

safer clubbing

Guidance for licensing authorities, club managers and promoters.

Published by the Home Office and London Drugs Policy Forum in partnership with Release.

Overall co-ordination of drug strategy in the UK is the responsibility of the Home Office Drug Strategy Directorate, which commissioned this guidance through its Drug Prevention Advisory Service, in partnership with the London Drug Policy Forum.

The Drugs Prevention Advisory Service

The Drugs Prevention Advisory Service (DPAS) was launched on 1 April 1999 by the Home Secretary as the replacement body for the Drugs Prevention Initiative. It forms the operational and regional arm of the Home Office Drugs Strategy Directorate. The DPAS remit is to promote effective community-based drugs prevention at local, regional and national level in line with the aims and objectives of the Government's national drugs strategy.

DPAS provides information, advice and support to local Drug Action Teams to encourage good drugs prevention practice based on available and emerging evidence, as well as to local communities and practitioners. It aims to help foster links with other Government initiatives such as crime and disorder partnerships, Health Action Zones and other initiatives all aimed at tackling social exclusion. DPAS also provides funding and expertise to assist in the development and evaluation of demonstration programmes to help further knowledge about effective practice in drugs prevention. It publishes a series of detailed research reports about drugs prevention to inform evidence-based policy and practice.

The London Drug Policy Forum was established in 1991 to co-ordinate London local authority policy and practice and to encourage joint working. It is funded by the Corporation of London.

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Drug Prevention Advisory Service at www.drugs.gov.uk

Nightclubs are an inherent part of social life for young people in Britain today. Clubbing provides an opportunity for an estimated 3.8 million people every week to meet up, socialise and dance.

One of the objectives of the national 10 year drug strategy 'Tackling Drugs to Build a Better Britain', is to tackle drugs in clubs. In 1996 the London Drug Policy Forum produced guidance for clubs called 'Dance Till Dawn Safely' which proved to be an extremely useful document for licensing officers, club managers and promoters. Fashions and patterns in clubbing change constantly, and the time has come for an updated edition of the guidance to be produced.

The Home Office has worked in partnership with the London Drug Policy Forum to produce this update. The consultation process has been thorough and lengthy and we feel that the final document is one which is practical and provides guidance which is achievable. The purpose of this revised guidance is to improve safety for all club goers and in particular to reduce the range of harms associated with drug use and clubbing. It is for Drug Action Teams to ensure that the spirit of this guidance is implemented at a local level.

Drug use by young people in a club environment poses many challenges to all those responsible for the regulation of nightclubs and other dance venues. The following chapters provide detailed guidance on how best to tackle these challenges. We should point out, however, that there is a key role for clubbers in ensuring that their environment is safe, and that they do as much as possible to look after themselves, and each other. We hope that this guide will stimulate debate and that further action with clubs will follow.

We very much hope that this guidance will prove invaluable in encouraging a safer clubbing environment for all.

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This guidance is issued in order to ensure the health and safety of anyone who attends dance events ¹ in England, with a particular emphasis on those who also take controlled drugs. It is commissioned by the Drug Prevention Advisory Service, part of the Home Office Drug Strategy Directorate, and the London Drug Policy Forum, who believe that the safety of club goers is the responsibility of everyone involved in organising dance events. The guidance is particularly aimed at

- 📄 Club owners and promoters
- 📄 The promoters of dance events, both indoors and out
- 📄 Those responsible for licensing and policing dance events
- 📄 Drug Action Teams ²
- 📄 Those providing drug education, medical or general welfare services at dance events

It should also be stated that clubbers who take drugs need to recognise that some drug use is illegal. Furthermore, it is important that they take responsibility for their own health and safety. Just as there is a duty of care on club owners, there is also a responsibility on clubbers to care for themselves and each other.

The document is based on a code of practice on health and safety at dance events, 'Dance till Dawn Safely', produced by the London Drug Policy Forum in 1996. The current guidance updates this document for a national audience. It brings together in one place up-to-date legislation, information and best practice from a wide range of sources.

It recognises that individuals from many different organisations and backgrounds need to work together to make clubbing a safe and enjoyable activity. Whilst the guidance constantly encourages high standards, it also aims to be realistic and takes full recognition of the legitimate business interests of owners and promoters, and the workload of licensing authorities and police services. The varied forms of dance events by their very nature require that the guidance should be interpreted to fit local needs. There are a completely different set of

¹

The British Entertainment and Discotheque Association estimated that 3.8 million people go clubbing every week.

²

Drug Action Teams (DATs) are local multi-agency co-ordinating groups set up to implement the national drug strategy in England. There are 150 of them, mainly based on local authority boundaries.

needs to address at a 'Super Club' hosting thousands of clubbers on a nightly basis, from those at a small bar which holds dance events once a month.

There is no guaranteed, comprehensive approach to ensuring the end of drug related casualties at dance events. There are however numerous steps that can and should be taken to reduce the likelihood of such situations occurring.

This guidance recommends that every Drug Action Team which has clubs in its area, should take the lead in getting the police service, club owners and promoters, licensing authorities and local drug agencies to sit down together and plan a strategy which ensures that dance events take place in as safe an environment as possible. There may also be the need to involve existing multi-agency partnerships, such as Crime and Disorder Reduction Partnerships, or town centre management groups, in developing a strategy. Attention may need to be paid to dance events which are unlicensed where the safety of clubbers may be particularly at risk.

This guidance also recommends that licensees of dance event venues, who have not already done so, should consider developing a drug policy. Such a policy would cover all the issues discussed in this document which are relevant to an individual licensee. The development of a drug policy gives licensees the chance to consider carefully all the key issues which affect the safety of their customers who take drugs. It can operate as an effective checklist. However, the development of a drug policy is not a legal requirement. For this reason, we do not start this publication with a sample policy but dedicate a later chapter to its merits.

The guidance is organised in a straightforward manner. Chapter one gives a brief overview of dance culture and examines the links between drug use and dancing in the UK at the start of the 21st century. Chapter two looks at making the physical environment as safe as possible. Chapter three deals with preventing drug dealing and reducing the amount of drugs used at dance events. Chapter four covers reducing the harms associated with drug use and keeping clubbers safe during and after the event. Chapter five introduces the concept of a drug policy for dance venues and provides a recommended outline for this. Chapter six contains a series of fact files which set out the main roles and responsibilities for each professional interest group. The final chapter provides further information and contact details of useful organisations. All organisations or publications cited in the guidance are listed alphabetically in this chapter.

It is expected that this document will be used as a reference guide. Some parts of the document are technical and are only likely to be of interest to those directly involved in, for example, ensuring that ventilation meets Health and Safety regulations, or that door staff are registered in a way that complies with national requirements. In order to make the guidance easy to navigate, key points are summarised at the end of each chapter in a form which marks their relevance to the main professional groups at whom this guidance is targeted.

This guidance is concerned with the health and safety of people who attend dance events and use drugs. These people are referred to throughout this publication by a variety of terms – ‘clubbers’, ‘club-goers’, ‘dancers’, and ‘customers’ are all used. These terms are intended to be interchangeable and are used to make the text easier to read, not to convey different meanings.

The guidance is designed to cover dance events taking place at a variety of venues including small and large night clubs, student union bars, arenas and in tents and marquees outdoors. Again, we use the terms ‘club’, ‘night club’ and ‘dance venue’ interchangeably to make for a smoother read. It will normally be obvious if a certain element of advice does not apply to some venues. By the same token, there is some overlap in our use of the terms ‘club owner/manager’ and ‘promoter’, here we are always using these terms to indicate the people with responsibility for maintaining safety at a dance event.

Chapter 1 *One*

Dance nation

1.1

Nobody knows for certain just how many young people in the UK go clubbing on either a regular or occasional basis. Nor do we know how many ecstasy tablets and other drugs are consumed before, during and after these events. What we do know, however, is that the dance music scene that emerged in the late 1980s has continued to grow and evolve over the past fifteen years. The sustained popularity of this dance drug scene is perhaps only matched by the media's high level of interest in it. Much of this coverage focuses on the level of drug use at clubs and festivals. In particular they highlight the tragic deaths of young people who have died after taking ecstasy. Many of these stories are understandably sensationalist in tone, and sometimes give a misleading picture of the ways in which drugs are taken at night clubs. It may be helpful to provide a brief, more sober overview of the current dance and drugs scene.

1.2

Counter cultures or youth cultures have been associated with drug use for many years. However, the culture associated with ecstasy use differs from many of its predecessors because of the way it has become a mainstream phenomenon.

What has happened ... is a significant broadening of the drug-using constituency encompassing a much wider range of substances taken by ever-larger groups of young people. For a significant minority who would consider themselves otherwise 'ordinary' members of the community, drug taking has become an unremarkable part of the lifestyle kit.³

1.3

Since the arrival of dance music in the late 1980s, dance culture has grown, diversified and sustained itself beyond many commentators' expectations. It has become more commercialised and there has been a fragmentation into sub-genres, different forms of music attracting different groups of young people with associated preferences in their choice of drug. The use of ecstasy, amphetamines and ketamine is associated with 'techno' music, whilst those attending events playing

3

Shapiro, Harry (1999) *Dances with drugs: pop music, drugs and youth culture* in *Drugs: cultures, controls and everyday life* Ed. South London, Sage..

'garage' music are more likely to consume alcohol, cocaine and ecstasy. Whilst trends in music and drug taking are forever changing, it is a fact that every weekend, thousands of people go out dancing all night to a diverse range of different forms of dance music, often under the influence of a cocktail of controlled drugs, alcohol and 'herbal highs'.

