
Written Submissions of Premier Inn Hotels Ltd

Background

1. This is an application for review of the Premises Licence pursuant to section 51 of the Licensing Act 2003 (the Act) for Premier Inn at Signal House, Letcombe Street, Reading (the Hotel).
2. The Applicant is Thames Valley Police (TVP).
3. The Respondent and Premises Licence Holder is Premier Inn Hotels Ltd. Premier Inn operate over 750 licensed premises nationwide. The subject premises are one of three Premier Inns operated in Reading Borough Council district.
4. The hotel's licence was granted in 2008 and has not been the subject of any previous review application. The hotel consists of 151 rooms and has a ground floor reception and food and beverage area. In the financial year running 2016 to 2017 46,912 rooms were let at this site and 68,125 guests were welcomed. The hotel has a high level of customer satisfaction with a 4 out of 5 star rating on Trip Advisor and is ranked the 5th best hotel in Reading (which has 31 entries). The Premier Inn at Caversham Bridge is ranked #1.
5. Indeed, this is the first Review of a Premier Inn hotel since the Act came into force on 24th November 2005.
6. The company employ over 50,000 members of staff in the UK the majority of whom are involved in the retail sale of alcohol. Through their Training Academy 495 staff members achieved their Award for Personal Licence Holders between 1st October 2016 and 30th September 2017; the company have provided training for many thousands of staff to achieve an accredited qualification since 2005 in order to achieve their personal licence. The



hotel staff at Reading at the time of the October incident referred to below included 3 personal licence holders.

7. Premier Inn are a responsible and experienced operator of licensed premises (the majority in town or city centre locations) with robust systems in place for the exercise of due diligence to ensure that their premises are properly and responsibly run in accordance with the law and to ensure the avoidance or the commission of regulatory offences, and, in particular, to guard against the sale of alcohol to persons under the age of 18. These measures include :-
 - The company wide operation of challenge 21 throughout England and Wales.
 - Induction training for all new members of staff on a range of legal responsibilities including under age sale prevention.
 - In order to graduate from a probationary status, all staff must within the first 28 days of employment complete a number of online training units.
 - Regular refresher training.
 - The use of “smart tools” through which challenges to persons under 21 are recorded through a refusals register or a refusals button on the EPOS till system. A screen shot of the opening image for each till (which is visible every time a server opens the till) is attached hereto at Annex A.
 - The regular and estate wide use of independent covert test purchasers to assess the effectiveness of the Challenge 21 system.
 - Safety Audits of our hotels, including licensing issues are undertaken by NSF International an internationally recognised auditing company, entirely independent of Premier Inn Hotels.
8. The company publish their responsibility commitments on their website may be summarised as follows:



9. Ward Van Gorkum is the hotel's DPS and manager. He has over 14 years' experience in the hospitality industry. He was awarded a degree in Hotel Management School by Maastricht University in 2012.

10. His previous hospitality experience includes roles with Marriott International as a food and beverage intern for a year and 3 years for Hilton Worldwide as a food and beverage manager before joining Premier Inn. He joined Premier Inn as an Assistant Operations Manager in January 2015 before assuming the manager's role in for the hotel August 2016.

Legal Framework.

The licensing objectives.

11. Central to the statutory regime are the four licensing objectives which are the only relevant areas for consideration and they are as follows:

- i. Prevention of crime and disorder.
- ii. Public safety.
- iii. Prevention of public nuisance.
- iv. Protection of children from harm.

The licensable activities.

12. The Act regulates licensable activities and provides for a range of exemptions. By extension the Licensing Committee's remit here is limited to these three licensable activities:

- i. The retail sale of alcohol.



- ii. The provision of regulated entertainment.
 - iii. The provision of late night refreshment.
13. The Act does not regulate the activities of the hotel aspect of this business and the guest bedrooms do not form part of the licensed area. Although Premier Inn take the issue of CSE extremely seriously, this is not an issue directly within the purview of the Committee. We will return to the issue of CSE at a later point in this document.

The guidance

14. Under section 182, the Secretary of State is required to issue guidance (Guidance) to Licensing Authorities on the discharge of their functions under the Act. Section 4(3) requires licensing authorities to have regard to the Guidance.
15. So whilst the requirement to have regard to the guidance is binding on licensing authorities, paragraph 1.9 of the guidance recognises that:
- iv. *"This guidance cannot anticipate every possible scenario such as circumstances that may arise and, as long as licensing authorities have properly understood this guidance, they may depart from it if they have good reason to do so and can provide full reasons. Departure from this guidance could give rise to an appeal or judicial review and the reasons given will then be a key consideration for the Courts when considering the lawfulness and merits of any decision taken."*
16. Although the Guidance cannot be said to have statutory force, those parts of the Guidance which express the key aims and objectives of the legislation must have significant regard paid to them because any decision which undermines the legislative scheme may be found to be unlawful (*Padfield v Minister of Agriculture, Fisheries and Food (1968) A.C. 997: R (on the application of British Pub & Beer Association) -v- Canterbury City Council (2005) EWHC 1318 Admin*).

Respondent's Case



Summary of Facts

17. The following are facts of this case:

- On the evening of 24th September 2016 a CSE operation was conducted by TVP at the premises. A room was not let to Police Officer or underage volunteer. However the Police officer then proceeded to the bar area and purchased two alcoholic drinks, the implication was that one of the drinks was for the underage volunteer. This operation was not performed in accordance with the Operational Briefing Statement disclosed by TVP in relation to the October test. It is not clear whether the September 2016 was subject to difference protocols/standards.
- This represented an unfortunate failure by the business to avoid proxy purchasing and is contrary to Premier Inn's policies and training.
- Although a Penalty Notice was issued to the member of staff involved in the proxy purchase of alcohol, this was subsequently rescinded by TVP and no further action was taken against the individual concerned.
- On 13th January 2017, TVP carried out an inspection of the premises. A number of minor issues were identified. In addition, there was a concern about the extent of CCTV coverage of the licensed area. Increased CCTV coverage was immediately installed.
- A notice was served by TVP directing the premises to remedy the issues identified which was actioned and subsequently removed.
- On 22nd March 2017, the DPS, together with senior representatives of operations and safety and security team and their solicitor attended a meeting with TVP and Reading Borough Council (Reading).
- At the above meeting a number of conditions were proposed by TVP for addition to the premises licence. At the conclusion of the meeting it was agreed Premier Inn would provide written replies to the proposed conditions. Challenge 21 was promoted at the meeting as the preferred standard to promote consistency across Premier Inn's Reading premises and wider, across England & Wales where Challenge 21 is the nominated standard, and consistent with most of the on-licensed trade.
- Proposed draft conditions were provided by the licence holder for comment on 28th April 2017 to TVP and Reading. Until this review application no comments were received on what had been proposed.
- On the 11th April 2017 and 23rd April 2017 the two members of staff on duty at the bar in September successfully passed a covert 'Serve Legal' test operation. Copy of the



reports are attached hereto as Annex B and C. This operation involves a person of youthful appearance (but over the age of 18) attending the venue and attempting to purchase alcohol. A pass would equate to a member of staff asking for identification (in accordance with their Challenge 21 policy) and following prescribed procedures. The tests are unannounced with the results following in the annexed report format sometime after the test.

