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Our ref PW/EH/FAC001-3-4/4171

Your ref

18 December 2018

By Email Only

Dear Sirs

**Re: Factory 251, 118-120 Princess Street, Manchester, M1 7EN
Representations against Interim Steps - Section 53 B (6)**

Please take this letter as formal representations against the Interim Steps imposed against our clients premises licence by the Licensing Sub-Committee on 5 December 2018.

At that stage the premises licence holder had voluntarily closed their premises and did not challenge the Interim Steps suspension being sought by the police.

We understand that this application can be considered by a Licensing Sub-Committee on December 20th in the afternoon. It is our submission that there have been material changes in circumstances since our client did not challenge the Police application for the suspension of the premises licence on the 5th December.

Since that time there have been meetings with the police and licensing authority representatives.

We would ask the licensing authority to consider varying the Interim Steps by removing the suspension of the premises licence and imposing the following interim steps as being appropriate to promote the licensing objectives:-

1. That the premises remain closed until after the hearing of the review on the 28th December 2018.
2. That the conditions on the schedule attached to this representation be added to the premises licence.

We have also included a copy of the report prepared by Darrell Butterworth, a copy of the new Door Supervisors Policy and a copy of the job specification for the independent auditor/compliance manager.

We look forward to hearing from you with a time and venue for the hearing to take place.

Yours faithfully

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Schedule of conditions to be offered

1. Professional security will be removed from their contract at the premises.
2. None of the door staff working on the night of the incident will be employed by any new company providing door supervisors for the premises.
3. Any door company employed by the premises licence holder will be an ACS accredited company.
4. All door supervisors will wear high visibility professional attire/uniform ensuring that they are easily recognisable as door supervisors.
5. All SIA door supervisors will wear body worn cameras. These cameras will be used to record all ejections from the premises, and all incidents involving physical or verbal confrontation at the premises. The DPS will ensure that the body worn cameras are in good working order at all times. Footage of incidents recorded on body worn video will be downloaded and stored for a period of 28 days, and available for viewing and downloading to disk/USB device by police officers on request. Door supervisors will be given training on how to use body worn videos, and this training will be documented.
6. An independent compliance auditor will be employed by the premises licence holder who will audit compliance with the conditions on the premises licence and the provision of door supervisors.
7. A bespoke premises door supervisor policy written in conjunction with the independent compliance office auditor will be in operation at the premises. All door supervisors working at the premises will be trained on the door staff policy before they are allowed to work at the premises. Refresher training will be given in relation to this policy at regular intervals.
8. The compliance auditor will arrange for covert mystery shopper visits to take place at the premises to assess procedures and focus on the door supervision and management of the premises.
9. The premises licence holder will operate a nightnet or other communication link radio to other venues in the city centre. This will be the system recognised by the Greater Manchester Police and Licensing Authority. This communication link will be operational for every trading session at the premises. The communication link will be kept in working order at all times when licensable activities are taking place. If the night net radio system

is down/unusable for any or part of a trading session the police will be made aware immediately.

10. At all times the premises are open to the public after midnight a qualified first aider will be employed at the premises whose primary job will be to care for customers health and welfare. A log will be maintained at the premises to show the first aider on duty, and their start and finish times, and signature.
11. Door staff will be employed at the premises to a ratio of 1 door supervisor to 75 customers. A door supervisor deployment plan will be written and door staff will be deployed where risk assessed to ensure sufficient members of the SIA door team are placed at areas within the premises requiring additional supervision. The premises licence holder will deploy at least 1 door supervisor per 100 people in the queue.
12. At least one metal detection wand will be used at the entrance of the premises on every trading night.
13. The smoking terrace will be supervised by at least 1 SIA door supervisor at all times and will not have more than 100 people contained in it. Door supervisors and staff will maintain order in the smoking terrace and ensure that people do not stay in the smoking terrace after they have finished smoking.
14. All staff at the premises will receive appropriate training in relevant legislation for their employment (including the licence conditions) and managing patrons behaviour. Training will be documented and training records will be kept on the licensed premises and made available for inspection by Police and responsible authorities.
15. Door supervisors and senior members of management will receive training on the policy in relation to management of queues at the premises which will include:
 - Identifying the areas where queueing will be permitted to take place
 - Where the barriers are to be used
 - At any times and capacity restrictions to be enforced
16. A staff member will be responsible for using a click accounting device, or similar device, to ensure that the maximum capacity of the venue and maximum capacity of each floor and smoking area is not exceeded. The maximum capacity for the premises includes staff members.
17. The premises will have at least 2 management level members of staff at the premises for each trading session. These 2 management level members of staff will be personal

licence holders. One of these members of staff will be positioned at the entrance of the venue whilst customers are queuing and entering the premises.

