

ENCLOSURES FOR PARADISE CITY

SECTION A:

Reports & Witness Statements:

- i. Andy Bamber, AB Conformitas Ltd
 - a. Environmental Audit
 - b. Photos
- ii. Gary Brown
- iii. Daniel Parma
- iv. Ruxandra Niculescu
- v. Zviad Tsiklauri

SECTION B: Supporting Documents

Tab 1: Broad Street: Location & Other Businesses

- 1.1 Map & List of Businesses
- 1.2 Photos

Tab 2: Proposed license conditions

- 2.1 Proposed licence conditions

Tab 3: Paradise City Policies

- 3.1 Proposed Management Structure
- 3.2 Etiquette & Club Rules
- 3.3 Policies & Documents
- 3.4 Risk Assessment
- 3.5 Transaction Acknowledgment Form
- 3.6 Training Questionnaire

Tab 4: Curriculum Vitaes:

- 4.1 Gary Brown
- 4.2 Andy Bamber
- 4.3 Ruxandra Niculescu
- 4.4 Zviad Tsiklauri

Tab 5: Personal Documents Gary Brown:

- 5.1 DBS Certificate
- 5.2 Personal License
- 5.3 Personal license card
- 5.4 BII level 2 certificate

Tab 6: Personal documents of Danny Parma;

- 6.1 Birth Certificate
- 6.2 Personal License & SIA license
- 6.3 DBS certificate

Tab 7: Personal Documents of Ruxandra Niculescu & Zviad Tsiklauri:

- 7.1 Personal license
- 7.2 Professional certificates (Level 3 Mortgage Advice Certificate, Restaurant & Hospitality & Management Diploma)
- 7.3 SIA certificate Ruxandra Niculescu
- 7.4 SIA certificate Zviad Tsiklauri

Tab 8: Companies House information:

- 8.1 Companies House documents

SECTION A:

REPORT:

REPORT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET, BIRMINGHAM BY ANDY BAMBER OF AB CONFORMITAS LTD.

Andy Bamber, AB Conformitas Ltd	Report
Appendix i	Environmental Audit
Appendix ii	Photos

AB Conformitas Ltd

**REPORT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET
BIRMINGHAM**

Dated March 2019

A. Bamber

1. I have been asked by Peter Adkins of Emms-Gilmore-Liberson Solicitors, to provide an assessment of a licence application made by Parma (Midlands) limited to open a venue called Paradise City as a Sexual Entertainment Venue.
2. I am aware that the application refers to a premises in Broad Street, Birmingham and that the venue previously operated as a sexual entertainment venue known as Legs 11. I have had no contact or involvement with the previous club called Legs 11.

Personal summary

3. I was a police officer in the Metropolitan Police and retired in January 2007 with 34 years of exemplary service. Throughout my service I have been regularly involved in the enforcement, management, and development of licensing initiatives and policies. I retired as a Borough Commander having managed two London Boroughs.
4. As a constable I worked as an undercover officer detecting offences in late night licensed premises in central and west London. As an Inspector I was the Licensing Inspector for a very busy inner London policing division.
5. Whilst working as a Chief Inspector I was the operations manager in the central London Clubs and Vice unit from 1990-1996. As part of this role I had responsibility for late night licensing in Westminster and I supported other London boroughs as appropriate. During this period, I managed both covert and overt police operations on behalf of the police and the local authority to ensure compliance with the legislation and to prosecute breaches where necessary. The overt licensing visits were structured in a way that ensured that all premises operating with late night licences received at least 4 visits a year from a joint licensing team of police officers and local authority officers. It was during this period that I was involved in the development of the initial licensed door supervisor's scheme, commissioned by Westminster City Council, which was implemented and managed by myself within the Clubs and Vice unit. During the same period I researched, with a local authority counterpart, the

potential for the introduction of 'Lap Dancing' clubs in Westminster. The work resulted in the introduction of 'lap dancing' establishments in the borough. The initiative and the supervision of the licence was then monitored covertly and overtly by officers under my direction.

6. As Detective Superintendent I was a senior investigating officer in the Metropolitan Police anti-corruption command investigating police corruption and serious incidents that presented a risk to the reputation of the organisation.
7. As a Borough Commander on 2 London boroughs, between 2001 and the beginning of 2007 (January), I worked with both local authorities to develop the respective licensing and enforcement policies. The work with the Local Authority formed a significant part of Community Safety and local policing plans. With the introduction of the new Licensing Act 2003 I oversaw the transfer of responsibilities to the local authority and was instrumental in setting up a joint licensing team for a busy inner London borough.
8. I have also represented HM Government overseas working in foreign missions, and I was a Public Order Commander trained in crowd management and crowd control.
9. In 2007 having retired from the police I was employed by an Inner London Local Authority as an Assistant Director for Safer Communities. I held this post for 10 years.
10. When working for the Council I had responsibility for a wide ranging Safer Communities portfolio that included the Council, and the Partnership Crime Reduction Strategies. The role included the Council's enforcement function, all licensing functions including the development of Licensing policies and enforcement policies, Environmental Health, Trading Standards, the Drug and Alcohol Team, CCTV, Corporate Health and Safety, and Emergency Planning and Civil Contingencies, and many more corporate services and corporate roles.
11. My work involved comprehensive partnership working with all agencies involved in the crime reduction partnership, problem solving local hotspots and environmental audits with the associated action plans. Amongst the many roles I had responsibility for the Council's night time economy and the impact that it had on communities. In this role I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives, the licensing objectives, and the borough licensing and enforcement policies. As the principal officer for licensing in the local authority I worked closely with local community groups, ward councillors, and members of the licensing

committee to develop knowledge and understanding of local partnership enforcement policies, and crime and disorder initiatives linked to drugs and alcohol.

12. I delivered a structured approach to licensing management, supervision, and enforcement, the Council's Community Safety Plan, the Enforcement Policy, and the Licensing Policy. My role also included the consultation, development, and delivery of the boroughs controlled drinking zone, cumulative impact zone, Sexual Entertainment Venues, late night levy, early morning restriction orders, Best Bar None, and alcohol treatment programmes.
13. On my retirement from Local Government I set up my own compliance consultancy and I now offer independent advice, environmental audits, and compliance audits and risk assessments for licensed premises. The compliance visits are both overt and covert.
14. I have a Masters Degree in Business Administration, I am a member of the Institute of Licensing and I have Personal Licence.
15. I have also been trained in Strategic Emergency and Crisis Management (Cabinet Office EPC), Emergency Control Management (Cabinet Office EPC), Gold Support London Emergency Planning (LLAG), and I was an Authorising Officer for Covert surveillance.

Compliance visits (Covert and Overt)

16. Whilst I personally undertake overt compliance visits I have a number of associates that conduct the covert visits on my behalf to ensure that owners and management have no way of identifying the covert customer during the visit. The time and day of both overt and covert visits is not notified to the owner beforehand.
17. The structure of the overt visit is identical to the types of supervision inspections that are undertaken by police and licensing enforcement officers, looking at and testing the conditions on the respective license. The covert compliance visit is the same as 'test purchases operations' conducted by police forces and Trading Standards Services across the country. It is also similar to 'mystery shopping exercises' conducted by many organisations and businesses to test their employees' compliance with their company rules and policies.
18. The visits are commissioned by the owners of establishments who wish to ensure that due diligence is part of the operating schedule, and with the intention to provide assurance to

the Licensing Committee that they are responsible individuals that focus on the promotion of the 4 Licensing Objectives and the conditions set on their licence. In one case the Local Authority stipulated, as a licence condition, the introduction of independent compliance visits with the report being sent directly to the police and council officers. After 6 months of compliance visits and slight readjustments the owners were able to reapply to the Licensing Authority for a variation and reduce the frequency of their visits because the concerns of the licensing officers and the police had all been satisfactorily managed and dealt with.

Experience with Sex Entertainment Venues

19. I have worked extensively with proprietors of premises that operate with Sexual Entertainment Venue Licences within the City of Westminster, other London Boroughs, and along the M4 corridor. I have helped to re-engineer the operating schedule and compliance regimes of Sexual Entertainment Venues to ensure that the police and local licensing officers have confidence that the venues operate to high standards of compliance, completely in line with the conditions of their licences and that they focus on the welfare of their entertainers.
20. A number of the venues I have worked with have been in cumulative impact zones and I have been able to address the concerns of local authorities and the police to ensure that the four licensing objectives are not adversely affected, that any policy adopted by a venue is fit for purpose, and that the process to manage the policy is transparent and effective.
21. At a number of venues I have completely redesigned how the proprietors manage and supervise their establishments to the satisfaction of the Licensing Authority and local council enforcement officers, and police licensing officers. In addition to the compliance and environmental audits for venues I risk assess the four Licensing Objectives for each venue along with the conditions set by the Licensing authority. The risk assessments identify potential areas of risk with the management and compliance of the conditions that would be of concern, and would be a risk to the owner if left unchallenged. The assessments provide a due diligence test for the owner, it enables them to develop welfare policies for their performers, correct management practices and/or introduce additional measures. Such assessments can be conducted at 6 monthly intervals or annually.
22. In the areas that I have worked the risk assessments have provided assurance to the Licensing Authority that the proprietors of Sexual Entertainment Venues have an effective due diligence test in place.

Objections to Sexual Entertainment Venues

23. From time to time, objections are made to Sexual Entertainment Venues on grounds of location, crime, disorder, and public nuisance.

In my experience, especially working with the number of venues with SEV licences that I currently work with, I find that venues tend to be located in areas that already have a vibrant night life, and they function as an additional offer in the wider night time economy. The difference is that Sexual Entertainment Venues do not contribute in any significant way to crime, disorder, and public nuisance. This is primarily because of the nature of the offer itself, the clientele they attract, the effective regulatory framework within which they operate, and the range of operating conditions placed upon them by the Licensing Authorities. All of which are apt to control the impact of the premises on their environment in ways going beyond controls placed on other types of premises.

24. Unlike casinos, cinemas, night clubs, traditional public houses, large themed drinking venues and other night time economy outlets Sexual Entertainment Venues have very unobtrusive facades. They do not have bright garish lighting to attract people, unlike the rest of the night-time entertainment industry. The frontages are plain and innocuous. People passing such premises cannot see into the venue unlike other night-time venues and there is no advertising or images on or near such a venue, or any other form of publicly displayed notice (other than a website) that depicts the type of entertainment on offer at such places. The only obvious signs tend to be a rope across the entrance and a door supervisor standing just inside the venue. In the many environmental audits that I have carried out I have watched the pedestrian footfall walk past venues without noticing them. I have also seen customers walk along the road trying to identify the location of the venue because it was not obvious.
25. Themed drinking venues and night clubs tend to attract larger volumes of people and as a consequence large and often noisy groups gather outside venues queuing to enter. Throughout the evening and night these venues regularly decant large groups of intoxicated customers back into crowded public space, leading often to a mass exodus at closing time. In Sexual Entertainment Venues, there is no mass exodus, both because footfall tends to be lower and because the clientele does not stay until the end of the entertainment in any case.

26. Crowds and queues for night-time economy venues can often be noisy if customers have been 'pre-loading' or drinking in other venues before moving to other late night establishments. This tends to happen later in the evening when the local ambient noise starts to die off and the noise is directly attributable to certain night time venues that even become more apparent. This is not a feature of Sexual Entertainment Venues that operate in the night time economy. Queues are not a feature of Sexual Entertainment Venues and as a consequence there is no elevation in street noise or disorder associated with the venue and its customers.
27. Significant high levels of intoxication are not normally attributable to Sexual Entertainment Venues, unlike other premises that operate at the same times in the same night time economy. Individuals that go to Sexual Entertainment Venues are not primarily interested in alcohol. People go to Sexual Entertainment Venues for the purpose of paying for the entertainment that is being provided, and alcohol consumption is an ancillary element to the evening. In addition, the pricing tariff in such venues tends to be higher than the average pub or themed drinking venue and there is no advertising offering cheap or discounted alcohol to entice customers into the venue.
28. The customer is also paying for the in house entertainment. Entertainment costs are not levied by other businesses operating in the night time economy.
29. In the main customers that frequent Sexual Entertainment Venues tend to be older than the average club goer.
30. Sexual Entertainment venues are not generally identified as clubs of interest for the student population, and in any case the cost of an evening in a Sexual Entertainment Venue is far in excess of the means of the general student population.

Paradise City

31. My involvement with the owners of the applicant company has been regarding legal compliance, and in particular:
 - a. the Information Commissioners Office requirements under the Data Protection Act, the General Data Protection Act Regulations, and the HRA;
 - b. a CCTV policy to meet the needs of running a Sexual Entertainment Venue;
 - c. risk assessment;

- d. the venue's policies and how to manage the processes that underpin the effectiveness of such policies;
- e. conditions going beyond those set out in the Birmingham City Council Sexual Entertainment Venue Policy.

In addition, I have also attended a meeting with the Council's Licensing Department with Mr Gary Brown where additional conditions were discussed.

Objections to the Application

32. I have read the objections to the application for a Sexual Entertainment Venue Licence and Premises Licence (under the Licensing Act) at 193-194 Broad Street that would operate as a venue called Paradise City. The three objections that I have read fall into the following main areas of concern
- The location of the venue.
 - The operating conditions and policies.
 - Mr Parma's involvement.
33. I shall deal with each of these areas of objection in turn.

Location

34. Having considered this objection I conducted an Environmental Audit of the area in which the proposed Paradise City would operate. To this end, I visited Broad Street and its environs on Saturday 2nd February conducting a visual audit from approx 7.30pm through to approx 2.30am.
35. I have no doubt at all that the Committee will be very well aware of the general and specific locality. My environmental audit is therefore dealt with as an appendix to this report.
36. My clear conclusion is that Broad Street is a very lively night time economy area, with the main environmental impacts driven by the alcohol-led venues along the street.
37. From my observations, the existing Sexual Entertainment Venues have a negligible impact on the night time environment, being visually unobtrusive, quiet and with no contribution to

alcohol related nuisance, crime or disorder. This entirely accords with my experience of such venues over many years and in a number of large and small local authority areas.

38. There were two distinct types of premises operating in Broad Street:
- A. The clubs and large themed drinking venues that were bright, had large bright signage outside, they were noisy with amplified music all audible at a distance from the venue. They were frequented by large numbers of intoxicated customers and had large queues outside. Intoxicated customers leaving the venues contributed to the anti-social behaviour in the area.
 - B. The other smaller number of venues were quiet, unobtrusive, had no queues attached to them and were not contributing to the overall nuisance factor in the street. These venues included the two Sexual Entertainment Venues that had bland frontages with no garish lighting, and no advertising, no loud music, no queues, and no apparent intoxicated customers leaving the venues.
39. I have already set out at paras 23-30 the contributing factors that create such an environment for SEV's and why they are most unlikely to add to the crime and anti-social behaviour in any given area.
40. Given that the proposed Paradise City would operate under the same, if not tighter, conditions than the two established Sexual Entertainment Venues that currently exist in Broad Street I saw nothing that would indicate that the existence of another Sexual Entertainment Venue would adversely impact upon the environment or its character or impinge in any material or harmful way on any nearby uses.
41. As I understand it, the existing SEVs are well-established and there has not previously been objection to the renewal of the Legs 11 premises on these grounds. Venues of this nature typically slot into busy, vibrant night time areas of the sort seen in Broad Street where they satisfy a market demand for the activity and add to the diversity of the night-time offer without impacting harmfully on other interests of acknowledged importance. I have no doubt that Paradise City, properly run, would operate without a significant impact on the amenity or character of the locality.

Proposed Conditions and Management of the Venue

42. I believe that each application for a Sexual Entertainment Venue Licence should be based upon a sound risk assessment so that additional conditions, going beyond the licensing authority's standard conditions, are placed on each licence as are deemed appropriate and proportionate for each individual case. This is because the style, location and in some cases the history of each premises can vary considerably.
43. I have considered the specific needs of the proposed premises, having visited it on 2 separate occasions to assess the operating environment and I have bench marked it against other venues that I have worked with. I have also considered the objections raised, and the discussions with The City Council on the 14th December, at which I was present. I have also discussed matters with Mr Brown and reviewed the licence conditions for the two existing Sexual Entertainment Venues in Broad Street
44. Whilst the proposed venue is not operating as a Sexual Entertainment Venue I have conducted a visual audit of the building and looked at the standard SEV conditions.
45. In this case, there has apparently been a history of non-compliance. To a large extent, this concern can be ameliorated by the fact that the staff and door security will be subject to much more training, scrutiny, and control. In addition, the day to day management will be different as I am confident that Mr Brown will be an effective Designated Premises Supervisor. This process has served to highlight to him the importance of compliance and the seriousness that the Licensing Authority view poorly managed venues. The only point of connection with the past is Mr Parma himself, who is not to have any day to day management of the premises.
46. Nevertheless, in order to provide still greater assurance, I have recommended the list of conditions in the bundle, in addition to the standard conditions on SEV licences. The list is a relatively long one, and includes conditions recommended by the company's legal advisers, and which I endorse, as well as conditions which I would have in any event recommended. The complete list represents an extensive matrix of control.
47. It is also essential to develop a culture of zero tolerance to licence breaches and a due diligence framework is a key aspect for management. All staff must be empowered to

intervene if they see a breach or an act that is, or likely to result in, a breach, Entertainers and customers must be clear what the house rules are and that any breach of the conditions will result in a sanction. Equally all staff must be aware of the SEV conditions and the underpinning policies and procedures.

48. I shall deal briefly with some of the additional conditions suggested as follows.

(i) Personnel and training (conditions 2 - 8) & (36) Compliance Audit

49. There are clear and understandable concerns about the involvement of any person who worked in Legs 11, having any management involvement in Paradise City. The importance and the impact of 'culture' and how it affects a business should not be underestimated and therefore the management of staff and the setting of standards is a key aspect in achieving a zero tolerance environment in licensed premises throughout the late night entertainment industry.
50. The removal of Mr Parma from the day to day management of the venue, and the enhanced training of the Designated Premises Supervisor are essential elements in developing a zero tolerance culture/environment.
51. Having met Mr Gary Brown and discussed the operating environment with him I feel sure that, as an individual, he is more than capable of managing the venue as a Designated Premises Supervisor. However, although it is not a legal requirement, if Mr Brown, and any person that is likely to deputise in his absence, attends the BII Level 2 Award for Designated Premises Supervisors there will undoubtedly be an enhanced level of awareness and management capability at this particular venue.
52. In addition, the whole application process to date has been insightful for Mr Brown and served to be an excellent piece of learning. He has developed an acute understanding of the responsibility placed upon a Designated Premises Supervisor of a Sexual Entertainment Venue Licence. He also appreciates the importance of zero tolerance and compliance, and the seriousness with which the Licensing Authority view failure, elements that can never be effectively conveyed in the classroom of a Licensing Course.

53. By adding an independent oversight structure into the due diligence process, with reports that are readily available to authorised officers, reinforces and ensures that management understands the importance of compliance and zero tolerance.

(ii) CCTV Conditions 9 through to 16

54. The installation of a good quality CCTV system, and the implementation of effective policies offers a number of benefits, if used correctly. It offers the opportunity to enhance the welfare and safety of the entertainers and provides management with a supervision instrument to ensure compliance. If sufficiently overt it serves to remind and reinforce the house rules and compliance by customers, staff, and entertainers. It ensures good identification of individuals and provides quality evidence which in turn reduces investigation times and ensures cost effective prosecutions.
55. The use of computer tablets linked to the CCTV system provides management and staff with the ability to effectively monitor the entire environment even when moving around the venue. Constant monitoring allows for early management intervention if there is concern about a customer or the behaviour of an entertainer.
56. The provision of a protected CCTV viewing platform in the reception area for authorised officers ensures that any officers conducting licensing visits have almost immediate access to the system without having to find the DPS and then negotiate 2-3 floors of the building.
57. Problems inside and outside Sexual Entertainment Venues are most uncommon, unlike clubs, pubs, and large themed drinking venues. However, door staff with radio systems that are linked to the DPS and other managers serve as a reminder to those entering the venue are entering a highly regulated and supervised environment.
58. The current standard condition to retain footage for 28 days is slightly out of kilter with ICO guidance. The suggested condition to retain footage for thirty days is a slight enhancement. That, along with the provision of computer tablets to improve supervision, and the requirement to 'dip sample' footage and record what has been seen and the action taken, if required, will be a significant enhancement of the CCTV conditions.