- On 26th May Reading requested copies of training materials which are subsequently provided by Premier Inn.
- On 23rd August 2017 Reading apologise for the delay in replying to Premier Inn's email of 28th April 2017. No substantive reply has been received to date.
- 7th October 2017 – Staff members received refresher training on Challenge 21 and CSE prevention.
- On the evening of 12th October another covert operation was conducted by TVP. James Murren (acting as duty manager) let a room to the covert operatives and subsequently sold alcohol to the underage volunteer.
- This member of staff is a personal licence holder, his licence was granted by Reading on 20th June 2017. He has completed the following training sessions in the past 2 years:
 - i. Alcohol Server – 5th August 2016
 - ii. Licensing Act – 5th August 2016 and 19th January 2017
 - iii. APLH – 4th February 2017
 - iv. Disorder and Drunkenness Policy – February 2017
 - v. CSE training – 6th February 2017 and 7th October 2017
 - vi. Challenge 21 – 17th February 2017 and 7th October 2017
 - vii. Academy online training, Licensing Law – 31st March 2016
- A statement from James Murren confirming the most recent training undertaken is attached hereto and marked Annex D.
- Training materials concerning CSE produced and utilised by Premier Inn have been accepted by TVP to be of *"an acceptable standard to be used instead of the TVP training."*
- The Operations undertaken are not in response to any evidence specific to the hotel. The TVP Operational Briefing Statement includes the following:



- i. *“There is a CSE concern surrounding the potential usage of hotels within the Reading area for the apprehension of CSE offences with the retail sale and supply of alcohol as a further risk factor.”.*

18. Following the failure of 12th October the following steps have been undertaken by the hotel:

- Retraining of all staff member in the following subjects:
 - i. Avoidance of Child Sexual Exploitation (presented by TVP) has been presented to all staff members.
 - ii. Age restricted products; a new Challenge 25 policy is to be implemented at site.
 - iii. James Murren, who dealt with the booking and alcohol sale has been the subject to disciplinary proceedings, the outcome of which was a final written warning being given.
 - iv. Further successful Serve Legal tests have been undertaken on 24th November 2017, copies of the reports are attached hereto marked Annex E & F. The DPS was one of the individuals tested (see Annex E). There have been 3 successful Serve Legal tests conducted between the 24th September 2016 and 24th November 2017, while the premises has utilised a Challenge 21 policy.

19. James Murren has since given notice to leave the business.

Test Purchase Operations

20. Alcohol test purchases are not regulated by a common set of operational practices. Each Police force and Trading Standards department are at liberty to design and operate their own operations. There is Government guidance as to how such operation should be undertaken. TVP have disclosed their Operational Briefing Statement for the October operation. It would appear that this policy was not adhered to in relation to the September operation.
21. For alcohol test purchase operations pass or failure of the test is binary. Either a sale is completed or it is not.
22. For CSE tests the results are not binary. The licence holder accept that TVP aim to design their tests to be indicative of CSE activity and are not designed to trap unfairly an Operator. Premier Inn consider the test undertaken on the 12th October to be fair and were very disappointed by the actions of staff members on the evening. Premier Inn do not excuse the member of staff or criticise TVP for conducting such operations.
23. There is however no absolute check list for CSE activity. Any number of factors could be the sign of CSE activity and equally innocent. In this operation a volunteer (not identified as such



by Mr. Murren) accompanied a considerably older male into the hotel, a double room was booked and the booking was accepted. Payment being taken by credit card and not cash.

Premier Inn Policies

24. Any suggestion in this review that the licence holder is complacent on the issues of CSE prevention or underage sales is entirely refuted.
25. The evidence in this review cannot be interpreted as an institutional failing by the Licence holder. As stated, this is the first Review application against a Premier Inn hotel.
26. The evidence in the Review application is evidence of individual error and not evidence against the premises licence holder's policies or the seriousness with which Premier Inn take such issues.

Underage Sales

27. In regards to underage sales, members of staff receive the specific training upon induction regarding Challenge 21, which is refreshed by notices around the service area and upon the till itself (see Annex A & G). In addition regular refresher training is delivered by the hotel to their staff, the last such training was delivered on 7th October 2017 (see Annex H).
28. Every piece of written policy on the subject is unequivocal and reflects company policy which is to prevent underage sales.
29. At paragraph 10.49 of the Guidance, it is stated that it is acceptable, and indeed encouraged, for premises to have an age verification policy which requires individuals who appear to the responsible person to be under an age greater than 18 to produce such identification upon request. **For example, if premises have a policy that requires any individual who appears to be under the age of 21 to produce identification that meets the criteria listed above, this is perfectly acceptable under the mandatory code.** [Our emphasis]

CSE Prevention

30. Premier Inn recognise the potential for CSE activities at their premises.
31. Premier Inn do not have any evidence to suggest the CSE activity is taking place at their Reading venues but remain vigilant to prevent the same and have robust policies, including training in place to seek to ensure avoidance.
32. A history of the formation of the current CSE strategy can be found detailed in Annex I.

Working in Partnership

33. Responsible Authorities are encouraged by the Act and Guidance towards working in partnership with licensed premises on voluntary measures. Premier Inn have demonstrated



their willingness to work with the Authorities in the spirit of partnership. They entered into discussions with the Authorities regarding improvements to the operating plan for the premises. A set of conditions were proposed and commented upon by Premier Inn, those comments in turn were expressly offered as part of an ongoing conversation, please see email dated 28th April 2017 attached as Annex J.

34. In the Review application PC Wheeler states:

- *“We feel that the amended versions of the supplied conditions by the PLH via Mr. Grunert earlier in the year do not sufficiently address our concerns and the failure to accept Challenge 25 as a condition amongst other was a major impasses which would not be resolved by negotiation. Therefore no further communication has been made via TVP to Mr. Grunert in relation to the conditions put forward to be added by minor variation by Mr. Narancic who was leading this proceed by RBC was informed.”*

35. It is perhaps unfortunate that this view was never relayed to Premier Inn by TVP or Reading to enable further dialogue on proposed revised conditions to be undertaken in the spirit of ongoing mediation, advocated by the guidance:

- Para 11.10 – *“...Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this cooperation.”*

Reading Licensing Policy

36. The Council’s Licensing policy states at paragraph 12.1.10:

- *The responsible authority for protecting children from harm for the Reading Borough Council area is the Local Safeguarding Children’s Board*

37. The Local Safeguarding Children’s Board have not commented on this Review application.

Review Outcomes

Determination

38. Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:

- i. modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;



- ii. exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption);
- iii. remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;
- iv. suspend the licence for a period not exceeding three months;
- v. revoke the licence

39. The Guidance states:

- *“In deciding which of these powers to invoke, it is expected that licensing authorities should so far as possible seek to establish the cause or causes of the concerns that the representations identify. The remedial action taken should generally be directed at these causes and should always be no more than an appropriate and proportionate response to address the causes of concern that instigated the review.” [Our Emphasis]*

Revocation

40. It is the submission of Premier Inn that revocation would be a disproportionate remedy in the circumstance of this case.

Proposed Conditions

41. TVP state in their Review application:

- *“If the decision is not to revoke the licence then TVP request that the following actions be taken and conditions placed onto the licence...”*

42. Premier Inn accept that additional conditions can and should properly be added to the premises licence arising from this review. These are set out in Annex K being the conditions proposed by TVP with proportional variations proposed by Premier Inn.