18. All crimes and incidents involving physical harm will immediately be reported to the police.

Report following the incident at Factory Manchester

This report has been compiled following a serious incident at Factory, 118 Princess Street, Manchester, M1 7EN.

Qualifications and Experience

I am an independent licensing consultant and a former Police Inspector, having completed 30 years' service with the Greater Manchester Police in a variety of uniform and non-uniformed roles.

The longest period of attachment to a department was between 1998 and 2006 when I performed the role of Force Licensing Inspector. This role involved the supervision of 12 divisional licensing officers, tasking and management of a covert licensing unit comprising a sergeant and six constables, developing force policy and enforcement in relation to all licensed units and employment and briefing of a licensing solicitor to act on behalf of the force in more complex licensing hearings.

During the period as the Force Licensing Inspector I was responsible for the good conduct of outlets involved in selling alcohol but also those that provided gambling, betting and bingo facilities. I have represented Greater Manchester Police at Magistrates Court hearings, Crown Court Appeals, The High Court and Council Licensing Committee hearings to oppose unsuitable applications and to take enforcement action against those premises whose standards had fallen below an acceptable level. I was responsible for the Force's response to support the Government led Alcohol Misuse Enforcement Campaigns (AMEC) which was highly acclaimed for reducing alcohol related crime and disorder.

Throughout my period in the central licensing role Assistant Chief Constable Robert Taylor, also from the Greater Manchester Police, was the Association of Chief Police Officers (ACPO) lead spokesman on Alcohol and Licensing matters. As a result of this connection I became secretariat to the ACPO National Licensing officers group and National Licensing Forum (NLF). The latter group was made up of trade organisations including the British Beer and Pub Association, Retail Trade Consortium, Business in Sport and Leisure, Magistrates Association, Justices Clerks Society, Local Government Association, Home Office, and Department for Culture, Media and Sport. During the period above, these groups scrutinised and made recommendations for amendments to the proposed Green and White papers, which were subsequently presented to the House of Commons as the Licensing Act 2003.

In 2006 on leaving the Central Licensing Unit I received a Chief Officer's Commendation, recognising the contribution I had made to licensing enforcement across Greater Manchester, particularly in relation to my leadership and commitment shown in developing force policy and training in response to the Licensing Act 2003

Between 2006 and my retirement from the Greater Manchester Police in December 2010 I took up the role of Neighbourhood Inspector for the town of Heywood on the Rochdale division. I continued to work with the licensed trade in that area to improve safety in and around licensed premises and reduce crime and disorder. I was chairperson of the Heywood Pub Watch and closed a number of premises in the town that failed in their licensing objectives using my powers under the Licensing Act 2003 and subsequent amendments.

In recent years I have continued my professional development in regard to licensing knowledge by taking and passing the National Licensees Certificate and National Door Supervisors course. This enabled me both to successfully apply for a Personal Licence and to become approved by the Security Industry Authority (SIA) as a front line operative. In September 2011 I successfully applied to become a nominated tutor with the British Institute of Inn keeping enabling me to carry out training in the award for responsible alcohol retailing and the award for personal licence holders which are National Vocational Qualifications. In October 2018 I attended a Licensing Seminar to update solicitors and practitioners on licensing changes.

Since January 2011 I have worked in a consultancy role with licensed premises in Bedford, Birmingham, Blackpool, Brighton, Canterbury, Cardiff, Chester, Derby, Guildford, Harrogate, Lancaster, Leeds, London, Manchester, Mildenhall, Newcastle, Nottingham, Preston, Sheffield, Stratford, Watford and York, producing strategies aimed at reducing crime and disorder in and around venues. In addition to conducting investigations on behalf of operators I have also been engaged by Camden LBC and residents in Cardiff, Chester, Newcastle and York to conduct observations and reports on licensed venues. I would estimate that since January 2011 I have visited in excess of 550 premises licensed under the Licensing Act 2003. In all of these cases I believe that I have been able to make a positive impact on the licensing objectives.

