-tolerance policy towards drug use and will take whatever measures are necessary to ensure this policy's active promotion. In particular, we co-operate with the police to ensure, if a risk has been identified, that appropriate action is taken and that, where discovered, illegal substances are confiscated, securely stored and handed to the police, in accordance with the police protocol.
- 1.7.2 Where a search policy is in place, customers are advised that this is a voluntary procedure and that they have the right to decline this condition of entry. If customers decline, and our door staff or employees remain concerned that they are in possession of illegal substances, the customers will be refused entry.

1.7.3 Employees are expected to be vigilant to prevent drug use from occurring, with training provided on how to deal with such issues, should they arise. Additional site-specific training, offered and arranged by the local police, will always be accommodated.

1.7.4 Toilet checks are completed by employees at least once an hour during trading hours - and more frequently during peak trading hours. These checks assess and rectify any cleanliness issues and also help to ensure that no illegal activities take place in these areas.

1.8 CCTV

1.8.1 CCTV has proven an active deterrent for antisocial behaviour and is provided throughout the premises. All pubs and hotels are fitted with digital equipment, with camera locations selected, whenever possible, in conjunction with the local police crime prevention officer. CCTV is also installed in the communal areas of some toilets and hotels, for the prevention of crime and disorder.

1.8.2 Pub management is trained in the use of the CCTV system, so that, immediately following an incident, a trained staff member is available to replay footage, download material and make available, on request, to the statutory authorities.

1.8.3 All CCTV footage will be retained for a period of at least 31 days and is compliant with the Data Protection Act 2018/GDPR.

1.8.4 Pub management and other supervisory staff (including door staff) wear body cameras ('body cams') and carry radios, while working in customer areas. A body camera is worn at all times and manually switched on by the staff member wearing it. Body cameras record audio and visual images and are connected to the pub's main CCTV system.

1.9 Door staff

1.9.1 Most of our premises operate successfully without the need for door supervisors. We risk assess continually the need to provide door supervision and are willing to follow any reasonable police recommendations to engage door supervisors, where deemed necessary.

1.9.2 Where door staff are engaged, they work in accordance with our policies and procedures, under the control of a head door supervisor, whose primary function is to ensure that the points of exit and entry and outside areas remain under supervision, while also monitoring the interior of the premises to maintain a safe and relaxing environment for customers and employees alike. Door staff are expected to:

- meet the same standards of service and behaviour as employees.
- give customers confidence in their ability, and in the company, to create a safe environment.
- behave in an appropriate manner in any situation in which customers are rude, aggressive, violent.
- know how, when deemed necessary, to use proportionate force in controlling a situation.
- be registered and in possession of a valid SIA badge.

1.10 Toughened glassware and polycarbonates

- 1.10.1 Wetherspoon is committed to working with the police and other authorities to improve industry standards for customer safety in licensed premises and, in particular, reduce the risk of glass-related injuries.
- 1.10.2 We aim to eradicate glass-related incidents through strong front- of-house management, staff training, effective door and customer management policies, regular glass collection, well-maintained premises and the use of toughened glass. Wherever possible, glassware used is toughened glass. This glass, if broken, tends to break into very small pieces, thereby reducing the possibility of being used as a weapon. Employees are trained to ensure, when customers leave our premises, that they do not take glassware or bottles with them. They are also tasked to ensure that empty drinking vessels are cleared away promptly to reduce the risk of breakages and theft. Most importantly, in most pubs, food is available from 8am, or even 7am, to 11pm. As a result, the pubs attract a broader range of age groups and types of clientele - a significant factor in reducing the potential for alcohol-related violence and antisocial behaviour, which can result in injury.
- 1.10.3 We will consider, on a premises-by-premises basis, whether polycarbonates should be introduced. When problems have been identified with a particular pub, or location, we accept that this approach may assist in addressing those problems. Similarly, there may be specific occasions when a temporary use of polycarbonates is appropriate, eg on match days in premises situated close to major sporting grounds. The use of polycarbonates is a very delicate balancing exercise between our desire to work with the authorities to reduce the risk of glass-related injury and the need to promote customer and staff safety, while, at the same time, accommodating and respecting customers' expectations.