1.4

A wide range of surveys have shown that people who go clubbing regularly tend to use controlled drugs much more frequently and in higher quantities than their peers. Table 1 provides details.

Table 1 – Drug use amongst British clubbers

Author	Release	O'Hagan	Winstock	Measham
Year #	1996	1998	1999	2000
Sample	520	200	1151	2057
Area	London & SE	London	UK	North-West
Period	Day of interview*	Day of interview	Past month	Past 3 months
Alcohol	63%	73%	–	–
Cannabis	59%	64%	73%	87%
Ecstasy	53%	53%	86%	67%
Amphetamine	39%	24%	40%	77%
LSD	16%	9%	10%	52%
Cocaine	8%	16%	46%	45%
Ketamine	4%	6%	4%	–
Poppers	8%	3%	22%	72%
Tranquillisers	2%	–	8%	15%
GHB	–	–	3%	11%
None	10%	3%	–	–

Year indicated is year when interviews took place, not year of publication.

It should be noted that the surveys were looking at drug use over different timescales and are not directly comparable.

* Includes those intending to take a specific drug..

1.5

The relatively high levels of drug use by clubbers can be seen by comparing the figures from the above surveys with our most comprehensive national survey. The British Crime Survey (BCS) involves interviews and self-completion questionnaires with approximately 10,000 people. Ramsay & Partridge (1999) report findings from the 1998 BCS. In their survey, only 16% of 16-29 year olds (the peak age for clubbers) had used controlled drugs in the month prior to interview. Only five percent had used more than one drug in the previous month.

1.6

For many, but certainly not all, young people attending clubs, drug use has become an integral part of their night out. A recent survey of 486 UK clubbers found that over one in five young people (22%) interviewed at clubs stated that drug use was one of the things they liked about attending dance events.

1.7

Over recent years, many clubbers have started to take a range of drugs. Some clubbers will start an evening by drinking alcohol, go on to snort a few lines of cocaine, then take a couple of pills in the club, smoke some cannabis to 'take the edge off', perhaps consume more alcohol and on returning home use a range of depressant drugs to ease into their 'come down'. These can be prescription drugs such as valium, or may be more alcohol and cannabis. There are considerable risks in taking controlled drugs, prescription drugs, alcohol and herbal highs in indiscriminate combinations. The amount and combination of drugs used, the purity or exact chemical composition of the drug, the environment where substances are taken, and the individual's physiology all contribute to the effects of drug use. The effects will vary, not only between individuals, but will differ for the same individual on different occasions. Use of controlled drugs plainly also places individuals in contravention of the law and at risk of criminal prosecution.

1.8

The full extent of the long term health risks regular clubbers are taking is not yet known. For example, relatively little is still known about the long-term effects of using ecstasy. Most research has pointed towards the substance having a debilitating effect on levels of serotonin, one of

the chemicals which regulate mood in the brain. The main component of ecstasy, MDMA (methylenedioxymethamphetamine), causes a large and unnatural release of this chemical and research indicates that the reserve stocks in the brain do not automatically replenish themselves to compensate for this. It is possible that nerve terminals in the brain can be permanently damaged. This suggests that long term users of ecstasy can anticipate problems with mood, depression and anxiety. Memory loss has also been cited as a net result of regular use. There is also research that shows fetuses exposed to ecstasy in the womb are at greater risk of being born with abnormalities.⁵

1.9

However, we do know that certain key factors exacerbate the health risks of drug taking. These include: taking combinations of controlled drugs and/or mixing these with alcohol, becoming overheated and exercising to exhaustion. All these factors are commonly found at dance events. Approximately 80-100 people have died after taking ecstasy in the last ten years. The majority of these deaths have been due to acute heat stroke. In most cases the heat stroke has been caused by a combination of factors:

- ☞ Ecstasy causes body temperature to rise significantly
- ☞ Non-stop dancing increases this already elevated temperature
- ☞ Poor ventilation, over-heated venues and over-crowding, increase temperature further
- ☞ Inadequate intake of water (or other non-alcoholic drinks) exacerbates dehydration and impairs the body's ability to cool itself

1.10

Taking alcohol or other drugs with ecstasy can further cause the body to overheat.

1.11

In conclusion, it is estimated that millions of young people go clubbing in the UK every week, many of them consuming a range of drugs. Dance drug fatalities are comparatively rare, but all involve the tragic death of young people and the majority are avoidable. The guidance contained in the next three chapters sets out tried and tested approaches with the aim of reducing the likelihood of further such tragedies.

⁵

Information taken from Internet sites of Drugscope (www.drugscope.org.uk) and the National Institute for Drug Abuse (www.drugabuse.gov/nidahome.html).

chapter 2

Creating a Safe Physical Environment

two

2.1

This chapter concentrates on ensuring there is a safe physical environment in which the dance event can take place.

2.2

The key people responsible for ensuring the environment is safe are club owners and managers, and/or event promoters. The local licensing department will give advice and sometimes require particular works to take place in order to ensure that these key people are creating a safe environment.

2.3

Any individual or company wishing to put on a dance event will need to apply to the local authority for a Public Entertainment Licence ⁶. Staff at the licensing department will advise the applicant on the conditions which have to be met for a licence to be granted. These staff will then make a recommendation to the licensing committee ⁷ which is comprised of local councillors who will decide whether to grant the licence. It is important that these councillors have a good understanding of the issues relating to safety at clubs and of the context in which dance events take place. Visits to venues and drug awareness training are invaluable components of any induction process designed to equip councillors to fulfil this licensing role.

2.4

The standard approach for deciding the conditions on a licence is for the licensing officer to undertake a risk assessment of the venue or outside premises where it is intended that the event will take place. Clearly, the requirements placed on a three day festival attracting 20,000 people will be very different from those placed on a disco in the back room of a pub holding 150 people.

2.5

The working cultures and approaches of licensing officers and club promoters will often be quite different. However, it is important for both parties to build a working relationship with the common objective of ensuring a successful and enjoyable event which takes place in a safe environment.

⁶

Venues which sell alcohol will also have to apply for an on-licence from local magistrates. Alcohol licensing is not the business of this publication and to avoid confusion, all references to licensing refer to the need for a Public Entertainment Licence.

⁷

Sometimes known as the licensing panel..

2.6





Perhaps the single most important element of a positive working relationship is good communication. Some licensing authorities produce step-by-step guidance on how to apply successfully for a Public Entertainment Licence. Setting out the process clearly is an essential aid to good communication. If both parties know the terms on which they are working together, liaison and negotiation can be much smoother. The interaction between venue and local authority should be seen as one of expert consultation. The personnel from licensing departments have the knowledge to equip venue management with the skills to meet licensing conditions thoroughly and consistently.⁸

2.7

Equally important is the communication between club owner/manager, promoter and the police. The safety lessons and requirements which are the responsibility of the venue owner must also be known and understood by the promoter who may, to a large extent, be running the evening's entertainment. In London the Metropolitan Police hold a voluntary database of responsible promoters. This has proved to be a model of good practice.

2.8

There are five key areas to address in ensuring the environment for a dance event is safe:

- Prevention of overcrowding
-  Air conditioning and ventilation
-  Availability of drinking water
-  Further measures to combat overheating
-  Overall safety

8

Guidance has been or is in the process of being issued by a number of bodies and groups. However, there is currently no agreed national approach to applying for a public entertainment licence..

Prevention of overcrowding

2.9

Overcrowding has been implicated as a key factor in injuries and deaths at dance events.

2.10

Licensing officers will set an overall accommodation limit for a venue (based mainly on floor area and exit capacity) which is stated on any licence granted. Exceeding this capacity is a serious breach and may result in criminal proceedings being instituted against the licensee, manager and promoter, and the licence being revoked.

2.11

It is important that licensing officers ensure that venues use a reliable method of counting the number of customers entering. Methods include electronic clocking systems, 'clickers' and tills. The selling of a finite number of tickets is also acceptable. It is recommended that a designated staff member informs the person in charge when 75% capacity is reached. It is also important to record the number of people leaving the venue during the evening.

2.12

It is vital that all people on the premises are counted. Where guest lists or VIP passes are in operation, the number of paying customers allowed in must be adjusted accordingly. It is important to clarify with licensing officers whether staff are included in the capacity figure and to make a full list of all staff on duty including those involved with a sound system or lighting as well as permanent staff.

2.13

In addition to ensuring that the overall capacity of the venue is not exceeded, it is important to ensure that localised overcrowding is avoided. It is pointless observing the capacity limit, if half the customers are squeezed into small popular areas. Care should be taken to design the venue in ways which avoid this 'bottle-necking'. Local authority and police licensing officers often have the experience to provide helpful (and free) advice on this subject. Particular attention should be paid to bar areas, toilet and cloakroom areas, and thoroughfares, stairways and landings.

Air conditioning and ventilation

2.14

Controlling temperatures and humidity in venues is of paramount importance for the comfort and safety of clubbers. As stated earlier, overheating has been closely linked to ecstasy-related deaths.

2.15

Technical guidance as to appropriate temperatures and humidity and how to ensure that they are adhered to, is available.⁹

2.16

A common complaint about air conditioning is that some owners or managers are reluctant to switch it on, owing to the costs involved. Air conditioning is sometimes switched on when the temperature is already very hot and is then of very limited use in controlling temperature. In order to ensure that the temperature remains at a proper level, air conditioning should be switched on before the event so that it can cope with a gradual increase of temperature as the number of customers increases. This also enables the air conditioning to be operated at less than full power and is more cost efficient.