I am experienced in the production of independent written reports and giving evidence before Licensing Sub-Committees and Magistrates' Courts. It is important to stress that in carrying out this work, I act independently, record what I see and express my own opinions. Due to concerns expressed by a number of Licensing Committees and Magistrates Courts that premises modify their behaviour in anticipation of a compliance visit I always endeavour to conduct my observations without the local operators being made aware of my impending visit.

The report does not seek to minimise or detract from the seriousness of the incident or make judgement on the actions of members off staff and sub contracted door staff. The incident is being rightfully investigated by the Police and other statutory agencies and the outcome of their enquiries will formulate a large part of any response to ensure that no such incident occurs at this venue in the future.

Pending those outcomes this report must be viewed as an interim measure to ensure that the venue is able to reopen in a safe and lawful manner.

As well as this report I have drafted the following Policies which will ensure that such an incident does not occur in the future. By training staff on these policies, implementing the actions and ensuring that they are complied with at all times, there will also be a reduction in other less serious crimes and incidents occurring at the venue.

Security Policy
Customer Service Policy
Monitoring of external contractors policy
Nitenet radio policy

Recommendation

It is recommended that there is a closer scrutiny of sub-contracted employees working on behalf of the company.

Action

The security company providing door staff at the venue will be changed. Only a company satisfying the Security Industry Authorities approved contractor status (ACS) or approved by the G.M.P will be engaged to supply third party door staff. None of the personnel employed at the time of the incident will be employed at the venue. I understand that their SIA licences have been suspended in any event.

Action

A new corporate uniform will be worn by all new door staff with an image that they are meet and greet door hosts and not "bouncers". This refreshed image will be a visible sign to customers that the venue's security and policies have been amended and improved.

Action

A new role has been created of Licensing and Security Manager. The individual fulfilling this role will be notified to Greater Manchester Police. Any change to the person engaged in this role will also be notified to Greater Manchester Police.

Action

New policies have been created for the engagement of external security personnel and how they will be monitored. Training will be given to all staff (including sub-contracted door hosts) on the new policies. Staff training will be repeated to all new employees and repeated on a 6 monthly basis. Overt and covert compliance visits, covering Licensing and company policies will be conducted on a monthly basis. Mystery shopper exercises will be conducted to support these compliance checks.

Action

A member of the management team (DPS, GM, AGM) or other person identified and agreed with Greater Manchester Police will be deployed outside the venue during peak trading periods in order to assist with customer service issues. The name, their role and contact details will be clearly displayed outside the venue to enable customers to be aware of who is in charge and responsible for customer service related issues.

Action

To protect our staff and customers body worn cameras will be issued to front of house security staff. These have been shown to reduce aggression shown by customers towards staff and may provide staff with evidence to support the use of force by staff on the rare occasions when it has been necessary to use it. Body worn cameras have also been shown to reduce the numbers of complaints made against staff where they have been deployed.

Recommendations

The Nitenet radio was not being used on the evening when the incident occurred, although enquiries at CityCo reveal that the radio is used on a regular basis. The Nitenet radio is a useful tool to any late night venue and should be available for use on all occasions.

Action

A condition will be given that the Nitenet radio will be utilised on all occasions that the venue is open to the public. Any failure detected in the radio will be reported to CityCo at the beginning of any trading period when it cannot be used. Venue staff will conduct a radio check with the control

room at the commencement of any trading period and inform the control room at the conclusion of the nights trade. Any noteworthy incident will be reported over the Nitenet radio.

Recommendations

No report was made to Greater Manchester Police at the time of the incident.

Action

Any incident during which physical force is used on a person will be recorded in the incident book at the premises and reported to Greater Manchester Police as soon as practicable. Any other incident worthy of note will be recorded in the incident book at the venue. The reporting of incidents of note not involving physical force and any other matters will be reported to Greater Manchester Police at the discretion of the Licensing and Security Compliance manager.

The above recommendations and courses of action have been made based on the information to hand at the time of writing. They are made to address the immediate concerns and issues that the author of this report and the company are aware of at the time of writing. Following the conclusion of the Police investigation and the disclosure of other incidents alleged to have occurred at, or near to the premises, other recommendations and actions may be required in order to fully address the situation at the venue.

Darrell Butterworth
Licensing and Security Compliance Manager

Factory

Door Supervisor Policy

Author	Darrell Butterworth Security Manager
Date of Origin	December 2018
Last Updated	N/A
Next review date	December 2019
Relevant Audience	Site Managers, Door Supervisors

Introduction

This manual contains the company's Security Policies and documents. It should be read and adhered to by all members of Management and Door Supervisors. The Policies will be strictly enforced by the company and it is the General Managers responsibility to ensure that these procedures are followed.