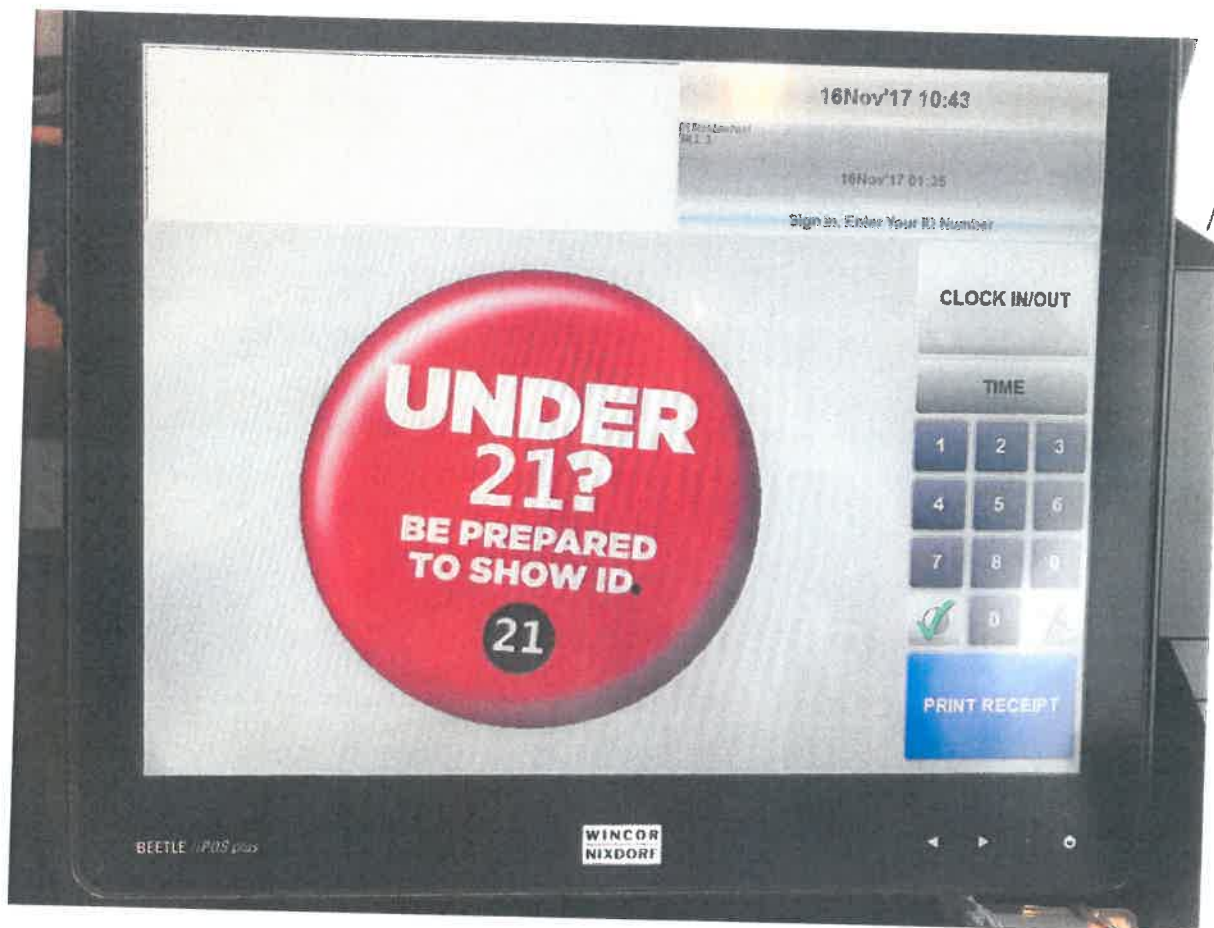
Conclusion

43. Premier inn regret the fact that this review application has had to be brought. Across their national estate, they take their legal responsibilities very seriously, evidenced in part by the fact that this is the first review application across their whole estate since the 2003 Act came into force.
44. Additional conditions would, in our submission, be the proportionate remedy and sanction for the reasons set out in the above and in the oral submissions to be put at the hearing.
-

John Gaunt & Partners

November 2017

Annex A



Annex B



Serve Legal

protecting your business

VISIT627898

Site:

Premier Inn Reading Town Centre, BaRest

Site Address:

Letcombe Street
RG1 2HN
Berkshire
Reading

Site Code:

44023600

Order From/To:

Saturday, 1 April 2017 to Sunday, 30 April 2017

Survey Result:

PASS

Item to order:

Alcohol

Upload Image:

Date and time of visit:

Tuesday, 11 April 2017 - 18:20

Aborted?:

No

Survey

What type of alcohol did you purchase?

Other

Please give details of the alcohol purchased (brand and size):

A glass of vodka and coke.

Did you purchase a single drink or a round of drinks?

Single

Did the person who served you ask your age?

No

Did the person who served you (or their

Yes



supervisor) ask you for ID?

Did the person who served you make eye contact with you? Yes

If eye contact was made, when was it FIRST made? Before the transaction

In your opinion, did the person who served you make an assessment of your age? Yes

Were you acknowledged / served within 5 minutes of being at the bar? Yes

Was the bar busy? No

What was the gender of the person who served you? Male

What was the approximate age of the person who served you? In their 20's

Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features): The member of staff was male and likely in their early 20s. He was around 5'10 and had short black hair.

Was the person who served you wearing a name badge? Yes

What was the name of the person who served you (from the name badge)? Fernando

In the bar area, did you see any "Challenge 21 " or "Think 25" signs? Yes

Please use this space to explain anything unusual about your visit or to clarify any detail of your report:

Please confirm in the space below whether or not you were asked for ID: I was asked for ID.

Date of Birth: Wednesday, 5 August 1998

Gender: Male

Age 19 years, 3 months

Date of Last SL Visit



Premier Inn

Number of SL visits

82

Pass Rate

83.54 %

Status:

Approved

[export pdf](#)

Annex C



Serve Legal

protecting your business

VISIT402291

Site:

Premier Inn Reading Town Centre, BaRest

Site Address:

Letcombe Street
RG1 2HN
Berkshire
Reading

Site Code:

44023600

Order From/To:

Friday, 1 April 2016 to Saturday, 30 April 2016

Survey Result:

PASS

Item to order:

Alcohol

Upload Image:

Date and time of visit:

Saturday, 23 April 2016 - 21:05

Aborted?:

No

Survey

What type of alcohol did you purchase?

Lager

Please give details of the alcohol purchased (brand and size):

Stella Artois, pint.

Did you purchase a single drink or a round of drinks?

Single

Did the person who served you ask your age?

No

Did the person who served you (or their supervisor) ask you for ID?

Yes



Did the person who served you make eye contact with you?

Yes

If eye contact was made, when was it FIRST made?

During the transaction

In your opinion, did the person who served you make an assessment of your age?

Yes

Were you acknowledged / served within 5 minutes of being at the bar?

Yes

Was the bar busy?

No

What was the gender of the person who served you?

Female

What was the approximate age of the person who served you?

19 or under

Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):

Blonde hair, pony tail to shoulder length, 5,6, pale.

Was the person who served you wearing a name badge?

Yes

What was the name of the person who served you (from the name badge)?

Emma

In the bar area, did you see any "Challenge 21" or "Think 25 " signs?

Yes

Please use this space to explain anything unusual about your visit or to clarify any detail of your report:

Please confirm in the space below whether or not you were asked for ID:

Yes I was asked for ID.

Date of Birth:

Monday, 28 April 1997

Gender:

Male

Age

20 years, 6 months

Date of Last SL Visit

28/02/2017

Number of SL visits

242

Pass Rate

83.26 %



Premier Inn

Approved

export pdf

Annex D

BETWEEN:

THAMES VALLEY POLICE (TVP)

Applicant for Review

- and -

PREMIER INN HOTELS LTD

Respondent to Review

STATEMENT OF MR JAMES MURREN

I, MR JAMES MURREN of [REDACTED] READING, BERKSHIRE, RG1 2NN, WILL SAY AS FOLLOWS:-

1. I am a Premier Inn Host, employed at the Premier Inn Hotel located Letcombe House, Reading, RG1 2HN (the hotel). I make this statement in the knowledge that it will be disclosed to the Licensing Committee as evidence of my employment history and training record.
2. I commenced my employment in late 2013, initially employed at a Premier Inn hotel in Bath. I relocated to the Reading hotel in October 2016.
3. As part of my induction, in Bath, I undertook a training programme entitled "Bigger, Bolder, Better" which included the following areas:
 - a. Reception protocols,
 - b. Bar setup,
 - c. Restaurant setup,
 - d. Kitchen procedures, and
 - e. The service of alcohol which included a "Challenge 21" policy.
4. Since my first day, I feel that I have fully understood the Company's Challenge 21 policy and my responsibilities in this regard.
5. This induction programme has since been replaced by a new programme based online.
6. During the course of my employment I have also completed over 65 online training units. These are provided by my employer. There are a number of core units which must be completed by all

members of staff. The current policy is that these core units must be completed prior to the commencement of the first working shift. When I joined the business a 2 week window was permitted to complete the units following the commencement of work.

7. Approximately 40 of the 65 plus units completed were discretionary units.
8. At Reading I first received training on the subject of Child Sexual Exploitation (CSE) in February 2017. I was not present at a Thames Valley Police led training session which took place that month. On the date of the TVP course, I was attending an Award for Personal Licence Holder course in South Mimms. I subsequently obtained my personal licence, having successfully passed the exam.
9. Shortly after my return to work I was trained by the DPS, Ward Van Gorcken, in a session which took place at the hotel.
10. On 7th October 2017, I was again spoken to by a member of the management team, Mathew Sproad, on the issue of CSE.
11. In both of these sessions, I perceived the aim of the training to be raise my awareness of CSE issues and identify potential signs of suspicious behaviour in order to prevent CSE taking place at the hotel
12. On the evening of 12th October 2017 I was on duty at the hotel and was the most senior member of staff on duty and was acting in the role of manager.
13. At approximately 10:20pm I attended to a male customer and his female companion and checked them into a room at the hotel.
14. I subsequently sold 2 alcoholic drinks to the same female immediately following the check in process.
15. It transpired that this was a test purchase operation conducted by TVP and that the female was aged 13.
16. In hindsight, I feel that my conduct fell far below the standard expected of me and was not in accordance with Premier Inns' policy. I have reviewed CCTV images of the event and feel that my failure to challenge the room reservation and to sell alcohol was contrary to my training.
17. My failings were due to a mistake on my behalf and not as a result of a lack of instruction from my employer. The appearance of the young lady should have prompted to challenge her for identification, she does appear to be under the age of 21.