1.11 Pubwatch and Best Bar None (BBN)

- 1.11.1 Wetherspoon is a member of the National Pubwatch organisation and a senior company representative on the National Pubwatch committee, the only national pub company to be such. We also support National Pubwatch financially via an annual contribution and one-off funding for particular projects, such as the annual awards ceremony to celebrate the success and contribution of National Pubwatch throughout the year in the community.
- 1.11.2 National Pubwatch is an entirely voluntary organisation, set up to support local pubwatch schemes and encourage the creation of new schemes. The organisation aims to achieve safe, secure and responsible social drinking environments in all licensed premises throughout the United Kingdom and to help to reduce alcohol-related crime.
- 1.11.3 Pub managers are expected to take an active role in their local pubwatch scheme. We will support the establishment of a local pubwatch, where one is not already in existence. Support can include providing expertise on how to set up a local pubwatch scheme and/or pubwatch online, offering our premises as venues in which pubwatch meetings can be held and chairing those meetings.
- 1.11.4 We support initiatives introduced by local pubwatch schemes to reduce crime and disorder in town centres. For example, many of our premises operate the 'Banned from One - Banned from All' initiative and subscribe to the Radio-Link scheme, providing radio contact with other licensed operators and with the town centre's CCTV operators.

- 1.11.5 We provide national support for the BBN award scheme. This UK-wide scheme, backed by the Home Office, was piloted in Manchester in 2003 and has since been adopted by over 100 other towns and cities. BBN aims to promote the responsible management and operation of alcohol-licensed premises, with the ultimate intention of offering and maintaining a safer, more welcoming, attractive and lively drinking experience. The scheme encourages local operators to act responsibly and take pride in their premises and surroundings and, in so doing, put something back into the town and their local community. Wetherspoon's pubs have won BBN numerous awards throughout the United Kingdom.
- 1.11.6 We also actively back other partnership-based initiatives to promote safe, vibrant and welcoming economies, such as Business Improvement Districts (BIDs) and Purple Flag schemes.

1.12 Drinkaware

- 1.12.1 Wetherspoon was a founding supporter of the Drinkaware Trust ('the Trust'). We support its strategic aim, namely, to change the United Kingdom's drinking culture in order to help to reduce alcohol misuse and alcohol-related harms, and communicate its sensible drinking messages within pubs and online. We also provide a significant annual subscription to fund the Trust.
- 1.12.2 We promote the Trust by including a reference to its website [www.drinkaware.co.uk] on alcohol-related point-of-sale and marketing materials. A link to its website, recognised as the leading public source of information on sensible drinking behaviour, is provided on the company's website. The link also features routinely in the header of the 'responsible drinking' section of Wetherspoon News. The Trust is offered free advertising in Wetherspoon News to support its campaigns.

1.13 Zero tolerance of harassment, sexual harassment and racial harassment

- 1.13.1 Wetherspoon operates a zero-tolerance approach to any form of harassment in the workplace, including from customers. Antisexual harassment awareness training is mandatory for all directors, senior management, head office staff, area managers and pub managers.
- 1.13.2 The following measures are implemented:
- customer 'zero tolerance' poster displayed front of house in all pubs and hotel receptions.
 - 'Ask Angela' and 'Safe Spaces' schemes are promoted in all pubs/hotels.
 - barring policy and barring log, used in all pubs/hotels.
 - antiharassment and antisexual harassment risk assessment is in place in all pubs.
 - vulnerability training is completed by all pub management.
 - child sexual exploitation (CSE) training is completed by all staff in hotels and in pubs adjoining hotels.