The employment of door staff at Factory is an essential and important part of the operation of the premises. Door staff are normally the first and the last person that a customer sees when visiting Factory and consequently their impression can be long lasting in the customers mind. So the standards of their appearance and behaviour are important. As security officers our door staff will be seen by members of the public as the professional, regardless of their experience, knowledge or skill.

A considerable amount of legislation now effects the employment of Door Supervisors. The principle Acts of Parliament are as follows:

The Fire Precautions Act 1971

The Health & Safety At Work Act 1974

The Crime and Disorder Act 1998

The Private Security Industry Act 2001

The Criminal Justice and Police Act 2002

The Licensing Act 2003

As well as all this legislation, there are now various codes of practice and training handbooks, all of which lay down various standards. Consequently it is now essential for a modern bar operator to lay down clear procedures and requirements for the employment of door staff, which are outlined in the rest of this document. This document will be reviewed on a regular basis in order to keep up to date with these legislative and Policy changes.

Door Staff Duties

Door Supervisors working at Factory will be employed either in house, directly via the company, or via a third party door company. Regardless of which type of supplier, all staff act on behalf of Factory and will work under the supervision and direction of the General Manager whose decisions on appropriate action will be adhered to.

All door staff working at Factory will adhere to the agreed dress code whilst on duty.

All Door Supervisors working at Factory must hold a currently valid Door Supervisors SIA Licence issued by the Security Industry Authority. It is the Managers responsibility to check licence badges are current and not out of date. In the event that a door supervisor does not have his badge or the badge is out of date, then that person is not allowed to start work. It is a condition of Security Industry legislation that the SIA Licence must be worn outside of the jacket or coat and must be clearly visible.

All door supervisors working at the premises are required to sign on duty before starting work and sign off duty at the end of their shift. This will include their name, Security Industry Authority number, time started, time finished (including breaks if taken) and their signature. A book is provided by the company for this purpose.

Induction Process

Before being allowed to start work for the first time at Factory, new door staff will carry out a basic induction programme with the Licensing Compliance Manager or head Door Supervisor. As part of this induction they will need to bring proof of their identification (passport or driving licence) and their SIA Door Supervisors licence. A colour photocopy of the SIA licence will be taken at this time and this will be attached to the operatives personal file.. They will also need to submit their personal details including home address and contact telephone numbers. This confidential information will be held by the Manager and retained

by the company for six months after the last date that the individual worked at the premises. The reading of this door policy document forms a part of the induction process.

General requirements:-

You are working on behalf of Factory and will adhere to direction and instruction of the Designated Premises Supervisor or General Manager.

Always wear clothes that comply with the agreed dress code, are smart and clean.

Always wear clean shoes.

Make sure that you are cleanly shaven.

You may not smoke, eat, drink, or chew while on duty unless on a break. Never consume alcohol while on duty or before commencing work.

You must not wear any jewellery other than a wedding band.

Always be polite to customers and greet them on entry.

Do not use your mobile telephone for personal calls while on duty.

Never discriminate or be offensive in any way.

Ensure that any complaint is referred to the Manager.

Say Goodnight to customers leaving the premises and encourage them to depart quietly, keeping disturbance to a minimum.

Make use of clickers to ensure that the premises are not overcrowded.

Admissions Policy

It is the policy of Factory to admit customers, guests, visitors and any member of the public irrespective of their colour, race, religion, sex or disability provided that:

- 1) They are not considered to be underage
- 2) They meet the dress standards
- 3) They meet any local licensing requirements
- 4) They abide by the house rules

- 5) They don't refuse to be searched, where appropriate
- 6) They are not under the influence of drugs or alcohol
- 7) They have not previously been excluded
- 8) They are not subject to an exclusion order issued by HM Courts
- 9) Their behaviour at the time of admission is not likely to cause a disturbance, create disorder or be offensive to any customer or employee

When denying a customer entry, Door Staff should ensure that they do so in a polite but clear manner. Door staff should not engage in arguments with customers. If it becomes necessary to speak to a person about their behaviour, then diplomacy and tact are the key words. Under no circumstances may door staff take the initiative to use force or offer violence. Where refusing entry, explain courteously the reason for refusal.