2.17

Licensees should ensure that venues which do not have air conditioning make provision for temperature cooling by hiring or purchasing industrial fans to be placed around dance floors. If necessary, fire exits could be opened to allow cool air in, providing the venue has prior assent and agreement for such actions from local fire authorities. The venue must take responsibility for keeping customers as cool as possible. This could be the active distribution of free ice or frozen ice pops. Venues should also have a policy where readmission is possible if a customer wishes to go outside to cool off. Although in extreme cases, going from a very hot temperature to a very cold temperature can cause shock. In the majority of cases being allowed to go outside and cool down can be of great benefit.

Availability of drinking water

2.18

It is important that everyone attending dance events keeps themselves hydrated with water or other non-alcoholic drinks. This is particularly important for those who have consumed alcohol and drugs, especially ecstasy.

2.19




There have been many health education campaigns on this issue and Surveys ¹⁰ show that many clubbers are aware of the need to keep themselves hydrated. However, it should also be noted that in some cases the over consumption of water can cause serious problems. It is recommended that users aim to sip a pint of water per hour.

2.20

It is therefore imperative that there is free and unrestricted, but monitored, access to cold drinking water at all times. Licensing authorities should be aware that, in order to maximise bar profits, several owners and promoters have turned off water supplies, supplied only warm water or discouraged bar staff from supplying free cold water. The provision of free water is often a standard condition of a licence where dance music is being played and any breach should be considered very seriously.

2.21

Recommended best practice is:

-  Provision of cold water in easy to access areas; jugs of water and ice or drinking fountains are good examples
-  Large signs to advertise and locate where water can be accessed
-  Availability of a large range of appropriately priced bottled water and soft drinks for purchase at the bar
- Staff detailed to walk round the dance floors with chilled water, offering it to those who look in need

¹⁰

For example, Winstock, A & Griffiths, P. (In preparation) High risk behaviours and harm reduction implementation amongst drug users associated with the dance music scene in the UK. Forthcoming..

2.22

It may be necessary to have staff supervising the distribution of cold water to ensure that it is not adulterated in any way. A recent survey of drug-assisted sexual assault in the UK found that in 50% of all cases, the drug was administered at a pub or club ¹¹. Warnings about this issue should be included in any drug education material made available in clubs (see chapter four for more details).

Further measures to combat overheating

2.23

One of the main causes of overheating is dancers becoming 'locked in' to the music and dancing for hours on end to a fast beat. Fuelled by ecstasy or other stimulant drugs, the risks to health are clear. A number of measures can be taken by club and sound system staff to encourage dancers to take breaks. These are set out below.

2.24

Typically, as the event goes on, the harder and faster the music gets. This is what the majority of customers want and expect. Although clubbers should take responsibility for controlling their own heat levels, DJs can help by being attentive to what is happening on the dance floor and should be aware if the temperature is rising to dangerous levels. Within mixes of records it is possible to introduce a few moments of calm time.

2.25

The vital measure in pinpointing potential candidates for overheating is for all staff to be extra vigilant and watch the dance floors. By keeping a watchful eye on the customers, it will become apparent who is too immersed in dancing to think about taking a break or a drink. These people should be kept under close observation, offered water and gently encouraged to take a break. It is not advisable to be persistent, however, as this may upset or agitate the customer who may become confused as to why they are receiving such attention.

2.26

Spaces should be set aside for dancers to rest and cool down – 'chill out areas'. These areas should be cooler and quieter than the main dance floors. Seating should be provided and door supervisors or other club staff should have a low-key presence to prevent overcrowding. This is also an ideal location for outreach services to set up, or information to be provided.

¹¹

Sturman, Peter (2000) Drug assisted sexual assault. London, Home Office..

2.27

If chill out rooms are provided, it is important to ensure that the music played there is quieter and slower. Although DJs may be briefed to fulfil this requirement, they may disregard this and end up 'competing' with DJs playing music in the main areas. If this happens, the promoter or venue manager needs to step in and remind them of their brief.

2.28

Some dancers may get so hot that they wish to undress in a way that contravenes the venue's dress code. This is an indication that the temperature is too hot and action needs to be taken. In the meantime, dancers should be allowed to take off clothes to aid them in controlling their body temperature.

2.29

Clubbers will need to put on extra layers of clothing to safeguard their health on the way home, especially in winter time. It is important therefore for clubs to provide an adequate cloakroom which is efficiently and securely operated. The cost should either be free, (incorporated into the price of entry) or reasonable to encourage clubbers to use it.

Overall safety

2.30

Licensing officers will direct the venue to comply with all requirements of Health and Safety legislation. Common important issues for consideration at dance event venues include:

- Ensuring that access to potentially dangerous sites such as the top of speakers or balcony rails is effectively prevented
- Employing glass collectors to ensure that drinking vessels do not accumulate and cause obstructions
- Providing drinks in glasses that are made of plastic or toughened glass to prevent them being used as weapons
- Ensuring that fixtures and fittings are safe and secure and unlikely to cause harm or injury
- Ensuring that all fixtures and fittings and electrical systems in particular are safeguarded from the effects of excessive condensation which are common at dance events

- Making sure that a maximum volume on sound systems is set to prevent causing hearing damage to clubbers and staff or disturbance to neighbours. In many cases it may be appropriate to install a tamper-proof sound limiter on the amplification system
- Informing customers of the intended use of any strobe or laser lighting, smoke or other special effects and ensuring that these are installed and used safely
- Preventing floors from becoming slippery from condensation or spilt drinks
- Ensuring that emergency evacuation procedures take into account the fact that many customers may be intoxicated from drink or drugs

2.31

Where a dance event takes place outside, or is of a particularly large scale (e.g. arena-based) there are a number of additional safety issues to cover. All such issues are dealt with comprehensively by the Health and Safety Executive's publication, 'The event safety guide', which is highly recommended.¹²

12

Health and Safety Executive (1999) HSG 195: The event safety guide: a guide to health, safety and welfare at music and similar events. Sudbury, Health and Safety Executive Books..Monitoring and enforcement

Monitoring and Enforcement

2.32

The most effective means of ensuring a safe environment for clubbers is for club owners, event promoters and licensing officers from the local authority and the police, to work together in a constructive partnership. However, it must be recognised that not only licensing authorities, but licencees, managers and event promoters all have a duty to preserve public safety and enforce compliance with licence conditions. It is clear from clubbers and the organisations which represent them, that on occasions their safety is put in jeopardy: ventilation is poor, air conditioning is not used, water taps are turned off, and capacity limits are ignored. In these situations, licensing authorities must take action.

2.33

Some local authority licensing teams are under-resourced and are unable to monitor whether venues are fulfilling their requirements on a regular basis. It will be important for teams to prioritise their work and to pay most attention to those clubs playing music that is attractive to people who take drugs as part of their night out. The risks of harm and, ultimately, of fatalities, are highest in these circumstances. Although licensing authorities have a duty to check on all licencees, such clubs should be monitored more regularly. It should of course be emphasised that although enforcement is the responsibility of licensing officers, the legal responsibility for ensuring the health and safety of clubbers remains with licencees, venue managers and promoters.

2.34

It is important that monitoring takes place at the time when risks are highest – a venue may have the right number of people, a comfortable chill out room and be operating at an appropriate temperature at midnight. By 4 o'clock in the morning, it may be packed from wall to wall, have the temperature of a blast furnace and have run out of cold water.

2.35

Given licensing teams' finite resources, it will be important for them to gain information from a range of agencies in order for them to target venues that are not ensuring a safe environment. The police, drug agencies, medical teams and others should all be encouraged to provide information on a confidential basis.

2.36

The most appropriate source from which to gather information is from the customers who attend dance events. Local authorities should encourage venues to have a clear complaints procedure displayed conspicuously. Clubbers should be encouraged to complain directly to the management of the club at the time of the event if they feel they have not been provided with a safe environment. Complaints procedure notices should also include contact numbers for licensing authorities so that clubbers can take up issues that are not resolved to their satisfaction.

2.37

Licensing authorities are encouraged to consult actively and regularly with clubbers about safety issues. Surveys can be conducted at clubs, or may be distributed with flyers and tickets. Return to a freepost address with entry in a prize draw giving a relevant prize (CD vouchers etc.) can increase the number of replies.

Summary

2.38 The table below summarises the key action points for ensuring a safe physical environment and indicates who the key players are for each point.

	Owners, managers & promoters	Licensing authorities & police	Drug outreach or medical services	Drug Action Team
Developing a constructive working relationship	•	•	•	•
Providing information on the licensing process		•		
Providing induction training to councillors on licensing panel	•	•		•
Supporting club operators to provide a safe clubbing environment		•		•
Designing venue to prevent overcrowding	•	•		
Preventing overcrowding at events	•			
Ensuring air conditioning and ventilation systems are appropriate & working	•	•		
Providing free, accessible, cold water	•	•		
Informing clubbers about importance of water and where to get it	•		•	•
Providing a chill out room	•	•		
Ensuring breaks in fast music	•			
Ensuring overall health and safety	•	•		
Informing clubbers of their rights	•	•		
Surveying clubbers	•	•	•	
Ensuring regular monitoring and enforcement	•	•	•	

three

Chapter 3
Tackling drug dealing

CHAPTER 3 Tackling drug dealing

3.1

There is an essential challenge in tackling drug use in a club setting. It has already been discussed that controlled drug use has become a large part of youth culture and is, for many young people, an integral part of a night out. Certain forms of music are associated with particular types of drug use and when owners or promoters put events on featuring this music, it is inevitable that the customers will include people that use drugs. The Government's advisory body on drugs, the ACMD, has counselled against attempts to ban dance events and recommended flexibility in granting licenses to prevent driving events underground where safety is much more difficult to guarantee.¹³

¹³ Drug Misusers and the Criminal Justice System Part II Police, Drug Misusers and the Community. Advisory Council on the Misuse of Drugs, HMSO 1994..