2 Public safety

2.1 High-quality design

- 2.1.1 Wetherspoon works closely with planning officers, listed building specialists and, where appropriate, English Heritage and Scottish Heritage to ensure that each new pub is designed and built to the highest specification. We aim to provide comfortable and efficient dining facilities and accessible customer areas suitable for all types of customer.
- 2.1.2 Customer areas are designed aesthetically, with surfaces carefully chosen to ensure safety. Most of our premises are spacious, allowing us to provide ample seating space which, in turn, prevents overcrowding and creates a safer and more welcoming atmosphere. All floor-coverings are assessed for suitability and are slip resistant, to minimise slips and trips. The sanitary accommodation comprises ceramic tiles and either quarry tile flooring or non-slip flooring, similar to that of the kitchen and behind the bar. Again, when choosing flooring, consideration is given to maximising slip resistance.
- 2.1.3 We operate the 'Ask for Angela' initiative in all of our pubs/hotels, whereby customers who feel unsafe, vulnerable or threatened can approach a staff member and ask to speak to Angela. Staff are trained to look after the individual(s) and assist, where possible. This may include calling a taxi, contacting friends/family, offering a safe place away from an individual(s) and/or calling the police. As a company, we continue to monitor incidents of this nature because of the importance of safety.

2.2 Fully accessible facilities

- 2.2.1 We aim to make all new developments as accessible to all as is possible, within the constraints of the building. Every pub and hotel has been risk assessed in accordance with the Equality Act 2010, with measures implemented as necessary.
- 2.2.1 Wetherspoon is highly respected by consumer and enforcement bodies interested in the provision of services and facilities for those with disabilities. Significant emphasis is placed on designing premises which will provide easy access to toilet facilities and also, where required, lifts for customers with disabilities.
- 2.2.2 All new buildings meet the requirements of Part M of the Building Regulations 2016.

2.3 Electrical and gas safety

- 2.3.1 All electrical systems are installed in accordance with Part P Building Regulations and are under the supervision of an electrical services consultant. The company follows good electrical practice guidance and ensures that all equipment is maintained in a safe condition, in accordance with the Electricity at Work Regulations 1989.
- 2.3.2 All gas appliances are installed by Gas Safe-registered engineers and maintained, thereafter, within a planned maintenance scheme.
- 2.3.3 Electrical safety procedures form part of our overall health and safety management system.

2.4 Health and safety

- 2.4.1 All pub management staff and associates are trained in health and safety to a level commensurate with their job responsibilities.
- 2.4.2 A safety policy statement is displayed on the staff notice board of every pub. Detailed procedures, in respect of safe working practices, are contained in the health and safety policy, available to all employees.
- 2.4.3 Regular audits, often unannounced, of all pubs are carried out by senior managers and the audit department.
- 2.4.4 An extensive accident- and incident-reporting and -monitoring system is in place, with all accidents and incidents reported to the audit department. Records of the types of accident are collated using computer software. Accidents are investigated, where necessary, with RIDDOR reporting undertaken.
- 2.4.5 The company has a wide range of standard operating procedures (SOPs), acting as a how-to guide for employees, to ensure that our policies and procedures are easily understood and implemented. Several written SOPs are also supported by video SOPs, demonstrating the practical task at hand. These can be searched for and viewed on the employee app or accessed directly by scanning a QR code adjacent to the relevant equipment.
- 2.4.6 We work closely with our primary authority partner (PAP), Reading Borough Council, across all relevant areas, to ensure that best practice is implemented and maintained.
- 2.4.7 We are the highest-scoring pub company in the Food Standards Agency-maintained food hygiene Scores on the Doors scheme. As of February 2022, 98.47% of our pubs had the maximum five-star rating, with the average rating across all pubs in England and Wales being 4.98. In Scotland, which operates a 'pass/fail' system, all 65 pubs have achieved a 'pass' rating.

2.5 Fire safety

- 2.5.1 All of Wetherspoon's premises in England and Wales comply with the terms of the Regulatory Reform (Fire Safety) Order 2005 and the Fire (Scotland) Act 2005 in Scotland. We engage independent consultants to conduct regular fire risk assessments, focusing on the safety of all relevant people in situations of fire. We identify and define the nature and extent of both the fire precautions which must be implemented to protect against fire and the inherent risks remaining, taking steps to remove or reduce those risks, where appropriate.
- 2.5.2 All employees are trained in basic fire safety, with regular refresher training undertaken. Daily, weekly and monthly logs of fire safety checks are kept, with all fire protection/precaution systems regularly maintained.

