



City of Westminster

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Please ask for Francis Keegan

Our ref: 9253574

Your ref:

Date: 6 April 2019

Dear Mr Spiegler

Freedom of Information Act 2000

Thank you for your recent Freedom of Information request. You asked to be provided with the following information:

Please provide details of any recommendations relating to CCTV systems or warnings relating to breaches of licences given by the licensing authority to the operator of the above premises between November 2015 and December 2016.

Thank you for your email of 3 April and I apologise for the delay in my response I have carefully checked the records in line with your Freedom of Information (FOI) request and I can advise you as follows:

16/37688/ELREAC (Dec 2016)

WCC received a complaint regarding this venue and its application to renew their SEV licence.

James Hayes and G Franks visited and met with DPS and Duty Manager, we then viewed the images as supplied of events on the 6th and 7th of October covering VIP rooms 9 and 10. All parties agreed that some contact seen was inappropriate and contravened the club rules; the dancer identified as XXXX had already been suspended until further notice.

There was a general agreement and understanding of what is and is not acceptable under the conditions of the SEV licence. The club have installed additional cameras in the private dance areas and these cameras are monitored full time.

In all the circumstances we accept that the club has breached the conditions on the SEV licence as well as their own code of conduct; they have dealt internally with their staff and we as the enforcing authority are satisfied with the measures in place to prevent or minimise the risk in the future.

This is a matter of record and might well be referred to again, but for the moment is now deemed to be complete.

We met at the club with the owner, DPS, legal advisor. we were provided some evidence that contradicts in partial form the statements supplied. There was general discussion about the " new matters" but we were unable to view the images on the clubs IT equipment.

Matter ongoing.

I had a meeting with Steve Rowe (WCC) and David Sycamore (WCC), due to the circumstances they had attended the club to discuss elements of the complaint and the application to renew. They gave me the situation so far and a memory stick of a private dance area, this had revealed evidence of inappropriate contact between dancer and customer and was completely separate to the statements provided as basis of the complaint. James Hayes and GF will resume the investigation and enforcement of this separate matter.

16/11709/ELSEV (April 2016)

GF...Routine inspection in company with JH; with Duty Manager XXX, then joined by XXXXXXX. Walk through all areas of club, particular attention to private dance areas. Noticed two SIA door staff patrolling these areas, no dances taking place at time. Then into office to examine the images from new cameras placed in private dance areas; an issue with one server means some aspects of replay are limited, I saw evidence that this matter had been reported by the club on the day of installation, followed up on the 19th and again on the 27th. We viewed the breaches folder since March 2016. Noted some verbal reprimands plus fines in accordance with the code of conduct.

There was also an investigation report from February, regarding XXXXXX and the allegation of inappropriate touching. Manager dealt with the matter by way of verbal warning; the reasoning seemed sound and we had no cause for comment.

We then examined the siting of the new cameras; which showed that the significant majority of areas were now covered.

We then left the club at about 03.30.

Response from DPS see notepad

16/01043/ELREAC (Jan 2016)

Video and images sent to WCC which appear to show inappropriate behaviour by customer/dancer.

Meeting at venue with duty manager XXXXX and director XXXXXXXXX. Footage seen of the incident of 12/12/15 at 03:46 hours. Incident unfolds over 15 minutes.

Coverage of CCTV includes corridor but not inside booth itself. This is being addressed by the venue with extra CCTV. Dancer seen taking couple into booth. There is a male standing around who was not confronted. There is also an occasion where another couple are in the corridor and try and obstruct a view to the booth being used. There is not any complicity with the door supervisors, and the level of supervision is satisfactory, but the quality is not and showed a level of complacency. The venue has redrawn their security policy and retrained all door supervisors and waiting staff and got them to sign off on the higher level of expectations. The head door supervisor has also been suspended and a decision will be made in due course on his future role. CCTV is also being increased.

The dancer was questioned regarding the incident. She remembered the couple as very pushy, in particular the female. She accepted that she had breached the code of conduct. She stated it was a one off and the venue had no dispute. There did not appear any additional offer from the dancer, and it is felt the customer has instigated all the activity for the purposed of recording it. The dancers contract to work at the venue has been terminated.

The new security policy and staff method statement has been emailed by XXXXXX (attached to IDOX). The venue appears to have investigated the incident and taken appropriate corrective action. It did not appear the incident was reflective of typical operation at the venue, but it did highlight some failings, which have been addressed. No further action required at this stage. Another visit will take place to assess the new CCTV at a later stage

Wednesday the 6th of January 2016 at 3pm, James Hayes and Glyn Franks from WCC met with XXXXX and XXXX from Platinum Lace. All parties viewed the video images; the club accepted that the images were from their club and that they knew the true details of the dancer identified as Mindy. These details were given to WCC. The images show that the touching taking place was instigated by the customer on a number of separate occasions; on the edited version that we have been supplied; it does not show any attempt by the dancer to prevent the contact continuing; nor was there any intervention on the part of the SIA staff patrolling, or any of the managers on duty.

The club will make an investigation as to the time and circumstances, make a decision as to the correct action to take regarding their staff and the dancer; and will inform the WCC and provide any images relevant.

There is evidence to suggest that the club rules were broken and that there is a breach of the conditions on the SEV licence. There is not sufficient evidence to make a prosecution viable or appropriate.

A copy of the video evidence was handed to manager "XXXX" on the 7th of January at 3pm.

This matter is ongoing.

21.01.16 Email response regarding incident received from XXXXX. Internal investigation now complete and actions taken. Key points:

1. Additional documented training for all security (for supervisors to understand the levels of enforcement and have ownership of perceived breaches they encounter).
2. Introduced additional policies and amended the existing method statement to give improved supervision of the booths.
3. Conducted staff meetings to reinforce the 'Code of Conduct' required of Performers and Customers and to reiterate vigilance required from all members of staff and report any suspected breach of either code. We have improved and enhanced the paper trail to support and monitor all initiatives.
4. Replaced Supervisory Manager

Full email and response attached on IDOX. Further meeting to be arranged.

There are 2 other visits for the period in question recorded, but no matters of concerns (relevant to your FOI) are recorded as having been seen or discussed.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

Information Management Team
64 Victoria Street
London
SW1E 6QP
foi@westminster.gov.uk

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Further information is also available from the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 or 01625 54 57 45

Fax: 01625 524510

Web: www.ico.org.uk

I will now close your request as of this date.

Yours sincerely

Francis Keegan