Legislation

3.2

Club owners and promoters are therefore placed in a difficult situation, they are required to prevent drug dealing and drug use in an environment which is associated with both these activities. Nonetheless the full responsibility is with club owners and promoters to ensure they work within the law, and make every effort to control the use and supply of drugs on their premises.

3.3

If they fail to be rigorous in their efforts to tackle drug use, club owners are liable to have their licence withdrawn under the aegis of the Public Entertainments Licences (Drug Misuse) Act 1997¹⁴. Club owners may also be affected by another important piece of legislation. In May 2001, the Criminal Justice and Police Act 2001 was passed. Section 38 of this Act is reproduced below:

Use of controlled drugs

38 Permitting use of controlled drugs on premises

For paragraph (d) of section 8 of the Misuse of Drugs Act 1971 (c. 38) (offence of knowingly permitting cannabis, cannabis resin or prepared opium to be smoked on premises) there shall be substituted-

“(d) administering or using a controlled drug which is unlawfully in any person’s possession at or immediately before the time when it is administered or used.”

3.4

This change to the legislation extends the scope of the Act which now requires all club owners and others with responsibility for buildings, to ensure that they do not knowingly allow supply or use of any controlled drug, on their premises. Legal precedent makes it clear that anyone responsible for a building should take vigorous action to tackle any suspicion of drug use or supply on the premises. Owners must demonstrate that they are making every effort to control use of these

¹⁴

The British Entertainment and Discotheque Association, in partnership with the Local Government Association and Association of Chief Officers of Police have produced a guide to this Act. See chapter seven, ‘further reading’ for details..

drugs in their clubs. Although the amendment has been enacted, there is currently a period of consultation to shape guidance on how the new Section 8 should be used.

3.5

It is essential for local police services, usually the officer responsible for licensing, and club owners, to establish close working relationships. Whilst it may be desirable, achieving the complete eradication of all drug use and supply is unrealistic. Therefore the provisions in the Public Entertainments Licences Act state that an application for revoking a licence can only be made if:

*'there is a **serious** problem relating to the supply or use of controlled drugs at the place or at any place nearby which is controlled by the holder of the licence.'*¹⁵

The guidance on implementation of the Act also stipulates that application for revocation should only take place:

*'if such action taken by the local authority would significantly assist in dealing with the drugs problem at that place.'*¹⁶

3.6

The police will expect close liaison and co-operation. The practical issues which need consideration are set out below. If a club adheres to these guidelines, and co-operates with the Police, it should be possible for them to operate within the law. A scheme in Rochdale encourages clubs to 'sign up' to the police run protocol on preventing drug dealing and use on their premises. Although adherence to this protocol is not made a condition of a licence, the police licensing officer advises licensing magistrates that if a club has not adopted the protocol, then certain standards cannot be met.

3.7

Where a club adheres to national guidance and co-operates with local police, it should be able to operate within the law.

¹⁵

Public Entertainment Licences (Drug Misuses) Act 1997 paragraph 6a.

¹⁶

Home Office Circular 20/98 Public Entertainments Licences (Drug Misuse) Act..

Entry to the venue

3.8

As part of a licensee's policy on drugs – a topic covered fully in chapter five – there should be a section setting out policies and procedures for searching customers for drugs and weapons including firearms. These policies should be formulated in consultation with the licensing authority and police. It is important that the policy contains a complaints procedure.

3.9

The policy of searching customers for drugs and weapons should be advertised widely, on tickets and flyers and prominently in entrance and queuing areas. Amnesty boxes should also be provided so that customers who have drugs on them and still wish to enter the club can dispose of their drugs before being searched. These boxes must be secure and a protocol should be established for opening them. The opening of the box and any findings should be recorded and witnessed by at least two people. Any drugs should be stored securely before being handed over to the police. The Metropolitan Police Service issue clubs in the centre of London with self-sealing exhibit bags. Any drugs found are placed in these and retained by the management for collection by the police. The bags are all individually numbered and tamper-proof.

3.10

The single most important factor in tackling drug dealing in clubs is the quality of door supervisors. A well trained team of professional door staff can be extremely effective in preventing drug dealing and any related problems. Conversely, it has also been found that criminal organisations can use door supervisors as a way of running drug dealing operations on a large scale.¹⁷ Police officers with licensing responsibility should request full information on the door supervisors used. An efficient, professional team can also act to ensure weapons, including firearms, are not brought into clubs.

Door supervisors

3.11

The Government has recognised the urgent need to regulate the whole of the private security industry in England and Wales, which includes door supervisors working at licensed premises, and the

¹⁷

Morris, Sheridan (1998) Clubs, drugs and doormen London Police Research Group, Crime detection and prevention series paper 86, Home Office..

Private Security Industry Act (2001) became law in May 2001. This means that in time all security industry personnel will need to be licensed to be able to work in the industry. All door supervisors will be required to apply for registration, will be vetted regarding any previous criminal convictions they may have, and will need to be suitably trained. Once the new system is operating, it will be a criminal offence for anyone to work as a door supervisor without being licensed, and it will be illegal for a pub or club manager to employ anyone who is not licensed. In effect, there will be a national registration scheme for door supervisors, to replace the current system of local schemes. This scheme is expected to start in 2003.

3.12

Where current local registration schemes are operating, door supervisors must visibly wear their registration badges at all times whilst working at licensed premises. In areas that do not have a registration scheme at present, it is recommended that security staff wear an identification badge bearing the user's photograph and a number which can be clearly read (not their full name).

3.13

People convicted of robbery, serious assaults, all types of burglary and drugs offences should not be considered suitable for the role of a door supervisor. Local authorities should abide by the Rehabilitation of Offenders Act 1974. Police officers will encourage venues, companies and events to ensure that door supervisors are properly selected, trained and supervised. Door supervisors may be permanent staff employed by the venue or they may work for a security company. In the latter case venues should only contract door supervisors from a reputable security company. The most professional door security companies can work towards, and be assessed against, a set of British Standards for this sector, BS:7960. It is recommended that managers of venues and events should only use the services of door security companies that have been assessed against, or are actively working towards, accreditation for this standard¹⁸.

3.14

The key duties of door supervisors with regards to preventing drug dealing and the use of firearms or weapons are set out below.

¹⁸
Copies of BS:7960 can be obtained by calling the BSI: 020 8996 9000.

Searches

3.15

Door supervisors need to be aware of search/seizure/arrest procedures at the venue, particularly in relation to controlled drugs and offensive weapons. The use of search arches or metal detectors is strongly recommended. Needle-proof gloves should also be considered as a health issue for the door supervisors concerned.

3.16

Door supervisors have no statutory legal rights to search customers. Searches can only be conducted with the customer's consent, as a condition of entry. The fact that searches will be conducted should be clearly advertised. Female customers should be searched by female door supervisors. Under no circumstances should door supervisors perform strip searches. Any customer refusing to consent to a search should be politely but firmly refused entry to the venue. It is important that those conducting searches should do so in a respectful and polite manner, remembering that those being searched are customers. Searching should not cause undue problems to customers, such as requiring them to wait outside in cold weather. The methods and approach to searching influence the mood of clubbers, and set the tone for compliance with the club's practices.

3.17

Where suspected controlled drugs are found on customers during a search, door supervisors have two options. They can either seize the items and refuse entry to the customer, booking in the property in the incident book before handing it to the manager for safe keeping, or they can seize the items, make a citizen's arrest, and hand the customer and confiscated items over to the police when they arrive. The local police service should make it clear which approach they favour and the licensee's drug policy should make it clear what is expected of staff.

3.18

Searching should be especially vigilant in those clubs playing certain types of music historically shown to be most associated with gun use.

General vigilance

3.19

Although a consistently enforced search policy sends a strong message that the licensee does not tolerate drug dealing or drug use, regular customers will be aware of this and those seeking to bring drugs in to the club will not find it difficult to secrete them in places which cannot reasonably be searched. Another consequence may be that customers 'double dose' – take all their drugs before entry to the club, an unsafe practice that is discussed in the next chapter. The use of overt methods of searching may result in this.

3.20

It is therefore imperative that door supervisors working within an event are vigilant in looking for signs of drug dealing. They should regularly patrol all areas of the venue, especially any corridors or secluded areas. Good club managers and professional door supervisors will cultivate good working relationships with their regular club-goers. Where these relationships exist, experience suggests that club-goers will inform staff about drug dealers, particularly if they are acting in an irresponsible or aggressive way.

Training

3.21

It is important that all door supervisors receive appropriate training. The British Standard details specific requirements in relation to door supervisor training, and it is recommended that all door supervisors undergo induction training to at least this standard. The standard recommends that drugs awareness is one of the key subjects to be covered in this training. There are a number of training courses including the British Institute of Inkeeping's City and Guilds certified Door Supervisor's National Certificate Scheme. Qualifications are available at two stages and there is a whole module dedicated to drugs awareness ¹⁹. Generic training for door supervisors should be supplemented by briefings specific to the particular venue.

¹⁹

Full details from the BII, contact information can be found in chapter six..

Other security measures

3.22

It is important that the police, licensing authorities and the leader of the team of door supervisors discuss other security measures in detail. The following methods have proved effective.