(iii) Performers, performances and pricing (conditions 17-33)

59. Many entertainers that work in Sexual Entertainment Venues are transient, having worked in clubs locally, at other locations in the United Kingdom, and abroad. Consequently they will have worked in establishments with a variety of different house rules and performers codes of conduct. In addition, depending on the management controls, the conditions will have been applied to differing standards.
60. It is essential that each entertainer goes through an induction process where the codes and policies are made clear, this should include all safety policies, and it is imperative that they understand each and every one.
61. Entertainers in most Sexual Entertainment Venues are relatively unsupervised apart from when they are on the entertainment floor, where they supervised by security staff and management. The employment of a 'House mother' ensures the welfare of the performers, provides security and support, reinforces the house rules, and provides a valuable level of extra supervision.
62. At the meeting with officers on the 14th December the officers expressed their concern about the payment methods in the former establishment. Therefore, the additional conditions that relate to payment for entertainment should allay their concerns.
63. Officers also voiced concern about the VIP room on the second floor of the venue that is away from the main entertainment area, and I understand their concern. The room itself does not represent a risk if it is managed and supervised correctly. The computer tablets providing the remote capability to monitor the venue through a CCTV portal and the CCTV viewing platform in the reception area provided for authorised officers seeks to address their concerns.
64. The additional conditions in this section also seek to develop;
- The zero tolerance culture,
 - Enhance the safety and welfare of the entertainers,
 - Ensure that customers are absolutely aware of the rules of the venue and that non-compliance is not tolerated.

(iv) Drugs (Condition 34)

65. Drug use and supply should be a key concern for every business operating in the night time economy and the procedures adopted should be agreed and signed off by the police, especially in relation to seizure and retention.

66. The random searching of staff and their facilities provides extra reassurance for management and the authorities. The employment of a 'House Mother' as indicated at condition 35, ensures that entertainers are aware that they and the changing facilities are subject to scrutiny.

(v) Recording of incidents (Condition 35)

67. The use of an incident log provides a useful record for management about incidents in the venue if they are later challenged by the authorities or customers that have been to the venue. It provides an easy cross reference to CCTV footage and aids any investigation by the police, licensing officers, or management.

(vi) Compliance audit (Condition 37)

68. I have worked with other local authorities and Sexual Entertainment Venues where regular audits (compliance visits) are undertaken in the venue, both overtly and covertly by independent individuals.
69. These compliance visits are in two-forms, overt and covert visits. The overt visits are similar to the overt licensing visits undertaken by the police and licensing officers. The covert visits or 'test purchases' are also the same as those conducted by police forces across the country or 'mystery shopping exercises' conducted by many organisations and businesses to test their employees' compliance with their company rules and policies. The visits are arranged on a date and time without the prior knowledge of the owners or management team.
70. In some cases the audits are undertaken specifically for the management as part of their due diligence and annual risk assessment process. In a number of venues that I work with the compliance visits are part of the conditions on the licence. In these cases a copy of the visit report is provided to the licensing officers.
71. The unannounced or impromptu overt visits will always include a 'dip sampling' of the CCTV footage on random dates and times to assess compliance.
72. In this case, because of the history, I would advise regular audits, followed by less frequent audits if the venue trades without harm before the first licence renewal. I will be pleased to

conduct such audits and ensure that my audits are made available to the licensing authority and police, if requested.

Mr Daniel Parma's involvement in the venue.

73. I cannot make any comment about the previous history of the venue, formerly known as Legs 11, or Mr Parma's involvement in it, other than to say that I am not aware of any criminal proceedings being taken against him for money related matters or offences that relate to contraventions of the previous licence conditions at the venue Legs 11.

Conclusion

74. Broad Street is clearly a significant night-time economy hub with a diverse number of venues.
75. The large club style venues and drinking establishments appeared to be the main catalyst for the levels of intoxication and the street behaviour which I witnessed.
76. The two Sexual Entertainment Venues were quiet, unobtrusive (almost indiscernible) in the night-time economy and had no apparent effect on the levels of street intoxication and street behaviour.
77. Paradise City would, if granted a licence, occupy a location in Broad Street that is at the quieter end of the entertainment area. It is opposite a line of business premises on the other side of the road and there is a line of trees between the footpath and the building line on the opposite footway.
78. Whilst there is a building development of high rise apartments being built on the west footway at the junction with Sheepcote Street, Paradise City would be far enough away as to be undetectable at such a distance given the tight conditions on the licence that relate to signage and the facade of the building. I noted that the building referenced is close to both of the other existing Sexual Entertainment Venues and that there is a large venue next to the development that has a very large outside entertainment area.
79. Far more prominent and beside and opposite the residential development are a number of large themed drinking venues and clubs that will be very conspicuous by their bright lights, large customer base, and high noise levels. I have assumed that the advertisement on the hoarding for the apartments *"Discover a vibrant and stylish new home where the city life*

revolves around you" (see Photo no 6) is, in part, a reference to the close proximity of these large night-time entertainment venues and the entire night-time economy of Broad Street.

80. The proposed location of Paradise City is not out of kilter with the rest of the night-time economy in Broad Street and will be far less obvious than the vast majority of venues in the road. Therefore, along with the Standard Conditions in the Birmingham City Sexual Entertainment Venue Policy, and the new additional licence conditions being proposed for a licence, I cannot see grounds where a venue operating under these tight controls will adversely affect any of the licensing objectives or the amenity or character of the locality.
81. The applicant company has taken my advice, and that of its lawyers, as to the future operation of the premises. I believe its proposals to be comprehensive and well-considered. From my own visits to the premises and meetings with Mr Brown I do not doubt his ability to run his premises in a compliant manner.
82. The expressed concern regarding the involvement of Mr Parma is, in my view, dealt with by the raft of conditions which not only exclude him from management of the premises but provide a new broom whereby all managers working at the venue will be new staff.
83. For all of these reasons, I am able to advise that I consider that the licence may be granted in this case.

The contents of this report are true to the best of my knowledge and belief

Signed:

Date: 20th March 2019

AB Conformitas Ltd

**ENVIRONMENTAL AUDIT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED
FOR A SEXUAL ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD
STREET BIRMINGHAM.**

(Appendix)

March 2019
A Bamber

Appendix: Statement of A Bamber

Environmental Audit

Pre-reading

1. Prior to arriving in Birmingham I reviewed the internet to evaluate the area of the City that Broad Street occupied and to get some idea of the type of night-time economy that was available. I noted that the City has a Purple Flag Accreditation and the Portman Group highlight the initiatives in Broad Street in a case study.

"The 1990s saw an explosion in the number of nightclubs, pubs and bars in city and town centres across the UK. In Birmingham, the focus of this investment and expansion was Broad Street, which was transformed into a dynamic conference, entertainment and nightlife quarter, centered on the International Convention Centre, which opened in 1991. This rapid growth was a welcome boost for the local economy, but it also brought challenges. Large numbers of young people were attracted to the vibrant nightlife from all over the city and beyond, and driving up standards in licensed premises and managing large numbers of people in public spaces after closing time, became a priority."

2. The 'Visit Birmingham' website has no mention of the Broad Street area and the night-time economy.
3. The 'Brindley Place' website, although adjacent to the Broad Street area, makes no reference to the night-time economy in Broad Street.
4. The University student population has a number of websites that highlight the night life available to students. The comments all revolve around bars and clubs, music and drinking. There was no mention of Sexual Entertainment Venues or casinos.

"The nightlife! All the clubs and bars are in one place (Broad Street) and they are both cheap and so much fun. I can't remember the last time I went out and didn't have a good time!"

5. There is a large selection of individual venues within Broad Street all advertising the night-time economy and their location within it. The website 'Design My Night Out' advertises Broad Street as *"Known as one of the busiest weekend party streets in Britain, Broad Street tends to stay lively until the early hours of the morning. With many bars open until 6 AM, it feels like the party never*

ends here! Brimming with students, stag/hen parties, drinks deals and more, it's a great place to let your hair down after a long week and make the most of the freedom of your weekend. Check out what Birmingham's Broad Street bars have to offer Birmingham's party animals."

6. Having reviewed the various websites and a map of the area I decided that my assessment was best confined to the length of Broad Street from the Five Ways roundabout down to where Broad Street runs alongside the International Convention Centre. I also incorporated Brindley Place into the assessment due to the close proximity of the area in relation to Broad Street. The Brindley Place area included Water's Edge, Central Square, and Oozells Square.
7. I was also conscious that my visit was in February, a cold and not traditionally busy month for the night-time economy.

Audit

8. Broad Street itself runs approximately north to south with the Five-Ways junction at the south end of the area that I identified as the main night-time economy hub along to where Broad Street runs alongside the Symphony Hall.
9. Brindley Place sits west of Broad Street at the north end by the canal and has a number of roads and streets that access and egress from Broad Street.
10. I commenced my walkabout at 7.30pm from the Five-Ways walking north towards the Symphony Hall. I noticed that the vast majority of the entertainment venues were all on the east footway of Broad Street running the entire length, apart from a vacant lot and a couple of shops, all the way to the Symphony Hall.
11. On the west footway from Five-Ways down to Sheepcote Street the buildings, in the main, are set well back from the footway by some significant distance and they all appeared to be business premises. There is also a line of mature trees that stand between the footway and the businesses on the west side. In the summer the foliage will obscure the view across the road. The venue for the proposed Paradise City is on the east footway directly opposite the business buildings and the line of trees.
12. At the point that the buildings on the west of Broad Street become adjacent to the footway, is at the point that the business premises meet a large entertainment venue called Zara's. This venue (Zara's) was quite extensive, it was branded like a night club with a very substantial

covered outside entertainment area with tables, chairs, heaters, and television screens. Further research revealed that the venue had been closed down by the Licensing Authority.

13. From Zara's, at the junction of Broad Street and Sheepcote Street, the buildings then run along the pavement to the far north end of Broad Street.
14. At this point there is a new high rise housing development under construction, effectively in the middle of Broad Street and the night-economy. The hoarding displayed signage that seemed to embrace the local environment and the night-time economy as a plus for living in the complex.
15. The night-time economy contained fast food outlets, a street vendor, restaurants, public houses, large themed drinking venues, night clubs, two existing Sexual Entertainment Venues, and a Casino. The area was also well served with a significant range of hotels where large groups of young people were staying as part of a night out.
16. During my initial walk I counted about 26 significant outlets on the east footway along the length of Broad Street and 4 on the west footway from the Symphony Hall up to Sheepcote Street. I did not include the hotels as part of the count.
17. At 7.30pm Broad Street was quite a busy thoroughfare and the road traffic was moderate. The venues were well lit with large, colourful and bright signage. Pedestrian flow was reasonably busy and predominately on the east footway outside the bars, restaurants, and clubs. The pavement had a significant number of 'A' boards outside the venues advertising 2:1 and discounted drinks to entice customers into the venues. All of the venues appeared to have SIA accredited door supervisors and a number were attempting to tempt customers into their venues.
18. There were a number of large themed venues that had open frontages, about 5-6 meters deep running the entire length of the frontage. They had low walling to separate them from the footway. These appeared to be smoking areas for customers. These areas also had amplified music that could be heard quite some distance from the venue and the sound wave could be felt as I walked past each of the areas.
19. Almost the entire length of Broad Street I encountered groups of young men and a few groups of women that were displaying signs of significant intoxication.

20. From Broad Street I walked into Brindley Square along Waters Edge and into Central Square, and Oozells Square. The area called Waters Edge was situated alongside the canal and appears to be a concentrated area of restaurants and bars. The bars were well known chains as were the restaurants. The area seemed popular with couples and small groups of young people. The area was well lit, clean, and the security staff outside the venues were attentive and friendly. There was music emanating from the bars in the immediate area but it was not loud or obtrusive. Whilst standing in the area where the bridge crosses the canal the noise from the bars was audible, however, the sound of music coming from a venue in Broad Street beside the canal was the most obvious environmental impact as I stood watching and listening.
21. From Waterside I walked into Central Square and from there into Oozells Square. In Central Square there was one quite large bar/restaurant with people sitting outside under heaters drinking and eating. I could clearly hear the amplified music from the other side of the Central Square but it was not as pronounced as the venues in Broad Street or the venue close to the canal opposite Watergate. From Central Square I walked through Oozells Square which was completely quiet with people going to and from the restaurants.
22. After a meal I returned to Broad Street at about 9.30pm and I was struck by the significant increase in the road traffic and the pedestrian flow.
23. As with earlier, the main flow of people tended to be on the east side of the road along and outside the entertainment venues. There were large numbers of people that were clearly intoxicated and queues were forming outside the themed venues (clubs and large bars). The numbers of door security appeared to have increased and surprisingly I saw that the hotels had closed their entrances and door security personnel managed the flow of customers in and out of the hotels.
24. The music levels seemed to have increased, especially in the open areas at the front of the large themed venues, and could be heard some distance from some clubs and bars. These open areas had also started to fill with people who were very loud and intoxicated.
25. As I walked along Broad Street the footway outside the large venues was increasingly difficult to pass because of the volume of pedestrians, queues outside the venues, A boards, and people standing on the footway talking to people in the large open fronted areas of various premises.
26. At the junction with Watergate positioned on the road bridge above the canal were 3 ambulances. As I stood and watched it was clear that the deployment was part of the night-

time economy and was for people who may suffer the effects of alcohol or injuries incurred while out in the area. Throughout the night one ambulance remained as if a static fixture and the bridge area became a focal point for the ambulance service and police officers, and their vehicles.

27. I also noted a visible increase in the number of police officers in high visibility uniforms. Their deployment was along Broad Street, not in Brindley Place, with slightly more officers at both ends of the road. There were also a number of Westside street wardens out on patrol.
28. I continued to walk around Broad Street and Brindley Place until about 2.30am.
29. After about 11pm the traffic levels increased significantly and for the next few hours the traffic filled the entire length of Broad Street, often at a standstill. A large number of vehicles had their windows down and very loud music emanated from the cars and the volumes of music coming from vehicles and bars was quite considerable.
30. The pedestrian flow along Broad Street also increased after 11pm and again it was predominantly on the east footway outside the clubs and bars. I noticed that large numbers of people were coming out of a number of hotels along the street and that the flow of people from the hotels was being managed by door security staff. Many were exhibiting the effects of alcohol and joining the queues outside the clubs and late bars. The size of the queues outside the venues was also increasing.
31. There was a reasonable amount of pedestrian flow on the west footway from the night club on the north side of the canal bridge to an area close to Sheepcote Street. Further south from Sheepcote Street towards the Five-Ways junction the footpath opposite the old Legs 11 and other late night venues was virtually free of pedestrians. The pedestrian traffic was almost exclusively on the east footway outside the clubs and bars.
32. Policing numbers appeared to increase and there were more police vehicles at both ends of Broad Street. The focal point for all of the blue light services seemed to be on the canal bridge.
33. Adjacent to the canal bridge on the north side was a cab rank that was being effectively marshalled by two street marshals that were dressed in high visibility jackets.
34. Brindley Place remained a busy but a relatively quiet enclave. When the restaurants closed for the evening the bars continued until late. There was no queuing, loud or intoxicated behaviour

from customers outside the venues, and the music, whilst audible outside the premises was not too loud or obtrusive. While standing in Brindley Place I could still hear the loud music being generated by the venues in Broad Street that were close to the canal bridge.

35. I had started the evening photographing the street scene as it developed, making a record of the volumes of people, queues, pavement congestion, and traffic. However, after midnight I stopped photographing due the number of challenges I started to receive from intoxicated individuals and groups in and around the venues. I attach copies of some of the photographs that I took.
36. When I stopped walking along and around Broad Street and returned to my hotel the road was still full of traffic from end to end. It was slow moving, and the occupants of the vehicles were still playing exceptionally loud music.
37. The restaurants had closed although there was a street vendor selling fast food. A few smaller bars had closed but the large venues remained open with loud music and queues of intoxicated people waiting to gain entry was the defining image.
38. The street scene remained constant. High levels of pedestrian flow on the east footway with considerably more people on the pavements between Sheepcote Street and the canal bridge in the north. People were displaying levels of intoxication, some were particularly drunk and were being assisted. The queues outside some venues had grown larger and spilled across the footway. People exhibiting levels of intoxication were being admitted into clubs.
39. The pavements along Broad Street had a significant amount of detritus. High concentrations of cigarette butts could be seen outside venues as well as food wrappings and discarded partially eaten food, bottles and cans of drink. It is pleasant to report that my morning walk at 10 am highlighted the effectiveness of the public realm waste management teams. The road and pavements were exceptionally clean and free of any detritus.

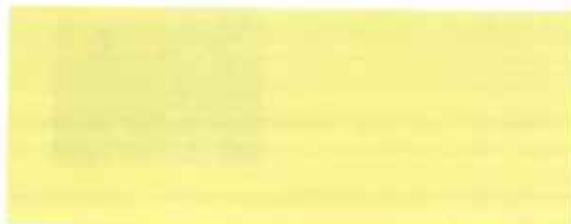
Audit conclusions

40. At the end of my evening I was able to reach some very clear conclusions.
41. The first, which will be well known to anyone involved in licensing and/or management of the night time economy in Birmingham, is that Broad Street is an extremely vibrant night time

entertainment area, with a high proportion of drink-led venues, and all the challenges that brings.

42. The second is that, even within Broad Street, there is a small group of venues that had a completely different environmental footprint to the small bars, large themed drinking venues and the clubs that seemed to dominate the road. These venues were quiet, unobtrusive, with no queuing, no large 'A' boards and no associated bad behaviour. This group of venues comprised restaurants, the Casino near to Bishopsgate Street, and the two Sexual Entertainment Venues that were effectively at either end of the road. One of these, 'Cyclone', is within a few metres of the proposed site of Paradise City.
43. The third is that Brindley Place, albeit part of the night-time economy, with its restaurants and bars, is a far less "charged" environment than the adjacent Broad Street.
44. On returning to my hotel and being vetted into the lobby I spoke with the security team that were managing the door to get an understanding of the unusual security procedures being employed by hotels along Broad Street. The consensus was that the security was in place because of the drunkenness and disorder associated with the high levels of alcohol consumption in Broad Street, and how it spilled over from the street into the foyers of the hotels. It was commented that the street consistently remained this busy and noisy until about 4am in the morning when the night clubs began to close. Mid-week was busy with the student population and January and February were relatively quiet months with the summer bringing an increase in the volumes of people and street disorder.

Signed.



19th March 2019



1



2



3



4



5



6



7



8





11



12



13



14









18



19



20



21



22



23

SECTION A:

WITNESS STATEMENTS:

NUMBER	NAME
i.	Gary Brown
ii.	Daniel Parma
iii.	Ruxandra Niculescu
iv.	Zviad Tsiklauri

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET
BIRMINGHAM

STATEMENT OF GARY BROWN

I Gary Brown of [REDACTED] will state as follows

1. I am a Director and majority shareholder of the Applicant Company, Parma (Midlands) Limited.
2. I make this statement in support of the application submitted for a sexual entertainment venue (SEV) licence for the premises to be known as Paradise City at 193-194 Broad Street. The SEV application was submitted with a bundle of supporting documents required and extra documents intending to assist the committee with consideration of the application. I will refer to many of those in this statement.
3. I am the proposed Designated Premises Supervisor.
4. The building which will house Paradise City was previously used as a Gentlemen's Club known as Legs 11. There was a second venue known as Legs 11 on Ladywell Walk China Town and I was employed as a resident DJ there.
5. I did not work at the Broad Street venue. I was not involved in the management of either Legs 11 venue or have any involvement with the companies who ran the businesses other than as an employee.
6. This statement is intended to set out more detail as to the background to the applications, my own involvement and the manner in which I would intend to run the premises going forward.

