

Imperial College Union
Responsible Retailing of Alcohol Policy
A paper by the Deputy President (Finance & Services)

Notes

1. The Executive Committee passed the Responsible Retailing of Alcohol Policy in July, written by the DPFS and DPFS-elect with input from the Commercial Services Manager at the time.
2. The Policy was written to bring the Union's licensed trade practices into line with licensing law and current best practice in licensed trade.
3. Union Council requested that the Policy was brought to the meeting of the 31st October for discussion and was subsequently passed by Council with amendments.

Believes

1. The Policy contains a vast amount of operational procedure and practice, and should be administered by the Executive Committee.
2. However, due to some students' concerns that the changes were 'too radical', Council mandated the DPFS to present it.
3. Some of the amendments proposed and passed by Council directly contravene licensing law and harm the reputation of the Union as a responsible retailer of alcohol.
4. If changes to the Policy need to be approved by Council, licence holders and commercial managers have insufficient input into and control over into the content of the policy.
5. The Alcohol Policy Committee is made up of members perfectly suited to manage this policy on behalf of the Executive Committee.

Resolves

1. To amend the Policy as laid out in the Appendices.
2. To delegate future authority over the Responsible Retailing of Alcohol Policy to the Executive Committee

Appendix 1

Amendment 1 (page 3):

The suggested amendment removes the following bullet point

'Amendments made to this policy by the Alcohol Policy Committee shall require the approval of the Union Council to become effective'

As an Executive Committee policy, to have Council approve changes is inconsistent with its ownership. The policy is underpinned by operational practice and procedure, and so should not fall under the remit of Council.

Amendment 2 (page 6):

The suggested amendment is to remove *'College ID'* from the list of acceptable identification.

This possibility has already been investigated with College and the Police. Police want a date-of-birth, and the College won't put this on for reasons of Data Protection. The most they are willing to do is put a red box around the picture of students under 18 (at the start of the year); however, this means that students who turn 18 in the academic year will continue to have a red box around their photo. College ID is therefore not an acceptable form of ID in all cases, and will not be in the future.

Amendments 3 & 4 (page 6):

The suggested amendments are as follows:

To remove

'Additionally individuals presenting College ID with a red box will be admitted but refused service'.

To add

'However, other ID that meets the above criteria can also be accepted if the member of staff believes it to be genuine. Additionally, College ID without a red box (signifying students are 18 years of age or older) will be accepted.'

There are some events throughout the year where no-one under 18 is admitted to the Union. This is so that bar service can be sped up by not needing to see proof of age identification. This line in the policy prevents that from happening, and is an obstacle to good service on some of our busiest nights. This is not to say, however, that under-18s will never be allowed into the Union. It merely gives us some flexibility as to where we apply our control on age.

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Introduction

We recognise the need for social responsibility, and that a significant part of our commercial business is in the entertainment and alcohol retail sector. We play a part in the communities in which we operate - both the College community and wider London community.

The provision of a safe and secure environment in our outlets is a key business objective. We have a responsibility to provide this environment to our members and wider customer base, and it is a commercial strength that we do so.

With regard to our licensed trade operations, the issue of social responsibility is one inextricably linked with alcohol consumption. In response to this, we have developed policy in four key areas:

1. Responsible Retailing
2. Health & Safety
3. The Prevention of Crime & Disorder
4. Dispersal

An Alcohol Policy Committee will ensure the Code of Practice is adopted, adhered to, and further developed. The panel will consist of the Union's:

President

General Manager

Deputy President (Welfare)

Deputy President (Finance & Services)

ICSMSU President

Commercial Services Manager

Bars Operations Leader

Central Services Manager

Entertainments Manager

The panel will be chaired by the Deputy President (Finance & Services) and will be responsible for developing and reviewing the various policies. Reviews will take place at least annually, and following any major incident. Meetings may be called by any member of the committee.