18. Premier Inn have clear policies regarding the prevention of CSE activities and the prevention of underage sales of alcohol, in which I have been trained. Prior to the 12th October 2017 I had received training on the specific issue of CSE and Challenge 21 policies.
19. On the evening of the test I provided the Police with documents requested which included training logs. These loges noted the names of staff and the dates upon which they were trained in various subjects.
20. Each entry is normally countersigned by the employee at the time of training. In my case, training regarding CSE undertaken on the 7th October was not countersigned until after the 12th October. I am positive that this training had been undertaken on 7th October and the failure to sign the log was an oversight.
21. Following the events of the 12th October 2017 I have been the subject of an internal disciplinary process, the result of which was a final written warning.

Statement of Truth

I believe that the facts stated in this witness statement are true.

SIGNED



MR JAMES Murren

Dated

16/11/17

Annex E



Premier Inn

Serve Legal
protecting your business

Passed Internal ID Check

Well Done! Your premises has passed an internal ID test purchase.

This means that a member of your staff has followed the Whitbread internal policy of asking young people for ID.

Please see the details of the test purchase below and congratulate the member of staff responsible.

If you have any queries or feedback regarding this visit, please email Serve Legal at info@servelegal.co.uk.

Site Review

Premises Details

Premises Name	Premier Inn Reading Town Centre, BaRest
Address 1	Letcombe Street
Address 3	Reading
Premises City	Berkshire
Post Code	RG1 2HN

Site Details

Store Code	44023600
------------	----------

Visit Details

Actual Date of Visit	24/11/2017
Actual Time of Visit	20:50
Visit Result	PASS

Report

Question	Response
What type of alcohol did you purchase?	Lager
Please give details of the alcohol purchased (brand and size):	Carling pint
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	Yes
Did the person who served you (or their supervisor) ask you for ID?	Yes
Did the person who served you make eye contact with you?	Yes
If eye contact was made, when was it FIRST made?	Before the transaction
In your opinion, did the person who served you make an assessment of your age?	Yes
Were you acknowledged / served within 5 minutes of being at the bar?	Yes
Was the bar busy?	Yes
What was the gender of the person who served you?	Male
What was the approximate age of the person who served you?	In their 30's
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Slick curly dark hair, glasses, tall, thin, pale
Was the person who served you wearing a name badge?	Yes
What was the name of the person who served you (from the name badge)?	Ward



Question

Response

In the bar area, did you see any "Challenge 21" or "Think 25" signs?

No

Please use this space to explain anything unusual about your visit or to clarify any detail of your report:

I Was given a receipt

Annex F



Premier Inn

Serve Legal
protecting your business

Passed Internal ID Check

Well Done! Your premises has passed an internal ID test purchase.

This means that a member of your staff has followed the Whitbread internal policy of asking young people for ID.

Please see the details of the test purchase below and congratulate the member of staff responsible.

If you have any queries or feedback regarding this visit, please email Serve Legal at info@servelegal.co.uk.

Site Review

Premises Details

Premises Name	Premier Inn Reading Town Centre, BaRest
Address 1	Letcombe Street
Address 3	Reading
Premises City	Berkshire
Post Code	RG1 2HN

Site Details

Store Code	44023600
------------	----------

Visit Details

Actual Date of Visit	24/11/2017
Actual Time of Visit	21:20
Visit Result	PASS



Report

Question	Response
What type of alcohol did you purchase?	Lager
Please give details of the alcohol purchased (brand and size):	Pint of carling
Did you purchase a single drink or a round of drinks?	Single
Did the person who served you ask your age?	No
Did the person who served you (or their supervisor) ask you for ID?	Yes
Did the person who served you make eye contact with you?	Yes
If eye contact was made, when was it FIRST made?	Before the transaction
In your opinion, did the person who served you make an assessment of your age?	Yes
Were you acknowledged / served within 5 minutes of being at the bar?	Yes
Was the bar busy?	No
What was the gender of the person who served you?	Female
What was the approximate age of the person who served you?	In their 20's
Please accurately describe the person who served you (include hair colour and style, height and any distinguishing features):	Female, blonde tied back hair, approximately 5ft 3 or so
Was the person who served you wearing a name badge?	Yes
What was the name of the person who served you (from the name badge)?	Karolina



Question

Response

In the bar area, did you see any "Challenge 21" or "Think 25" signs?

Yes

Please use this space to explain anything unusual about your visit or to clarify any detail of your report:

Annex G



Annex H

Challenge 21


The sale of alcohol to a child or young person (that is to say, a person aged under 18) is an offence which may lead to a fine of up to £5,000 and/or a term of imprisonment not exceeding three months. Such a sale will also lead to a review of the premises license and could result in the license being suspended or revoked.

Premier Inn operates an 'age verification policy', in terms of which you must require production of an acceptable proof-of-age document if you are in any doubt as to whether a person seeking to buy alcohol is less than 21 years of age.

Only the following documents are acceptable for proof-of-age purposes:

- A passport
- A European Union photocard driving licence
- A proof of age card bearing a PASS hologram

If no such document is produced or if you have a suspicion that the document presented is not genuine, or has been tampered with or has been altered, then you must refuse the sale or refuse to authorise the sale.

Name	Date	Signature
Ria Conte-Grand	19-09-17	
Coupley Burns P. Robinson	19.09.17	
Joao Andrade	19.09.17	
Matthew Spard	19.09.17	
KAROLINA PROZKOVA	19.09.17	
Aneta Kocunarska	21/09/17	
Nafisa Barshonova	21/09/17	
MONIKA KURSIKOWSKA	21/9/17	
ALEJANDRO MARTINEZ	25/9/17	
Adrian Ogden	05.10.17	
Aaron Parker	07.10.17	
Jose Antonio	07.10.17	
JAMES MUMER	07.10.17	
Waqueen Rude	07/10/17	

Bachellet
Bach dista
Received
Mumij

Challenge 21

*Teacher = V. Graham
P. Sericovska*

The sale of alcohol to a child or young person (that is to say, a person aged under 18) is an offence which may lead to a fine of up to £5,000 and/or a term of imprisonment not exceeding three months. Such a sale will also lead to a review of the premises license and could result in the license being suspended or revoked.


Premier Inn Reading Central operate an 'age verification policy', in terms of which you must require production of an acceptable proof-of-age document if you are in any doubt as to whether a person seeking to buy alcohol is less than 25 years of age. 21

Only the following documents are acceptable for proof-of-age purposes:

- A passport
- A European Union photocard driving licence
- A proof of age card bearing a PASS hologram

*To be reviewed
~~15/2~~ 2017*

If no such document is produced or if you have a suspicion that the document presented is not genuine, or has been tampered with or has been altered, then you must refuse the sale or refuse to authorise the sale.

Name	Date	Signature
<i>Corina Guro Protopic</i>	<i>15.02.17</i>	
<i>Aneta Kocankova</i>	<i>15.02.17</i>	
<i>Lin Hrubanova</i>	<i>15.02.17</i>	
<i>Peta Sericovska</i>	<i>15/02/17</i>	
<i>Natolija Seric</i>	<i>15.02.17</i>	
<i>Holly Dunk</i>	<i>15.02.17</i>	
<i>Petra Schmidova</i>	<i>15.02.2017</i>	
<i>László Protopics</i>	<i>15/2/17</i>	
<i>Tim Kolsteren</i>	<i>16/2/17</i>	
<i>Pia Conte-Grand</i>	<i>17/2/17</i>	
<i>James Murner</i>	<i>17/2/17</i>	
<i>João Andrade</i>	<i>22/02/17</i>	
<i>Kristina Pavoziniuk</i>	<i>18.3.17.</i>	
<i>Matthew Spard</i>	<i>11-4-17</i>	
<i>BROZKOVA KAROLINA</i>	<i>19.6.17</i>	
<i>Aaron Parker</i>	<i>04.07.17</i>	

Best Practice

If a customer fails to produce valid photo-ID that confirms his or her age, the sale should be **REFUSED** and recorded in this Refusals Register after the customer has left the premises.

Keep the register close to the counter but out of sight!