Parma (Midlands) Limited

7. The applications are made in the names of Parma (Midlands) Limited. I have been involved in the applications from the beginning and have been instrumental in their preparation. It was always intended that I was to be the manager of the venue.
8. I am a Director of the applicant Company with a 51% shareholding. The remaining shares are held by Daniel (Danny) Parma. The reason for that is that Danny is to be a sleeping partner in the operation. He will play no part in day to day management. I will be solely and ultimately responsible for the management of the premises including, of course, compliance with the law and licence conditions under both the SEV and premises licence

9. Danny will be a director of the applicant company. There has never been any attempt to hide Danny's involvement in the company. The name of the company incorporates his surname and the application was submitted with Companies House documentation showing his involvement. Prior to the applications being submitted our solicitors advised the Police of the proposed application and invited them to discuss these. The e-mail inviting the Police referred to Danny. The invitation to discuss the applications was declined by the Police.

My history

10. I was born in [REDACTED] 75 and am currently 43 years of age.
11. I have never been convicted of a criminal offence in the UK or elsewhere. At Tab 5.1 there is a DBS check confirming that there is no record of convictions, cautions, reprimands or warnings.
12. At Tab 5.2 is a copy of my Personal Licence under the Licensing Act and at Tab 5 is also my BIIAB Award for Personal Licence Holders.
13. I respectfully refer the Committee to my CV, which is at Tab 4.1.
14. It will be seen that I currently work as a Valuations Manager at Connells. This is a position I have held since March 2014. On the grant of a licence I will be devoting my full time to this business and it is my intention to resign my role at Connells.
15. I held a similar position to my role at Connells at Your Move from April 2013-March 2014. Prior to Your Move I had worked at Dixons Countrywide as an Appraisal Manager from April 2011.
16. I worked for PC World from 2008-2011 in a sales coaching / training role, and prior to that as a functions and conference manager for 2 years in Norwich. This venue had a large ten pin bowling centre, bars and pool halls etc. It was a family venue where there would be young children. I had to ensure that the children were kept away from the bars.
17. In 1996 I managed a small night club in Great Yarmouth and was the alcohol licence holder for the venue. My duties were wide ranging including cashing up, epos systems, staff training and management and also overseeing door supervisors and admissions policy.
18. Alongside my career in retail and estate agency, from 1994 to 2017 I worked all over the UK and Europe with various companies as a nightclub DJ. This included Luminar Leisure (now Deltic) who were the leading nightclub operators in the country.
19. This has led to me learning many skills including being alert and aware of staff activities and public safety in environments where alcohol is served. It is this capacity that I worked at Legs 11 at the China Town Premises. I worked there from 2013 to November 2017 when it closed.
20. Whilst I was there I developed a good relationship with the staff, including the DPS. This was originally Mr Michael McLean and then Ruxandra Niculescu who is intended to be part of the management team at Paradise City. Although I was the DJ I would point out to the DPS, doorstaff and management any problems I saw. This could be with staff, customers or

dancers, for example someone who had drunk to excess or dancers who were not complying with the Club Rules

21. I believe that I have the maturity, skills and experience to manage and run Paradise City. I have personally been responsible for much of the preparation work for the application and, as I say, I will be the head of the management team going forward.
22. I intend to continue to develop my professional skills. I will therefore attend and pass the BII course for Designated Premises Supervisors. Although it is a voluntary accreditation, I believe that further learning is always helpful. I will continue to look for opportunities to continue my professional development in this role.
23. I am aware of concern regarding the involvement of Danny Parma at Paradise City. I have described him as a sleeping partner. He will not be involved in the day to day management of the premises. In order to make this explicit and binding, a condition is offered to this effect.

Management Team / Staff

24. There is a copy of the proposed management structure for Paradise City at Tab 3.1 of the bundle and CV's of the main persons involved and copy documents at Tabs 4 onwards.
25. I will be the General Manager and as such responsible for day to day operations. I will also be the DPS.
26. I am also intending to undertake the SIA Door Supervisors course. This will mean that both myself and Ruxandra Niculescu have this qualification in addition to the normal door supervisors.
27. Supporting me will be a team including Ruxandra Niculescu (known as Andra). Andra is a personal licence holder (Tab 7.1). She was the DPS at Legs 11 China Town. From my own observation of her, she was a good and effective manager who commanded the respect of her staff. When I was working at Legs 11 China Town I was not aware of any conduct which was illegal or in breach of licence conditions. I have read the decision of the Licensing and Public Protection Committee of 14th July 2017. The allegations of misconduct related to Legs 11 at Broad Street. There was no evidence of misconduct at China Town. This accorded with my experience. From working with her for a period of xxx years, I have full confidence in Andra to be part of my management team.
28. It is intended that Andra will be the duty manager of the premises when I am not there. Further, there will always be a personal licence holder present when the premises are open. The Bar Manager will also hold a personal licence.
29. I make it clear that the previous DPS at Broad Street, Edmund Haxla, will not be employed in the premises or organisation. This is to emphasise that this will be a new broom.

30. In my experience, alcohol-driven crime and disorder is much less of an issue in lap dancing clubs than nightclubs. The main task for door supervisors within licensed premises is ensuring strict adherence to the rules regarding sexual entertainment, particularly the no-touching rule. I understand that this rule was being breached at the Broad Street Legs 11 before it was closed. I can assure the Committee that it will not be breached under my management. Making that assurance involves having strong policies, understood and enforced by everyone working at the premises – management, door security, dancers and other staff – and clearly communicated to customers at all points in the customer journey. Door staff play a key role in the communication and enforcement of the rules. They should be communicating the rule to customers as they enter the club and they should be a clear presence in the area of the booths to ensure that the rules are observed.
31. I have considered the identity of the door team further. I worked with the proposed head doorman Zvaid Tsiklauri before and am confident of his abilities. I considered whether there should be a complete change of doorstaff but I have been impressed by Zvaid who the committee will see now works at Spearmint Rhino, he has clear and valuable experience of supervising such premises.
32. There will also be the introduction of greater CCTV coverage and portable viewing screens allowing the staff to see all CCTV wherever they are in the premises. In addition, CCTV will be retained for 30 days to provide a record of precisely what has occurred in the premises, in case of any inquiry or investigation. We will appoint a bar supervisor and bar staff following the grant of the licence. For the supervisor role, I will be looking for someone with a personal licence and experience of working in and running a busy bar, preferably in a similar environment for 3+ years. I have noted concerns regarding intoxication of customers. If the premises is permitted to open, I will ensure that all bar staff take and pass the BIIAB course in Responsible Alcohol Retailing within 4 weeks of starting work. I am content to offer a condition to that effect.
33. We are not in a position to choose dancers until the licences are granted, but all dancers will be appropriately trained on the conditions and house rules, and there will also be regular refresher training. It is obviously crucial that there is a culture of compliance at the venue. Therefore, if any dancer is found to be breaching the no touching rule, termination of the relationship will follow. I do not believe there is room for any complacency in relation to the enforcement of this rule, and there will be none.
34. Allegations were made against specific dancers on the closure of Legs 11. If the authorities wish I am prepared to consider a condition that those dancers be named and prevented from working at Paradise City.

Opening Hours

35. We had sought 24/7 opening hours as part of this application. We did not expect to open those hours on a normal basis but would wish to be open from 19:00-07:00 each day. We are happy to amend the application accordingly.

Conditions / Policies and procedures

36. With the assistance of Mr Bamber I have reviewed the standard conditions imposed by Birmingham Council and also the policies and procedures used at the two former Legs 11 venues. I have also taken advice from our experienced lawyers.
37. As a result of this exercise, a further set of conditions is now offered, in addition to the Council's standard conditions. The full set of conditions offered is at Tab 2.1.
38. I also produce the documents entitled 'Etiquette & Club Rules (Tab 3.2), and the policies and documents at Tab 3.3 of the bundle. There is also a document at Tab 3.5 which is a risk assessment and shows how we would intend to comply with the conditions.
39. I believe that the problems alleged at Legs 11 Broad Street were not in terms of the procedures, but in terms of the management and enforcement of these. The same policies and procedures were in force at Ladywell Walk under the control of Andra, where there were no issues. Nevertheless, I fully accept that the serious issues at Legs 11 Broad Street mean that greater precautions should be applied to the venue, and therefore I am more than content to offer this series of further conditions, which I can assure the Committee will be strictly applied.
40. I will refer in more depth to the policies below when I look at the various objections.

The Objections raised / responses and proposed conditions

41. With Mr Bamber I have gone through the objections raised in connection with the Licensing and SEV applications.
42. I have set my responses below to those elements I know of. I do not wish to dwell on the past arrangements or allocate blame for the difficulties Legs 11 found itself in. I instead wish to try and demonstrate that going forward the premises will be run in a way which the Council can be comfortable with and which is in accordance with policies and conditions. I also wish to show the steps to ensure that any failings will not recur.
43. Objections to the SEV application have been received from Westside BID, Licensing Enforcement and West Midlands Police. I summarise these objections (briefly) as follows and I will deal with each of these in turn below:
 - (1) Same management structure as previously.
 - (2) Same procedures as previously.
 - (3) Irregularities in financial transactions at Legs 11 Broad Street.

- (4) Unauthorised sale of alcohol and/or service to those who were inebriated or under the influence of prohibited substances.
- (5) Breaches of rules in relation to contact and offering sexual services.
- (6) Locks fitted on the door to booths, including the VIP room.
- (7) The location of the premises, including proximity of cinema, restaurants, religious premises and a new residential block on the opposite side of Broad Street at the junction with Sheepcote Street.

(1) Same management structure as previously

- 44. The premises will be managed by me, assisted by Andra. I am not aware of any criticism of our performance at China Town.
- 45. The previous DPS, Mr Haxla, has no involvement.
- 46. Apart from Zvaizd Tsiklauri the previous door team have no involvement.
- 47. The directors of the former licensee, Thomas Taylor and Sydney Taylor, have no involvement nor do any other Directors of Clear Blue Sky Thinking. Sydney Taylor is deceased.
- 48. Danny Parma, who was involved previously, will have no role in the day to day management of the premises.
- 49. The job of hiring, firing, day to day management and compliance, including compliance with licence conditions, is entirely a matter for me. Danny Parma is a sleeping partner in the business. I would expect him to be involved, for example, in relation to matters such as investment, capital spend and leasehold matters. But he will have nothing whatsoever to do with matters of concern to the licensing authority. He is content to leave all of that to me. To make that both binding and transparent, we are offering a condition requiring that he has no involvement in day to day management matters.
- 50. As I have advised above I have been involved in this matter from very early on, I now have a controlling interest in the business. I have done all the paperwork, written the rules and venue policies and it will be my responsibility to run the business on a day to day basis. This will include staff training and recruitment. Danny Parma fully understands and supports this decision.
- 51. I wish to be absolutely explicit about this. I am a person of good character and reputation. I will not be involved in any venture which permits breaches of the law or licence conditions. These premises will be run in strict compliance with both. For my part, I was the resident DJ at China Town. I did not have any management role in running the premises or the organisation. However, I behaved as a good employee in a licensed premises should, in helping to ensure that the premises ran safely and compliantly. I do not believe that there is any criticism of the day to day management of China Town or my role within it.

(2) Same procedures as previously

52. The venue procedures for Paradise City are necessarily founded on the standard conditions provided by Birmingham City Council.
53. However, we have developed those procedures further on advice from Mr Bamber and our legal team, and following a meeting with the licensing department, in order to respond to the issues at the premises.

(3) Irregularities in financial transactions at Legs 11 Broad Street.

54. It is possible for customers to be charged too much in a lap dancing club. It is also possible for a customer to be charged sums without full appreciation of what they are being charged. From my experience in this field, and also from talking with Mr Bamber, I know that it is also possible for a customer to experience buyer's remorse, and wrongly claim that they were not aware of what they were being charged. It would be wrong of me to comment on what happened at Broad Street. I did not work there and have seen no statements from the customers concerned. I state neutrally that I understand that there have been no prosecutions or, as I understand it, even civil claims, arising from what did occur there.
55. Under my management, there will be no suggestion of overcharging or wrongly charging. Rather, there will be complete transparency.
56. The regime, which will be secured by conditions, will be as follows.
57. First, a clear tariff for performances will be displayed in the dance areas, on tables and at the bar and cash desk.
58. Second, all performances will be paid for before they occur.
59. Third, no credit or debit card payments will be taken by dancers. They may only be taken by staff members who are not therefore the beneficiaries of such payments, to introduce a check and balance into the process.
60. Fourth, no credit or debit card payments may be made in the private dance areas. This effectively means that they must be made at tables (as they would be in a restaurant) or at a cash desk or at the bar.
61. Fifth, all credit or debit card payments for performances exceeding £100 will be made at a designated cash desk, which will be well-lit and monitored by CCTV. All payments must be signed for by the customer.
62. Sixth, credit and debit card payments may only be made to the licensee. This is to avoid any suggestion of processing through another company.
63. Seventh, I understand there is a concern from the licensing department that free alcohol might be dispensed in the VIP room. It will not be. All alcohol must be purchased from the bar.

64. To put some flesh on this, for payments over £100, the client will be taken to the payment point, where there will be a schedule of charges. The client will be asked to produce ID of which copies will be kept. There will be a separate sheet entitled a Transaction Acknowledgment form to be completed, this will need to be signed by the customer showing the amounts. Only then will the customer be asked to use their card, confirm the amount on the screen and enter their PIN number. They would be given the printed receipt. This is all to be carried out in the view of the CCTV cameras which record the customer making the transaction. Staff and dancers are not to be allowed to view the PIN number being entered and the CCTV would not pick this up.
 65. I fully understand the concern in relation to payments. There will be no such concern in relation to the management of Paradise City, should a licence be granted.
- (4) Unauthorised sale of alcohol and/or service to those who were inebriated or under the influence of prohibited substances.*
66. The control of inebriation at the premises is a general management responsibility, which will ultimately be mine.
 67. I intend to support this by a number of means.
 68. First, if I am not at the premises, the premises will be managed by Andra or by another person, who must be a personal licensee. I am willing to offer a condition in that regard.
 69. Second, the name of the duty manager will be displayed at the reception at all times, so that it is clear to any visiting officer who is in charge.
 70. Third, linked to this, there will always be a personal licensee at the premises.
 71. Fourth, the bar supervisor will be a personal licensee.
 72. Fifth, all bar staff will undertake the BII Responsible Alcohol Retailing qualification.
 73. Sixth, I will be taking the BII voluntary accreditation for Designated Premises Supervisors.
 74. Seventh, as stated above, there will be no free alcohol in the premises. All alcohol must be paid for and dispensed from the bar.
 75. So far as drug control is concerned, the premises will be run with a zero tolerance policy on drugs for customers, staff and dancers. Anyone suspected of being under the influence of drugs will not be admitted, or if they are on the premises ejected immediately. Any drugs found will be confiscated and stored in a drugs safe until they can be safely collected by the Police or other suitable authority. Our policies will set out what should be done and relevant staff will be trained accordingly. There will also be random searches of staff and performers, with dismissal in the event of possession of illegal drugs.

(5) Breaches of rules in relation to contact and offering sexual services.

76. In order to ensure greater control of performances, the following additional measures will be employed.
77. First, although there will be fully private booths they will be covered by extensive CCTV which will be able to be monitored by any of the doorstaff, the CCTV supervisor and management. There will be no locks on any rooms with doors. Our previous request to be permitted to lock the VIP room when not in use is not pursued. There will be no lock on this area.
78. Second, there will be a permanent security presence in the area of the booths.
79. Third, door supervisors will carry tablets showing CCTV of the booth areas to provide further monitoring.
80. Fourth, there will be continuous monitoring of the CCTV at the premises including the dance areas. The monitoring position will itself be covered by CCTV to demonstrate continuous monitoring. The person undertaking monitoring will have the facility for radio communication with the door team and management.
81. Fifth, a full record of interventions with dancers and / or customers, together with action taken, will be maintained. The record of interventions shall be counter-signed by the manager or duty manager on a daily basis.
82. Sixth, the management shall undertake daily dip sampling of CCTV to ensure that the no touching rule is observed. A daily record of such dip sampling shall be maintained.
83. Seventh, we will provide an additional monitoring position for CCTV at the reception area, so that any visiting police or licensing officer can instantly view the dance areas at any time, to ensure that all of the rules are being complied with.
84. Eighth, CCTV footage shall be retained for 30 days.
85. Ninth, I intend to offer express conditions that sexual services shall not be offered by performers, and that telephone numbers shall not be given or taken by performers. Any dancer found breaching these conditions will have their contracts terminated. These are obvious rules, but would be expressed for the avoidance of doubt and to ensure absolute clarity on the matter.
86. Tenth, all dancers will receive training and refresher training in the rules, and will have to sign to show that they have received and understand the training and the rules.
87. We have considered the system of fines for the Dancers. I do not believe a £20 fine to a dancer who can make £1000 a night a suitable deterrent. I understand that this view is shared by Andra Niculescu. I believe the way to keep the rules adhered to is through education, training, a change in culture and a disciplinary procedure that will result in the dismissal of the dancer as opposed to a fine. The loss of the job is obviously a far more draconian deterrent.

We are happy also to instigate a system of fines if the Council requires it, but feel that it is more of an adjunct to mark minor transgressions than a deterrent in its own right.

(6) Locks fitted on the door to booths, including the VIP room.

88. As I have stated above, there will be no locks fitted to any doors including the VIP room. We are looking at replacing the current solid doors with ones which have partial glazing (unobscured glass). This would allow easier monitoring of the rooms by staff.

(7) The location of the premises, including proximity of cinema, restaurants, religious premises and a new residential block on the opposite side of Broad Street at the junction with Sheepcote Street.

89. As regards the challenge to the locality these premises have previously been used for many years as a lap dancing club without complaint from any residents or anyone else. There has been no objection from the developers of the residential apartments and those premises would have been granted planning permission at the time when Legs 11 was open. There are also similar venues operating in close proximity which I believe have not received a similar objection when their licences have been renewed.
90. Obviously, the location on Broad Street is very much part of an established night time area. Alcohol-related crime and disorder is not an issue at SEV premises. My experience, coupled with the evidence of Mr Bamber, is that the premises will trade discreetly in their location and without an adverse impact on their environment.
91. In summary, I have, together with our advisers, given thorough consideration to the previous issues. Clearly, many of the previous problems were the result of poor or ineffective management. We have tried to create a staffing structure, develop a set of policies and offer conditions which provide complete assurance that the issues of the past will be eradicated. I am more than happy to discuss any further conditions or policies which may be considered necessary to provide assurance in relation to legality and compliance, since my only intention is to oversee a safe and lawful operation.

External Audits

92. There is a separate report from Mr Bamber. Mr Bamber was recommended to us as an external consultant with a strong expertise in this area. He is a former senior police officer with strong local government and licensing experience. I believe that his involvement in the business going forward is very important to help demonstrate that we are in compliance. He brings the ability for us to have external checks and balances on our systems and recommend changes if necessary. For example, it was he who recommended changes to the CCTV. Mr Bamber and I, together with the legal advisers, have worked closely together to provide the policies and draft conditions which we think are necessary to show that the Club will meet the requirements of the Council and others to ensure that the Club is run properly.

93. I am very happy for Mr Bamber to continue to be employed when the premises open. He is being asked to supervise all licensing matters and to do mystery shopper visits to ensure we are complying. I am prepared to offer a condition that Mr Bamber audits the premises quarterly, and that the audit reports be made available immediately to licensing or the police upon request.