The use of closed circuit television

3.23

CCTV can be used to deter and detect drug use, drug dealing or other problems. There is need for a balance in using CCTV. It can be effective in deterring drug dealing, but should not be used to intrude on the legitimate privacy of club goers. It is particularly useful to cover entrance areas and secluded areas of the venue which could be used for drug dealing. There should be a clear policy which ensures that tapes are securely stored and access to them only granted to appropriate personnel. Perhaps the most effective use of CCTV is the ability to send out a clear deterrent message to drug dealers and those carrying weapons including firearms, that the identity of everyone entering a venue is recorded. It is recommended that footage should be kept for 31 days.

Supervising toilet areas

3.24

It is good practice to have attendants in toilet areas to discourage a large build up of people and the selling and use of drugs. Naturally, it is particularly important to respect individuals' privacy in this area and staff should be given clear guidelines which cover when it is appropriate for staff to try to enter a cubicle and when assistance should be sought, and from whom. Training to recognise individuals who are in distress through drug and/or alcohol use is also invaluable for toilet/cloakroom attendants.

Liaison

3.25

The importance of liaison between police and dance venues cannot be over-stated. Many of the difficulties involved in running a dance venue that is profitable, safe and legal can be overcome by good working relationships between local officers and club owners.

3.26

There should be an agreement about the way in which incidents relating to drug use or dealing should be handled. The police should

clarify in which circumstances they wish to be called and what they

expect of door supervisors. Police officers may not always be able to respond promptly, especially on weekend evenings and any agreement should cover what should happen when police cannot attend.

3.27

The procedures for seizing and keeping secure, suspected controlled drugs should also be formally agreed. In some areas, it is regarded as good practice for police officers to come to the club to collect seized substances on a regular basis. This visit also allows the opportunity to exchange information and concerns.

3.28

Many licensees worry about handing over drugs to the police, fearing that if they are regularly seizing drugs, they may be considered to have a serious drug problem and their licence could be at risk. Conversely, police officers often target venues who never seize drugs, feeling that they may be condoning drug use or dealing. These, normally unspoken, fears can evaporate within a good working relationship which involves frequent personal contact. Police services appreciate the difficulties in preventing drug dealing in a club setting and would rather work with licensees to tackle an identified problem than seek to close a venue down, which, in any case, may only displace any drug dealing taking place.

Networking

3.29

Liaison between clubs – especially those who provide similar events and are competitors – and police is particularly valuable. Banning a suspected drug dealer from one club may result in him or her trying to sell drugs in another. If a group of clubs in a city centre are successful in reducing the amount of dealing inside their premises, it may be that drugs are being sold more frequently in local ‘feeder’ pubs or bars where customers meet before going clubbing. The police, in collaboration with the local Drug Action Team, should seek to institute regular fora for exchanging information, on a formal or informal basis.

Summary

3.29 The table below summarises the key action points for tackling drug dealing in clubs and indicates who the key players are for each point.

	Owners, managers & promoters	Licensing authorities & police	Drug outreach or medical services	Drug Action Teams
Ensuring door supervisors are from a reputable organisation	•	•		
Developing a search policy	•	•		
Providing information on search policy	•	•		
Training door supervisors	•	•	•	•
Installing and monitoring CCTV	•	•		
Ensuring toilets are staffed	•	•		
Close liaison between police and venues	•	•		•
Procedures for calling police	•	•		
Networking between clubs	•	•		•

CHAPTER 4

four

Reducing the harm from drug use.^{4.1}

4.1

However efficient are the measures aimed at preventing drugs being brought into and sold at a venue, many clubbers see drug taking as integral to a good night out and it must be accepted that significant numbers of club goers will take drugs before, during and/or after their clubbing.

4.2

This chapter covers the ways in which all agencies, but particularly venue owners and promoters, can protect the health and safety of their customers. The following key issues are covered.

- 📄 Drug information and outreach services
- 📄 Dealing with drug induced problems
- 📄 Getting home safely

Drug information and outreach services

4.3 The club environment is a difficult setting to provide meaningful drug services. There is a lack of research evidence demonstrating effective approaches. Nevertheless, it is clear that many drug using clubbers are in need of support to encourage them either to reduce the amount of drugs they use or at least to use drugs in the safest way possible. There is potential to provide accurate information on safer drug use in the club setting.

Drug information and education

4.4

Any drug education and information service provided normally focuses on ensuring that clubbers understand the potential harm that they are doing to themselves by taking controlled drugs and that they are also aware of the legal consequences of their drug taking. The aim of drug information in this setting is to enable club-goers to be more informed about what drugs they are using, to make them aware of the risks they are taking, and to communicate a range of strategies to reduce their drug use or make it safer. Research suggests that primary prevention – encouraging people not to use drugs – is ineffective in a club setting as a high proportion of clubbers are confirmed drug users who are resistant to this approach.²⁰

4.5

A recent national survey of 1151 UK clubbers ²¹ found high levels of awareness of many key harm reduction messages, but much more variable implementation of them. Although clubbers were eager for up-to-date information, their attempts at harm reduction were found to be patchy at best. The research found that many clubbers do take efforts at cooling and hydration, but that most negate these effects by their level of ecstasy consumption, the frequency of their poly-stimulant use and their harmful levels of alcohol consumption.

²⁰

For instance Kunzel, J., Kroger, C & Buhringer, G. (1998) Evaluation of the Mind Zone Prevention Project in: Ecstasy: use and prevention Cologne, Federal Centre for Health Education.

²¹

Winstock, A & Griffiths, P. (In preparation) High risk behaviours and harm reduction implementation amongst drug users associated with the dance music scene in the UK. Forthcoming..

4.6

Other recent UK research conducted in the North-West illustrates the difficulty in getting harm reduction messages over to some clubbers who see drug use as integral to their enjoyment of a night out:

'The night out agenda is the most difficult to specify because the most cautious and thus safest advice – don't drink too much alcohol, don't mix alcohol with drugs, don't keep redosing or topping up – conflicts with the essential elements of the night out 22.'

4.7

These research studies suggest that, since club goers are very likely to be existing users of drugs, a harm reduction approach is likely to be the most effective. A first strategy may be to engage clubbers' attention by providing suggestions on how to avoid unpleasant experiences and hangovers, before going on to recommend a range of strategies to help them control and reduce their intake of harmful drugs. Such strategies should include information about the effects of mixing alcohol, legal drugs, herbal highs and prescribed medication.

4.8

Other research suggests that using peer educators may be fruitful. It is very important to ensure that information covers alcohol use, especially in combination with controlled drugs. Most admissions to accident and emergency departments from nightclubs are related to alcohol use and violence, rather than controlled drug use 23.

4.9

In addition to providing drug information and education at the venue, some responsible promoters and ticket agents provide information on flyers or tickets. Some ticket agents keep a stock of drug education materials which they distribute to personal callers at point of sale. Licensing officers should encourage venues that do not wish to have outreach services delivering a face to face service to buy in a range of literature from drug services for display at prominent places around the venue. Such literature should be available in a range of languages appropriate to the venues clientele.

22

Measham, F, Aldridge, J, Parker, H. (2001) Dancing on drugs: risk, health and hedonism in the British club scene. London, Free Association Books, page 188.

23

Luke, C., Dewar, C., Bailey, M. McGreevy, D; Morris, H. (1999) A little night club medicine: the healthcare implications of clubbing in Club Health 2000 programme and abstract book Amsterdam, NHS North West, Liverpool John Moore University, Trimbos Instituut..

Drug outreach services

4.10

There are several examples of drug outreach work undertaken at dance venues throughout the UK. Typically this work has involved drug workers being present to offer harm reduction information and advice to clubbers including advice on safer sex, and to help recognise and deal with drug-related intoxication. There is a lack of research evidence to demonstrate the effectiveness of this approach. It is important that where drug outreach workers attend clubs, that they are integrated into the team of staff working at a club and that they attend briefings on health and safety, evacuation procedures etc.

4.11

D 3 (pronounced 'D cubed') is one such specialist team which works in Leeds. The team is actually part of the health education team within the youth service and is therefore funded by the local authority. The team approach local clubs and promoters who put on events featuring music associated with the use of drugs and negotiate how they can provide a service at dance events. Many club owners and promoters are traditionally wary of such services, feeling that having a drug outreach team on site may indicate to licensing authorities and police that the club has a drug problem. In Leeds, local licensing officers and the police have been fully supportive of D 3 's work, and see the use of outreach services as a responsible and positive approach in reducing drug related harm at events.

4.12

Some owners and promoters are concerned that customers resent being approached by drug workers at events and need reassuring that outreach workers are skilled professionals who, while making themselves accessible, will not force themselves on club goers who are not interested.

4.13

D 3 , and other similar teams throughout the country, provide a range of services which typically include:



- Free literature covering safer drug using, both controlled and prescription
- Information on users' legal rights
- Advice on how to access drug services and support
- Warning and information about drug quality and purity
- Advice on welfare and best practice at events

4.14

Whether drug outreach services attend clubs locally or not, there is clearly an important role for drug agencies to engage with club promoters and staff to address the following key issues:

- To provide club owners and promoters with information on trends in local drug use and associated harms
- To ensure that owners and promoters have access to relevant, up-to-date and user-friendly drug education literature to make available to clubbers
- To provide advice and training to staff on how to recognise and respond to drug-related intoxication
- To advertise services provided by their agency

4.15

Drug Action Teams (DATs) should consider commissioning local drug agencies to provide education or outreach services to clubs in their area. In making this assessment they should consider to what degree these services achieve the following objectives:

- Better management of incidents
- Greater confidence of clubs in managing drug use
- Behavioural changes by clubbers in relation to drug use
- Take up of services by clubbers
- A reduction of incidents of drug related harm in clubs and in relation to road safety after clubbing
- Clubbers who are better able to assess the risks to themselves from drug use

DATs may also wish to consider whether these services should be commissioned by clubs themselves.

