

# **Safeguarding Guidance for Licensed Premises**

## **Contents**

Introduction: understanding your safeguarding responsibilities .....	2
Chapter 1: Preventing drink spiking .....	3
Chapter 2: Ask for Angela.....	5
Chapter 3: Recognising vulnerability .....	7
Chapter 4: General health and safety .....	9
Chapter 5: Combating illegal drugs .....	11
Chapter 6: Martyn's Law (Protect Duty) and Counter-Terrorism Preparedness .....	13
Chapter 7: Conclusion and further information .....	15

# Introduction: understanding your safeguarding responsibilities

Safeguarding the public is a critical responsibility for all licensed premises. It extends far beyond simply preventing disorder; it is a fundamental duty of care that underpins a safe, welcoming, and successful venue.

## What is safeguarding?

In the context of licensed premises, safeguarding means protecting vulnerable adults and children from harm, abuse, or neglect. Harm isn't just physical violence; it can include drink spiking, sexual harassment, substance abuse, and general health and safety risks. It involves creating an environment where people feel safe, respected, and supported, and now includes preparing for and mitigating potential terrorist threats.

The topic ranges across the following areas:

- **Customer welfare:** Identifying customers who are vulnerable due to intoxication, isolation, or distress
- **Preventing crime:** Implementing procedures to deter and detect criminal activity, such as drug dealing, spiking or sexual predatory behaviour
- **Physical safety:** Ensuring the venue's physical environment is safe and compliant with health and safety and fire regulations
- **Terrorism prevention:** Meeting new legal requirements under Martyn's Law to enhance public safety in the event of a terrorist attack
- **Staff conduct:** Ensuring your staff are trained, vetted, and understand their roles in promoting safety

## Why is this important?

For licence holders, being aware of these responsibilities is not optional – we all share a responsibility for safeguarding, and in some cases it is a legal requirement.

- **Legal compliance:** Adhering to the Licensing Act 2003 and promoting the four licensing objectives is mandatory. Failure to safeguard the public can lead to reviews of your premises licence, imposition of strict conditions, curtailment of activities or hours, or even revocation of your licence by the local authority. This now extends to compliance with new legislation like Martyn's Law.
- **Reputation and business:** Venues known for being unsafe or poorly managed will quickly lose custom. A strong reputation for customer welfare attracts patrons and builds trust within the local community and with authorities.
- **Moral duty:** Ultimately, every person who enters your premises should be able to enjoy their night without fear of harm

The following chapters provide practical, bitesize guidance on key safeguarding areas to help you and your staff meet these vital responsibilities. You will find lots of useful links to guidance and resources at the end of the document.

# Chapter 1: Preventing drink spiking

## Introduction

Drink spiking is a serious crime that involves putting alcohol or drugs into a person's drink or by injecting them, without their knowledge or consent. It carries a potential prison sentence of up to 10 years and is a crime, regardless of whether a further assault occurs.

Spiking can happen to anyone, and the substances used are often odourless and colourless. Your vigilance and a proactive approach are the best deterrents. For additional information, the National Police Chiefs' Council (NPCC) provides guidance on spiking.

## How to spot it

Staff should be trained to look for unusual behaviour or specific physical signs:

- **Suspicious activity:** Individuals lingering near drinks, acting suspiciously around unattended beverages, or discreetly adding substances to drinks
- **Customer condition:** Customers who become unexpectedly or rapidly intoxicated, disorientated, drowsy, or confused
- **Physical signs:** Glazed eyes, unsteadiness, or an individual showing signs of injury or distress
- **Discarded items:** Finding unusual items like needles or small vials in the toilets or smoking areas, note that metal detectors at entry may not pick up small needles

## How to prevent it

Prevention is a combination of strong venue policies, staff training, and customer awareness.