Proposed Conditions

94. Through the course of this statement I have made reference to some of the further conditions we are suggesting. The full list of proposed conditions is at Tab 2.1
95. Birmingham City Council's standard conditions are comprehensive. Nevertheless, I fully recognise that, in the light of the previous history, greater assurance is required, to guarantee that the premises will run according to the law, the licence and the expectations of the authorities.
96. The list of conditions we have attached is intended to provide a very strict set of measures by which we will judge ourselves and expect to be judged. I wish to emphasise that this is a living document. If there are further measures suggested by the authorities or by the Committee itself, we will of course be more than glad to consider them.
97. I am confident that we will run the premises in accordance with the conditions and I would hope and expect that we will quickly allay the concerns of the authorities and the objectors.
98. Clearly, all involved with this venture understand that if there is not complete compliance, the result will be closure of the premises.

The contents of this statement are true to the best of my knowledge and belief.

Signed

Dated

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

STATEMENT OF DANIEL PARMA

I Daniel Parma of [REDACTED] will state as follows

1. I am a Director of the Applicant Company, Parma (Midlands) Limited, and I make this statement in support of the applications submitted for a Sexual Entertainment Venue (SEV) Licence for 193-194 Broad Street.
2. There is produced a bundle of documents to explain and support the application. References to tab numbers are to this bundle.
3. I am the holder of a personal licence under the Licensing Act 2003 granted by Birmingham City Council. I am also the holder of an SIA licence from the Security Industry Authority. (See Tab 6.2.)

My personal history

4. I fully understand that my involvement in this application is one of the main reasons that objections have been made to this application. Therefore, I believe it right to set out my personal history, and my involvement in Legs 11 at both Broad Street and China Town in a full and open way.
5. I was born in Lezhe Albania on [REDACTED] name at birth was Elton Lekstakaj (see birth certificate at Tab 6.1). I have 2 sisters. One of my sisters lives in Albania, the other in Italy.
6. I was at school from ages 4-18 but I have no formal school qualifications. I didn't take any University entrance exams, those were due the year I left the Country.
7. When the troubles began in Kosovo, it was not safe for us as Albanians to remain. I therefore came to this country as a refugee seeking asylum with my mother in 1997 when I was 19. My father, who is disabled, was left behind and he followed in 1999. We came to the country through Italy and were smuggled into Britain in a lorry. I would confirm that I have no criminal offences to my name in either Albania or Kosovo.
8. When I came to England, I tried to learn English. I now understand the language well but sometime struggle to express my answers correctly in replies to questions.

9. I met my wife here when she was over here on a Student Visa and married in November 2005. She was studying engineering at Falmouth. In 2007 her visa expired so she had to return to Albania. She remained there until 2012 when she was granted the right to return on a married Visa.
10. We have 3 sons and a daughter, all of whom were born in the UK and are UK nationals. My eldest son Peter was born in 2006, my daughter Amy was born in September 2007. Following my wife's return to the UK we had a second son Sidney in May 2013 and another Andrew in March 2017. The children all attend local schools.
11. We own the house where we live having bought it in 2013/2014. It is a 3 bedroom terraced house.
12. I have only been back to Albania 3 or 4 times since I left including one trip in 2010 to see my wife and children who were then living there. The only relatives I have in Albania are one of my sisters and her 3 children.
13. On 7th January 2005 I obtained a Certificate of Naturalisation and became a British Citizen. This was founded upon a grant of indefinite leave to remain in the UK I obtained a British Passport which was issued on 11th January 2005.
14. On 21st February 2005 I changed my name by Statutory Declaration from Elton Lekstaka to Daniel Parma. I wanted to make the UK my home and I was finding that people were having difficulty spelling my names. I applied for, and was issued, a new British passport in the name of Daniel Parma. This was issued on 28 February 2005. I have not tried to hide this change of name: I have always been completely open about it.
15. In 2015 I submitted my passport for renewal. This application has been under consideration by the Home Office since that time. The reason is that when I came to this country as a 19 year old refugee, I was advised to identify myself as Kosovan. It is being said that I ought to have stated that I was originally Albanian.
16. At this time a problem seems to have arisen and this is being handled by lawyers I have instructed in London. My grant of indefinite leave to remain was founded upon a claimed identity as a Kosovan (hence "Serbian") refugee. At the time I came to the country I was only 19, was travelling as a refugee and was told that if I applied as a Serbian refugee the process would be easier. I was young and scared and followed the guidance of those who were advising me. I fully accept that the identity I claimed at that time was not "genuine", as I am in fact Albanian. My lawyers tell me that the Home Office are continuing to consider my passport renewal application.
17. I have involved my MP Jess Philips Labour MP for Yardley in this and I have a letter from her saying that the case remains under investigation and there is no timescale for completion. According to my lawyers in the unlikely event that the Home Office seek to refuse the passport application and decide to revoke both my citizenship and my earlier Indefinite leave to remain, they would vigorously resist that based upon my family life here in the UK. I am in

any case advised that there is no action against me, I remain a British citizen and am entitled to work and establish a business here.

18. In order to be fully open regarding my history, it is right to disclose that I do have one criminal offence to my name, in 2010. At the time I was working in a club and came across what appeared to be a mobile phone. I put it in my pocket and then forgot to hand it in at the end of my shift. Later that night, I was stopped by the police on a random check, and they identified the item (some time later) as a small taser, this was a completely surprise to me, not least because I had no idea that you could disguise a weapon in this way. It is not something I would ever want to have on me. However, because I had it in my possession (which I did not deny) I was charged and convicted of possession of an offensive weapon.
19. I have no other criminal history, either in the UK or elsewhere.
20. I obtained my Personal Licence in 2014. In order to obtain my Personal Licence and regain my SIA Licence in 2012, I disclosed the offence at para 18. It did not prevent my obtaining either licence. Both licences are enclosed at Tab 6.2.
21. I also produce a recent DBS check at Tab 6.3, which can be seen to be in my current and former names. As can be seen, there are no other matters listed.
22. I have never been arrested or charged with any offences arising out of the closure of Legs 11. There have also been no civil or other enforcement proceedings brought as far as I am aware arising out of the closure against myself or anyone else involved. I have co-operated fully with the Police and others in their investigations when required to do so.
23. I instructed solicitors in London to deal with the investigation against me. In February 2018 I was advised by my solicitors that the Police and HMRC were not proceeding and that all the paperwork they had removed from the premises was being returned to me.
24. I appreciate that other allegations have been made against me in the past that I am involved in organised criminal gangs in Eastern Europe. This is unfounded. I can confirm that I am a law-abiding individual without connections or involvement with organised crime. I have seen no evidence whatsoever to the contrary.

My work history

25. I have had a variety of jobs since being allowed to work within the UK. From 2000-2005 I worked as a forklift truck driver for Fed-Ex in Birmingham. I worked in their warehouse loading and unloading
26. In 2005/2006 I moved and worked as a groundsman / greenkeeper at a golf course near Birmingham Airport.
27. In 2006 I began working as a doorman / security guard and took my qualifications to become SIA registered. I worked for a company known as PRP based in Wolverhampton. I was,

amongst other roles, doorman for Iceland and for Global Company. I worked at various clubs in the Birmingham / Wolverhampton area.

28. I continued to work as a doorman until 2010 when my conviction meant that I lost my SIA certification and I was unable to work. I found work -time in a chip shop.
29. In 2012 after I regained my SIA badge I began working as door staff again in Birmingham. Around this time I first met Sydney Taylor who was a Director of Clear Blue Sky Thinking Ltd. They were the licence holders for Legs 11. I saw him often in town but I remember meeting him at Milanos, a restaurant in China Town which was owned by the Taylor family.

My involvement in Legs 11 premises

30. Sydney Taylor later told me that Legs 11 Broad Street was not making any money, indeed they were losing money. He said that he wanted to spend more time abroad and that he had family problems, he was married to a Brazilian lady and had a son in Brazil. After a while he suggested that we work together and that I take over the running of the club for a period. The period was for 6 years. There was a large amount of rent to pay on the premises and I agreed to be a guarantor on the Broad Street premises.
31. I was the effective owner of the Club, but the day to day running of the club when I took over was by Michael MacLean the DPS. This remained the case until Mr MacLean left in August 2016. Sydney Taylor had very little to do with the business on a day to day basis. I based myself mainly at the China Town premises and would attend the Clubs 4-5 days a week.
32. When I went to the Clubs I would do very little other than chat to the staff and sit at the bar or in the office. Mr MacLean ran the premises and was responsible for hiring and removing staff and complying with the conditions. I had confidence in him.
33. As the Committee knows, at the time of the closures of Legs 11 I was a Director of 2 companies, Dansid Limited and Take it Back Limited. They were the companies through whom all the payments for China Town and Broad Street Legs 11 were made. This included the card payments. I had an accountant who prepared all the necessary returns.
34. I believe that all payments made through Legs 11 were properly accounted for and tax returns and company returns made for both companies. Although HMRC took all the records following the closure there has been no further investigation into those companies and all records have been returned.
35. Approximately 2-3 years before the premises were closed we had an inspection by HMRC. They were happy as to the accounting / VAT generally, but at the time myself and 3 other members of staff were being paid as self-employed. HMRC told us that this was wrong and I took steps to change this immediately, we were all changed to employed status.
36. My accountant has prepared all my tax returns and I have paid all my tax and NI payments.

37. I fully accept that I was involved in the Legs 11 businesses. I was led to believe by Sydney Taylor Junior (the 100% shareholder of Clear Blue Sky Thinking Ltd) that there was no problem with this. Mr Taylor handled all the SEV licence applications and renewals and I was unaware that I should have been referred to on these. I believe that Mr Taylor did not tell his advisers about my involvement. The Police were aware that I was involved in the business and I was present on many occasions when they visited the premises.
38. As I have said the premises at Broad Street formerly traded as Legs 11. The Premises were operated as a Sexual Entertainment Venue under a Premises Licence under the Licensing Act and an SEV Licence. Both licences were in the name of Clear Blue Sky Thinking Limited of which I was not a Director or Shareholder. There was another similar venue licensed to Clear Blue Sky Thinking Limited based at Ladywell Walk China Town.
39. The Premises were both subject to enforcement action and Broad St closed in July 2017.
40. The Broad St Premises were, for many years, under the day to day supervision of Mr Michael McLean. During his time at the premises I can say that there were few, if any incidents which caused problems, and I believe the police would agree that he ran the premises well.
41. Mr McLean left in August 2016 and Mr Eddie Haxia was appointed as DPS for Broad Street, and Ruxandra Niculescu DPS for China Town. They were appointed without my agreement by Thomas Taylor, the uncle of Sydney Taylor who was also a Director of the licence holders Clear Blue Sky Thinking Limited. I was told they needed appointing urgently due to the sudden departure of Michael MacLean.
42. The appointment of Eddie Haxia to run Broad Street was a mistake by Thomas Taylor. He did not control and run the premises as tightly as Mr McLean but I was unaware of this for some months. At this time I was suffering from mental health problems and suffered a nervous breakdown. I was obviously not as heavily involved as I used to be. I believe my problems were triggered by a spiked drink but they reached a stage where I was admitted to hospital under the Mental Health Act and stayed there from 14th December 2016 to 13th January 2017.
43. I was only visiting the premises 2-3 times a month after this and although Andra ran the China Town premises very well, there obviously followed a number of problems at Broad Street which ended with the enforcement action being taken.
44. After the enforcement action I did not take any further role in the business. At the time of the enforcement visit to Broad Street I was at the China Town premises. I received a call telling me about the enforcement action and I went immediately to Broad Street.
45. On arrival at Broad Street I found the main door closed and I was allowed entry by the Police when I explained who I was. I was not questioned by the Police but I was asked for the key to the safe. This was in my car and I went with the Police to collect it. I went back to the premises and opened the safe as requested, leaving the key with the Police. The safe only had the cash float in it.

46. I stayed on the site until the Police had finished. I was not questioned nor was I asked to give a statement. My home was raided and bank statements, personal and business papers, mobile phones and tablets were taken. All of these were later returned to me and I have never been charged with any offence following the enforcement action.
47. I was later handed copies of papers closing down the Broad Street premises and this was closed down. I never went back to that site. I went to the China Town premises which continued to run for a period until I resigned on 23 August 2017. After that date I had no further involvement with the business.

Parma (Midlands) Limited

48. The applications for new licences are in the names of Parma (Midlands) Limited. I am one of the two Directors of the Applicant Company, the other is Mr Gary Brown. The company is a private limited company and was incorporated on 23 January 2018. The Company has no trading history as it was formed with the intention solely of being used for the purposes of the applications.
49. Initially I was the sole Director and sole Shareholder of the Applicant. However due to my involvement with the previous venues known as Legs 11 I was advised that I should not be in control of the day to day management of the business, and that I should not be the sole director or the main shareholder. I have complied with that advice. I do not, and never did, intend to be involved in the management of day to day operations at the new venue when it opens. The daily running of the business will be controlled by Gary Brown who will be giving up his current job at Connells.
50. If there is any question that I will be running matters 'behind the scenes', I can assure the Committee that this will not be the case.
51. For the reasons set out above, and following the objections received, I have agreed recently that the Company running the Premises will be owned jointly by myself and the other Director, Gary Brown. Mr Brown now has a controlling shareholding of 51%. The remaining holding of 49% being held by myself. I intend to be 'a sleeping partner'.
52. The costs of making the application and supporting works are being funded by way of a loan from the Company Take It Back Limited. I am advised by my accountant that this is legal and that the loan will appear in the books of Parma (Midlands) Limited as a loan from Take it Back Limited and repayable as such. The loan is not from myself. Gary Brown retains a majority share in the Company.
53. In objections by the Police and others to the applications references are made to their concerns as to my involvement. There are allegations that the company was set up as a smokescreen to hide my interest in some way, and that attempts are being made to mask my involvement. This is not the case. We have always been fully open as to both ownership and

directorship. The Police in their own objections refer to communications from our solicitors referring to myself as instructing them.

54. My solicitors invited the Police to discuss the applications so we could try and answer their concerns before the applications were submitted. This request was declined by the Police.
55. The name of the company alone indicates my involvement. With the SEV application we provided copies of the Companies House documents which clearly show the directors as being myself and Mr Gary Brown. We were not required by the rules to file these documents. The application also clearly refers to my involvement.
56. As I have stated the venue going forward will be run and operated by Mr Brown for the Company with no other companies (other than suppliers) being involved. All payments from card machines etc will be made to Parma (Midlands) Limited.
57. The Committee will know that the licence could not be transferred to another company without an application for transfer and the opportunity for objections by the Police. I and Mr Brown are prepared to offer an additional condition that there should be no change in shareholdings without first giving appropriate notification to the Police.

Conclusion

58. Although I am not taking part in day to day management I can confirm that I have read the statements of Mr Brown, Ms Niculescu and Mr Bamber and have noted the proposals for the management of the premises they set out.
59. I also confirm that I will not be directing, involving myself with or otherwise interfering with the day to day management of the premises.
60. Working with Gary Brown, Mr Bamber and our advisers we have drafted a series of conditions which take into account the objections made. I believe Mr Brown will be able to run the club within these conditions.

STATEMENT OF TRUTH

The contents of this statement are true to the best of my knowledge and belief.

Signed

Dated ✓

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

WITNESS STATEMENT OF RUXANDRA NICULESCU

I, Ruxandra Niculescu, of [REDACTED] will state as follows:

1. I make this statement in support of the applications submitted by Parma (Midlands) Limited for a Sexual Entertainment Venue (SEV) Licence for 193-194 Broad Street. I was born in Romania on 22 December 1984 and have been residing in the United Kingdom since 1 March 2007. I confirm that I have permanent residence of the United Kingdom.
2. I do not have any criminal convictions either here or in Romania.
3. I am the holder of a personal licence under the Licensing Act 2003 granted by Birmingham City Council in 2013 (There is a copy in the bundle of documents with this statement at Tab 7).
4. I am currently employed as a part-time Branch Administrator at Shipways Estate Agents and a part-time mortgage advisor at Mortgage Circle.
5. I completed my CeMAP mortgage advisory course in June 2018 and have commenced a business management course with the University of Bedfordshire due to be completed in three years.
6. I am trained and certified in first aid, health and safety, data protection (GDPR), financial crime, estate agency regulation and fire marshalling. I have also completed a Restaurant Hospitality and Management Diploma (certificates at Tab 7).

History

7. I previously worked at the former Legs 11 premises in China Town Birmingham. I was employed there from June 2013 until 24 August 2017, and was the DPS there from August 2016 to August 2017 when I resigned following a change of management.
8. The Premises were operated as a Sexual Entertainment Venue under a Premises Licence and SEV Licence. There was another similar venue trading as Legs 11 based at Broad Street, these are the premises to which the current application relates.

9. During my employment at Legs 11 China Town my role developed. I was initially the house mum/bar manager and then progressed to a duty manager and then a general manager with my final role being the DPS. I confirm that I have never worked at Legs 11 Broad Street as a member of staff but did attend occasionally at the request of the management to help with paperwork.

My proposed role at the new premises

10. I confirm that I am happy to be involved in the business as duty manager.

Closure of Legs 11 Broad Street

11. I am unaware as to many of the specifics in relation to the enforcement action at Legs 11 Broad Street which led to its closure. I was not based at those premises due to my role as the DPS at Legs 11 China Town. I have however been told of some of the allegations and read about these in the press.
12. The Committee will be aware that the premises at Legs 11 China Town, which were under my control, were not closed down by the Police and were not subjected to a raid in the same manner as Broad Street. Legs 11 China Town was allowed to stay open after the Broad Street premises were closed down.
13. For the sake of completeness, I mention that my own home was searched and my cash savings were removed. I demonstrated that the cash was my own money and accounted for it by reference to my taxation documents. In due course, the police returned the money to me. I have not been asked to make any statement in relation to the allegations regarding Broad Street.

Avoidance of Credit Card Fraud

14. I understand that there are allegations of credit card fraud in respect of transactions which were taken from customers visiting Legs 11 Broad Street.
15. At China Town we had a set procedure for card transactions to ensure that customers were fully and demonstrably aware of what they were being charged. The procedure was rigorously enforced and worked well. It was as follows.
16. The procedures involved the completion of a 'Transaction Acknowledgement Form' which the customer then checked and signed before their card was charged. A copy of this form is at Tab 3.5 ✓ In the bundle of documents. Before the card was charged we would also insist on photo ID being shown to verify the card holder as being the person present. A copy of the ID was retained.
17. Price lists were clearly situated at the bar area.

18. The client would then insert their credit card into the machine and details would be inputted to include the amount of the transaction, date and time. In the normal way the customer would have an opportunity to review this information and then enter their PIN code. By this time the amount would already have been entered on to the form. A receipt would be printed and a copy was given to the customer. The copy receipt we retained together with the copy of the customers ID and the signed transaction form. These documents would then be placed in a folder which I retained for a period of six months. After this period I would store them in a storage box in a secure room. With the new premises documents will be destroyed after six months.
19. These transactions would take place in view of the CCTV cameras, so that any allegation of intoxication could be readily checked. In general, this procedure will be carried into Broad Street, but I understand (and agree) that further controls will apply, in particular that dancers will have no part in the payment process, payments will not be made in the private dance areas, all performances will be paid for in advance, all payments over £100 will only be made at a designated place to introduce even greater formality and CCTV will be retained for longer.
20. It is in the nature of sexual entertainment venues that customers are sometimes embarrassed to admit to themselves or their partners why or how they have run up such costs. In such a case, we might get a query from a bank or card company regarding a payment, following a customer suggestion that they did not authorise the payment or were not sober when they did so. It is extremely important that the venue can show with absolute certainty that the customer knew what they were doing. In the case of China Town, there was never an occasion when a bank refused to honour a transaction, following our proof that the transaction was entered into transparently and voluntarily. However, with the further controls which have been suggested by our advisers, I am still more confident that the only payments taken will have been willingly and knowingly made.