Ecstasy testing

4.16

One controversial form of harm reduction is the provision of ecstasy testing kits, used to establish whether tablets do in fact contain ecstasy. The sale and use of these tests is legal, although the possession of the drug tested is illegal. The promotion of such tests is not recommended for the following reasons:

- ✎ It is hard to maintain a policy that discourages drug use at the same time as offering a pill testing service
- ✎ Tests do not confirm purity or whether there are dangerous adulterants present, in addition to the common components of ecstasy
- ✎ There is no evidence to suggest that pill testing results in safer use ²⁴

4.17

It should be said, however, that pill testing can be effective in attracting clubbers to services and enabling important dialogues to be developed between clubbers and health professionals.

4.18

A more productive approach than providing pill testing facilities at events, might be the analysis of the contents of amnesty boxes and confiscated drugs to research trends in drug use and to examine the content of what is being sold as ecstasy. Being able to report such information through drug outreach services at events can make clubbers aware of what they are taking – a crucial factor in reducing drug related harm. This is an area in which the local Drug Action Team can take a lead.

4.19

It is important for drug outreach teams to have a close working relationship with club owners and event promoters. This enables them to share information and make sense of any changes in the patterns of drug use. For example, if a club tightens up its searching policy and less drugs are brought in, some clubbers will 'double dose' – take all their drugs together before coming in. This practice has serious health consequences and the outreach team would wish to be raising this issue with clubbers, and with the venue manager.

²⁴
EMCDDA (2001) Scientific report on-site pill-testing interventions in the European Union..

Dealing with drug induced problems

4.20

Licensing officers will need to discuss in detail with club owners/managers their expectations with regard to dealing with drug induced problems. These problems may be of a medical or psychological nature and the assistance provided should be swiftly and easily accessible. The scale and type of medical interventions available will vary according to the type and scale of event being run. The following section explores some of the key issues but does not attempt to prescribe definitive levels of medical cover.

4.21

Sufficient club employees should be trained as First Aiders to ensure that a minimum of two such staff are present at all times during the event. These staff members should be clearly identifiable. The training provided to such staff should include information about common drug induced problems, such as anxiety, paranoia and heat-stroke. These will vary depending on the pattern of drug use locally. Staff, who for the first time encounter clubbers who have used ketamine for example, may not recognise the symptoms of use and fear that someone is having a serious seizure. It is important that local drug agencies, preferably dance outreach workers, are used to keep staff up-to-date. Another good source of information is the organisation NARCAID which circulates helpful bulletins.²⁵ It is advisable that all newly qualified First Aiders work with more experienced staff.

4.22

First Aiders should regularly brief door supervisors and other club staff about common symptoms of drug induced distress to look out for. Bar staff should also have comprehensive server training to help them to deal appropriately with people who are intoxicated through alcohol, drugs or a combination of the two.

4.23

In some cases, particularly large or all-night events, it may be necessary to buy in additional emergency medical cover. There are a number of companies who provide specialised services to dance events. Again, it is important that these companies have a track record of working with drug induced problems. It should not be assumed that

²⁵
Full details are given in the final chapter..

such reputable organisations as the Red Cross, or St. John Ambulance Service, necessarily possess the requisite experience. Even highly experienced and skilled NHS trained nurses and paramedics should not be expected to work in this setting without the supervision of a colleague with experience of working with drug-induced problems.

4.24

The provision of a separate treatment room is the single most useful facility to those providing the medical service. A great deal of work with clubbers suffering the negative effects of drug use involves providing reassurance and support in a calm, cool environment. It is virtually impossible to do this work on a crowded dance floor. It is better for the sufferer, First Aider and other customers for care to be administered privately and discreetly. The room must be of sufficient size for the patient to be laid down.

4.25

Useful medical equipment for such a room includes the following staples:

- 📄 Airways – to keep patient's tongue away from their throat
- 📄 Oxygen
- 📄 Glucose monitoring equipment
- 📄 Blood pressure monitors
- 📄 Vitamin C
- 📄 Rehydration drinks

4.26

On no account, should anyone suffering from the ill effects of drug use be thrown out of the premises. This can cause very serious health consequences. For instance, some ecstasy-related deaths involve hypothermia, hence ejecting someone from a hot club into the cold night air could result in a fatality.

4.27

Outreach services can also assist greatly in the monitoring of customers whilst at an event. This can be just keeping a watchful eye or looking after clubbers who may be experiencing difficulties due to their drug use. Outreach services train their staff or volunteers to very high standards in relation to recognising drug effects and can reduce the burden on security or other staff at an event.

Getting home safely

4.28

It is natural for all parties to focus on safety at the dance event. However, clubbers are particularly vulnerable on the way home where there is no-one designated to look out for them. The main risks are:

- 🖱 Clubbers driving home intoxicated through drink or drugs
- 🖱 Clubbers leaving the event in need of medical help because of their level of intoxication
- 🖱 Clubbers leaving the event in an intoxicated state and vulnerable to accident or assault

4.29

The dangers and illegality of driving with excess alcohol in the body are well known. However, driving when intoxicated by controlled drugs is at least as dangerous, as is driving when exhausted. A Scottish study found that drug-driving was commonplace amongst those attending dance/nightclubs. Of the 61 individuals participating in a series of qualitative interviews, 52 (85%) had ever driven after recreational drug use and 19 (31%) said that they did so on at least a weekly basis.²⁶

4.30

It is important that those providing drug information or other services at any dance event, provide information about the risks of driving while intoxicated and are knowledgeable about public transport routes and reputable taxi firms.

4.31

Some promoters include transport home by coach or minibus as part of the ticket price or arrange for buses to and from events taking place in remote locations. Venues should carry information on reputable and licensed taxi firms, and, if possible, arrange for taxis to be outside the venue at closing time. Some venues provide a freephone link to local cab firms and one London venue has a taxi office based outside the venue specifically to deal with the needs of customers.

²⁶
Scottish Executive Central Research Unit (2001) Recreational Drugs and Driving Development department research programme Research findings no.102..

4.32

Door supervisors, medical staff and all other staff should be vigilant about the welfare of customers leaving who seem seriously intoxicated, particularly if they are on their own. Such customers should be approached and offered the chance to see a First Aider or contact a family member or friend to pick them up and ensure they get home safely. Mention has already been made of the risks to health of overheated clubbers going home on cold evenings without adequate clothing.

4.33

Drug Action Teams may be well placed to engage with other multi-agency fora, such as Crime and Disorder Reduction Partnerships or Town Centre Management Groups, to examine the provision of public transport to and from large venues, especially at closing times.

Summary

4.34 The table below summarises the key action points for reducing drug related harm at dance events and indicates who the key players are for each point.

	Owners, managers & promoters	Licensing authorities & police	Drug outreach or medical services	Drug Action Teams
Providing relevant drug information literature	•		•	•
Promoting the work of outreach teams		•	•	•
Integrating outreach workers into venue staff team	•		•	
Analysing confiscated drugs and contents of amnesty boxes		•		•
Ensuring First Aiders are trained in drug issues	•	•	•	•
Providing safe transport home	•	•		•

chapter 5

five

Developing a drug policy.

The purpose of a drug policy

5.1

It was stated in the introduction that it is not a legal requirement for venues to have a drug policy, although some local authority licensing authorities have made the development and implementation of drug policies a condition of awarding Public Entertainment Licences ²⁷. Irrespective of whether a policy is required locally, the benefits of doing so are very clear:

- ☞ To demonstrate that the venue is committed to safeguarding the welfare of its drug using customers
- ☞ To ensure that the venue operates within the law
- ☞ To help employers comply with the Health and Safety at Work Act (1974) by safeguarding the health, safety and welfare of employees
- ☞ To serve as a checklist to ensure all areas of concern are addressed
- ☞ To communicate the venue's views to all staff, and ensure that everyone understands procedures and works to them

5.2

This chapter also serves as a summary of all the advice and guidance contained in the previous chapters. A model drug policy is not provided for two reasons. First, each venue or organisation needs to develop a policy which is appropriate and relevant to itself, rather than adopting a generalised version. Secondly, the process of developing a policy is as important as the policy itself – the process enables managers and key staff members to consider carefully particular issues of concern and the best ways of their venue responding to them. However, the chapter does set out a structure for a drug policy to enable venues to organise their thinking.

5.3

Before setting out this structure, it should be emphasised that a drug policy is only one part of the response to managing drug-related incidents in clubs. Staff need good information, training, supervision and support to implement any policy. A good policy also ensures a safe working environment for staff.

²⁷.
For example, Teeside.

5.4

A drug policy should be seen as a working document, continuously being amended and improved in response to new developments in drug use or health and safety legislation. It should be formally reviewed on an annual basis.

5.5

The involvement of police and licensing officers in the development of a drug policy can greatly enhance its worth and also contributes to the strengthening of working relationships. The Drug Action Team may also be able to act in an advisory capacity.

The structure of a drug policy

1 Purpose and scope

An introductory statement should set out the purpose and scope of the drug policy. Normally, there will be three main aims of the policy: to prevent drug dealing at dance events run by the organisation whose policy it is, to minimise drug use at those events and to safeguard customers attending who have used drugs.