For example:

"I am sorry Sir you do not meet our age policy".

"We are at capacity at the moment, you are more than welcome to queue".

"Sorry the time of last entry was at 0200 am".

Whenever appropriate, Door Supervisors should ensure that the customer recognises that refusal is just for that particular night, the reasons for the refusal and that they are welcome on another occasion subject to the usual Door Policy.

Even customers who are turned away on the basis of age should be treated with respect and advised of an appropriate age when they will be able to frequent the establishment.

In order to promote good business, there are instances where discretion on entry is required. These instances will normally centre on the dress code and the time of entry.

For example:

A 30 plus year old man and 25 years old female companion turn up at 11.00pm. The man is wearing trainers; however he looks fashionable rather than scruffy. The venue is not at capacity. Entry should be allowed to these people.

Age Checks

The venue complies with the Challenge 25 Policy, which determines that if a person appears to be under 25 then I.D. should be requested and checked. The only acceptable form of I.D. is a Passport or Photographic Driving Licence.

Drugs Policy

Factory operates a policy of zero tolerance with regards to drugs. The Management, Door Supervisors and Bar staff are instructed to be vigilant in this area and provide each other with support to maintain this initiative.

Admission must be refused to anyone suspected of dealing in illegal drugs on the premises. Toilet attendants are employed by the company to discourage the selling or misuse of drugs in the toilet areas.

Door Supervisors will have received training on how to deal with drug related situations through their National Door Supervisors Course. Whilst working at Factory any suspected drugs found will be handed to the duty manager, put in a sealed envelope and placed in the safe until it can be collected by the Police. The premises will comply with any advice from the Police in regards to detaining of persons suspected of drug dealing.

All drug related incidents must be reported by way of an incident Report.

Searches

It is not normal company policy to carry out searches. However at the Managers discretion Door Supervisors may be instructed to adopt a search policy. For example, as a result of staff observations or information received from a statutory authority

Where a search is required the following guidelines must be observed:

- Consent must be asked for before a search can be carried out
- If a search is carried out without consent then it may be viewed as assault.
- Refusal to consent to a search is a justifiable reason to refuse admission or request a customer to leave.
- Searches must be restricted to non-intimate areas only.

- If a male Door Supervisor must search a woman, then the search must be restricted to bags and outside pockets.
- Door Supervisors are not allowed to put their hands in a handbag or empty it themselves; this must be done by the person who owns the bag.

Seizures

In the event of items being seized an incident form must be filled in detailing a description of items seized and where found. Also included should be details of any action taken (person detained, police called, etc) and the signature of the person who seized the items.

Weapons

An offensive weapon is legally defined as “anything which has been made, adapted or is intended to cause injury”. Door Supervisors are trained through the Door Supervisors National Course to be vigilant for weapons and the ways of dealing with them if the situation arises.

An example of how to deal with offensive weapons is to: Seize the weapon; refuse entry to the person; fill in Incident Log. If a person refuses to hand over an offensive weapon, a Door Supervisor's first priority is to ensure that the person is not allowed on the premises. Once outside, Door Supervisors should avoid engaging with person and call for police assistance if necessary. Immediately the person has left the police should be notified of the event in case the person attempts re-entry or visits another licensed premises.

Communications

The company have purchased a number of radios for use by door supervisors at the venue to assist with their duties and responsibilities. Should the number of staff exceed the number of radios available the Head Door Supervisor will decide which members of staff will have possession of the radios. Staff should only use the radio for the purpose that they have been issued. Should staff need to use the radio system the following codes will be used to prevent unnecessary concern amongst nearby customers.

Code 1- General incident. Non violent

Code 2- Incident that has the potential to escalate

Code 3- Incident that has degenerated in to violence and more support is required.

Nitenet

The company also contribute to the Nitenet radio system. At the start of the days trading period the head doorman will check that the Nitenet radio is working by conducting a test call with the radio control room. During the trading period Any incident of note should be brought to the attention of the radio control room and any incidents involving the use of force should also be reported to the Police. At the end of the trading period the control room should be notified that the premises is closing and the radio put on charge. If for any reason the Nitenet radio is defective then City Co will be informed as to the issue and reason why it cannot be used.