- **Training:** Ensure all staff, including security, are trained to spot the signs and know the procedures for handling incidents
- **Security:** Implement robust searching policies at entry to prevent harmful items from being brought in
- **Drink management:**
  - Regularly remove unattended glasses from tables and bar tops and advertise a 'dispose of unattended drinks' policy
  - Do not promote rapid consumption of alcohol
  - Consider providing physical anti-spiking measures, such as bottle stoppers or protective drink covers, to customers who want them
- **Awareness:** Display government 'Enough' campaign posters and other anti-spiking materials in prominent areas (toilets, near bars) to educate customers on the signs and how to seek help
- **CCTV:** Optimise CCTV coverage to minimise blind spots and increase lighting where possible

## Action to take in case of a spiking incident or allegation

- **Act immediately:** Always take reports seriously and prioritise the customer's health and safety
- **Provide a safe space:** Take the person to a safe, quiet, and supervised area away from public view (e.g., a staff room or office where there is CCTV)
- **Seek medical help:** If they are unwell, ensure a trusted friend takes them to A&E, or call an ambulance immediately (999 in an emergency). Medical staff must be told that spiking is suspected.
- **Preserve evidence:** Secure all affected drinks, containers, or any contaminated clothing. Seal off the area where the incident occurred, if possible, for forensics. Seek advice from the police on preserving evidence if appropriate.
- **Inform police:** Report the incident to the police (999 for emergencies, 101 for non-emergencies). Review and secure CCTV footage.
- **Log incident:** Record as much detail as possible in writing with contact information of any witnesses, and alert local partnership schemes like Pubwatch

## Drink spiking checklist

- Staff trained on spotting signs and response procedures
- Clear, government-approved awareness posters displayed
- Unattended drinks policy visibly advertised and enforced
- Anti-spiking covers available upon request (optional, but recommended)
- Procedure for a safe space and medical assistance established
- Evidence preservation and police reporting protocols in place

## Chapter 2: Ask for Angela

### Introduction

The Ask for Angela scheme is a nationally recognised safety initiative supported by the Home Office that helps people who feel unsafe, vulnerable, or threatened in licensed premises.

By asking for 'Angela', a person discreetly signals to staff that they need help with a situation, such as unwanted attention, a bad date, or feeling threatened. The scheme works to empower staff to provide a safe resolution and shows a commitment to customer safety.

### How to spot it

The key sign is a customer approaching staff and asking for "Angela". While this is a code phrase, staff should also be generally alert to anyone appearing distressed, isolated, or being subjected to unwanted attention.

### How to prevent it

The scheme is preventative by creating an environment where inappropriate behaviour is not tolerated and people know they can get help.

- **Adopt the scheme:** Officially pledge to adopt the Ask for Angela campaign
- **Staff training:** Use the free resources and workbooks available on the Ask for Angela website to train all staff, including management and security. Training should be part of onboarding and regular refreshers.
- **Promote participation:** Display the official posters, window stickers, or staff badges to show you are a participating venue
- **Communicate expectations:** Use social media to promote your participation and let customers know that your venue prioritises their safety

### Action to take if you are asked for Angela

Staff actions should follow the **C.A.R.E.** framework:

- **Consider and actively listen:** Pause what you are doing, give the person your full attention, use open body language, and listen to what they say. Reassure them with phrases like, "You're safe here, how can I help?".
- **Risk assess:** Determine the immediate safety needs. Do they want to leave, call a friend, or simply be moved to a safe place within the venue?
- **Explain and evaluate:** Clearly explain their options. Actions may include:
  - Taking them to a discreet, safe internal area (e.g., staff room)
  - Calling a taxi for them (have local, trusted taxi numbers available)
  - Contacting a friend or family member for them

- Asking security to discreetly monitor or remove the person causing distress (never do this alone and ensure the vulnerable person doesn't leave at the same time as the aggressor)
  - Calling the police if the situation is an emergency or involves a crime
- **Follow up:** Record the incident internally, review what happened, and provide feedback to the team to improve future responses. Alert local partnership schemes like Pubwatch if appropriate.