2 Staff and the drugs policy

Clearly a policy only has worth if it is implemented. The policy should clearly state how staff will be informed about the policy, provided with drug training and supervised and supported in the implementation of the policy. The policy should pay attention to the health and safety of staff as well as customers.

3 Customers and the drugs policy

It is also vital to communicate the drugs policy to club-goers. The policy should set out how different practices and procedures in the policy will be made known to customers, e.g. clearly advertising the search policy. There may be particular issues in the policy which benefit from consultation with customers – for example, if you are thinking of installing water fountains, where would regulars like them to be. Although the drug policy should ensure that customers' health and well-being is safeguarded to the best of the licensee's ability, it is also fair to say that clubbers should take responsibility for their own welfare. Consultation with regular clubbers on a drugs policy could also result in a statement about their responsibilities:

- To be well informed about drug use, including harm reduction practices
- To have a good understanding of the law and know one's rights
- To look after oneself and others when at a dance event
- To communicate quickly with staff, other officials and clubbers if problems arise
- To be proactive in the development of better standards at dance events

Developing a drug policy

4 Preventing drugs and weapons including firearms entering the venue

The policy should set out very clear procedures to minimise the amount of drugs and weapons that come into the venue. A search policy should be formulated and should cover, the form and regularity of searches, the provision of amnesty boxes, a complaints procedure and the procedure when drugs or weapons are found.

5 Preventing drug dealing at the venue

Procedures should be laid down to ensure that all staff are vigilant to prevent drug dealing at the venue. Several key issues should be covered including: expectations of door supervisors, the regular supervision and monitoring of the building, particularly any key areas where drug use or dealing may take place, the use of CCTV and ensuring that toilets are attended at all times. There should be a system for logging and pursuing information from staff members, customers or outside agencies about any suspected drug dealing at the venue.

6 Finding drugs

The policy needs to be very clear on what staff should do if they find drugs in order to minimise any legal risk to staff. The policy should include the following:

- The recording of suspected drug finds in an incident book
- ☞ Procedures for the safe and secure storage of drugs
- ☞ The process for handing over drugs to local police
- ☞ Procedures for emptying amnesty boxes
- ☞ A clear procedure agreed with the local police service about the circumstances in which they expect to be called
- Actions to be taken against any customer found with drugs

7 Keeping drug using customers safe

The policy should set out the expectations of all staff in being vigilant in identifying customers who are suffering from the effects of drug use. The roles of those providing any drug outreach service, bar staff and door supervisors in particular should all be clearly stated. It should be clearly identified who has the responsibility for helping drug users in distress. The policy should state that door supervisors must not eject drug users in distress without ensuring they have the means to get home safely and a companion to help them do so. The policy should also clarify procedures in relation to weapons, including firearms.

8 Dealing with emergencies

The policy should contain clear instructions to staff on how to deal with emergencies. It should cover arrangements for the training of First Aiders and ensuring that sufficient numbers of trained staff are always present. It should specify where any medical treatment should take place and in what circumstances an ambulance should be called. Procedures for dealing with heat stroke and customers who are disoriented and hallucinating should be clear for all staff. A system for keeping staff up-to-date with new trends and patterns of drug use and any common medical consequences should be instituted.

9 Record keeping

The policy should stress the importance of keeping accurate records as a legal safeguard to staff and the organisation, and as a professional manner of operating. An incident book should be kept where details of all drug-related events should be recorded including suspicions, third party information etc. Information should be recorded concisely.

Training

A policy will only be effective if all staff have adequate and regular training.

10 Training for licensees

The British Institute of Innkeeping Awarding Body (BIIAB) has recently introduced the Licensees' National Drug Certificate. The syllabus for this course is divided into two sections. The first section is designed to raise awareness of the prevailing controlled drugs scene. It gives licensees and managers a basic knowledge and understanding of the law pertaining to the misuse and supply of controlled drugs on licensed premises. The second section provides operational guidelines to help licensees deal effectively with any drug related problems in their venues. It also provides guidance on the development of policies and strategies to prevent such problems arising. The BIIAB has produced a handbook to help licensees study for the certificate, and training may be taken at approved centres throughout the country.

11 Training for door supervisors

With the advent of a national registration scheme, training for door supervisors is becoming more frequent and of a higher standard. Many local authorities organise or co-ordinate training courses. It is important that the drug component on such courses is provided by someone with relevant knowledge and experience of drug use in a dance setting. The use of local drug outreach teams is appropriate. The BIIAB National Certificate for Door Supervisors – Licensed Premises has an entire stage two module devoted to drugs awareness.

12 Training for cleaners

Cleaning staff should receive training in safe methods for the disposal of any drugs or drug paraphernalia found.

13 Training for all staff

At venues which regularly play music attractive to clubbers who use drugs, it is important that all staff have a basic training around the effects of the main substances used and how to respond to drug users in distress. Training should also cover the health and safety of staff in implementing the different requirements of the drug policy. The local Drug Action Team should be the first point of call to organise such training.







chapter 6 *six*

Professional fact sheets.

6.1

This chapter contains fact sheets for six separate interest groups in order that different readers can quickly access information on their key roles and responsibilities in ensuring the welfare of drug using club goers.

The six groups are:

-  Local authority licensing officers
-  Police officers with licensing responsibility
-  Police officers with drug enforcement responsibility
-  Club owners, managers and event promoters
-  Drug Action Teams
-  Drug agencies

Club Safety Fact Sheet Local authority licensing officers

The role of local authority licensing officers is to take the lead in ensuring that dance venues are designed and run in a way that maximises the safety of customers and staff. They are responsible for monitoring the way that venues are run and enforcing compliance with regulations.

Key activities of licensing officers include:

1. Providing clear information on how to apply for a Public Entertainment Licence
2. Providing induction training to councillors serving on licensing panels
3. Advising venue owners on how to establish and maintain a safe environment
4. Advising venue owners, in partnership with police licensing officers, on developing a venue drug policy
5. Ensuring that sufficient medical staff are always present and are trained to a high standard
6. Informing clubbers of their rights
7. Liaising with police licensing and other officers to ensure good communication about potentially dangerous venues
8. Encouraging venues to use outreach services
9. Encouraging venues to provide safe transport home
10. Surveying clubbers on their views of the safety aspects of different local venues
11. Monitoring the operation of clubs at times of peak occupancy
12. Ensuring door supervisors are from a reputable company.
13. Ensuring that door supervisors are properly trained

Club Safety Fact Sheet

Police officers with licensing responsibilities

The role of police officers with licensing responsibilities is, by working in partnership with local authority licensing officers, to ensure that venues are operated safely and legally, in particular that the level of drug dealing and drug use is minimised.

Key activities of police officers with licensing responsibilities include:

1. Developing a constructive working relationship with local authority licensing officers
2. Developing a constructive working relationship with venue owners/managers
3. Providing advice on safety issues at venues
4. Advising on the development of a venue drug policy
5. Agreeing the protocols for actions taken by door supervisors in relation to illegal drugs, in particular when police officers should be called immediately
6. Advising on and approving search procedures and the storage procedures for confiscated drugs
7. Gathering and sharing intelligence on drug dealing and use with partner organisations and local clubs
8. Advising on the installation and monitoring of CCTV
9. Advising on the provision of safe transport home in consultation with community safety colleagues
10. Working with venue owners and managers to resolve drug-related problems

Club Safety Fact Sheet

Police officers with drug enforcement responsibilities

The role of police officers enforcing drug legislation in clubs is to ensure that drug dealing is minimised. They should ensure that their actions are taken with the best possible intelligence and co-ordinated with the long-term crime prevention and harm reduction policies adopted by the police licensing officer in partnership with the local authority, Drug Action Team and club owners and managers.

Key activities of police officers with drug enforcement responsibilities include:

1. Liaising with the relevant police licensing officer to obtain details of licences and working practices within the club. They may also be able to assist with floor plans of the club and the position of any CCTV cameras
2. Ensuring that a risk assessment is carried out prior to any pre-planned enforcement activity. This will usually include the views of the Community Liaison Officer
3. Planning to ensure that enforcement operations have as few negative consequences as possible
4. Devising a communication strategy which explains clearly to clubbers, club staff and the general public the purpose of any enforcement operation
5. Overseeing an intelligence-gathering approach which monitors any criminal activity within a venue and links into the police intelligence gathering systems
6. Preparing evidence that may be required to support an application under the 1997 Public Entertainments Act for closure of a club
7. Ensuring that those arrested within any such operations are offered an opportunity to see a drugs worker through arrest referral schemes

Club Safety Fact Sheet

Club Owners and Managers, and Event Promoters

The role of club owners and managers, and event promoters is to ensure that all aspects of their venue and designed and run in ways which maximise the safety of customers.

Key activities of club owner and managers include:

1. Communicating all safety requirements clearly to promoters
2. Developing a constructive working relationship with local authority licensing officers and police officers with licensing responsibilities
3. Developing a venue drug policy in consultation with licensing and police officers
4. Ensuring that all staff are aware of their responsibilities within the drug policy and that they receive training and support to discharge these fully
5. Employing door supervisors from a reputable company
6. Employing experienced and fully trained medical staff
7. Providing free and easily accessible supplies of cold water and ensuring the provision of water is supervised to prevent the contamination of water by others
8. Liaising with appropriate drug service personnel to provide training to staff, and information, advice and support to clubbers
9. Considering inviting and supporting drug outreach work, including integrating outreach workers into the staff team
10. Sharing intelligence on drug use and drug dealing with police officers and other local venues
11. Informing clubbers of their rights and responsibilities, and encouraging their feedback on safety issues
12. Considering the provision of safe transport home
12. Ensuring that all staff are aware of the law and the responsibilities of the club to work within it

Club Safety Fact Sheet Drug Action Teams

The role of Drug Action Teams is to ensure that all agencies are working in partnership to ensure the safety of drug using clubbers and to make available the expertise of Drug Action Team members to further this goal.