03



04



05



06



06

03/02/ CitizenCard (03) Young Scot card (04) Driving licence (05) Passport

All staff should know where this Refusals Register is kept, and should write an entry whenever an age-related sale is **REFUSED**. A Trading Standards Officer will ask to see it if they visit your store.

The manager will sign off and date each page of this register, which will be kept in a safe place away from customers. The Register may need to be produced in the event that local authority enforcement officers undertake test purchases, other enforcement activity or if a threat of legal action against the premises' manager or staff arises.

no1nosale.com

Age Restrictions

Which products are restricted?

18

Tobacco products, papers, cigarettes, rolling tobacco
Alcohol, including pre-mixed drinks and shot tubes
Cigarette lighter refills, butane
Solvents, including glues and intoxicating substances
Fireworks and sparklers
Knives, razor blades (except safety razors)
18 Videos, DVDs and PEGI 18 rated games
R18 videos, but you need a special license to sell these
Newspapers and magazines with any 18/19/18 DVDs or games attached
Tattoos and sunbeds

16

Lottery, including the National Lottery, scratchcards and the Health Lottery
Party poppers, cracker snaps
Pets and animals
Liquor confectionery
Fuel, paraffin and liquefied petroleum gas
PEGI 16 rated games

15

15 Videos, DVDs and games
Newspapers and magazines with any 15 DVDs or games attached

12

12 Videos, DVDs and PEGI 12 games
Christmas crackers
Newspapers and magazines with any 12 DVDs or PEGI 12 games attached

PENALTIES vary depending upon the product and circumstances of the sale. A seller could receive a fixed penalty of £80. But for repeated sales could be a higher fine up to £5,000. They could also be banned from working in a tobacco shop for up to one year.

The shop owner could receive a fine of up to £5,000 for the first offence but as high as £20,000 for repeated breaches, a criminal record and restrictions placed on any licences that they hold or intend to apply for.

The licence holder could lose their licence to sell alcohol or fireworks, have the lottery terminal removed or be banned from selling tobacco products for up to one year.



Annex I

Recent development of CSE Policies

1. A CSE session with Avon & Somerset Police and Barnardo's concerning overall content is held and is rolled out to all Team Members in early 2015.
2. March 2015 – Michelle Bickerton (Regional Safety & Security Manager), John Forrest (Chief Operating Officer) for Premier Inn and Shaun Ross (Head of Safety and Security) met with Paul Sonigra of the Met Police and Katherine Wallis of South Yorkshire Police in London regarding the creation of a new CSE policy to reflect lessons learned from the Oxfordshire and Rochdale and Rotherham Child Sexual Exploitation scandals. Paul and Katherine were two of the Police's national lead Officers for CSE matters.
3. August 2016 – Rob Ferguson, Safety & Security Support Manager and Shaun Ross (Head of Safety and Security) met with Paul Sonigra in London for a further update meeting. We informed Paul of our intention to develop a bespoke CSE Awareness Training course for Premier Inn and we had a discussion around the potential content.
4. January 2017 – updated CSE Session and associated training record sheet rolled out to all Team Members, this was not the full policy.
5. March 2017 – PowerPoint based full CSE Awareness training and associated training log sheet rolled out in Premier Inn, along with supporting 1 Weekly Communications article (an article included within the newsletter all employees receive on a weekly basis). Operations Managers were tasked with ensuring that all of their Team Members had completed the new training course by the end of May 2017
6. March 2017 – Mark Pugh, Regional Safety & Security Manager and Shaun Ross (Head of Safety and Security), along with representatives from Travelodge and Marston's, met with Paul Sonigra and Jonathon Best, West Yorkshire Police for a CSE update. Jonathon Best had been appointed as one of the Police's Regional CSE Coordinators and had effectively taken over from Katherine Wallis from South Yorkshire Police.
7. April 2017 – the Whitbread Safety & Security Team attended a presentation on CSE by Henry Birmingham, a partner with BLM LLP who specialises in sexual abuse cases. Prior to the day we had provided Henry with a copy of our CSE Awareness Training, which he described as 'industry leading'. A copy of the presentation is attached hereto marked Annex L.
8. May 2017 – CSE Awareness posters issued to all hotel, examples of the posters are attached hereto marked Annex M.
9. June /August 2017 – members of the Safety & Security Team attended all Head Housekeeper area meetings across the country to brief the Head Housekeepers on CSE Awareness



Premier Inn

10. Premier Inn are currently developing an e-Learning based CSE Refresher Training module for roll out early 2018, a draft copy of the presentation is attached hereto marked Annex N.

Annex J



Premier Inn

From: Chris Grunert [<mailto:CGrunert@john-gaunt.co.uk>]

Sent: 28 April 2017 15:12

To: Simon.Wheeler@thamesvalley.pnn.police.uk

Cc: Narancic, Peter

Subject: Premier Inn - Reading.

Simon,

We write following our meeting in March to discuss the Premier Inn Reading.

We have reviewed the conditions proposed at your meeting a return herewith an amended version for discussion. Our client has confirmed that a minor variation application to implement agreed changes is the best way forward.

As you will recall, the meeting followed operations by the Police involving the site. Although a number of issues were identified, and have since been resolved, we would summarise your principal concerns as:

- Potential for CSE activity associated with all hotels.
- Under 18s accessing alcohol illegally at site.

In respect of CSE training, we can now confirm that this has been comprehensively rolled out across the Premier Inn estate including Reading. We shared with you the Whitbread training programme which had been prepared in consultation with a number of relevant authorities including Bernardo's and the Metropolitan Police Service.

We have therefore amended the references training package to Whitbread's internal package, which I understood you found acceptable.

In respect of the more general training for bar staff around the sale of alcohol, Whitbread have their own in-house training policy which is delivered at every site across England & Wales. The policy has proven successful and has been accepted by numerous police authorities and licensing authorities. The 'headings' referenced in your condition may not be mirrored in our client's materials and therefore we are reticent to agree the condition as proposed. One issue for example, Proxy Sales, is not a specific unit title. However the consumption of alcohol be under 18's and the sale of alcohol to under age persons is covered in other sections.

In respect of the CCTV condition, this has been altered in line with our wider discussions regarding the Data Protection Act. The condition, as amended, provides that CCTV will be in operation (save for periods of maintenance or repair), that images will be of sufficient quality and retained for a period of 31 days. Access to the CCTV system, which would allow images to be burned off, is restricted in line with proper a data protection policy. The condition does provide that upon production of a properly evidenced request from the Police our client will act in a timely manner to respond. We hope you will appreciate that the condition as drawn is in line with Data Protection laws.

At our meeting we discussed our client's policy on Challenge 21. We have amended the conditions to reflect this. As stated, the benefit of having a consistent policy across the estate are considerable.

In respect of a refusal log, this is agreed (subject to the minor change to vocabulary).



Premier Inn

Finally, the incident log will be retained. The premises currently has a system of recording such information in their daily logs and, where necessary, escalating this to the national Safety and Security team. This log could also potentially be subject to Data Protection legislation, on the basis that the information could identify the subject. For that reason unfettered access to the log may undermine our client's responsibilities to the data protection act.

Police attendances would normally be recorded but the need to condition this is not apparent to our client, this is information the Police would hold themselves.

We would be grateful for your comments on the draft conditions attached.

Regards

Chris Grunert

Partner

C.Grunert@john-gaunt.co.uk | www.john-gaunt.co.uk
T: 0114 266 8664 | M: 07834 933 041 | F: 0114 267 9613

[<image001.jpg>](#)

Omega Court | 372-374 Cemetery Road | Sheffield | S11 8FT

[Premises Licences](#) | [Personal Licences](#) | [DPS Changes](#) | [Temporary Event Notices](#)
[APLH Courses](#) | [Reviews](#) | [Due Diligence](#) | [Betting and Gaming](#) | [eLearningPlus](#)

Annex K

Staff Training Child Sexual Exploitation (CSE)

- ***The Premises Licence Holder (PLH) and/or Designated Premises Supervisor (DPS) shall ensure that all staff complete training in Child Sexual Exploitation (CSE) that is of a standard agreed with Thames Valley Police and Reading Borough Council training package within 28 days of employment and a signed record of their training shall be maintained.***

1. Agreed.

- ***Refresher training in relation to CSE shall formally take place once every 3 months and signed records of this training shall be maintained. These records shall be kept for a minimum of 2 (two) years of the date of the training and shall be made available to any authorised Offices of Thames Valley Police or an authorised Officer of Reading Borough Council.***

2. Agreed, save for the proposed retraining intervals.

3. The frequency proposed by the Police is considered to be too frequent. Our clients experience over their substantial business is that over training can lead to lower attention rates as a result of over familiarity. Our client would propose that a more effective regime would be bi-annual training. One session to be conducted in a group and one session by means of an on-line training unit (see Annex K). In addition the issue will be refreshed in the intervening period via direct communication with staff through posters at site and weekly newsletters. It would not be our client's proposal to include CSE in every weekly newsletter.