1. Responsible Retailing

Responsible retailing encompasses the key elements of our alcohol code of practice. We consider the (our) supply of alcohol and the (consumer) demand for alcohol. On the supply side we recognise we have a responsibility to consider issues under our control such as a drinks service policy, pricing, promotions and advertising. We believe all responsible retailers have an obligation to consider these issues. On the demand side our only real influence on consumer demand is the provision of information to consumers. As a Students Union we have an enhanced role to play here from a general welfare provision to our members. Our main focus is in providing information to consumers and reminding them of issues related to the consumption of alcohol (and going out generally).

The advertising of alcohol, events, and promotions spans both the supply and demand side in the context that advertising is our opportunity as a supplier to influence customer demand. Although we recognise that the price of alcohol sold in the on license sector is generally much higher than students could purchase alcohol for from the off sector if they wished to, we believe that we have a duty to lead the sector in this area. We believe that control over advertising, and issues such as time-span of promotions are further effective levers to encourage responsible consumption. As such our drinks service policy and alcohol promotion policy are detailed and also represent a level we believe is leading in the industry.

Consumer Safe Drinking

Our main consumers are students. It is our view that they are adults, and we are not here to dictate or control their actions or choices. We also recognise that there are plenty of alternatives to the Student Union as a venue. Our general policy is one of awareness and education. We do not wish to “preach” or take a “moral high ground”. We do aim to use our knowledge of how to market effectively to students, to get key messages across regarding their safety and well-being, by providing relevant and timely information and reminders.

Drinks Service Policy

- We will not sell spirits in quantities greater than a double normal serve measure in one glass other than in a recognised cocktail.
- We will not serve spirits mixed into the same glass other than in a recognised cocktail.
- We will not serve spirits into draught alcohol products e.g. put a whiskey in a pint of lager.
- We will not normally stock any product over 50% ABV. Where we do, it will be only with the approval of the Alcohol Policy Committee.
- Mobile service is defined as the offering of a specific promoted drink brand (away from the bar area) dispensed immediately by the server. We recognise that the mobile service of shooter drinks, for example the use of tequila belts, could be considered part of a binge drinking mentality. However, when used responsibly these add a fun element to events appreciated by the majority of customers. The following measures apply to this specific type of service:
 - a) Staff briefed to preclude those who have already consumed enough alcohol
 - b) Activity not to be undertaken after 2am

- c) All spirits above 38 % abv will only be served diluted 50/50% with an appropriate non alcoholic mixer
- d) Service limited to a single measure
- e) There will be no competition elements that involve volume or speed drinking incentives
- f) Alcohol will never be dispensed directly into a customers mouth
- g) If this activity is being undertaken by a third party they will be required to sign a disclaimer committing to abide by the above.
- We will refuse service of alcoholic products to those who have already drunk too much, encouraging them to have a soft drink or water instead, and in extreme cases (e.g. when they are posing a threat to others or the buildings) ask them to leave the premises
- We will review this policy via the Alcohol Policy Committee.

Alcohol Promotions Policy

- All central promotional activity agreed with suppliers will comply with the Portman Group Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks (4th edition), and therefore should not in any direct or indirect way:
 - a) Have the alcoholic strength, relatively high alcohol content, or the intoxicating effect, as a dominant theme;
 - b) Suggest any association with bravado, or with violent, aggressive, dangerous or anti-social behaviour;
 - c) Suggest any association with, acceptance of, or allusion to, illicit drugs;
 - d) Suggest that consumption of the drink can lead to social success or popularity;
 - e) Encourage illegal, irresponsible or immoderate consumption, such as drink-driving, binge-drinking, or drunkenness;
 - f) Urge the consumer to drink rapidly or to “down” a product in one;
 - g) Have a particular appeal to under 18s;
 - h) Incorporate images of people who are, or look as if they are, under twenty-five years of age, unless there is no suggestion that they have just consumed, are consuming or are about to consume alcohol;
 - i) Suggest that the product can enhance mental or physical capabilities.
- In line with the BBPA (British Bar and Pub Association) Social Responsibility Standards, promotions or promotional materials will not:
 - a) Condone, encourage or glamorise excessive drinking or drunkenness or encourage anti-social behaviour. Effects of intoxication should not be referred to in any favourable manner.
 - b) Be linked to sexual imagery implying sexual success or prowess;