3 Prevention of public nuisance

3.1 Dispersal policy

3.1.1 A poorly managed pub can be a potential source of nuisance, antisocial behaviour and crime which may create concern for the immediate neighbourhood, its residents and the authorities. Wetherspoon places great importance on ensuring that our premises do not have a negative impact. We accept that our responsibilities do not end at our front door and that, by operating a well-managed pub throughout the time for which we trade, we can help to deliver a quieter, safer environment in the immediate vicinity of our premises.

3.1.2 We implement a dispersal policy through which we manage customers leaving the premises. The policy allows us to reduce any pressure on the authorities at the end of trading, ease customers' passage home and minimise the likelihood of local residents being disturbed. The vast majority of our pubs does not play music, so there is a natural and gradual dispersal throughout the evening. The key factors of the dispersal policy are:

- Where music is played, music levels are reduced towards the end of the evening to assist in the quiet and orderly dispersal of customers. Our experience is that customers tend to leave more quietly because, immediately before leaving the premises, they have not been having to raise their voice against a background of loud music.
- Wherever possible, lighting levels become 'brighter' at the end of trading hours to encourage the gradual dispersal of patrons during the last part of trading and the drinking-up period.
- On dispersal, staff encourage customers actively not to congregate outside the venue, directing customers to the nearest taxi ranks or other transportation away from the area and ensuring the removal of all bottles and glasses from departing customers.
- Managers will speak to any groups which congregate after closing time in the vicinity of the premises, asking them to move on.
- A minimum of 30 minutes' drinking-up time at the end of the evening is incorporated in the premises licence as an aid to the gradual dispersal of all customers from the premises.
- There is a strong management and staff presence in the customer area and at all exit points during the dispersal period.
- Signage is routinely placed at exits, asking customers to respect the rights of our neighbours to the quiet enjoyment of their homes.
- Where deemed appropriate, we can provide customers with site-specific information about getting home safely. Where customers require individual assistance in obtaining safe transport from our premises, we do whatever is reasonably possible to help, eg providing details of bus routes or contacting taxi/private hire operators on their behalf.

3.2 Liaison with neighbours

3.2.1 We attach the utmost importance to the careful investigation and prompt resolution of any complaint made in relation to the day-to-day running of any of our pubs, including the implementation of a 'good neighbour policy'. Some premises, both before opening (during development) and when trading, have residents living above/adjacent to them. We have always emphasised the importance of building close relationships with our neighbours, including residents and local businesses. Pub managers are expected, quickly and effectively, to resolve any complaints from the local community. If they cannot be resolved, these are referred for resolution to the area or general manager.

3.2.2 We are always willing to convene meetings with residents. These provide a useful forum for residents to raise any concerns which they may have about our operation and provide our local management teams with an opportunity to become a better neighbour. In areas where residents are nearby, a designated mobile phone number may be provided for them to contact the pub directly in the event of any issues.

3.3 Music and dancing

3.3.1 The vast majority of our premises does not have permission to provide regulated entertainment, operating without music of any kind, including background music. Where music is provided, in Lloyds bars, this is from high-quality sound systems, controlled by a central computer or selected DJs, to maintain control over the music's style/volume. Where deemed necessary, sound-limiters will be installed. The sound system allows music to be zoned in each premises, meaning that the music level can be varied in accordance with the use of each area. This ensures that particularly sensitive parts of the premises can be kept quieter. Music levels are reduced towards the end of the evening to assist in the quiet and orderly dispersal of customers.

3.3.2 Designated dance floors are generally provided where customer dancing is allowed. To ensure the safety of customers and employees, it is company policy that drinks are not permitted in these areas.