Staff training alcohol sales

- ***Staff employed to sell alcohol shall undergo training upon induction. This training shall include, but not be limited to:***



- *The premises age verification policy*
- *Dealing with refusal of sales*
- *Proxy purchasing*
- *Recognising valid identity documents not in the English language*
- *Identifying attempts by intoxicated persons to purchase alcohol*
- *Identifying signs of intoxication*
- *Conflict management*
- *How to identify and safeguard vulnerable persons who attend and leave the premises.*

Refresher training shall be provided every 3 (three) months and signed records made available for inspection by a Police Officer or authorised Officer of Reading Borough Council upon request. These records are to be kept for a minimum of 2 (two) years of the date of training.

4. We would repeat our earlier concerns regarding the frequency of refresher training proposed, in this instance the individual was 'refreshed' less than 7 days prior to the failures. Our clients experience over their substantial business is that over training can lead to lower attention rates as a result of over familiarity. Our client would propose that a more effective regime would be 6 monthly training.

CCTV

- *The premises licence holder shall ensure the premises' digitally recorded CCTV system cameras shall continually record whilst the premises are open to the public and records shall be kept for a minimum of 31 days with time and date stamping. The entire licensable area shall be covered by the CCTV. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or Reading Borough Council together with facilities for viewing upon request, subject to the provisions of the Data Protection Act. Recorded images shall be of such quality as to be able to identify the recorded person in*



any light. At-least one member of staff on the premises at any time during operating hours shall be trained to access and download material from the CCTV system.

5. Our client considers they are generally in compliance with this proposed condition. They would express a reservation regarding the final sentence. In order to achieve compliance with current and upcoming changes to Data Protection legislation our client is concerned regarding the security of private data. The hotel is defined as a data handler and as such is responsible for the security of all relevant data, including CCTV footage. No external party, including the Police, are automatically entitled to copies of CCTV footage captured by the hotel's system. Legally the Police must provide evidence that they are undertaking a relevant criminal investigation to override a subject's right to privacy.
6. In order to maintain security, Premier Inn is implementing a system limiting the number of personnel entitled to access and copy data from the CCTV system, this accords with recognised best practice.
7. Our client would suggest the replacement of the final sentence of the Police's condition with the following:
 - a. *"Upon receipt of a legitimate request, the Licence Holder shall ensure that requested data is provided as soon as practicable."*

Challenge 25, Refusals and Incidents:

- *The premises shall at all times operate a Challenge 25 policy to prevent customers who appear to staff members to be under the age of 25 years from purchasing alcohol without having first provided identification.*
Only a valid driver's licence showing a photograph of the person, a valid passport, national identity card, military ID or proof of age cards showing the "PASS" hologram are to be accepted as identification. Notices the Challenge 25 and proof of age policies shall be displayed in prominent positions on the premise.
8. Agreed.



9. In light of the October failure the hotel feels that special measures are appropriate at this site.

- *All staff involved in the sale of alcohol shall be trained to record refusals of sales of alcohol in refusals log (whether written or electronic). The log shall contain:*
 - *Details of the time and date the refusal was made;*
 - *The identity of the staff members refusing the sale;*
 - *Details of the alcohol the person attempted to purchase.*

This book / register will be available for inspection by a Police Officer or authorised officer of Reading Borough Council upon request.

10. Our client has no objection to this condition which reflects current practices.

- *An incident log shall be maintained to record all incidents of crime and disorder as well as those relating to the protection of children from harm occurring at the premises. This log shall be available for inspection by a Police Officer or authorised office of Reading Borough Council upon request and shall be retained for one year. The log shall be signed off by the DPS or nominated representative at the end of each trading session. A weekly review of the incident register shall also be varied out by the DPS.*

11. Our client has no objection to this condition.

- *All transactions for Hotel bookings shall require photographic ID from any adult accompanying a child.*

Staff shall take all reasonable and proportionate steps to establish the name, date of birth and relationship between the adult and child. This may include but shall not be limited to asking for identification from each and establishing via questioning the nature of their relationship.

Only a valid British driver's licence showing a photograph of the person, a valid passport, proof of age card showing the "PASS" hologram or Military Identity Cards are to be accepted as identification. If there is any doubt in relation to the validity of a booking or



the nature of the relationship, details of the incident shall be recorded in the premises' incident log and Police notified immediately.

12. This proposed condition is repetitious of statutory requirement under the Anti-social Behaviour, Crime and Police Act 2014. (s.116) which requires the hotel to provide guests' names and addresses for the previous 6 months. The hotel can comply with a s.116 request.

13. The condition as proposed is ambiguous and compliance with the condition would be difficult to ascertain with certainty or evidence. As such we would suggest that the condition as proposed, if implemented, would be unenforceable. Our client would propose the following condition:

- ***All staff shall receive training in the prevention of Child Sexual Exploitation and demonstrate an annual competency.***

Such training will provide staff with an understanding of the potential indicators of CSE and where such indicators are identified staff shall take all reasonable and proportionate steps to establish the relationship between the adult and the child.

Cash payments shall not be accepted without supporting proof of identification for all guests.

When deemed necessary, only a valid British driver's licence showing a photograph of the person, a valid passport, proof of age card showing the "PASS" hologram or Military Identity Cards are to be accepted as identification.

Any suspicious customer shall be recorded in the premises' incident log and Police notified immediately

Annex L

Child Sexual Exploitation Raising Awareness

March 2017



Premier Inn

Introduction

We have a moral duty to keep children and young people safe and help prevent their exploitation

This awareness training is designed to assist Operations/Hotel Managers brief their Teams in what Child Sexual Exploitation is, how they might recognise the potential signs of it and what to do if they have any concerns

It is recommended that the training session is undertaken as a group so that individuals can share their thoughts and discuss any concerns



What is Child Sexual Exploitation?

- Child Sexual Exploitation (CSE) is where children and young people are manipulated, or forced into taking part in sexual activity, doing things they don't want to do. This is often in return for attention, money, food, alcohol, clothes, somewhere to stay or gifts
- It can affect young people from any background, boys and young men, as well as girls and young women
- Parents are unlikely to be able to identify what is happening. They may suspect something is not right, but may not be in a position to stop it due to the control the exploiter has over their child due to threats, fear or other factors



What is Child Sexual Exploitation?

- Child Sexual Exploitation is not just carried out by men, women are known to be perpetrators of this crime too. They may use different grooming methods, but are known to target boys and girls. The imbalance of power and control is still present in these cases
- In many cases the child themselves may not realise or feel that they are being exploited and may become dependant on the person exploiting them
- Child Sexual Exploitation is not limited to physical sexual abuse. Exploitation can also occur through the use of technology without the child's immediate recognition; e.g. the child being persuaded to post images of themselves on the internet/mobile phones



Why is it an important issue?

- Child Sexual Exploitation is a serious issue facing society as a whole, not just hotels
- The Government has given dealing with Child Sexual Exploitation equal priority to Counter Terrorism, demonstrating the seriousness of the issue
- It is important that we work together with the Police and other agencies to deter and detect Child Sexual Exploitation
- We have a moral duty to keep children and young people safe from harm and exploitation
- As part of "Being Good Together" and supporting our communities, it is important we take our responsibilities seriously in this area
- Failure to act or not having the necessary safeguards in place may result in negative media attention, which could adversely affect Premier Inn's reputation
- And, most importantly, appropriate intervention may save a child from exploitation

How does it happen?

Child grooming is a carefully planned process with the aim of controlling a child or young person, ultimately for sexual purposes, which may involve the groomer:

- Initially targeting the vulnerable child or young person
- Befriending them and building trust
- Making them feel special and understood
- Entering into a relationship with them
- Building dependency while isolating the young person from their family, carers, school, friends and /or social group

The groomer has then gained control of the child or young person



How does it happen?