Drugs/intoxication

21. We operated a zero tolerance policy on drugs for employees, dancers and customers. This is a policy which I understand will be the same at the new premises. I could not work in premises that did not adopt this approach.
22. I do not believe that intoxication is a frequent issue in sexual entertainment venues, since on average customers tend to be older than in pubs and clubs and are visiting for the entertainment rather than the alcohol, at least that was the experience in China Town. At Broad Street there will be strong training and venue policies in relation to intoxication, and ultimate responsibility for enforcing these will be for Gary and myself.

VIP Room

23. At both premises there was a Room 11 VIP area. No 'free bar' was operated. However, if customers paid for use of the VIP room a bottle of prosecco or champagne would be included.

24. No free bar will be operated at Broad Street if this licence is granted.

Dancers

25. The welfare and control of the dancers is always one of my main concerns.
26. I understand that there allegations of dancers at Legs 11, dancing too close to the customers. There were no such allegations in respect of China Town. All the dancers were made fully aware of the conditions on the licences as to what they could / could not do and were made to sign a form confirming they had been given a copy of the conditions, were aware of the restrictions and would abide by them.
27. This was rigorously enforced at China Town. I understand that on the appointment of any dancers under the new regime we would adopt a similar policy. The rules will be explained to the dancers with each dancer signing a sheet to confirm their understanding and the penalties if they fail to do comply with such rules. They will be given a copy of the rules as well.
28. My understanding is that allegations have been put forward that customers were being offered sexual intercourse/other services in exchange of money. It certainly had not come to my attention that any dancer was offering such services: at China Town this would have led to the dancer being dismissed immediately.
29. For the avoidance of doubt, I should stress that, as was the case at China Town, every one working at Paradise City will have to provide proof of address and ID, National Insurance number, and if necessary their right to work within the UK. Copies of all such records will be kept on the person's file and regularly checked and updated if necessary.

Mr Gary Brown

30. Mr Brown is well known to me. He was formerly involved at Legs 11 China Town as the resident DJ from 2013 until 2017. I consider him to be a professional individual who seems to understand and know everything necessary in relation to the business.
31. Although only the DJ, Mr Brown was proactive during his role as the resident DJ and would often contact management, doorstaff and bar staff if he spotted any issues or difficulties. He seemed to adopt a responsible attitude to the club patrons, dancers and dancers as a whole.
32. My understanding is that Mr Brown will be primarily responsible for running the business and will be supported by me. I confirm that I am absolutely comfortable working with Mr Brown and consider him to be more than suitable to run the business on a daily basis.

Mr Daniel Parma

33. I understand that allegations have also been made in respect of Mr Daniel Parma being linked to gangs and being involved in the Albanian mafia. I am unaware of any such connections and did not see any evidence of this whilst I was at China Town.
34. I can confirm that at no time did Mr Parma encourage us at China Town to depart from the conditions on the premises or SEV licence or to break the premises rules or do anything else amounting to a breach of the law. I would not have been prepared to do so in any case, but such a situation never arose. It goes without saying that I have exactly the same attitude in relation to Broad Street. I understand that Mr Parma is to have nothing to do with day to day management at the premises. However, if I was encouraged to behave unlawfully by any person, I would immediately report this to the authorities. I am a law-abiding citizen and under no circumstances would I permit this to be compromised.

Rules, Systems and Implementation

35. At China Town systems were introduced and an etiquette rule book was presented to each of the dancers. I had prepared bullet points of things to prompt me when training the dancers. We implemented the form, at Legs 11 China Town, in relation to the dancers and the issue of dancing too close. These rules have helped to inform the set of venue rules and policies in Tab 3 of the bundle.
36. We fully enforced the rules at China Town and ran a friendly, lawful sexual entertainment venue. The policies and conditions offered in this case go still further. I have no doubt at all that we will run Broad Street in a similarly lawful way.
37. Training for all staff members and dancers is key. I ran regular training sessions at China Town. I constructed a training questionnaire for all members of staff to complete which is at Tab ~~xxx~~ 3.6. At Broad Street, we will ensure that a similar regime is followed.
38. In conclusion, we ran China Town in compliance with the law and the licences over many years. I am fully confident that we will run Broad Street compliantly too, particularly with more specific conditions, and with the external audit function in place.

Statement of Truth

I confirm that the facts set out in this witness statement are true.

Signed: -

Dated:

IN THE MATTER OF AN APPLICATION FOR A SEXUAL ENTERTAINMENT VENUE LICENCE AND FOR A
PREMISES LICENCE UNDER THE LICENSING ACT 2003

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

PARMA (MIDLANDS) LIMITED

Applicant

STATEMENT OF ZVIAD TSIKLAURI

I Zviad Tsiklauri of [REDACTED] will state as follows:

1. I am the proposed Door Supervisor of the new venue Paradise City at Broad Street Birmingham and currently hold the position of Senior Door Supervisor at Spearmint Rhino Gentleman's Club in Leicester.
2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.
3. I was born in Georgia on [REDACTED] and have been residing in the UK since February 2005. I confirm that I have permanent residence of the United Kingdom.
4. I am the Senior Door Supervisor at Spearmint Rhino Gentleman's Club in Leicester. I have held this position since August 2017. In this role I manage crowd control at the venue and coordinate the other door staff. In my supervisory role it is very important that I understand the venue's rules and carry them out. I have held senior supervisory roles since 2011.
5. I will be the Senior Door Supervisor of the Applicant Company, Parma (Midlands) Limited, and I make this statement in support of the applications submitted under the Licensing Act 2003 for a Premises Licence for the Premises at 193-194 Broad Street, and a Sexual Entertainment Venue (SEV) Licence for the same premises.

6. The premises concerned formerly traded as Legs 11. This was a Sexual Entertainment Venue under a premises and SEV License. I was employed as the Senior Door Supervisor at the Broad Street venue from February 2014 to May 2017 when I moved to the Ladywell Walk premises and stayed there until August 2017.

History

7. Prior to employment at Legs 11 I was Head Door Supervisor at Shaftsbury Casino in West Bromwich from July 2011 to January 2014 which involved close observation of all areas of the venue, identifying clients intoxicated by drink or drugs, checking the identification of clients, crowd control inside and outside the premises, and enforcing the regulations of the venue. This required me to be familiar with and understand the policies and procedures for the business, comply with them and carry them out. I left here for the job offer at Legs 11.
8. I have worked in the role of Head Door Supervisor at several other SEVs and nightclubs including Amara VIP in Leamington Spa from December 2009. These roles required understanding of the regulatory policies and procedures of the different business and make sure the staff under my responsibility could apply these policies as well.
9. I have completed an SIA Door Supervisors training course, a Close Protection Course, hold a Georgian Law Degree and am multi lingual in English, Georgian and Russian so can communicate well with all clients, staff and my employers.
10. I have competed for both England and Georgia in Judo and held the Commonwealth Heavyweight Champion title, competing for England in 2012.

Legs 11 Head Door Supervisor Role

11. As Senior Door Supervisor at Legs 11 I was responsible for the team of 3 door supervisors, for their briefings and discipline and to keep constant radio contact with them.
12. My responsibilities also included observing areas of the venue and protecting the security of the dancers and clients. It was my job to provide crowd control to the stage area and outside the club where necessary. There was rarely any need to take action in these areas and CCTV coverage was better than in any other SEVs I have worked in before or since. I typically worked every night.
13. Whilst I was working at Legs 11 Broad Street there was very little trouble at the venue. In my experience as a Door Supervisor this is indicative of SEVs compared to nightclubs and other

night time businesses. In a typical month there was never any fighting or violence and inside the club there was rarely any trouble, only minor incidents with complaints about the girls not giving enough dance time. In my experience this is very common in all SEVs. The protocol for this was for the manager to review the dance on CCTV. This was very easy in Legs 11 since the CCTV footage was so thorough and always covered the dances, payment and signing the agreements.

14. For the majority of time I was employed at Legs 11 Michael McLean was the DPS and he ran a very organised business. He was always prepared to turn people away at the door if they appeared underage or drunk or liable to cause disruption. I think the police would agree that there was very little trouble whilst Michael McLean was the DPS.
15. The policies for entry at Legs 11 were that if clients looked young we would check their ID to make sure they were over age. We adopted a Challenge 25 policy. A smart dress code was enforced. Entry cost £10 and sometimes there were vouchers for entry produced.
16. The door staff told all clients the rules as they entered. Every entrant was told they must not touch the dancers and must be respectful of them at all times. These rules were followed and clients were ejected if there was any breaches. If a client appeared drunk or under the influence of drugs they were not allowed entry and the door staff were vigilant to this. The same procedure operated to groups of clients including stag parties. Spearmint Rhino operates an over 18s policy.
17. There was a zero tolerance drugs policy at both Broad Street and China Town Legs 11 clubs. Any clients suspected of taking drugs were immediately ejected. This is the same at other SEVs I have worked at including Spearmint Rhino currently. Where drugs were found these would be confiscated and disposed of safely or handed to the Police.
18. Whilst I was at Legs 11 Broad St and Ladywell Walk it was not tolerated for men to touch the dancers. If this was spotted on CCTV or otherwise this would be immediately referred to the manager. Clients were given one warning before being ejected from the club. This procedure always occurred to my knowledge.
19. There was no rivalry between staff or clients of Cyclone, the neighbouring SEV on Broad Street and to my knowledge we never received any noise complaints either. There were certainly never any queues caused by clients to Legs 11 even when groups arrived. "Pit Stop" a late night street takeaway venue adjacent to the Legs 11 venue regularly caused queues of people encroaching onto the street area in front of Legs 11 and if there was any trouble outside the

venue it was from their customers. I suspect this is still the case now that Legs 11 is not operating.

20. The door staff at Legs 11 were regulars and a good team who knew each other and the regular clients and the procedures for the club very well.
21. I left Broad Street Legs 11 in May 2017 to go to China Town Legs 11 where Ruxandra Nicolescu was the DPS. She ran a smooth business and always had everything in order. She was definitely on top of her game. There was never any problems with violence or crime at China Town either. Gary Brown was working at China Town as the DJ when I moved there and I look forwards to working with him again. He is very knowledgeable of the policies, procedures and regulations of SEVs and I am confident he will run a very compliant venue.
22. Mr Osman took over as senior door supervisor at Broad Street and had been in my door staff team before I left so was very familiar with the operations.
23. For most of my time at the venue Michael MacLean was the DPS but he left and was replaced by Eddie Haxia. It was during Eddie Haxia's time as DPS the premises was subject to enforcement action and closed.
24. I was not working at Broad Street Legs 11 at the time of the raid, having already moved to China Town but I was most shocked to hear about the enforcement action. The accusations are hard to imagine based on my time working there.

I believe the facts in this statement are true.

Signed

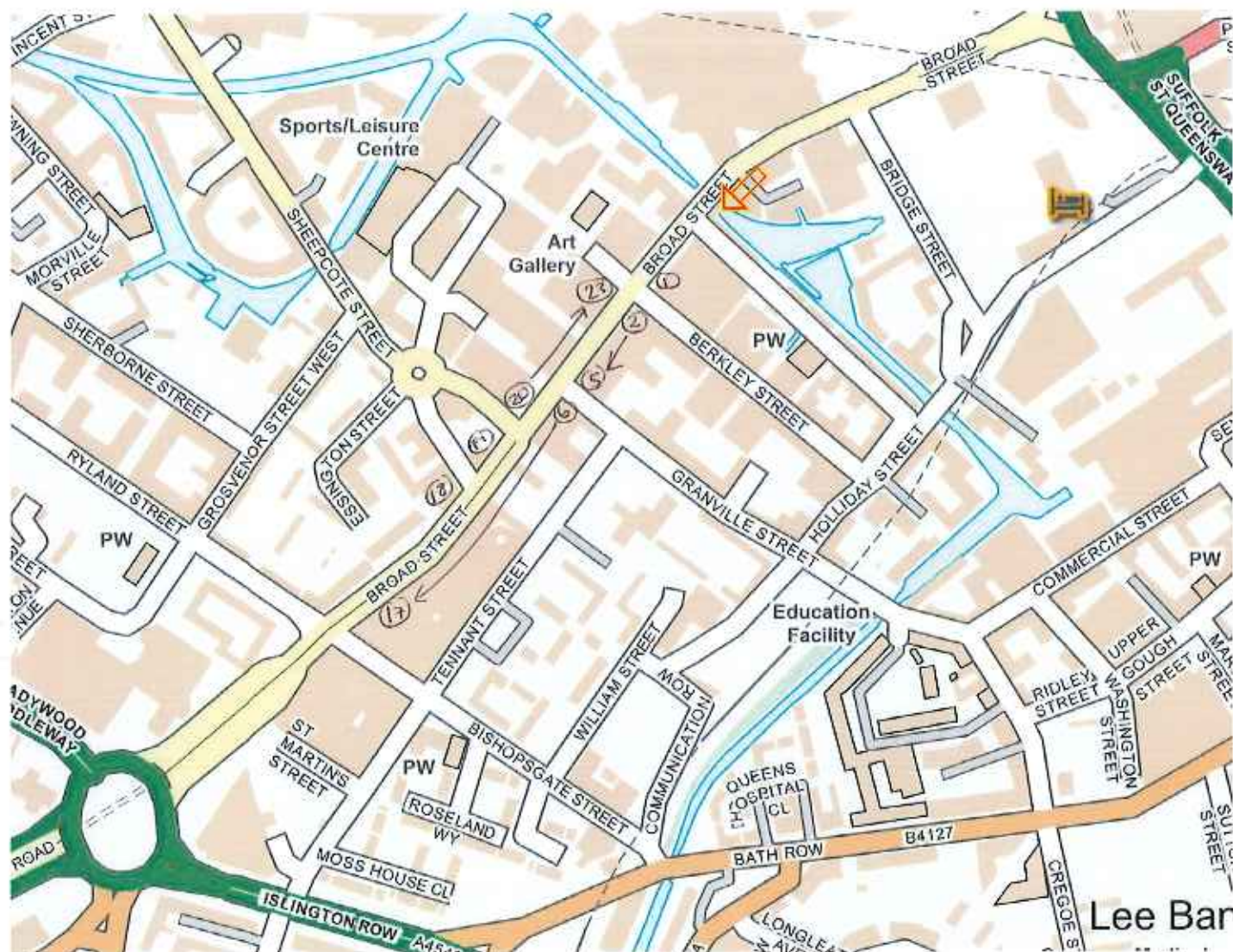
Dated

SECTION B: SUPPORTING DOCUMENTS

TAB 1:

BROAD STREET: LOCATION & OTHER BUSINESSES

TAB	DOCUMENT
1.1	Map & List of Businesses
1.2	Photos of Businesses



All Technology © Copyright: Streetmap.co.uk/Streetmap EU Ltd 2016
 This site includes mapping data licenced from Open Street Map, Ordnance Survey & Bartholomew.

1. ROCKET CLUB	18 ZARA'S
2. PUSHKAR	19 THE BANK
3. PLAYERS	20 ELEMENTS BAR
4. FIGURE OF 8	21 SAINSBURY'S
5. O'NEILS	22 COAST TO COAST
6. TRAVELODGE	23 POP WORLD
7. LEE LONGLANDS	
8. BUILDING SITE	
9. SUGAR SUITE	
10. VELVET MUSIC ROOMS	
11. HAMPTON HILTON	
12. BIERKELLER REPUBLIC	
13. LEGS 11	
14. PIT STOP	
15. MISCHLAS / CYCLONE	
16. EAST EAST	
17. GROSVENOR CASINO	





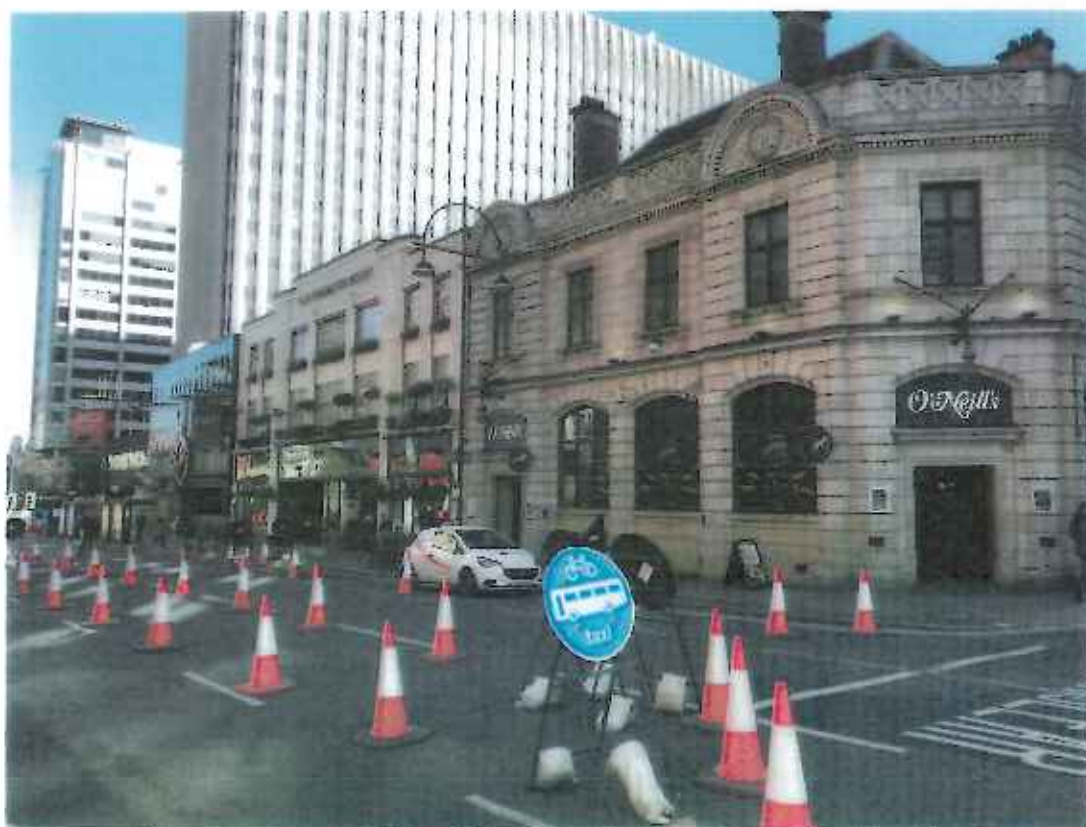
1



2



3



4



5,6



6,7



8



9,10



10,11,12



12



15,16,17



17



18



18



19



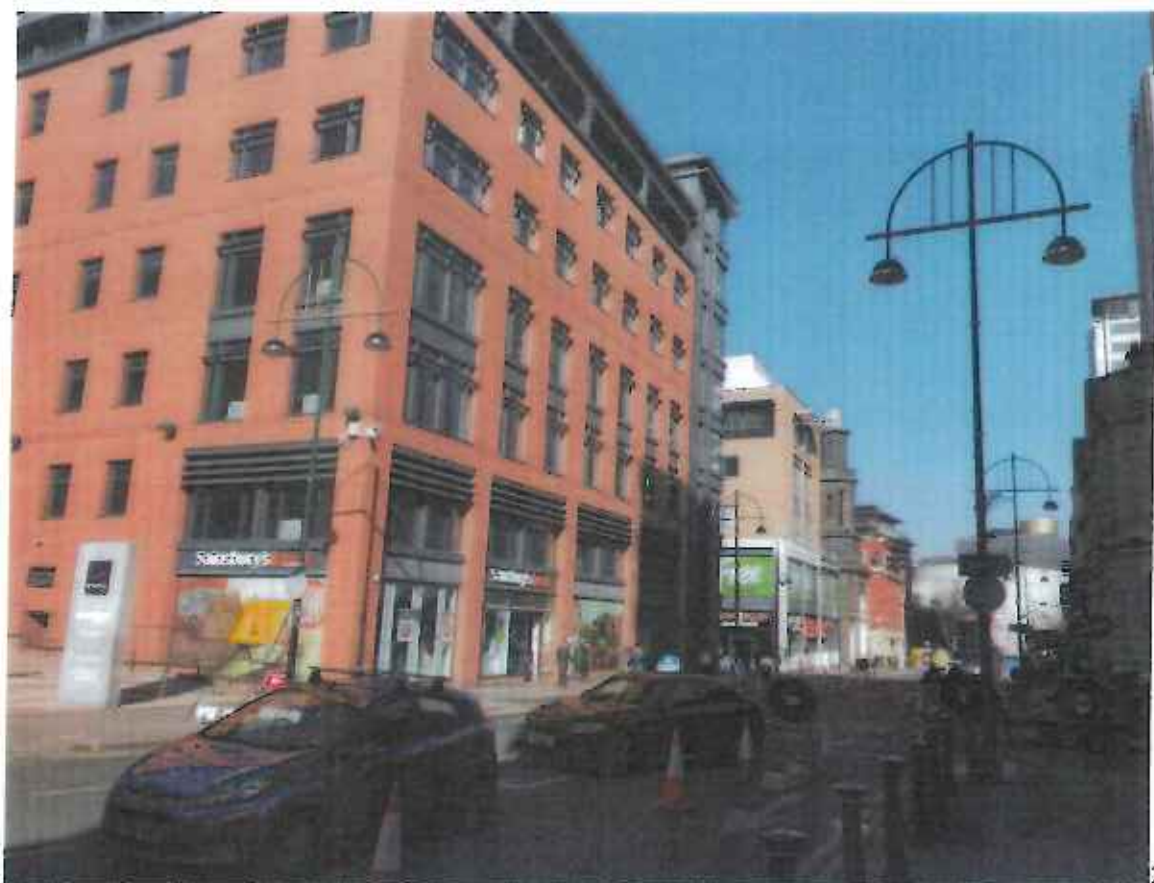
19



19



21



21



22,23

TAB 2:

PROPOSED LICENCE CONDITIONS

TAB	DOCUMENT
2.1	Proposed Licence Conditions

Opening

1. The premises shall not be open to the public between the hours of 07:00 and 19:00.

Personnel and training

2. Daniel Parma shall have no involvement in the day to day management of the premises.
3. No-one who was a Director at any time in Clear Blue Sky Thinking Limited shall have any involvement in the premises or the business.
4. There shall be no change in the shareholding or corporate control of the licensee without 28 days prior notification to West Midlands Police.
5. The designated premises supervisor at the premises shall hold the BII Level 2 Award for Designated Premises Supervisors.
6. The name of the manager on duty shall be displayed in the reception area of the club.
7. A personal licence holder shall be on the premises at all times it is open to the public.
8. The person employed as the bar supervisor shall be the holder of a personal licence.
All bar staff shall either hold, or within 4 weeks of commencing employment take and pass, the BIIAB Level 1 Award in Responsible Alcohol Retailing
9. CCTV shall be installed and maintained so as to cover all places in the premises to which the public has access save for the toilet areas. All cameras shall continuously record whilst the premises are open to the public and recordings shall be kept available for a minimum of thirty days
10. A member of staff who is fully trained in the use of the CCTV system shall be on duty at all times when the premises are open until the premises are clear of customers.
11. A CCTV monitor shall be maintained in the reception area for immediate viewing by any authorised officer of the Council or West Midlands Police.
12. Door supervisors working inside the premises shall be furnished with tablets showing CCTV of the private dance areas.
13. There will be continuous monitoring of the CCTV at the premises at all times when customers are present including the dance areas. The monitoring position will itself be covered by CCTV to demonstrate continuous monitoring. The person undertaking monitoring ("the CCTV controller") will have the facility for radio communication with the door team and management as to any interventions required.
14. A record of interventions with dancers and / or customers, together with action taken, will be maintained. The record of interventions shall be counter-signed by the manager or duty manager on a daily basis.
15. The manager on duty shall undertake daily dip sampling of CCTV to ensure that the no touching rule is observed. A daily record of such dip sampling shall be maintained.
16. The premises will provide copies of any CCTV recordings upon request by any authorised officer of the Council or West Midlands Police within 24 hours of the request.

Performers, performances and pricing

17. All performers at the premises shall have attained the age of 18 years.
18. All payment for entertainment takes place before the entertainment is provided.
19. Price lists for all beverages shall be placed on each table and bar for the information of customers.

20. A tariff for performances will be displayed in the dance areas, on tables and at the bar and cash desk.
21. No credit or debit card payments will be taken by performers.
22. No credit or debit card payments may be made in the private dance areas
23. All credit or debit card payments for performances exceeding £100 will be made at a designated cash desk, which will be well-lit and monitored by CCTV. All such payments must be signed for by the customer.
24. Credit and debit card payments may only be made to the licensee.
25. All alcohol supplied at the premises must be purchased from the bar(s)
26. Prominent notices shall be displayed at the club entrance, in the bar area, on all tables, in all private dance areas and WCs stating that:
 - a. there shall be no contact between performers and customers during a performance;
 - b. customers must remain seated during performances;
 - c. customers must not film any performance or use their mobile phone during any performance;
 - d. customers who do not observe these rules will be asked to leave the club.
27. Customers must be informed of the above rules at the point of entry into the club.
28. Performers may not give their contact details to customers or take contact details from customers. Breach of this rule shall result in termination of the performer's contract.
29. Performers may not offer sexual services. Breach of this rule shall result in termination of the performer's contract.
30. Each performer shall be subject to an induction process whereby they are trained in the licence conditions, codes and rules in force at the premises. The performer shall be given a copy and shall sign for receipt and understanding of the said codes and rules. All performers shall be subject to regular refreshment of the training on at least a 6 monthly basis. A record shall be maintained of all training provided.
31. The premises shall employ a house mother to supervise the performers and oversee their welfare.
32. Each area containing private dance rooms at the premises shall be covered by CCTV cameras and monitored by an SIA-licensed supervisor
33. Each private booth and VIP room shall have CCTV coverage and where there is a door this shall not be locked at any times.

Drugs

34. The premises shall have a written drugs policy which shall include the following:
 - a. A zero tolerance approach to substance misuse by customers, staff and performers.
 - b. Any person suspected of being under the influence of drugs will not be admitted, or if they are on the premises ejected immediately.
 - c. Any drugs found will be confiscated and stored in a drugs safe until they can be safely collected by the Police or other suitable authority.
 - d. Random searching of staff and performers and termination of contract in case of possession of illegal drugs.

Recording of incidents

35. The premises shall maintain an incident log, which shall record:

- a. All crimes reported at the venue by a member of the public, a performer or a member of staff.
- b. Any complaints made by customers or performers.
- c. Any breach or alleged breach of the house rules by a member of the public.
- d. Any breach of the conditions by a performer, together with action taken by management.
- e. Any removal of a person from the premises.
- f. Any faults in the CCTV system.
- g. Any visit by a statutory authority or emergency service.

Compliance audit

36. An independent compliance auditor, to be instructed and paid for by the licensee, must carry out a compliance audit of the premises when sexual entertainment is offered at the premises. Such compliance audits to be conducted at least quarterly. The compliance audits must not be pre-arranged with the licensees or their employees or agents. A copy of the compliance audit, signed and dated by the compliance auditor, must be kept at the premises and made available to authorised officers of the licensing authority and police immediately upon request.

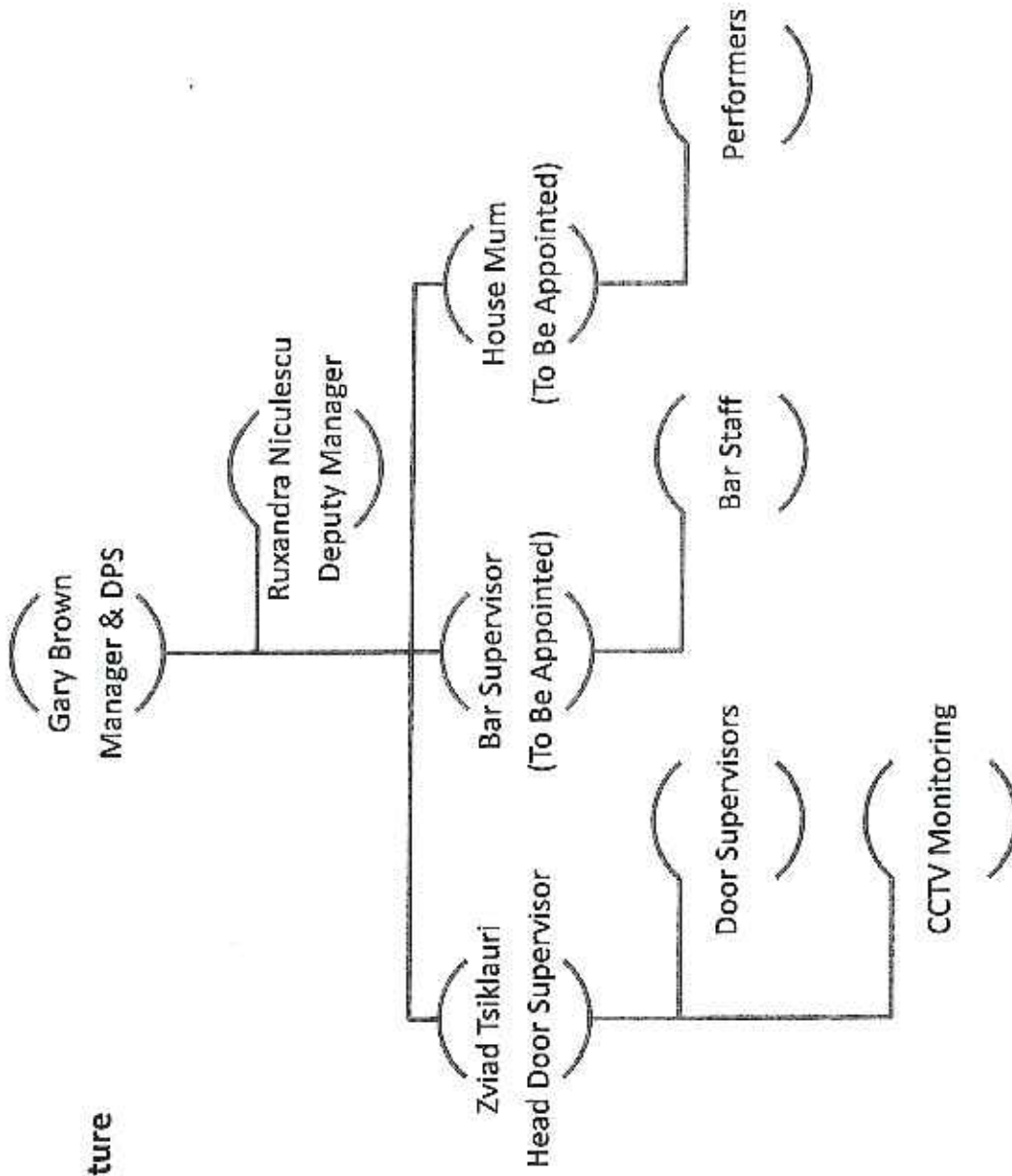
TAB 3:

PARADISE CITY POLICIES

TAB	DOCUMENT
3.1	Proposed Management Structure
3.2	Etiquette & Club Rules
3.3	Policies & Documents
3.4	Risk Assessment
3.5	Transaction Acknowledgement Form
3.6	Training Questionnaire

Management Structure

March 2019





Etiquette & Club House Rules Book

Please take time to read your introduction pack.

It may help you feel more confident on your first shift, if you know a little about Paradise City.

Any questions you may have after reading it can be discussed with any of the management team.

Good luck we hope you'll settle in quickly and enjoy your time at Paradise City.



WHAT MAKES A GOOD LAP DANCER

PLEASE DO THIS:

- Greet customers in a warm and friendly manner, a smile works wonders.
- You are an entertainer and you are on show as soon as you are in the club
- Make sure your appearance is immaculate, Hair, Nails, Make Up, Dress etc.
- Show self-confidence (Even if you don't feel it)
- Have a sense of humour
- Pay full attention to the customer at all times, A conversation is often more important than the dance and it helps the customer to relax and makes them feel that they are more than just a £20.00 note.
- These may sound like obvious attributes, but when you're tired or fed up, you cannot let this affect your work or dancing performance.
- The customer is expecting the above and if you can't deliver, you can't earn.
- Do not; give the impression that you are too busy to talk.
- Do not; show a negative attitude.
- Do not; neglect your appearance.
- Do not; talk about other girls, customers or the club in a negative way.
- Do not; argue with customers or other dancers.
- Do not; talk about your private life.
- Do not; moan or complain unnecessarily about customers or other dancers.
- Do not; approach a customer as soon as he walks through the door.

THE LAP DANCE EXPERIENCE

- A lap dance is a personal experience for both the customer and yourself; the customer should feel that you are only interested in them.
- Please make sure you get paid before you start a dance.
- The customer may not have the money or may refuse to pay.
- GETTING PAID IS YOUR RESPONSIBILITY.
- A good dancer will hold eye contact for as much of the dance as possible, follow your hands with your eyes and then back to the customer.
- Do not look around the room for your next customer whilst doing your dance.
- Ladies are using lap dancing clubs more and more with their partners, you should treat them with the same courtesy and professionalism as our male clientele. They appreciate a good female body as much as a man and are often quite intrigued by your dancing. They are paying customers, the same as men, please make them feel welcome.
- There are clocks in the dance rooms, discreetly check the time; do not keep checking your watch.



THE APPROACH

- Allow the customer to come in buy a drink and pay for it before you approach him.
- Approach the customer with a smile and ask if you can join them.
- Introduce yourself with a handshake.
- Make polite conversation if the time allows.
- After 3-5 minutes of chat ask the customer if they would like you to dance for them, if they say no, ask is there anyone else that they would like to talk to or have a dance from, if he points someone out, let them know and move onto the next customer. This is dancer etiquette; remember another dancer will do the same for you if you show them this courtesy.
- If a customer says that they don't want a dance, do not be rude or pass comment, be polite, be professional and move on.
- When you finish, give them a kiss on the cheek and say goodbye and thank you.
- Sit down and put your clothes back on, then either chat or leave the dance area, do not leave the customer sitting unattended in the dance room.
- You can still refer the customer to another dancer at the end of your dance if you wish, if he does not want another dance from you straight away.
- Your dance is only three minutes long, so with the chatting at the beginning and the end, you are only spending about 10 minutes with each customer.

THE DANCE

- This is a chance to showcase yourself.
- Make your stage show sexy, exciting, entertaining and erotic.
- You'll secure a few dances from customers who see your routine.
- You are performing to an audience and your aim should be to get their attention.
- You know what the customers want to see, sexy, erotic, fun and approachable girls.
- Impress them on stage and its money in the bank.
- Many of you have two girl routines, you should practice them continuously, this is great if you are worried about being on stage alone.
- An unrehearsed routine however, looks bad and won't earn you any money.
- The more effort you put in the more you will get out.
- You will be introduced by the DJ, walk on stage with confidence and a smile.
- Act sexy, make eye contact with individual customers to make them feel special.
- Perform your pole tricks with as much sex appeal as possible.
- Wear sexy outfits.
- Use the whole of the stage during your show.
- Never go through the motions because you have to.
- Never try new tricks on the pole without a rehearsal.
- Dancers who earn well, take pride in their appearance and their job.
- This means constant practice and close attention to detail.
- Follow these simple rules and you should earn good money.



DRESS CODE

- All dancers should wear dresses until midnight unless prior agreement with the management, for example themed nights.
- These should not be transparent and should not be short in length.
- No bikini style outfits with matching shorts should be worn.
- Please ensure that your dresses / outfits are clean and well presented.

DRESSING ROOM ETIQUETTE

- Please keep the dressing room clean and tidy, put rubbish in the bins.
- If bottles and glasses are taken into the dressing room, please take them back out when you leave.
- Please do not leave your valuables like money, mobile phones etc. on display, they are your responsibility, please use the lockers provided.
- Do not borrow items from the other girls without their permission, as it will cause unnecessary friction.
- Security cameras are installed through the building for your security and protection.

CUSTOMERS

- It is strictly forbidden for dancers to fraternise with Paradise City customers.
- Telephone numbers must not be exchanged with customers.
- The club considers this a serious offence, if a card is given out by a customer, for example folded up in a note, it must be seen to be disposed of to avoid unnecessary action.
- Dancers at Paradise City should never arrange to meet customers after work.
- You should never receive money from a customer on the understanding that you will meet him outside the premises even if you have no intention of doing so, this is procuring money by deception or procuring money for sex both are illegal and will never be tolerated by the club.



ALCOHOL AND DRUGS

- Drugs will not be tolerated.
- Dancers may drink in moderation
- Dancers are requested not to carry or drink from a bottle, use a glass.
- Any dancer suspected of being drunk will be sent home.
- There are those of you who can drink all night without it showing, and there are those that can't, you know who you are.
- Never drink so much that you are not in control of your dance and your customer, if you're drunk you may not think you're slurring your words and stumbling, but chances are, you probably are.
- There is nothing more unattractive than a girl who is drunk. This is a fantasy and you are supposed to be their ideal woman.
- No one wants a drunk slurring woman to dance or talk to them.
- Please limit your alcohol intake or you will be sent home.

PARADISE CITY WILL NEVER TOLERATE DRUG USE.

- Anyone caught using, supplying or believed to be under the influence of drugs will be sacked without hesitation.
- We are not prepared to risk everyone's jobs for the sake of a few who put the license of Paradise City in jeopardy if you bring drugs into the club.
- If you are found to be in possession of a controlled drug. You will be dismissed with immediate effect.
- If you are found to be in possession of drugs with intent to supply to assist in the supply or distribution of controlled drugs, you will be dismissed with immediate effect and the police will be called.
- We appreciate that you do a difficult job, but if you need drugs to get you through, then you need to re-assess your choice of work.

PARADISE CITY OPERATES A ZERO TOLERANCE POLICY TOWARDS DRUGS

PAYMENT OF FEES & DISCIPLINARY PROCEDURE

- House fees must be paid on arrival.
- Receipts for house fees and any additional charges are provided by management.
- Breaching the club rules will result in disciplinary action being taken and may result in instant dismissal from the club.
- Breaching the standard conditions of our license (which you will be made aware of on your induction) will result in dismissal from the club.



DANCES

- A dance will last for one song (approximately 3 minutes)
- The customer is not allowed to touch the dancer, politely tell the customer to stop or you will end the dance if he / she continues.
- If the customer requests you to continue for another dance, you must replace your G string before you continue into the next song and any other subsequent songs.
- Chewing gum whilst working is not permitted
- When using mobile phones whilst in the club please use the designated areas.
- You are not allowed to use a mobile phone in view of customers.

OTHER ISSUES

- No one should leave the club without a member of management being made aware.
- Dancers for their own security will be escorted to their cars at the end of a night or be seen getting to a pre booked taxi by one of the management or security.
- You must not have your boyfriend / husbands in the club when you are working.

CUSTOMERS, COMMENTS AND BEHAVIOUR

- It is unacceptable for customers to be rude to you, the reverse also applies.
- Do not swear at customers, walk away and let management or security handle the problem.
- If you have a problem with a customer, please inform management or security and let them deal with it.
- You should not attempt to deal with it yourself as it can make the situation far worse.
- If you are in any of the private rooms and feel unable to deal with a customer, either leave the room and report it to management or security failing that use the wall mounted panic alarm.
- Do not put yourself at risk.



The policies set out by the management
for the day to day running of Paradise
City, Broad Street, Birmingham.

Paradise City



Table of Contents

Proposed Changes	2
Induction Policy	3
Admission Policy	4
Search Policy	5
Customer Conduct Policy	6
Performer Policy	7
Performers Welfare Policy	8
Disciplinary Policy	10
CCTV Policy	11
Drugs Policy	12
Staff Deployment Policy	13
Performer Disclaimer	14

Proposed Changes:

There are doors on the entrance to the private performance areas. These doors will be replaced with curtains allowing easy and unobstructed access into the private performance areas.