- c) Refer to consuming alcohol to recover from previous over-indulgence;
 - d) Be disrespectful of contemporary, prevailing standards of taste and decency, and avoid degrading or gratuitously offensive images, symbols, figures and innuendoes. Promotional material should not be demeaning to any gender, race, religion, age or minority group.
 - e) Appeal, through images / symbols, primarily to those under the legal purchase age. Characters should only be used if it is clearly established that their primary appeal is to adults. Use of any cartoon character popular with children is unacceptable.
 - f) Contain any direct or indirect references to drug culture or illegal drugs.
 - g) Have any association with violence or anti-social behaviour.
- Additionally, in response to the Mandatory Code for Alcohol Retailers (April 2010), we will avoid:
 - a) Any promotional activity which implies drinks being 'downed in one' or which incentivises speed drinking.
 - b) Any promotion that relies on an unpredictable event e.g. 'first goal scored', and therefore encourages urgent and / or unplanned alcohol consumption.
 - c) Promotions that involve drinking games.
 - d) All-inclusive promotions – including large quantities of, or all drinks, in the admission fee.
 - e) Links with any tobacco related products in (drinks) promotions e.g. match boxes, cigarette lighters, ashtrays etc. (Note: we will provide for use but not as part of a drinks promotion).
 - f) Activity that presents alcohol abstinence, or choosing soft drink alternatives, in a negative light.
 - g) Sampling activity involving staff under the age of 18.
 - h) Sampling activity which offers more than 1.5 units of alcohol per person.
- Examples of good promotions include:
 - a) Round-buying promotions of two or more
 - b) The inclusion of responsible drinking messages and alcohol units where appropriate
 - c) Promotions that are run over periods of time to ensure prizes such as drinks vouchers can be redeemed later, not just on the day they are won
 - d) All promotional activity will incorporate a soft drinks offer
 - e) Any time-limited promotion should be for 2 hours or longer

Clubs, Societies & Projects

The Union's Clubs & Societies Policy stipulates:

- A ban on all Initiation Ceremonies

Additionally, the Union will enact:

- A ban on checklists of drinks to be consumed and the use of apparatus that aids speed drinking
- A limit of 8 units of alcohol on the number of free drinks per person provided at a social

If these rules are breached disciplinary procedures will be invoked as per the Union Constitution.

Staff will be trained to recognise behaviour that breaches the above, and given guidelines for reporting any such behaviour.

Consumption of Alcohol

The Union has strict guidelines on the consumption of alcohol. The following actions are prohibited:

- Mixing of multiple drinks into one glass or creating a "dirty pint" for someone else to consume
- Pouring alcohol directly into someone's mouth
- Downing large quantities of alcohol in one go (e.g. downing excessive numbers of drinks)

If a customer is caught doing or attempting to do any of the above they will be warned that it is prohibited and that if they attempt to do it again they will be asked to leave the premises.

Alcohol Safety Issues

Customers observed by Security inside, outside or leaving our premises are informally assessed. If their demeanour causes sufficient concern, that person will be treated initially as a casualty, be assessed further, and given appropriate assistance. This could include first aid, assistance getting home, or locating a friend to accompany them. Aggravating features to cause concern are people leaving alone, or when challenged, the casualty cannot positively identify a companion. Where we suspect someone's drink may have been spiked we will also treat it as a criminal act, investigate further to gain evidence, and involve the emergency services.

Welcome Week

We are not naive to the point of thinking many of our students will not have drunk alcohol prior to coming to University. However, we need to recognise that it is the first time many of them won't have had to return home to face parents at the end of the night, and the freedom this gives can lead to a less responsible approach to their drinking behaviour. Consumer campaigns during this busy period, however, are generally low impact.