- Manipulation, threats, violence, coercion and intimidation are common in cases of Child Sexual Exploitation
- Involvement in exploitative relationships is often characterised by the child or young person's emotional vulnerability and/or their social and/or economic circumstances
- In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources



The Age of Consent – What age is a child?

Question:

Ask the group what age is a child?

Discuss the answers before moving to next slide

The Age of Consent – What age is a child?

Under the Sexual Offences Act a child is generally someone under the age of 18 years old.

The age of consent to sexual activity is usually 16 years old. However, in some circumstances where a child of 16 years or older is not capable of making safe decisions e.g. due to learning difficulties, it may be deemed that they cannot consent to sexual activity. This may therefore be considered to be exploitation.

The table below helps to summarise the Sexual Offences Act (2003)

Sexual Offences Act (2003)				
Age 12 years 364 days (and under)	13 Years	14 Years	15 Years	Age 16 & 17 years old
Any sexual activity is an offence - the child is legally unable to consent to sexual activity	Sexual activity can be mutually agreed, but remains an offence			Sexual activity is legal in a consenting relationship, otherwise it is a criminal offence

The Law

Under the Sexual Offences Act 2003 persons could be charged for offences such as:

- Rape or sexual assault
- Sexual activity with a child
- Inciting a child to engage in sexual activity
- Making, distributing or possessing indecent images of a child
- Abuse of a position of trust
- Meeting a child following sexual grooming



Anti-social Behaviour, Crime and Policing Act 2014

- There is an increasing expectation that hotel companies work with local Police authorities to combat the issue of Child Sexual Exploitation
- The Anti-social Behaviour, Crime and Policing Act 2014 enables the Police to require hotels in England & Wales, where they reasonably believe Child Sexual Exploitation has taken, or will take place, to provide the names and addresses of all guests staying over a 6 month period.

You should immediately contact the Safety & Security Team if you receive any such request.



Anti-social Behaviour,
Crime and Policing
Act 2014

Licensing Act 2003

- Our Premises Licences include conditions relating to:

- The prevention of crime and disorder
- The protection of children from harm



Licensing Act 2003

- Child Sexual Exploitation considerations are now more commonly raised by the relevant Responsible Authorities (e.g. child protection services and/or the Police) in relation to new Premises Licence applications and variations to existing licences
- A number of new Premises Licences now include a condition that we provide regular Child Sexual Exploitation awareness training and maintain evidence of this
- Premises found to be failing in their responsibilities are liable to face Review proceedings with potential ramifications including changes to their licence conditions or revocation of their Premises Licence

Licensing Act 2003 – current enforcement activity

- A number of Police forces are now conducting CSE style “test purchase” operations. This is a sign of assertive steps being taken by the Responsible Authorities to raise the profile of CSE issues across the industry
- For example, undercover Police officers accompanied by a young person have attempted to make a “walk in” booking at hotels and pay by cash without providing any ID
- Whilst these attempted bookings have been refused, on more than one occasion the Team Member concerned has advised the undercover Police officer to make a booking via the website so as to avoid the need to provide ID. All relevant Team Members should be informed that they must not do this, as they may inadvertently be assisting someone who is exploiting a child or young person
- During the test purchase operations the undercover Police officer has also attempted to purchase alcohol for the young person. All relevant Team Members should therefore be reminded of the proper procedures to follow around underage alcohol sales and the recording of any refusals

OXFORDSHIRE HOTELS FAIL CHILD EXPLOITATION TESTS

Numerous hotels and guest houses in Banbury and Bicester in Oxfordshire have failed child exploitation tests carried out by Thames Valley Police. In partnership with Cherwell District Council, police visited 20 establishments during the operation, earlier this month. The objective was to test the reaction of front of house staff when a man and 15-year-old girl attempted to book a room. Nine hotels failed the test, agreeing to rent a room without checking the identification of the guests. Other hotels correctly asked probing questions and passed their concerns on to police.

www.thecatereer.com



Potential Signs of Child Sexual Exploitation

Ask the group to think about and write down what could be some potential signs that Child Sexual Exploitation is taking place in a hotel.

Consider:

- Bookings
- Check In
- Bedrooms
- Bar, Restaurant and public areas

Hold a brief discussion around the points raised before moving on to the next slide

Potential Signs of Child Sexual Exploitation

Room bookings

- Guests requesting a room that is isolated or a number of rooms situated adjacent to each other
- Guests with a local address booking a room
- Last minute / walk-in bookings
- Bookings made in a different name to those who check-in



Potential Signs of Child Sexual Exploitation

Check in

- Guests requesting a room that is isolated or a number of rooms situated adjacent to each other
- The person checking in speaking a different language to the person who made the booking
- Adult guest wishing to pay in cash but reluctant to provide ID
- Guests who do not have any luggage or ID
- Guests arriving and asking for a specific room number, but they don't know the name in which the room is booked
- Guests who appear secretive or evasive about the reasons for their stay



Potential Signs of Child Sexual Exploitation

Check in

- Young people with significantly older boyfriends / girlfriends
- A child or young person who appears withdrawn or tries to hide their face, or appears to be afraid or disorientated
- A child who is restricted from moving, communicating or who appears to be acting under instruction
- A child or young person who does not speak the same language as the person checking in
- Young persons who appear overly made up



Potential Signs of Child Sexual Exploitation

Bedrooms

- Guests that don't want their room entered or cleaned
- Guests trying to conceal their activities in the room or who they are with
- Noise disturbances from a bedroom or many visitors to a particular bedroom
- Excessive alcohol containers in a bedroom
- Items associated with drug taking e.g. spoons, syringes in a bedroom
- Excessive used condoms or condom wrappers found in a bedroom or waste bin
- Signs of items being removed from a bedroom by a guest e.g. bin containing bedding



Potential Signs of Child Sexual Exploitation

Bar, Restaurant and Public Areas

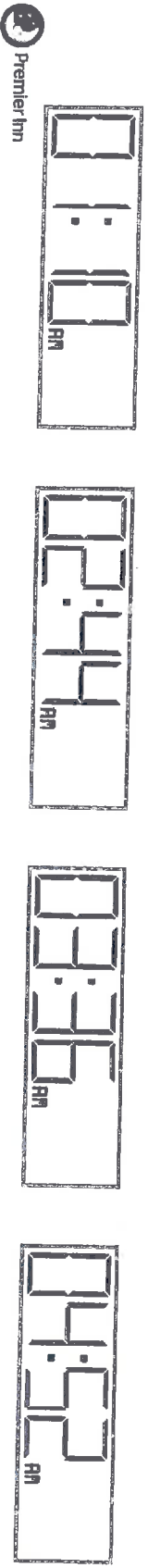
- A young person being bought alcoholic drinks by an adult, particularly if they already appear to be intoxicated
- A young person being bought food or drinks by a much older adult, who they seem to see as their boyfriend/girlfriend
- A young person meeting, or out late with, a group of adults who do not seem to be family members
- Frequent visitors to the hotel who do not appear to have a reason for being there
- Teenagers loitering in public areas or external areas of the premises
- Individuals who appear to be monitoring public areas



Potential Signs of Child Sexual Exploitation

Other Suspicious Behaviour

- The same adults visiting the hotel regularly but with different children/young people each time
- The same adult and child/young person visiting in a regular pattern e.g. on the same day every week
- A child/young person being taken into a bedroom by one or more adults who do not seem to be family members
- A child/young person in a bedroom that is visited or requested by a number of additional adults
- Adults trying to sneak children/young persons into the hotel
- A child/young person in the company of adults known, or suspected, to be involved in prostitution
- Indication of sexual activity between a young person and one or more adult, who is significantly older than the young person
- Guests who regularly move in and out of the hotel at unusual hours



“Usual” vs. “Unusual” Behaviour?

We must be aware that this is a sensitive issue and we need to differentiate between suspected exploiters and genuine adults e.g. Mums and Dads with their own children.

The potential signs of Child Sexual Exploitation mentioned on the previous slides are only potential indicators and do not necessarily mean that exploitation is taking place.

You should therefore trust your instincts as to what is “usual” vs. “unusual” behaviour.

We deal with genuine guests day in, day out, but should look out for any behaviours which are “out of the ordinary”. If you are unsure, share your concerns with your colleagues to see what they think.