### **Ask for Angela checklist**

- Venue is officially registered/pledged with a local scheme
- All staff are trained using the official workbooks/guidance
- Posters and promotional materials are visibly displayed
- A dedicated 'safe space' within the premises is identified
- Local, trusted transport options (e.g., taxi numbers) are easily available to staff
- Incident reporting procedure is established and followed

## Chapter 3: Recognising vulnerability

### Introduction

Vulnerability can be temporary and result from excessive alcohol/drug consumption, being alone, or being targeted by an offender. Your staff's ability to identify and appropriately respond to these situations is crucial.

### How to spot vulnerability

- **Intoxication:** Staggering, slurring words, confusion, or signs of alcohol poisoning (unresponsive but conscious, irregular breathing, seizures, vomiting). Refuse entry to those already clearly intoxicated.
- **Isolation:** A person who is alone, seems lost, or is separated from their friends
- **Distress:** Someone who is crying, upset, scared, or in a clear argument
- **Being controlled:** An individual who appears to be under the influence or controlled by someone else, or is being plied with alcohol
- **Appearance:** Dishevelled appearance or missing clothing

### How to prevent vulnerability and ensure safety

- **Staff Training:** Implement comprehensive Welfare and Vulnerability Engagement (WAVE) training or similar courses (e.g., from National Pubwatch or Drinkaware). The WAVE training, specifically developed for the night time economy, provides staff with the skills to recognise vulnerability and intervene safely.
- **Refusal of Service:** Uphold the law by refusing to serve intoxicated individuals. This is a legal requirement and promotes public safety. The Drinkaware website has specific resources for licensed premises on this topic.
- **Age Verification:** Strictly enforce age verification policies (e.g. Challenge 25) to protect children from harm. Guidance is available from the PASS scheme.
- **Physical Environment:** Ensure the venue is well-lit, has clear fire exits, and a good layout to prevent accidents and allow for easy monitoring

### Action to take if you are concerned about a vulnerable person

- **Intervene early:** If someone looks vulnerable, approach them proactively. The WAVE initiative encourages staff to use the **ASK, ASSESS, ACT** framework:
  - **ASK** simple, caring questions: "Are you okay?", "Are you with friends?", "How are you getting home?"
  - **ASSESS** the situation: Are they safe? Do they need medical help? Is someone else a threat?
  - **ACT** accordingly: Offer support, a safe space, call a taxi/friend, or contact emergency services if necessary

- **Dynamic risk assessment:** Staff should constantly evaluate situations, treating each person as an individual and avoiding assumptions
- **Safe departure:** If a vulnerable person is leaving alone, offer to call a taxi or a friend, or have security watch them leave to ensure they are safe
- **Seek medical help:** As with spiking incidents, call emergency services if there are signs of alcohol poisoning or injury
- **De-escalate:** Use non-threatening body language and a calm voice to de-escalate anger or aggression
- **Record:** Document all incidents thoroughly. Alert local partnership schemes like Pubwatch if appropriate.

## **Vulnerability checklist**

- Staff trained in vulnerability awareness (e.g., WAVE/Drinkaware course)
- Intoxicated persons refused entry/service according to the law
- Robust age verification policy (e.g., Challenge 25) in place
- Procedures for safe departure of vulnerable customers established
- Clear incident reporting and recording procedures followed
- Venue layout and lighting support safety and monitoring (CCTV optimised)



## Chapter 4: General health and safety

### Introduction

Adhering to health and safety legislation is a fundamental obligation for all employers and premises owners. A safe working environment for staff translates directly to a safer environment for your customers and promotes the public safety licensing objective.

Premises must comply with the Health and Safety at Work etc. Act 1974 and related regulations. Guidance can be found on the Health and Safety Executive (HSE) website.