Key activities of DATs include:

1. Raising the issue of drug-related harm at nightclubs with the DAT membership
2. Developing a forum on drug-related harm at clubs, engaging with key agencies
3. Ensuring that the work of this forum is integrated with other key fora including young people's drug sub-groups, crime and disorder reduction partnerships, town centre management groups etc.
4. Encouraging the provision of information services at dance events
5. Considering the provision of outreach services at dance events and commissioning local drug agencies to be able to provide such services, if required
6. Encouraging the provision of drug education information at clubs and ticket outlets
7. Developing mechanisms for the sharing of intelligence relating to drug dealing and drug use at dance events
8. Working with other multi-agency fora to develop a strategy for ensuring safe transport home from clubland areas
9. Developing mechanisms for analysing trends in the use of dance drugs, assessing levels of drug-related harm, and ensuring that this information is shared widely and appropriately
10. Encouraging the surveying of clubbers on issues of drug-related harm
11. Promoting the drug training of club staff and door supervisors

Drug Agencies

The role of drug agencies is to ensure that advice, information and support services are offered to drug using clubbers.

Key activities of drug agencies include:

1. Targeting advice and information on harm related to dance drugs at club-goers
2. Training staff to provide outreach services in a club setting
3. Engaging with venues to invite outreach services in to their clubs
4. Providing training on drug information, identifying drug users in trouble and trends in local drug use to club staff and door supervisors
5. Providing information to licensing officers and venue managers of unsafe practices at clubs
6. Sharing information about trends in drug use and associated risks and harms with DAT members, licensing officers and venue managers
7. Encouraging clubbers to take responsibility for their own drug use
8. Encouraging clubbers to assert their rights to a safe dance environment

seven

Information and contacts.⁷⁰ Chapter 7

Further Information

CHAPTER 7

Further information

The final chapter of this guidance provides a compendium of further information. It is organised into two sections. The first provides brief details and contact information for useful organisations, and the second gives a reading list of useful publications.

Alcohol Concern

Alcohol Concern is the national agency on alcohol misuse. It provides a comprehensive information service and advises on all aspects of alcohol related policy. Alcohol Concern works to reduce the incidence and costs of alcohol-related harm and to increase the range and quality of services available to people with alcohol-related problems.

Alcohol Concern
Waterbridge House
32-36 Loman Street
London SE1 0EE
Tel: 020 7928 7377
www.alcoholconcern.org.uk

British Entertainment and Discotheque Association

BEDA is the trade association for the late night entertainment industry representing club and bar operators, both corporate and independent, from Inverness to St. Ives.

British Entertainment and Discotheque Association
5 Waterloo Road
Stockport
Cheshire SK1 3BD
Tel: 0161 4290012
website: www.beda.org.uk

British Institute of Innkeeping

The British Institute of Innkeeping is the professional body for the licensed trade. Its mission is to promote high standards of professionalism throughout the licensed retail sector and to provide information, skills and qualifications to help members run successful businesses.

British Institute of Innkeeping
Wessex House
80 Park Street
Camberley
Surrey GU15 3PT

Tel: 01276 684449
Website: www.bii.org

D.CUBED Safer Dancing

D₃ provide a drug education/harm reduction service to dance events in Leeds. Also provide information and support on sexual health to clubbers, as well as training for door supervisors and others connected to events and consultancy on all issues related to clubbing and drugs.

D3 Leeds City Council
 Department of Community
 Planning & Regeneration
 Health Education
 Hunslet Lake Centre
 Arthington Avenue
 Leeds LS10 2LU

Drug Action Teams

Drug Action Teams (DATs) are the Government's chosen multi-agency vehicles for implementing the national drug strategy. There are 150 DATs in England. Membership of DATs comprises senior representatives from the police, customs and excise, probation and prison services, local authorities (including education, housing and social services) and health authorities. Co-option of voluntary sector representation is encouraged, as is the involvement of chambers of commerce. A full list of contact details for every Drug Action Team in the country can be accessed from www.drugs.gov.uk

Drugscope

Drugscope was formed from the merger of the Standing Conference on Drug Abuse and the Institute for Study of Drug Dependency in Spring 2000. Drugscope's aim is to inform policy development and reduce drug-related risk. It provides drug information, promotes effective responses to drug taking, undertakes research at local, national and international levels, advises on policy-making, encourages informed debate and speaks for its members working on the ground.

Drugscope
 Waterbridge House
 32-36 Loman Street
 London SE1 0EE
 Tel: 020 7928 1211

Website:
www.drugscope.org.uk

The Drug Strategy Directorate

The Drug Strategy Directorate co-ordinates drug policy across Government for the Home Office. It develops policy and guidance, and provides funding to support the strategy on the ground to Drug Action Teams through

its Drug Prevention Advisory Service.

The Drug Strategy Directorate
50 Queen Anne's Gate
London SW1H 9AT
Tel: 020 7273 2744
Website: www.drugs.gov.uk

The Drug Prevention Advisory Service (DPAS)

The Drugs Prevention Advisory Service (DPAS) was launched on 1 April 1999 as the replacement body for the Drugs Prevention Initiative. It is the operational and regional arm of the Home Office Drug Strategy Directorate and is based in Government Offices. The DPAS remit is to promote effective community-based drugs prevention at local, regional and national level in line with the aims and objectives of the Government's national drugs strategy.

DPAS provides information, advice and support, based on available and emerging evidence, to local Drug Action Teams, and to local communities and practitioners. It aims to help foster links with other Government initiatives such as crime and disorder partnerships, Health Action Zones and other initiatives all aimed at tackling social exclusion. DPAS also provides funding and expertise to assist in the development and evaluation of demonstration programmes to help further

knowledge about effective practice in drugs prevention. It publishes a series of detailed research reports about drugs prevention to inform evidence-based policy and practice.

Drug Prevention Advisory Service
Room 314
Horseferry House
Dean Ryle Street
London SW1P 2AW

Tel: 020 7217 8631
Website:
www.homeoffice.gov.uk/dpas/dpas

Health, Safety and Welfare at Events

Specialist service around health, safety and welfare provision at a range of entertainment events.

Penny Mellor
Health, Safety and Welfare at
Events
8 Southern Street
London N1 9AY
Tel: 020 7837 2230

Local Government Association

The Local Government Association speaks on behalf of all local authorities in England and Wales. It represents their views to government and others, and acts as a lobbying body on issues which affect the delivery of local government services. The LGA's work on drugs is the responsibility of the Social Affairs and Health Executive, who have established a Task Group to take the work forward.

Local Government
Association
Local Government House
Smith Square
London SW1P 3HZ

Tel: 020 7664 3258
Website: www.lga.gov.uk

The London Drug Policy Forum

The London Drug Policy Forum was established in 1991 to co-ordinate London local authority policy and practice and to encourage joint working. It is funded by the Corporation of London.

London Drug Policy Forum
Town Clerk's Office
PO Box 270, Guildhall
London EC2P 2EJ.

Tel: 020 7332 3084
Website:
www.cityoflondon.gov.uk/our_services/social_services/ldpf/london_drug_policy_forum.htm

Metropolitan Police Clubs and Vice OCU

Charing Cross Police Station
Agar Street
London WC2N 4JP
Tel: 020 7321 7759

NARCAID

NARCAID is a voluntary drugs project whose aim is to promote the competent management of drug related emergencies. It provides a service for practitioners of first aid and pre-hospital care consisting of information, advice and training on drug awareness.

NARCAID
30 Henshaw Street
Stretford
Manchester M32 8BT

Tel: 0161 864 1199

Release

Release is the national drugs and legal advice charity. In addition to pioneering the provision of free legal advice to drug users Release also has many years experience in running dance outreach services at clubs and festivals throughout the UK. Other relevant services include training, conferences and a range of publications including some specifically aimed at clubbers.

Release
388 Old Street
London EC1V 9LT
Tel: 020 7729 9904
Website: www.release.org.uk

Safer Doors

This project campaigns for a national registration scheme for door supervisors. It holds an annual national conference on door supervision and has recently formed the Safer Doors Forum, a body of 28 representatives from the security industry, local authorities, the entertainment industry and police services, whose remit is to work with the Home Office to implement the national registration scheme.

The Safer Doors Forum
PO Box 81
Driffield YO25 6XD

Tel: 01262 402707
Website:
www.saferdoors.co.uk

Further Reading

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British Entertainment and Discotheque Association et al. (1998)

Good practice guide on the implementation of the public entertainments licences (drug misuse) act 1997 London; HMSO – available from BEDA
Tel: 0161 4290012.

British Institute of Innkeeping Awarding Body (2001)

Handbook for the licensee's national drugs certificate Camberley, Tel: 01276 684449

District Surveyors Association and Association of British Theatre Technicians (2001)

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Entertainment Technology Press (ISBN 1-904031-05-6)

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Scientific report on-site pill-testing interventions in the European Union

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Safer bars: assessing and reducing risks of violence Toronto Canada; Centre for addiction and mental health.

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Tel: 01787 881165, website: www.hsebooks.co.uk

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