Grooming of Hotel Employees

- Exploiters have been known to become friendly with hotel employees in an attempt to avoid suspicion or encourage them to turn a blind eye to “unusual” behaviour
- Sometimes hotel employees may be offered payment, gifts or some other reward
- All Team Members should report any such approaches to their Line Manager and ensure they comply with Whitbread’s Hospitality and Gifts Policy at all times
- Individuals who are proved to have assisted or encouraged Child Sexual Exploitation will themselves have committed a Criminal Offence and may be prosecuted accordingly



What to do if you have a concern

If you spot any potential signs of Child Sexual Exploitation and you believe the behaviour is unusual you should:

- Raise your concerns with a Manager or, if unavailable, talk to another Team Member to see what their view of the situation is
- If you reasonably believe exploitation is taking place or about to take place you should raise your concerns with the Police on 101
- Managers can contact the Police on 101 to report any potential concerns. However, they should call 999 if a child or young person appears to be in immediate danger
- You should not approach or challenge guests directly
- Preserve evidence - do not touch, move or remove any items from the bedroom. If the room has been vacated, do not let anyone go into the room until the Police arrive or instruct you otherwise
- Inform the Safety & Security Team on 01582 888829

If you see something, say something.
Let us know on 101 or in an emergency call 999.

- Child Sexual Exploitation can quite literally happen to any child or young person
- By knowing the potential signs, being vigilant and raising any concerns you will help to ensure that Premier Inn acts responsibly and we meet our collective moral duty to protect children from harm
- Most importantly, your actions may save a child or young person from sexual exploitation



Annex M

SAY SOMETHING IF YOU SEE SOMETHING

Sexual exploitation
is abuse and a crime.

QUIET PLEASE.

Let's just keep this
between you and me.

If you spot any potential signs of Child Sexual Exploitation:

- Raise your concerns with a Manager or, if unavailable, talk to another Team Member to get their view of the situation
- If you reasonably believe exploitation is taking place inform the Police via the 101 Non-emergency number. However if a child or young person appears to be in immediate danger call 999
- Inform the Safety & Security Team on 01582 888829

Premier Inn



Annex N

Child Sexual Exploitation - Refresher Training

Child Sexual Exploitation

Refresher Training



EXIT

SAY SOMETHING IF YOU SEE SOMETHING

Sexual exploitation is abuse and a crime.

PLEASE
Call 999 for help or
contact your local police

If you spot any potential signs of Child Sexual Exploitation

- Think you or your child is being exploited or is at risk of being exploited
- If you have concerns about a child or young person who may be at risk of being exploited, please contact your local police or the NSPCC Helpline on 0800 1111.



Key: Not started Started Completed

ZOOM

EDIT

Child Sexual Exploitation - Refresher Training



Child Sexual Exploitation Refresher Training MENU

Introduction

Welcome to the refresher training module designed to remind you of the potential signs of Child Sexual Exploitation and what to do if you have any concerns.

If you have not previously completed the main 'Child Sexual Exploitation Raising Awareness' training, please speak to your Operations Manager as they will need to take you through that more detailed training in the first instance.



ZOOM

EDIT

Navigation icons: back, forward, refresh, play, stop.

Child Sexual Exploitation - Refresher Training



Child Sexual Exploitation

Refresher Training



What is Child Sexual Exploitation?

- Child Sexual Exploitation (CSE) is where children and young people are manipulated, or forced into taking part in sexual activity, doing things they don't want to do. This is often in return for attention, money, food, alcohol, clothes, somewhere to stay or gifts
- It can affect young people from any background, boys and young men, as well as girls and young women
- Child Sexual Exploitation is not just carried out by men, women are known to be perpetrators of this crime too
- It is a serious issue facing society as a whole we therefore have a moral duty to keep children and young people safe and work together with Police and other agencies to help prevent such exploitation



ZOOM

Next

EDIT



Child Sexual Exploitation - Refresher Training

Child Sexual Exploitation

Refresher Training

Potential Signs

There are a number of potential signs of Child Sexual Exploitation that may be spotted at different points in and around the hotel.

Click on each of the buttons below to be reminded of the potential signs to be aware of.

Room Booking

Checking In

Bedrooms

Suspicious Behaviours



ZOOM

EDIT



Child Sexual Exploitation - Refresher Training



Child Sexual Exploitation

Refresher Training

Potential Signs

There are a number of potential signs of Child Sexual Exploitation that may be spotted at different points in and around the hotel.

Click on each of the buttons below to be reminded of the potential signs to be aware of.

- Room Booking
- Checking In
- Bedrooms
- Suspicious Behaviours

- Guests requesting a room that is isolated or a number of rooms situated adjacent to each other
- Guests with a local address renting a room
- Last minute / walk-in bookings
- Bookings made in a different name to those who check-in / person speaking a different language to the person booking



ZOOM

EDIT



Child Sexual Exploitation - Refresher Training



Child Sexual Exploitation

Refresher Training

Potential Signs

There are a number of potential signs of Child Sexual Exploitation that may be spotted at different points in and around the hotel.

Click on each of the buttons below to be reminded of the potential signs to be aware of.

Room Booking

Checking In

Bedrooms

Suspicious Behaviours

- Adult guest paying in cash and not willing to provide credit card details
- Guests who do not have any luggage or ID
- Guests arriving and asking for a specific room number but they don't know the name in which the room is booked
- Guests who appear secretive or evasive about the reasons for their stay
- Young people with significantly older boyfriends / girlfriends
- A child or young person who appears withdrawn or tries to hide their face
- A child who appears to be afraid or disorientated
- A child who is restricted from moving, communicating or acting under instruction
- Young persons who appear overly made up



ZOOM

EDIT



Child Sexual Exploitation - Refresher Training

Child Sexual Exploitation

Refresher Training

MENU

Potential Signs

There are a number of potential signs of Child Sexual Exploitation that may be spotted at different points in and around the hotel.

Click on each of the buttons below to be reminded of the potential signs to be aware of.

Room Booking

Checking In

Bedrooms

Suspicious Behaviours

- Guests that don't want their room entered or cleaned
- Guests trying to conceal their activities in the room or who they are with
- Noise disturbances from the bedroom or due to frequent visitors to the room
- Excessive alcohol containers in the bedroom
- Items associated with drug taking e.g. spoons, syringes in a bedroom
- Excessive used condoms or wrappers found in a bedroom or waste bin
- Signs of items being removed from a bedroom by a guest e.g. bin contents bedding



ZOOM

EDIT



Child Sexual Exploitation - Refresher Training

Child Sexual Exploitation

Refresher Training

Potential Signs

There are a number of potential signs of Child Sexual Exploitation that may be spotted at different points in and around the hotel.

Click on each of the buttons below to be reminded of the potential signs to be aware of.

Room Booking

Checking In

Bedrooms

Suspicious Behaviours

- The same adults visiting the hotel regularly but with different children/young people each time
- The same adult and child/young person visiting in a regular pattern e.g. on the same day every week
- A child/young person being taken into a bedroom by one or more adults who do not seem to be family members
- A child/young person in a bedroom that is visited or requested by a number of additional adults
- Adults trying to sneak child/young persons into the hotel
- A child/young person in the company of adults known, or suspected, to be involved in prostitution
- Indication of sexual activity between a young person and one or more adults who is significantly older than the young person
- Guests who regularly move in and out of the hotel at unusual hours



ZOOM

EDIT



Child Sexual Exploitation - Refresher Training

Child Sexual Exploitation

Refresher Training

MENU

If you have a concern

It is important to remember that spotting one of the potential signs mentioned earlier does not mean that Child Sexual Exploitation is taking place.

You should therefore look out for any behaviours which are out of the ordinary and trust your instincts of what is 'usual' vs 'unusual'.

If you have a concern you should take appropriate action as follows:

- You should raise your concerns with your Manager or if unavailable, talk to another Team Member to see what their view of the situation is. If you reasonably believe exploitation is taking place or about to take place you should call the Police on 101 to report your concerns. However, if you believe a young person is in immediate danger call 999/112
- **Guests should not be approached or challenged**
- Preserve evidence, do not move items. If the persons causing concern have left the room, do not let anyone go into the room until the Police arrive or instruct you otherwise
- Contact the Safety & Security Team on 01582 888829

If you see something, say something.

Let us know on 101 or in an emergency call 999.



Q ZOOM

EDIT