We will put a heightened awareness on bars and security staff to be aware of those who are drinking too heavily and to limit service in that case to soft drinks, or refuse entry or service.

Age Verification

ICU will operate a Check 21 age verification policy. This policy applies in relation to the sale or supply of alcohol on ICU premises.

For this policy the responsible person is the designated premises supervisor for each bar/venue.

Staff serving alcohol must require any individuals who appear to the responsible person to be under the age of 21 years of age to produce on request, before being served alcohol, identification bearing their photograph, date of birth, and a holographic mark.

Examples of appropriate identification include:

- A photo card driving licence
- A passport
- A proof of age card bearing the PASS hologram

However, other ID that meets the above criteria can also be accepted if the member of staff believes it to be genuine. Additionally, College ID without a red box (signifying students are 18 years of age or older) will be accepted.

Anybody who cannot produce acceptable ID will be refused entry/ service.

The Union will ensure that staff are made aware of the existence and content of this policy.

2. Health & Safety

The Union's commitment to Health and Safety is covered by a wide variety of internal policies and procedures, the elements that relate to the responsible retailing of alcohol are summarised here.

Operations Manual

Under development

Health and Safety Management System

All outlets will have individual Health and Safety Management Manuals that include the following:

- Departmental Fire Risk assessments.
- Monthly Fire precaution check lists
- Control of Substances Hazardous to Health (COSHH) Procedure. All cleaning products must be stored and used according to the manufacturers' instructions. All products must be stored in their original correctly marked containers and not decanted into other containers. Staff must be trained in the correct usage of the chemical products used in their area of work.
- Accident and Near Miss Reporting. All accidents (staff and customer) must be reported in the accident book or via other approved routes to record the incident.
- Outlet-specific Risk Assessments

Venue Checklists

Before every central Union event a walk of the venue is undertaken and a checklist is completed to ensure that the venue is safe to open. This includes:

- Fire checks of all equipment and exits to be reviewed on a monthly basis by the Central Services Manager
- Licensing checks to ensure all documentation is accurate available and up to date
- Security checks this includes checking of all secure areas team briefing and recording and checking of all SIA badges in a log Book

Glass Collecting Policy

We will operate a strict glass collecting policy included in the Operation Manual:

- Baskets must be used to collect glasses and bottles, and glasses must not be stacked more than 5 high when collecting.
- All broken bottles and glasses must be disposed of in the sharps bin in the glass-wash, not in bin bags or bottle skips.
- Glasses will be collected at regular intervals by staff specifically deployed for that purpose and the number of staff will be decided in relation to the volume of trade.

- All outlets will assess the need for designated glass collectors on each shift and will allocate the task accordingly to a proportion of the staff.

Smoking in Licensed Trade Outlets

- Smoking in enclosed public spaces was banned on 1 July 2007 (in England and Wales). This legislation came about as a result of the dangers of passive smoking. The Union obviously complies with the law, and in this respect has banned smoking from all enclosed spaces.
- We recognise also that in future outdoor developments we want to take account of the needs of non-smokers as well as smokers, and such developments should consider whether a reserved non-smoking area is possible and desirable. Such developments should also consider the experience of non-smokers in accessing the outdoor areas, e.g. will they have to walk through a dense smoking area. Furthermore, the development of outdoor areas needs to be for all users of the area if applicable and possible, and also take account of the fact that the likely number of smokers will decrease over the coming years.
- Unfortunately we cannot accept the use of electronic cigarettes indoors as they are too difficult to distinguish from the real thing. We believe this could lead to unfair confusion for both our staff and other customers.

Training Summary

We have a commitment to the development of our staff throughout all levels of the organisation, and believe training and development strengthens our operation as well as ensuring compliance with legal and self imposed service standards.