### How to spot hazards

Regular inspections and staff vigilance are key to identifying potential hazards:

- **Physical hazards:**
  - Slippery floors from spilled drinks, ice, or cleaning fluids (look for unaddressed spills and lack of 'wet floor' signs)
  - Blocked fire exits or corridors (e.g., storage of kegs, bins, or boxes in escape routes)
  - Poor lighting on stairs, in toilets, or in exterior areas
  - Damaged flooring, loose cables, or broken furniture
- **Hygiene hazards:**
  - Overflowing bins, dirty glassware, or unkempt toilet facilities pose a safety risk. Environmental Health can provide guidance on food and hygiene.
- **Operational hazards:**
  - Overcrowding (beyond the safe capacity limit of the venue)
  - Excessive noise levels that could cause hearing damage to staff or public nuisance

### How to prevent incidents

- **Risk assessments:** Conduct thorough and regular risk assessments across all areas of the premises (bar, kitchen, dance floor, toilets, cellar, exterior). The HSE provides templates and guidance on how to conduct a risk assessment.
- **Fire safety:**
  - Maintain clear fire escape routes at all times
  - Ensure all fire alarms and emergency lighting are regularly tested (weekly checks, professional servicing). Guidance on fire safety law for businesses is available on Gov.uk.
- **Cleaning regimes:** Implement a clear, scheduled cleaning rota, especially for floors and toilets. Use appropriate signage when cleaning is in progress.

- **Capacity management:** Strictly adhere to the maximum capacity set by your local authority. Security and floor staff should monitor crowd density.
- **Manual handling:** Train staff on correct lifting techniques to prevent back injuries when moving stock (kegs, crates). HSE manual handling guidance is essential.
- **Access/egress:** Ensure sufficient lighting outside the premises, particularly around entrances, smoking areas, and taxi queues, to deter crime and prevent trip hazards

## Action to take in case of safety issues

- **Immediate mitigation:** If a hazard is identified (e.g., a spill, a blocked exit), immediate action must be taken to clear it, cordon it off, or rectify the situation
- **Emergency response:** In the event of a fire, the priority is evacuation. Staff must know the assembly point and who is responsible for checking areas and liaising with emergency services.
- **Accident reporting:** All accidents, however minor, must be recorded in an accident book. Certain serious incidents must be reported to the HSE under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013).
- **Review and retrain:** Use incident reports and near-misses as training opportunities to prevent recurrence

## General health and safety checklist

- Up-to-date, documented risk assessments are in place
- Fire exits and escape routes are clear and checked daily
- Fire alarms and emergency lighting are tested regularly and serviced professionally
- Staff are trained in basic H&S, manual handling, and emergency evacuation
- Cleaning schedules are maintained and wet floor signs are used correctly
- Accident book is available and all incidents are recorded/reported (RIDDOR)
- Venue capacity limits are understood and enforced by management/security

## Chapter 5: Combating illegal drugs

### Introduction

The presence of illegal drugs at licensed premises poses significant risks to public safety and is a serious breach of the law and licensing objectives. As a licence holder, you have a legal obligation to take reasonable steps to prevent drug activity on your premises. The Misuse of Drugs Act 1971 makes possession and supply illegal, and venues can face severe penalties, including licence revocation, for failing to act.

Drug use can lead to violence, health emergencies, and a hostile atmosphere, contributing to crime and disorder in the night-time economy. A zero-tolerance policy, robust security measures, and clear staff training are essential components of a safe operating environment.

### How to spot signs of illegal drugs

Staff should be trained to look for suspicious behaviour and signs of drug use or dealing.

- **Dealing activity:**
  - Brief, discreet exchanges of small packages or cash
  - Individuals meeting repeatedly in secluded areas (toilets, smoking areas)
  - Suspects loitering without buying drinks or engaging in venue activities
- **Physical signs of use:**
  - Finding drug paraphernalia (small bags, white powder residue, needles, foil, nitrous oxide canisters) in toilets or bins
  - Hyperactivity, excessive sweating, paranoia, or unusually constricted/dilated pupils
  - Customers spending a disproportionate amount of time in the toilets or visiting stalls in groups
- **Smell:** Distinctive smells associated with certain substances (e.g., cannabis)

### How to prevent use of illegal drugs

Prevention relies heavily on visible deterrents, effective security, and clear policies.