3.3.3 All premises are developed to ensure good sound attenuation.

3.4 Standards-monitoring visits (CQSMA)

3.4.1 Wetherspoon sets very high operational standards which are maintained through constant supervision and monitoring, using a system of visits to all premises to assess 'cleanliness, quality, service, maintenance and atmosphere' (CQSMA).

3.4.2 All senior head-office and operational employees, including directors, are required to undertake 15-60 'mystery visits' to Wetherspoon's pubs and hotels every month. They are required to assess the premises against numerous criteria, from the toilets' cleanliness to the staff's friendliness. In addition, on at least two occasions every month, every single premises is visited and assessed by an independent external company.

3.4.3 Every pub/hotel will receive at least five CQSMA visits each month, but many will receive more than this. Any pub assessed as being below standard, in any way, is highlighted and revisited. Monthly bonuses based on the CQSMA results achieved are paid to all employees in the pubs/hotels. Senior head-office and operational managers also work in pubs at certain periods throughout the year.

3.4.4 CQSMA-monitoring visits assist in maintaining high standards, yet also allow pubs experiencing operational difficulties to be identified, so that improvements can be made.

3.4.5 The CQMSA scheme is the cornerstone of our business with employees, at all levels, trained and incentivised to deliver the highest standards.

3.5 Pavement cafés and outside areas

3.5.1 Whatever the scope, size or location of pavement cafés and outside areas, we endeavour to create carefully managed areas which are both sympathetic to the premises and its surrounding environment and, more important, designed to have minimal impact on the public.

- 3.5.2 While each area is developed specifically for the environment which it occupies, we operate all of our outside areas in accordance with the following principles: provision of sufficient furniture to discourage vertical drinking; allocation of staff to ensure that areas are kept clean; empty glassware and bottles regularly removed; a clear pedestrian route (in the case of pavement cafés) always maintained for those walking past the premises.
- 3.5.3 Those outside areas used specifically by smokers are closely managed to prevent any noise or litter nuisance. Areas are equipped with adequate cigarette-disposal bins – these are checked regularly, with any smoking materials discarded on the ground removed. Outside areas are managed to ensure that customers' behaviour does not adversely affect our neighbours or the general public. Outside areas are the pub's equivalent of a shop window – so it is commercially important to us that they create a good impression of our premises.
- 3.5.4 Where possible, external areas are designed so that they can be accessed only from inside the pub, with multiple entry and exit points avoided.
- 3.5.5 We cannot legally prevent customers from smoking on the pavement in front of our premises; however, where alternative smoking areas are available, we will actively encourage their use, either by personal request from a staff member or via signage.

3.6 Preventing odour escaping

- 3.6.1 All premises have independently connected mechanical ventilation systems incorporating fans and ducting which terminate, where applicable, above the level of the eaves.
- 3.6.2 All kitchen extract ventilation passes through grease-eliminating baffles at a rate which reduces the risk of odour nuisance. Kitchen extracts are usually located away from neighbouring properties. Where deemed necessary and subject to site survey, odour-control equipment is installed.
- 3.6.3 As part of planned property maintenance works (PPMs), ventilation systems are regularly checked and cleaned by third-party contractors to prevent issues. This enables us to ensure that all parts are in good working order and that replacement parts ordered/fitted as necessary. Each pub/hotel will have regular PPMs assigned – these are monitored by our dedicated maintenance helpdesk. PPMs and call-outs are raised via Wisdom (our online property maintenance system).

3.7 Refuse collections and deliveries

- 3.7.1 Provision for refuse is made according to premises' limitations. Sometimes, external storage facilities are not available, so an internal store is created. Refuse collection is conducted at frequent intervals via either the local authority contract services or private refuse collection companies.
- 3.7.2 We are conscious of the noise which late-night glass/refuse disposal into external bins can cause; where there are residential properties nearby, to ensure no disturbance, we will voluntarily limit the times of day at which this can take place.
- 3.7.3 We control our distribution network, allowing us to minimise the number of separate deliveries to our premises and dictate the time of those deliveries to minimise any potential noise and/or traffic.
- 3.7.4 Delivery and waste contractors are advised about complying with any planning and/or licensing restrictions. Any issues are raised directly with them, via the pub or head office, to ensure compliance.