Even though the current CCTV system has been approved by the Police, the system will be enhanced allowing remote/portable monitoring for the DPS / Responsible Person and a viewing station will be available close to the main entrance at reception, but hidden from public view.

The DPS portable system will allow monitoring of the CCTV from anywhere inside the premises giving greater control and access to the CCTV and allowing faster response to any issues that arise during the opening hours.

The business has been registered with the I.C.O.

Induction Policy

All members of staff and performers to undergo an induction with the DPS.

The induction is not limited to the following, but must include the club rules, SEV Standard Conditions, emergency procedures and staff safety.

Performers will be given additional information regarding the club rules that are specific to their role.

Bar staff will be given additional information that covers the sale of alcohol, 'challenge 21 / 25' and refusal to serve.

All staff will understand what to do if they observe staff, performers or customers not adhering to the club rules and SEV Standard Conditions.

A copy of the club rules will be given to each new performer with copies available on request and displayed in the performers changing rooms.

Admission Policy

When a customer wishes to visit or leave the premises, the four licensing objectives should be considered:

The prevention of crime and disorder

Public safety

The prevention of public nuisance

The protection of children from harm

A 'Challenge 21' approach will be taken when admitting customers into the venue.

The door supervisor(s) will point out the signs explaining the club rules and verbally note the 'no touching' and 'no photography' rules.

Subject to the following rules all visitors to the premises will be admitted irrespective of their colour, race, religion, sex or disability provided that:

They are over the age of 18 and can provide photographic proof of age in the form of driving license, passport or government / local authority approved proof of age card.

They are not under the influence of drugs or alcohol.

They are dressed smartly and not wearing shorts or sportswear.

They abide by the house rules.

They don't refuse to be searched.

They have not been previously banned.

They are not subject to an exclusion order.

Their behaviour at the time of admission is not likely to cause a disturbance, create disorder or be offensive to any customer, staff or performer.

Search Policy

A notice will be displayed at the entrance of the premises explaining the search policy is a condition of entry.

Customers may be allowed to enter the premises on the condition that the door staff are permitted to search them. If they refuse consent, then they should be refused entry.

The door supervisor will explain what they are searching for – illegal drugs, weapons and any other items unsuitable to be brought into the premises.

Searches will be carried out courteously and as efficiently as possible.

Male door supervisors may ask female customers to empty the contents of their handbags or pockets onto a table but otherwise should not carry out a "pat-down".

Seizures of illegal drugs or weapons will be recorded and the Police notified (See drugs policy)

Customer Conduct Policy

We operate a no touching rule. Anyone who does not abide by this rule will be asked to leave the venue.

All customers are expected to pay an entry fee at reception before entering the club.

All customers are expected to be dressed smartly and in accordance with the dress code. The club runs a smart casual dress code; we do not allow scruffy trainers, shorts, vests, or scruffy jeans.

Door Staff and Management have the right of refusal if customers seem intoxicated by drink or drugs.

Customers are expected to treat the staff and performers respectfully and courteously at all times.

The use of cameras, phones or recording equipment to take photographs or videos is not allowed inside the premises.

Shouting, swearing, heckling or disrespectful actions/behaviours are not permitted.

Customers are not permitted to throw money at the performers.

During a private performance customers are to be seated throughout the performance and are not allowed to touch the performer.

Customers are not allowed to exchange personal contact details with performers.

Customers are expected to consume alcohol in moderation or they will be asked to leave the premises.

We run a zero tolerance drugs policy in this venue. Anyone found with drugs in their possession will be ejected from the club and/or reported to the police.

All customers must be seated at all times during dances in booths and VIP rooms.

Performer Policy

All performers must be over the age of 18 years old.

Performers must only perform on the stage area or the designated private booths or VIP areas. There must be no physical contact between performers.

Customers must not touch the breasts or genital area of performers. Performers will not directly or indirectly touch the breasts or genital areas of customers.

Any performance will be restricted to dancing and the removal of clothes. There will not be any other form of sexual activity or stimulation which, for the avoidance of doubt, includes kissing.

Sex toys must not be used and penetration of the genital area by any means must not take place.

Customers are not permitted to throw money at the performers.

Performers Welfare Policy

Dancers and performers shall be provided with secure and private changing facilities.

Dancers and performers shall be provided with private toilet/hand washing facilities.

Dancers and performers must sign in and out at the beginning and end of their shift providing management with a list of performers in case of an emergency.

Dancers and performers can deposit any valuables with the management by way of a sealed/signed envelope, to be kept in a safe upon their arrival at the club and returned at the end of their shift.

Each new dancer and/performer will be given a full and detailed induction upon their commencement of employment at the club. This will include all club rules, conduct, code of conduct, premises familiarity, fire evacuation procedures and health and safety. This will be documented by way of the company dancer/performers contract.

At the conclusion of a shift all performers will be provided with a company nominated taxi or escorted to their own transport by a member of security staff or management.

All entrances to private areas to which members of the public are not permitted access shall have clear signage stating that access is restricted.

The designated smoking area for use by performers shall be kept secure and monitored by door staff. Dancers must be fully covered when using this area by means of a dressing gown, robe or be fully clothed.

Private booths will not be secured by doors. Access to these areas will be easy to access by door staff and management so that paid private performances can be easily monitored.

There must be a minimum of one member of security staff and or management on any floor where performance of sexual entertainment is taking place.

A performer notice board will be displayed in the changing area. The board will show contacts and names of charities and organisations that can offer help and advice regarding sexual health, domestic violence, human trafficking, taxation etc.

The GMB trades union, one of the largest in the UK, has a Branch for dancers and others who work in adult services and entertainment. This offers specialised support and benefits, as well as all the services available to all GMB members.

Member benefits include:

Representation at work and advice on work-related issues by someone who knows the business and is on your side.

Legal advice on any subject.

Advice on issues around self-employment and your rights at work and specialised legal advice on work-related issues.

Representation on criminal matters by a firm with award winning client care; advice about finding an expert witness if for any reason you are taken to court.

Financial support with training or further education.

Immigration and visa advice.

Health insurance.

Tax advice.

Performers' Third Party Liability insurance.

Protection for you and your family regarding accidents and personal injury; and discounts on goods and services including;

Open University courses;

Accountants with expertise in supporting people paid in cash.

To find out more, go to <http://www.qmb.orq.uk/> or call 020 7697 1058.

Disciplinary Policy

The club rules and the SEV conditions are in place to promote a safe and happy environment for both performers and customers.

The actions of one person breaking the rules can have consequences for others and the club. Any breach of the club rules, or Performers code of conduct will result in disciplinary action being taken against the performer.

A breach of the standard conditions will result in the performer being dismissed.

Whilst the disciplinary procedure is in place to deal with inappropriate or illegal behaviour, every effort will be made to educate the offender before or during the process.

All performers are reminded of the club rules, standard SEV conditions and performers code of conduct which was given to every performer and signed for on the staff induction.

The following disciplinary action may be taken against a performer for breaching the rules.

Verbal warning – A record of the verbal warning will be kept on the performer's staff file for 6 months with a written notification of the warning being issued. The performer will be referred back to the induction policy.

Written warning – Will be given if two verbal warnings are accumulated within a six month period. The written warning will be documented on the performer's staff file for six months. The performer will be referred back to the induction policy.

Final written warning – For a breach of the rules after a written warning, a performer will be issued with a final written warning and documented on the performer's staff file for six months. The performer will be referred back to the induction policy.

Suspension – After the above warnings have been exhausted, the performer will be suspended from working at the club. The suspension period will be for a three months period. If the management decide the performer can return to work after the suspension the induction process will begin again.

The management reserves the right to go straight to step four of the disciplinary procedure for intentional and or repetitive breaching of the club rules or in the case of a breach of the standard conditions.

CCTV Policy

Signs will be displayed prominently throughout the venue informing the public the CCTV recording is taking place on the premises.

The signs will be placed at the reception so they can be seen on entry, private performance areas and public areas throughout the premises.

Signs will be placed in performer and staff areas.

The CCTV system in the premises has previously been approved by the Police.

The current system will be enhanced with remote monitoring. This will be in the form of a portable device that can be carried or worn on the arm of the DPS / responsible person.

An additional viewing station will also be available in the reception area in the form of an iPad or tablet allowing authorised officers to view the CCTV system if requested.

The Police will be invited to check the CCTV system and make any recommendations to improve the current system.

The CCTV system will record continuously while the premises are open to the public.

Recordings will be kept for a minimum of 28 days.

The DPS or responsible person will be trained in the use of the CCTV system allowing them to provide copies of CCTV to authorised officers when requested.

The location of the CCTV cameras are shown on the premises layout document and submitted with this policy.

The company is registered with the ICO and will follow the guidelines laid down by the ICO.

A person has been nominated to ensure the rules laid down by the ICO regarding the use of CCTV recording equipment are adhered to.

All requests of CCTV images will be recorded in a CCTV incident book noting the date and time of the request, the person and authority making the request and the date and time the request was completed.

The CCTV log book will also show that routine visual inspections of the equipment have taken place.

Any failures, breakdown or issues surrounding the CCTV system will also be logged in the CCTV log book. Any part of the CCTV system not working correctly will be reported to the police with the date and time of the report being logged.

Drugs Policy

We operate a zero tolerance drugs policy.

Anyone found in possession of, using or dealing drugs will be reported to the police and the incident will be logged.

Drug seizures will be recorded in an incident log kept at reception. The log will note the day, time, members of staff involved in the seizure and a brief description surrounding the seizure.

Drug seizures will be stored in a secure safe and the police will be contacted to arrange collection. A collection log will be kept showing the date and time the police requested to collect the drugs and the officer and staff member dealing with the collection.

A record of the collection will be made and kept on the incident log.

Staff Deployment Policy

Staffing levels will change to adequately deal with busier trading times at weekend.

The minimum staff on a quiet trading night will comprise:

DPS / Responsible Person, one bar staff, two door supervisors, one DJ.

On busier trading nights the minimum staff on duty will comprise:

DPS / Responsible Person, three bar staff, three door supervisors, one DJ.

Staffing levels will be monitored to ensure more than adequate supervision of the premises during opening hours.

The Police will be asked to make recommendations regarding how many door supervisors are required.

Performer Disclaimer

I hereby warrant, represent and certify the following:

I have never been arrested and/or convicted for the sale of any illegal drug. I have never been arrested and/or convicted of any charge in relation to acts of prostitution. I understand that violations of law could occur if I was to handle a customer or a customer was to handle me. I agree to refrain from handling customers or allowing them to handle me and performing in such a manner that would be considered obscene or otherwise illegal or unlawful and I agree to comply with the rules of the club which have been adopted to ensure compliance with all existing national and local laws. I understand that if these rules are broken it will result in the dancer being escorted from the club.

I agree that I may be searched randomly and my refusal may result in immediate termination of contract for services and removal from the club.

I am eighteen years or older, I agree that giving false information on this application will be reason for me being unable to occupy space at the club. I understand that I will not be an agent or employee of the club and that Paradise City is not responsible for unlawful acts committed by me.

I hereby declared that I have the status of a self-employed person, and shall be responsible for all income tax liabilities and national insurance or similar contributions and I hereby indemnify Paradise City in respect of income tax or national insurance or similar contributions. I will provide Paradise City with my accountant's details.

I have adequate and appropriate insurance to include a valid public liability certificate, a copy of which shall be available to the company upon request. And hereby indemnify the company in respect to any claims.

I understand that the company is unable to accept responsibility for damage or loss of personal property.

Signed (Performer).....Date:.....

Print Name.....

THIS CONTRACT FOR SERVICES is made on the day of

BETWEEN: (1) Paradise City ("The Club") and

(2) ("Dancer")

DANCER

By signing this contract you are confirming that whilst you are providing dancing services to the Club you are doing so as a self-employed Dancer.

You are obliged to:

- Act in a professional manner and in accordance with the club's code of conduct at all times.
- Make all reasonable attempts to work to the Club's opening times.
- Observe Health and Safety regulations regarding working hours and site security.
- Be responsible for the cost of repairs for damage to property of the Club or any third party.
- Pay your own Tax and National Insurance.
- Pay a house fee, as agreed with the club, for each session services are provided.

You have the right to:

- Leave the site without permission (although you should notify the Club for Health and Safety reasons).
- End this contract without giving notice.
- Take legal advice before signing this contract, and to have a copy of it.

You do not have the right to:

- Holiday pay or sick pay.
- Hold yourself out as being an employee of the Club.

By signing this contract you are agreeing to be bound by its terms and you are agreeing that these terms will govern the working relationship between you and the Club.

You are also agreeing that the terms of this contract represent the whole contract between you and the Club with the exception of any verbal negotiation about price or location of the services.

Club

The Club intends that in this working relationship you are an independent sub-contractor

The Club is obliged to:

Provide all of the equipment used in the club either by employees or sub-contractors as the Club takes its Health and Safety responsibility seriously.

The Club is not obliged to:

- Offer you any work. They may offer you the opportunity to provide your services but they are not obliged to.
- Pay any substitute or help hired by you to undertake the work.

The Club has the right to:

- End this contract without giving notice.
- Take legal advice before signing this contract

The Club does not have the right to:

- Control the methods you use when you provide your services to the Club providing they apply with the terms and conditions of our licences and code of conduct
- First call on your services - they cannot expect you to drop whatever you are doing to come and provide your services to them.

By signing this contract the Club is agreeing to be bound by its terms and you are agreeing that these terms will govern the working relationship between the Club and you.

The Club is also agreeing that the terms of this contract represent the whole contract between you and the Club with the exception of any verbal negotiation about price or location of the services.

General

This Contract is governed by the laws of (England, Wales, Scotland or Northern Ireland) as appropriate and is subject to the non-exclusive jurisdiction of the (English, Welsh, Scottish, Northern Irish) Courts.

Club: Paradise City

Signed

Dated

Dancer

Signed:

Dated

Breach of any clause or clauses in this contract will not void or annul this Contract for Services as a whole in any circumstances.

	A	A		B	
	What is the risk: A failure to comply with the conditions listed below.	RISK RATING	How the condition will be implemented and managed.	RISK RATING	The policies that underpin the management of the condition.
A	SEV CONDITIONS				
1	The licensed premises shall not be open or used for the purposes for which the licence is granted except between the hours prescribed within the licence or those hours of operation determined by the Licensing and Public Protection Committee	1	The club opening hours will be displayed in staff areas with the club manager ensuring that the permitted trading hours are adhered to. The DJ will give notice of drinking up times, last orders and closure to the	1	The allowed trading times as stated on the premises license. The club opening and closing times are subject to change at the discretion of the management but will always fall within the prescribed hours of the license.
2	Save for the entrance lobby, the interior of the premises shall not be visible to passers-by and to that intent the licensee shall ensure the area of the premises in which relevant entertainment is offered shall not be capable of being seen from outside the premises.	1	The interior of the property is on the first floor and only the entrance lobby is visible to passers-by. First floor windows are tinted and too high to be seen by passers-by.	1	N/A

3	<p>The windows, doors, fascia board, walls and all external parts of the premises including the roof shall not contain any form of writing, sign or display save for: (a) The address of the premises.</p> <ul style="list-style-type: none"> • (b) The licensed name of the premises. • (c) A notice stating the opening hours of the establishment. • (d) In the case of a licence granted to a body corporate: • (i) If the premises name is not the same as the full name of the body corporate then such corporate name and; • (ii) If the premises are also the body's registered office for the purposes of the Companies Acts then an indication in a form acceptable to the company that such is the case. 	1	Photos included with license application to show outside of premises. No changes to the exterior building will be made once approved.	1	N/A
4	The lettering used in respect of such permitted items shall be of such colour and style as may be approved by the Council.	1	As Above	1	N/A
5	The licensee shall not permit the display outside of the premises of photographs or other images, which indicate or suggest that relevant entertainment takes place in the premises.	1	As per Part 3 Above	1	N/A
6	At the time of granting the licence in respect of the premises the Council will authorise a name referred to as "The Licensed Name" by which it is intended that the premises shall be known and the licensee shall ensure that the premises are known solely by that name and by no other, save as provided for by the paragraph below.	1	The premises was previously named 'Legs 11' The new proposed name is 'Paradise City' to reflect the change in venue management and DPS and operating procedures.	1	N/A
7	To change the licensed name, an application shall be made to the Council not less than 28 days prior to the proposed change and the Council shall have an absolute and unfettered discretion to allow or refuse such change.	1	The director, DPS and management are aware of this condition and accept it as a condition of the license.	1	N/A
8	a) A copy of the licence (two pages) shall be suitably framed and exhibited in a position that can easily be read by all persons entering the premises. b) The conditions of licence and all such documents listed as Appendices to said licence shall be retained in a clean and legible condition and immediately available for inspection by anyone who so requests.	1	The Licence will be displayed in the foyer area. The same area will also display the customer rules, DPS, authorised and responsible personnel, search / drug policy and age policy.	1	N/A

9	The licensee shall retain a copy of a form signed by each employee and performer confirming that they have read and understood the licence and conditions. The copy shall be retained for a period of six months after they cease work at the premises. A copy of the licence and conditions shall be given to each performer	1	An example of a staff file has been submitted showing the information that will be required for all members of staff and performers.	1	Induction Policy
10	The licensee or a responsible person over 18 years of age nominated by them in writing for the purpose of managing the SEV in their absence shall be in charge of and upon the premises during the whole time they are open to the public.	1	See Part 8. The DPS will be named along with the responsible persons at the entrance foyer. A responsible person file will also be kept at reception with photos so these people can be identified easily by authorised officers.	1	N/A
11	The written nomination referred to in condition 10 above shall be maintained in a daily register, kept on the premises and made continuously available for inspection by an officer authorised by the Council or police officer.	1	A licensing manual will be available at reception for inspection by authorised officers, the Council or police.	1	N/A
12	The person in charge shall not be engaged in any duties that will prevent them from exercising general supervision and they shall be assisted as necessary by suitable adult persons to ensure adequate supervision.	1	A deployment plan showing where staff are located within the premises has been submitted. The person in charge will not take on other roles or jobs that will prevent them from supervising the venue. The DPS will have access to CCTV by means of a mobile device on him.	1	Staff Deployment Policy / CCTV
13	The licensee must ensure that there is a current insurance policy in force to cover the performers whilst the premises are open and that a copy is displayed in areas where all staff have access.	1	A copy of the insurance certificate will be placed in the staff area and also in the licensing manual in the foyer for inspection (See Part 11)	1	N/A
14	The licensee shall keep and maintain at the licensed premises a written record of the names, addresses, and copies of photographic proof of age documents of all persons employed or performers permitted to operate within the licensed premises whether upon a full or part time basis and shall, upon request by an authorised officer of the Council or police officer, make such records available for inspection to them. (see Conditions regarding Door Supervisors)	1	A staff file for each individual will be kept and available for inspection. (An example file has been submitted) All files will be ordered and labelled making the information easily accessible.	1	Performer Policy and staff employment records