- All bar staff are given a minimum of 2 hours induction training prior to working on any of our bars; this includes training on the policies included in this framework document, and on the legal (and operational) need to refuse service. It also provides methods of refusing service to increase staff confidence in doing so. They are also trained to pass the situation onto their Manager or Supervisor after refusing service
- Bar Managers and Deputies also complete the BIIAB National Certificate for Door Supervisors Units 1 and 2; Roles & Responsibilities and Conflict Management.
- Additional training and pre-session briefings take place, with a focus on drink awareness, during campaign periods including the critical Welcome Week period.

Risk Assessments for Key Events

Whilst presented as different events, operationally most of our events are built to the same framework. We will have risk assessments in place for our outlets and operations in general; however some specific events are of a scale, complexity or nature that makes a specific risk assessment desirable.

Auditing

All of our outlets that retail alcohol will be externally audited by an independent company once a year. In addition to this we will undertake two night-time audits to check our compliance with licensing law. By doing this we believe that we are able to spot potential issues before they occur ensuring that we are compliant.

3. The Prevention of Crime & Disorder

The prevention of crime and disorder is one of the four Licensing Act (2003) objectives. In that context, many of the other sections of this alcohol policy aim to tackle issues relating to crime and disorder where there is a possible causal link to alcohol sales. The majority of specific crime and disorder issues are covered in our security procedures.

CCTV

The Union has a CCTV surveillance system and a Code of Practice for its operation. The system covers most of the main internal areas and some of the external areas of the Union building, and records on all cameras 24 hours a day. All images are automatically stored for a minimum of 30 days. The Code of Practice ensures that the Union's operation of the system complies with the Data Protection Act 1998. The CCTV system is intended to contribute to the provision of a safe and comfortable environment in the following ways:

- Reduce the fear of crime and offer reassurance to the public and staff members
- Facilitate the apprehension and prosecution of offenders
- Assist with the prevention and detection of crime, acts of terrorism and disorder committed inside the Union building
- Deal with any safety concerns

Noise Control

Noise pollution from licensed venues takes two main forms; noise breakout, and noise from customers (typically) returning home or moving on to another venue. We include "operational noise", such as glass being emptied into skips, as noise breakout on the basis we have a direct control over this type of noise from our operation. Further detail on customer noise is included under the Dispersal section of this document.

Customer Noise

Customer noise is noise resulting from those who are entering or leaving our outlets, typically referred to as boisterous behaviour e.g. shouting or singing, but can also be as simple as people talking loudly on their mobiles as they walk home in the early hours. We have no direct control over this noise. However we recognise we can play a part in the reduction of any inconvenience to the community resulting from this type of noise. We can possibly have an influence over the customers in our venues, but also in terms of good neighbourly behaviour; we can educate students who use our venues with a benefit in general when not using our venues.

4. Dispersal

Our Student Union building is a complex one with a variety of operations including bars, nightclubs, retail outlets, meeting rooms and offices. Activities are both licensable and otherwise, and we need to take a holistic view of the building not just the licensed activities. Different activities take place on different days with different finish times, and there is no such thing as a standard week. As a result we apply only three key principles to dispersal:

- We will not usually close our activities and outlets such that the whole building empties within a 30-minute timeframe, where the whole building was open. That is to say we will attempt to consider and apply the principle of staggered closing hours between our various outlets.
- Where any outlet or event involves the sale of alcohol, either as the primary purpose, or in the case of entertainment venues as a secondary service; the sale of alcohol should normally cease 30 minutes prior to the closure of the outlet (but not necessarily the termination of the event).
- Background music and lighting levels should be used to aid a gradual dispersal. The best way to achieve this in terms of timings will need to be assessed for each event dependant on the nature of the event. For example, at a carol concert, keeping the bar open for 30 minutes after the concert (the main event) has finished, and then the building open for a further 30 minutes “drinking up time” would aid gradual dispersal. In the case of a student disco event, closing the bar 15 minutes before the club music (the main event) finishes and then having no music or low level music and higher lighting levels for the remaining 15 minutes of “drinking up time” aids dispersal.

Information about local taxis and public transport will available throughout the Union.