4 Protection of children from harm

4.1 Family-friendly environment

- 4.1.1 The limited amount of entertainment provided in most pubs, together with the product range available and an emphasis on drinks such as traditional ales, means that a broad range of age groups is attracted to our pubs. We encourage families to dine with us which, along with our award-winning children's menu, further increases the age and range of customers.
- 4.1.2 Unaccompanied young persons aged 16 and 17 years are welcome in most of our premises, where they may order and consume food and non-alcoholic drinks. We do not permit them to consume alcohol (including non- or low-alcoholic alternatives).
- 4.1.3 Children aged under 16 years are permitted in our premises only if accompanied by a responsible adult. If adults purchasing alcoholic drinks are visiting the pub with children and young people, we operate a 'house rule' which requires them to purchase a meal for each group member.

4.2 Age verification policy

- 4.2.1 In all of our premises, as a minimum, we implement the Challenge 21 age verification policy. Certain premises operate a Challenge 25 age verification policy, either as a premises licence condition or at the request of the authorities. Under this policy, all of our employees are trained to ask any customers who appear to be under the age of 21 years (or 25 years) to provide valid proof of age that they are 18 years or older. We apply this policy to the sale of alcohol and the use of gaming machines.
- 4.2.2 Employees are also trained to be vigilant in ensuring that customers buying drinks at the bar (and/or via the app) are not buying them for underage individuals. Customers ordering an alcoholic drink via the app are required to confirm that they are 18 years or older and advised that refunds will not be provided if, on request, they fail to provide valid ID. This safeguard acts as a deterrent to prevent underage drinking.
- 4.2.3 When employees begin working for Wetherspoon, they receive induction training on our relevant age verification policy - and then regular refresher training via online learning modules. All training records are monitored centrally at head office. Records are reviewed regularly by pub management teams and audit department members to ensure that training is being completed satisfactorily.
- 4.2.4 If any shortcomings are identified, employees are required to undergo further training, until the policy is understood satisfactorily and applied.
- 4.2.5 Age verification policies are promoted within the premises using signs at entrances and back-of-house posters. Every customer who is refused the sale of alcohol, the use of a gaming machine or asked to leave the premises is logged via the 'Refusal' or 'Refused Service' button on the EPOS till system. A separate log is also kept by door staff, if working at the pub.

- 4.2.6 Wetherspoon has adopted the Home Office guidance/industry standards and recognises only the following identification as valid forms of age verification:
- valid passport (any nationality)
 - valid photographic driving licence
 - any 'PASS'-accredited age identification card
 - UK Military ID
 - valid photographic European ID
 - Ireland Age Card (Republic of Ireland only)
 - NI Electoral Identity Card (Northern Ireland only)
- 4.2.7 The company has an exclusive arrangement with CitizenCard (the United Kingdom's leading proof-of-age and ID card), under which any customer who does not possess any proof-of-age has the opportunity to purchase a CitizenCard at half the normal retail price. Pubs also use the CitizenCard app to verify the ID provided.

4.3 Gambling

- 4.3.1 Wetherspoon upholds the principles of the Gambling Act 2005. Employees are trained to adopt a Challenge 21 (or Challenge 25) policy towards the use of licensed premises' gaming machines and to take proactive measures throughout trading hours to prevent children and young people from accessing these machines.

4.4 Compliance with age verification policies

- 4.4.1 We regularly monitor compliance with our age verification policies by engaging with a third-party company to send individuals (aged over 18 years) to visit pubs/hotels unannounced to attempt to purchase alcohol and/or play on the gaming machines. We select pubs at random every month to be visited. On average, 600 visits per year are completed. After the visits, these individuals report to head office to confirm whether their ID was checked. A report is circulated to the company to raise awareness of failed/passed visits, for action to be taken to prevent further failures/to praise passes.

J D Wetherspoon plc

Wetherspoon House, Central Park
Reeds Crescent, Watford, WD24 4QL

01923 477777
jdwetherspoon.com