- **Zero-tolerance policy:** Display clear signage at entry and within the venue stating you have a zero-tolerance drug policy, outlining the consequences of being caught (removal and police involvement)
- **Effective search procedures:** Implement thorough and consistent searching procedures for all customers entering the premises. Security staff must be trained to search effectively and professionally. The Security Industry Authority (SIA) provides licensing and training standards for security staff.
- **CCTV coverage:** Ensure CCTV covers all internal and external areas, paying close attention to blind spots like smoking areas and the exterior of toilet doors

- **Toilet checks:** Implement a rota for regular, documented checks of toilet facilities by staff to look for drug use and paraphernalia, and to remove unattended items
- **Partnership working:** Engage actively with local Pubwatch schemes and local police to share intelligence on known dealers or drug trends in the area

## Action to take

- **If dealing is suspected:**
  - Do not approach the suspect alone
  - Alert management and security immediately using a discreet codeword or radio transmission
  - Monitor individuals via CCTV if possible to gather evidence of the exchange
  - Eject the suspect(s) from the premises if they are identified, ensuring security is present
  - **Crucially, call the police immediately and provide details of the incident and descriptions of the individuals involved**
- **If drugs or paraphernalia are found:**
  - Do not touch or handle suspicious substances directly. Use gloves or an appropriate container
  - Secure the item safely in a manager's office or secure area pending police arrival. This is preserving evidence.
  - Record the incident in the incident log
- **If a customer is unwell due to drugs:**
  - Follow the procedures in Chapter 3: ensure they are in a safe space and call 999 immediately
  - Inform paramedics of suspected drug use so they can provide appropriate treatment
  - Frank (National Drugs Helpline) offers resources for businesses and individuals on drug types and their effects

## Illegal drugs checklist

- Clear zero-tolerance drug policy advertised throughout the venue
- Effective and consistently applied searching policy at entry
- Staff trained to spot dealing activity and signs of drug use
- Regular, documented toilet checks conducted by staff
- Procedures in place for discreet communication between staff regarding incidents
- Procedures established for securing found substances and contacting police immediately

## Chapter 6: Martyn's Law (Protect Duty) and Counter-Terrorism Preparedness

### Introduction

Martyn's Law, formally known as the Terrorism (Protection of Premises) Bill, places a legal requirement on those responsible for certain venues and locations to consider the threat from terrorism and implement appropriate and proportionate protective security measures. This is a crucial addition to existing safeguarding duties.

The law is a direct result of the Manchester Arena attack in 2017 and aims to ensure that premises are better prepared to respond to and mitigate the impact of a terrorist incident. The requirements will be tiered based on venue capacity ('standard tier' for venues with 100+ capacity; 'enhanced tier' for 800+ capacity). All licensed premises, especially those in the NTE, should proactively engage with its principles now.

### How to spot and prevent threats

Unlike previous chapters focusing on incidents after they happen, this chapter focuses heavily on ongoing prevention and preparedness.

- **Vigilance (See Something, Say Something):** The most critical tool is staff vigilance. Staff must be encouraged to report suspicious behaviour without fear of overreaction. This includes:
  - Individuals showing unusual interest in security features (CCTV, entry points, back-of-house areas)
  - Unattended bags or packages
  - Individuals taking photos of restricted areas or acting as if they are 'casing' the venue
- **Access control:** Ensure only authorised personnel can access back-of-house areas, cellars, and roof spaces
- **Review supply chains:** Be aware of who has access to your premises during delivery times and ensure all contractors are vetted
- **Communication:** Have clear internal communication channels (radios, codewords) to raise the alarm discreetly

### Action to take and how to prepare

Preparation is key to survival in a critical incident.

- **Risk assessment:** Complete a specific counter-terrorism risk assessment for your venue. The NaCTSO (National Counter Terrorism Security Office) website provides official guidance and templates.