Incident Reports

All Serious Incidents and reports must be reported to the Security Manager immediately and all other incidents must be reported to the Security Manager within 24 hours. It is essential that the personal details of all parties involved are included on the report as well as details of any visiting Authority, such as Police, Fire, EHO, Trading Standards and SIA Inspectors. Always note their name, number and incident reference number on the report as this will assist in following up the incident at a later date. To assist staff, report forms are provided at the venue for the recording of incidents. Report forms should be completed as soon as is reasonably practicable after an incident has been dealt with.

The site manager must be informed of all visits by any statutory authority (police, fire, ambulance, Licensing Authority and Security Industry Authority) so that they are aware of all reports and allegations being made in respect of the venue or staff and complete the required records.

All employees need to be mindful that any incident or accident may result in a criminal, Licensing or civil investigation. In order to ensure that our actions are not misrepresented months or years after the event has passed we need to ensure staff secure as much information at the time as is reasonable under the circumstances. The complexity of that information will depend on the seriousness of the incident or extent of the injury. In cases involving a minor injury, small cut, trip or fall, the full details of the person, a photograph of the injury and details of witnesses should be the minimum information recorded. If the person says they are okay or decline first aid then this should also be recorded. In more serious incidents and all incidents involving the attendance of the emergency services the details of the person, witness statements and CCTV evidence should be the minimum information recorded. If staff are uncertain as to the extent of the incident/ injury then they should secure all available supporting evidence until the seriousness can be assessed.

CCTV

Extensive CCTV has been installed by the company throughout the venue to promote public safety and reduce crime and disorder. Only the General Manager, Assistant Manager or Security Manager should access the CCTV recording equipment. It is the General Managers responsibility to ensure that all systems are operating correctly when the venue is open for business.

Body worn Cameras

In order to protect its staff and customers the company will utilise body worn cameras at the front entrance to the venue. These will support security staff by recording the actions of unruly customers and support the security officer in the rare scenario when force is needed to eject an individual.

Exclusions and ejections

Factory is a responsible retailer and will not tolerate drunkenness on its premises. The Manchester Licensing Policy emphasises that all premises must take a positive stance in promoting the Licensing Objectives. It is a breach of our Licence to allow persons who have consumed excessive amounts of alcohol or suspected to have taken illegal substances to remain on the premises. Any person who shows signs of intoxication will be refused service of further alcohol and encouraged to have non alcoholic beverages. People who show signs of being drunk or under the influence of other substances will be requested to leave. Door Supervisors receive training on their National Door Supervisors Course on appropriate methods of escorting customers from premises. It is a Policy of Factory that two members of the security team will escort any person who it is assessed needs escorting from the premises. Under no circumstances should Door Supervisors use more force than is necessary or appropriate in the circumstances. This will require a judgement call by the members of the security staff present but will include an assessment of the individual, their size and potential strength, the reaction of the customer, their compliance with your verbal request, verbal and non verbal responses. The amount of force necessary will be dependent on many factors but you may have to account for your actions in court at a later date. Ejections should normally be conducted via the main entrance. However, on particularly busy evenings, it may be more effective to remove someone involved in an incident out via the fire exit.

Conflict Management & Physical Intervention Policy

Introduction

This part of the Policy document outlines the company's position and expectations in relation to managing situations that are, or could lead to heightened levels of conflict and the need to use increased levels of force. It is based on the Association of Chief Police Officers Conflict Management resolution model. Its aim is to ensure that all door supervisors and premises managers are aware of the company's position towards the use of physical force without compromising the lawful right of the operative to use a level of restraint that is proportionate, reasonable and necessary. By complying with the Policy employees will be able to assist the company in reducing complaints of violence and liability in the event of a civil claim and personal stress on the individual subject of an investigation.

Verbal Communication

In the first instance the company expects all operatives to attempt to resolve escalating situations with verbal communication using the 5 step approach to secure voluntary compliance from a resistant subject.

Step 1. Simple Appeal. Would you please stop doing that.

Step 2. Reasoned Appeal. Point out what they are doing and why it is wrong.

Step 3. Ethical or Personal Appeal. Tell them what the outcome of their actions might be.

Step 4. Final Appeal. Give them a last chance to comply with your request.

Step 5. Take action. Eject the person; call the police...

Lawful use of force

Lawful use of force is allowed under the following legislation.

- Section 3 Criminal Law Act 1967
- Common Law
- Breach of the peace

This legislation allows the use of force and restraint in order to:

- Prevent injury to self/other
- Prevent injury to themselves (offender/subject)
- Prevent loss/damage to property
- Making off before a constable can assume responsibility