- **Training:**
  - Ensure all staff complete the free, online ACT (Action Counters Terrorism) Awareness course. This covers how to spot the signs of terrorism and what to do in an attack.
  - Train staff on the 'Run, Hide, Tell' guidance
- **Create a plan:** Develop a specific PEEP (Premises Emergency Evacuation Plan) and a CTP (Counter Terrorism Plan) that covers different scenarios (e.g., marauding attack, bomb threat)
- **Physical security:** Based on your risk assessment, consider physical measures such as enhanced lighting, CCTV, hostile vehicle mitigation (bollards if applicable to your entrance), and access control

### **Martyn's Law and preparedness checklist**

- Venue management aware of upcoming Martyn's Law tiers and requirements
- Counter-terrorism risk assessment completed for the premises
- All staff have completed the online ACT Awareness course
- A CTP (Counter Terrorism Plan)/PEEP is drafted and understood by management
- Staff are trained on the 'Run, Hide, Tell' protocol
- Suspicious activity reporting encouraged and processes established with local police/CT unit

## Chapter 7: Conclusion and further information

### Summary

Effective safeguarding is an ongoing commitment that requires vigilance, clear procedures, and continuous staff training. By implementing the guidance outlined in these chapters, licensed premises can significantly enhance public safety, reduce crime and disorder, and maintain a compliant and reputable business operation.

Here is a brief summary of the key matters covered in this document:

Chapter	Topic	Key actions summarised
Intro	<b>Safeguarding responsibilities</b>	Understanding legal duties under the Licensing Act 2003, health and safety legislation, and new CT laws like Martyn's Law.
1	<b>Preventing drink spiking</b>	Staff training, using anti-spiking measures, removing unattended drinks, and preserving evidence for police.
2	<b>Ask for Angela</b>	Adopting the code phrase, training staff on the C.A.R.E. framework, and providing discreet assistance to those in distress.
3	<b>Recognising vulnerability</b>	Using the WAVE (ASK, ASSESS, ACT) framework to help intoxicated or isolated individuals, and refusing service lawfully.
4	<b>General health and safety</b>	Conducting risk assessments, maintaining fire safety compliance, managing capacity, and recording all accidents (RIDDOR).
5	<b>Combating illegal drugs</b>	Implementing zero-tolerance policies, robust searching, regular toilet checks, and immediate police reporting of dealing activity.
6	<b>Martyn's Law / Protect Duty</b>	Completing CT risk assessments, training staff via the ACT course, and developing emergency response plans (Run, Hide, Tell).

## Further information and resources

You may find the following links useful for detailed, up-to-date guidance and training materials tailored for the licensed trade.

- [National Pubwatch](#): Provides resources, best practice guides, and information on WAVE training and local schemes
- [WAVE training](#): Specifically designed for those operating in the night time economy
- [Health and Safety Executive \(HSE\)](#): The primary source for all workplace health, safety, and accident reporting (RIDDOR) regulations and guidance
- [Ask for Angela](#): Official campaign materials, posters, and training workbooks for implementing the scheme in your venue
- [Drinkaware](#): Offers free resources, tools, and training specific to responsible alcohol consumption and working with vulnerable people
- [Gov.uk](#): Central government source for all legislation mentioned (Licensing Act, Misuse of Drugs Act, H&S at Work Act), fire safety law, and the 'Enough' anti-harassment campaign materials
- [Frank](#): The national drug helpline and information service, useful for staff training on different substances and their effects
- [ProtectUK \(Counter Terrorism Policing\)](#): Official source for the ACT awareness course, Martyn's Law guidance, and counter-terrorism advice for businesses
- [National Proof of Age Standards Scheme](#): Advice and posters reference age verification e.g. Challenge 25, and the PASS card scheme
- **The council's Licensing Team at [South Oxfordshire](#) and [Vale of White Horse](#)**: Local licensing applications, guidance and policy
- **The council's Community Safety Team at [South Oxfordshire](#) and [Vale of White Horse](#)**: Information and guidance on a number of topics around drugs, alcohol, protecting vulnerable persons and anti-social behaviour
- **The council's Food and Workplace Safety Team at [South Oxfordshire District Council](#) and [Vale of White Horse District Council](#)**: Information and guidance on food hygiene and workplace safety.
- [Oxfordshire County Council's Public Health and Wellbeing](#): Information on alcohol and drug addictions and safe drinking and other public health matters

Stay engaged with your local police and licensing officers, as partnership working is the most effective way to manage a safe licensed premises.

For any queries on this document, please contact the council's Licensing Team. Contact information can be found at the links above.