15	Condition 14 does not relate to persons engaged to carry out repairs or provide services from external companies to the premises, however, such persons must be aged 18 years and over if the premises are open for the purpose of providing sexual entertainment.	1	The rules regarding entry into the venue will apply during trading hours.	1	
16	The licensee shall ensure that all persons employed or permitted to work within the licensed premises hold the appropriate rights to work and shall keep copies of any documentation used to verify the details of these rights where necessary.	1	A structured personal file will be kept for each individual and available for inspection. See Part 14	1	Induction Policy / Staff Employment Records / Performer Policy & Disclaimer
17	The licensee shall maintain a register of the names, addresses and dates of birth of such person or persons (whether employees or otherwise connected with the business) who have authority to manage the premises in the licensee's absence.	1	A letter of delegation approved by the Council and police will be kept in the licensing manual at reception naming authorised persons.	1	See above
18	Where the licensee is a body corporate or an unincorporated body any change of director, company secretary or other person responsible for the management of the body is to be notified to the Licensing Authority	1	Noted. Additional conditions are being proposed to support this	1	Draft proposed conditions
19	Where the licensed premises is a vessel or stall, the licensee shall not move the licensed vessel or stall from the location specified in the licence unless a variation application is submitted for the Council's determination giving not less than 28 days notice. n.b. this requirement shall not apply to a vessel or stall which habitually operates from a fixed location but which is regularly moved (whether under its own propulsion or otherwise) from another place such location as is specified in the licence.	1	N/A	1	
20	Alterations or additions, either internal or external and whether permanent or temporary, to the structures, lighting or layout of the premises as shown on the plan, including any change in the permitted signs on display shall not be made except with the prior approval of the Council.	1	Plans for proposed layout have been submitted with the application. No changes will be made after without the prior approval of the Council.	1	
21	Any club rules imposed on the performers shall be displayed in a prominent position within the premises for all employees to have easy access whilst at work	1	These are to be displayed in performers changing area and as part of induction process	1	Induction Policy / Performers Policy

22	A copy of the club rules shall be provided to performers engaged by the premises by means of a written contract signed by the recipient. Copies of the same must be retained on the premises and produced to an authorised officer of the Council or police officer on request. Receipts or records of payments received should be provided to performers where "house fees" are charged or when any fines are issued.	1	All performers to be over the age of 18. A copy of the club rules will be given to each performer, signed for and retained on the individuals staff file. A copy will also be displayed in the performers changing area.	1	Performers Policy / Club Rules / Induction Policy
23		1	Receipts are issued for any payments made. No fines will be used	1	
24	No person under the age of 18 shall be permitted to be on the licensed premises when sexual entertainment is provided. A notice shall be clearly displayed at the entrance to the premises in a prominent position stating that "No person under 18 will be admitted when sexual entertainment is being provided" so that it can be easily read by persons entering the premises.	1	Whilst the law states over 18, the club will operate an over 21 policy to deter large groups of young men. Over 18's will be admitted at the managements discretion.	1	Admissions Policy
25	Each area where relevant entertainment is conducted shall be supervised and/or contain a panic alarm for the safety of performers.	1	Panic alarms and CCTV are installed in these areas.	1	Deployment Policy & Performer Welfare Policy
26	A customer code of conduct shall be prominently displayed in each area to which the public are admitted.	1	The customers code of conduct will be displayed in entrance/reception area, toilets, private performance areas and bar areas. They will also be sited in the public areas.	1	Customer Conduct Policy
27	Performers shall be aged not less than 18 years.	1	The management have decided performers must be 19 years or older.	1	Performers Policy
28	Full nudity is only permitted in the approved designated areas, as stipulated or shown on the approved plan attached to the licence. In all other public areas within the premises the performers and employees must at all times wear at least a G string (female) and or pouch (male) covering the genitalia	1	This will be supervised by the DPS / manager, bar staff and security team. All performers will be aware of this rule in their induction and signed copy of the Performers Policy. Previous experience also shows that other performers will also bring this to management attention at once.	1	Performers Policy / Staff Deployment Policy / Induction Policy

29	During all performances (including performances usually termed 'private dances') there must not be any deliberate contact, by the performer, with any patron or person within the audience except: • a). Leading a patron by the hand to and from a chair or private room or designated dance area. • b). Simple handshake greeting at the beginning and/or end of the performance. • c). A customary ("peck on the cheek") kiss at the end of the performance. • d). the placing of monetary notes or dance vouchers into the hand or garter worn by the performer	1	This condition to be rigorously enforced. The venue will be adequately lit allowing good quality CCTV with infra-red cameras. All performers will receive training on the rules during induction. Security team, manager, DJ and bar staff will be vigilant to bring issues to the attention of the DPS.	1	Performers Policy / Induction Policy / Staff Deployment Policy / CCTV Policy / Customer Conduct Policy / Performers Welfare Policy / Disciplinary Policy
30	No performances shall include any sex act involving any persons or objects. (or involve any form of auto-erotic stimulation).	1	All performers to have the rules explained and the venue to be monitored by manager, DPS, all staff and CCTV.	1	Induction Policy / Performers Policy / Discipline Policy
31	A price list shall be displayed in a prominent position giving the price and the duration of any 'private dances'.	1	Prices and duration of dances will be displayed at the bar and on tables in the premises along with the no touching rule.	1	SEV Conditions
32	Any person employed to supervise or attend to the exterior or entrance area of the premises must, at all times be suitably and sensibly dressed so as not to indicate or suggest the nature of the relevant entertainment taking place at the premises.	1	Front of house staff and security to be dressed smartly in a business like manner. Consideration is currently being given to bodycam being worn by one of the front of house security team.	1	CCTV Policy
33	No fastening or lock of any description shall be fitted upon any booth or cubicle or other area within the premises except as shown on the plan; within the toilets, within the performers' dressing rooms and/or staff areas.	1	There were previously doors with locks fitted from the previous management. All locks are to be removed.	1	SEV Conditions
34	At all times during a performance, performers shall have unrestricted access to a dressing room.	1	The performers have access to a private dressing room at all times. This is away from customers and there is no access for customers. The entrance is covered by CCTV.	1	CCTV Policy / Performers Policy
35	Patrons or members of the audience shall not take photographs or record digital images of performers within the premises via a camera or mobile phones	1	Signs will be displayed throughout the premises and at the reception desk with the customer code of conduct explaining this rule. The DJ will make announcements periodically explaining this rule. Customers breaking the rule will be asked to delete the images from the device and the rule will be explained. A repeat offence will result in the offender being asked to leave the premises.	1	Customer Conduct Policy / Staff Deployment Policy

36	The licensee shall ensure all door supervisors employed or contracted to work on the premises are suitably licensed by The Security Industry Authority or appropriate agency. Where door staff are used, the licensee shall maintain profiles for all door staff that are, or have been, working at the premises in the last six months. The profile is to contain proof of identity (copy of passport /photo driving licence) and proof of address dated within the last six months (bank statement /utility bill). Separate proof of address is not necessary when the proof of identity is a photo driving licence. All profiles are to be made immediately available to Authorised Officers upon request.	1	Only SIA licensed doorman will be allowed to work as security. An individual staff file for each security supervisor will be kept with copies of the SIA license.	1	N/A
37		1	Individual staff files will be kept and available for inspection.	1	Induction Policy /Employee records
38	An adequate number of licensed door supervisors, based on a risk assessment undertaken by the licensee, shall be on duty on the premises whilst relevant entertainment takes place.	1	A risk assessment and security team deployment plan will be submitted based.	1	Staff Deployment Policy
39	At least one door supervisor shall be on duty at the premises at all times when the relevant entertainment takes place.	1		1	Staff Deployment Policy
40	CCTV shall be installed in each room within the premises where the public has access save for the toilet and staff only areas. All cameras shall continuously record whilst the premises are open to the public and recordings shall be kept available for a minimum of twenty-eight days	1	CCTV is installed throughout the premises and has previously been approved by the Police. The Police will be invited to inspect the CCTV system and cameras and make any suggestions for improvement. In addition the CCTV system will be enhanced to include remote monitoring via a portable device in the possession of the DPS / responsible person. A remote station will also be available at reception desk for viewing by authorised officers and will not be visible to the public.	1	CCTV Policy
41	A member of staff who is fully trained in the use of the CCTV system shall be on duty at all times when the premises are open until the premises are clear of customers.	1	DPS and deputy manager, together with CCTV operator will be fully trained on the system. See proposed condition	1	CCTV Policy
42	The premises will provide copies of any recordings upon request by a police officer or an authorised officer of the Council within 24 hours of the request.	1	See above	1	CCTV Policy
43	The licensee shall not allow the use of vehicles including limousines for the promotion of the relevant entertainment	1	No such vehicles are proposed	1	N/A

44	The collection of patrons and or potential clients is not permitted unless the vehicle is licensed in accordance with the provisions of the Local Government (Miscellaneous Provisions) Act 1976.	1	No such collections are proposed	1	
45	The licensee shall not permit any person whilst on a public thoroughfare to encourage any other person to visit the SEV premises by any means.	1	Noted. Additional conditions are being proposed to support this	1	
46	The licensee shall endeavour to ensure any marketing communications associated with the SEV or relevant entertainment shall comply with the code of practice as issued by the Advertising Standards Authority.	1	All marketing material will comply and be checked against ASA code of practice	1	
47	Officers of the Council, Police, and other authorised agencies who are furnished with authorities (which will be produced on request) shall be admitted immediately to all parts of the premises at all reasonable times and at any time the premises are open for business.	1	Accepted	1	

TRANSACTION ACKNOWLEDEMENT

DATE:

TIME:

CUSTOMER NAME:

NAME ON CARD:

LAST 4 DIGITS OF CARD:

TRANSACTION AMOUNT:

I AM FULLY AWARE AND AUTHORISE THE TRANSACTION TAKING PLACE IN PARADISE CITY, 193 – 194 BROAD STREET, BIRMINGHAM, B15 1AY.

I ACKNOWLEDGE THAT FRAUDULANT TRANSACTIONS MAY BE SUBJECT TO CRIMINAL AND OR CIVIL ACTION.

CUSTOMER SIGNATURE:

NAME OF STAFF MEMBER PROCESSING PAYMENT:

STAFF SIGNATURE:



STAFF TRAINING

As a way of checking your knowledge, please answer the questions below.

LICENSING.

1: What are the permitted opening hours?

2: What are the 4 licensing objectives?

1:

2:

3:

4:

3: What does challenge 25 mean?

4: What are acceptable forms of ID for checking someone's age?

5: What ABV content should a 'low alcohol' product contain?

HEALTH AND SAFETY

1: Name your three main responsibilities regarding health and safety as an employee?

A:

B:

C:

2: Describe the correct way to lift?

3: Where is the location of the accident book/log?

4: Who are the current first aiders?

5: How should you dispose of broken glass?

6: Name three basic controls you should carry out when using chemicals?

A:

B:

C:

FIRE SAFETY

1: Record where the following are located.

A: Nearest fire exit.

B: Assembly point.

C: Nearest break glass.

D: Nearest fire extinguisher.

2: What type of fire extinguishers does the club have?

3: Name 3 measures you can take to prevent fire.

A:

B:

C:

DISABILITY AWARENESS

A disability is defined as a physical or mental impairment which has substantial and long term effect on carrying out normal day to day activities.

1: List three disabilities you may come across whilst at work.

A:

B:

C:

2: Describe in your own words what you think discrimination means under the disability act.

3: What features at this site do you think might restrict a disabled person?

TAB 4:

CURRICULUM VITAE

TAB	DOCUMENT
4.1	Gary Brown
4.2	Andy Bamber
4.3	Ruxandra Niculescu
4.4	Zviad Tsiklauri

Gary Brown – Curriculum Vitae

Address:
Telephone:
Email:
D.O.B :



Personal Profile

- Well-presented, understanding and approachable. Able to interact with customers and colleagues in a friendly and professional manner.
- Enjoys problem solving, team leading, staff management and training. A good listener and always happy to help others.
- I am articulate and take pride in whatever I do. A quick learner, I can work individually or within a team to understand and achieve targets and motivate myself and others whilst understanding and adhering to regulation and compliance.

Employment

Valuations Manager

Connells Group (Shipways-Sequence)

March 2014 - Present

- Invited to join the group by the Regional Director based on previous success with competitor businesses.
- Valuing and listing properties for sale whilst being compliant with The Estate Agency Act, Consumer Protection Regulations, Data Protection, Money Laundering / Financial Crime. I would undergo continuous training throughout this role and be expected to pass an annual accreditation on all the above and be subject to regular audits. I passed every audit and accreditation exam I sat while in the role.
- I am often called upon by the Regional Director and colleagues to provide advice to other staff members on general compliance issues and money laundering. It is an area of the business that I enjoy and understand well.
- Leading a team of sales staff focussed on the valuation aspect of the business and ensuring compliance with legal and industry regulations alongside the branch manager.
- Training colleagues and helping them to perform their roles confidently, compliantly and with success.

DJ / Entertainment

Legs 11 – China Town

2013 - November 2017

- Providing music entertainment and managing the dancers for stage shows.
- Being aware of the club rules for both staff and public with regards to the provision of lap dancing entertainment and assisting management in making sure the club rules are adhered to by dancers and the public. Bringing to the attention of the management and or door supervisors any contravention of the club rules or any issues / disturbances that could put members of the public or staff at risk or in danger.

Valuations Manager*Your-Move*

April 2013 – March 2014

- Invited to join the company by regional director having been aware of results in previous employment.
- Working for the UK's largest Estate Agency brand. Responsible for providing best in class customer service and being the agent of choice.
- Training colleagues in branch around customer service skills, sales skills, product knowledge and compliance including the Estate Agency Act, Money Laundering / Financial Crime and Consumer Protection Regulations.
- Working within a team to exceed targets and our customers' expectations.

Property Appraisal Manager*Dixons Countrywide*

April 2011 – March 2013

- Offered the role with no previous experience in the property industry and went on to become top of the regional league tables for performance.
- I took part in regular training sessions with colleagues, often leading and offering a different perspective as an outsider coming into a new industry.
- Listing saleable properties in accordance with the company's fee scale and adhering to relevant legislation and compliance.

Sales Coach*Pc World, Sutton Coldfield, Birmingham*

July 2008 – March 2011

- Shop floor management of the sales team, understanding the business objectives, goals & targets. Part of a team responsible for achieving and sustaining numerous KPI's and ensuring an excellent level of customer service.
- Ensuring company rules & procedures are adhered to and understanding Health & Safety in the workplace and enforcing and acting on issues when they arise.
- Dealing with the return of goods and customer service issues in accordance with Consumer Protection Regulations and The Sale of Goods Act.
- Performing weekly/monthly performance reviews of staff including team development and performance management.
- Ensuring all staff possess a first class level of product knowledge.
- Key holder, responsible for ensuring security of stock & premises.
- 1st line support for I.T problems for customers and colleagues.

Customer Advisor (Connections Champion)

PC World, Sutton Coldfield, Birmingham.

- Responsible for training colleagues on the connectivity propositions. (Home & mobile broadband, digital TV services & mobile phones)
- Driving sales and achieving both personal sales targets & store targets.

Business Account Developer

PC World, Sutton Coldfield, Birmingham.

- Advising commercial, domestic and educational businesses on software & hardware solutions.
- Managing top 500 accounts.
- Training and coaching colleagues on all aspects of the business from administration to process and procedure and behaviours.
- 1st line support for business customers IT issues.

DJ / Marketing / Promotions

Self Employed.

February 1994 – December 2017

- Working all over the UK and Europe with various companies performing as a nightclub DJ as well as involvement in venue marketing and promotional activity. Identifying target clientele and implementing promotional events.
- I formed a good working relationship with two General Managers whilst working for Luminar Leisure who in turn took me to new venues they were posted to work alongside them.
- Being alert and aware of staff and public safety in an environment where alcohol was served.
- Creating customer profiles and databases to target relevant attendance to events.
- Gained experience dealing with the general public of all ages and from all walks of life.
- I enjoyed getting involved with local radio stations and producing shows and advertising.
- Running & owning my own business taught me valuable skills and the importance of always striving to be the best in your chosen field.

Functions / Conference Manager

Number 10 Bowling Centre, Norwich, Norfolk.

January 2001 – December 2002

- Part of the management team in a large 30 lane bowling centre including nightclub, function / conference room, bars, restaurant and arcade. Overseeing staff to ensure deadlines for preparation of events were met.
- Being on site during entertainment bookings and nightclub opening times to run the business, ensure licensing and entertainment laws were adhered to and enforced.
- Identifying staff training needs and developing staff to excel in their roles within the company.
- Creating new relationships with local and national business. Creating business for the private hire and conference side of the business.
- Being present during functions and conferences ensuring a high level of customer service and public safety.

Sales Advisor

July 1999 - December 2001

Bennett's Retail, Robert Boby Way, Bury St Edmunds, Suffolk.

- Trained as a multi-skilled sales advisor of electrical goods. (Brown & White goods)
- Attended numerous manufacturers training courses such as Sky, JVC, and Sony. Passing on training knowledge to other staff members.
- Chosen to be trained as the stores only mobile phone specialist advising and selling o2, Vodafone, T mobile and Orange.
- Advising customers on goods, services and extended service plans and advising on and completing credit applications.

Education & qualifications

February 2018	Award for personal license holders (BIIAB Level 2)
January 2018	Connells Group annual accreditation. Financial Crime, Data Protection, Consumer Protection Regulations, Estate Agency Act and general compliance.
March 2011	NVQ Level 2 In Team Leading Modules: Allocating and checking work, health and safety at work, managing resources, providing team leadership, providing learning opportunity for colleagues.
September 2010	EDI Level 2 Certificate In Team Leading
May 2010	Microsoft Office 2010 specialist learning course.
Feb 2010	Microsoft Windows training course.
1993 - 1994	City College, Norwich - 1yr training on a civil engineering work placement.
April 1993	I hold a full UK driving license with no penalty points.
1992 - 1993	After leaving school I attended Great Yarmouth College of Further Education - BTEC National Diploma in Leisure and Recreation, although I didn't complete the last three months of this course.
1988 - 1992	Lynn Grove High School Great Yarmouth - GCSEs Math (C) Design & Technology (B) English Language (C), English Literature (D), Double Certificate Sciences (CC), French (D), Physical Education (D), Religious & Social Education (B)
1996	<p>I previously sat the BIIA Level 2 course around 1996 and passed. I was managing a small nightclub in Great Yarmouth called Liberty's Rock Café and attended Great Yarmouth Magistrates Court where I was granted a license to sell alcohol for consumption on and off the premises.</p> <p>Duties included opening and closing procedures, cashing up, programming of epos till systems, stock management, staff training and management and overseeing door supervisors and admissions policy.</p> <p>The club traded seven nights a week with a Public Entertainment License for music, dancing and singing.</p>
1992	Awarded 1 st Dan Black Belt by the English Korean Karate Association.

Personal summary: Andrew Bamber

I retired from the Metropolitan Police in January 2007 having served 34 years of exemplary service. Throughout my service I have been regularly involved in the enforcement, management, and development of licensing initiatives and policies. I retired as a Borough Commander.

As a constable I worked as an undercover officer detecting offences in late night licensed premises in central and west London. As an Inspector I was the licensing Inspector for a very busy inner London policing division.

Whilst working as a Chief Inspector I was the operations manager in the central London Clubs and Vice unit from 1990-1996. As a part of this role I had responsibility for late night licensing in Westminster and I supported other London boroughs as appropriate. During this period, I managed both covert and overt police operations on behalf of the police and the local authority to ensure compliance with the legislation and to prosecute breaches where necessary. The overt licensing visits were structured in a way that ensured that all premises operating with late night licences received at least 4 visits a year from a joint licensing team of police officers and local authority officers.

It was during this period that I was involved in the development of the initial licensed door supervisors scheme, commissioned by Westminster City Council, which was implemented and managed by myself within the Clubs and Vice unit. During the same period I researched, with a local authority counterpart, the potential for the introduction of 'Lap Dancing' clubs in Westminster. The work resulted in the introduction of 'lap dancing' establishments in the borough. The initiative and the supervision of the licence was then monitored covertly and overtly by officers under my direction.

As a Borough Commander on 2 London boroughs, between 2001 and the beginning of 2007 (January), I worked with both local authorities to develop the respective licensing and enforcement policies. The work with the Local Authority formed a significant part of Community Safety and local policing plans.

With the introduction of the new licensing legislation in 2003 I oversaw the transfer of responsibilities to the local authority and was instrumental in setting up a joint licensing team for a busy inner London borough.

In 2007 having retired from the police and was employed by an inner London local authority as an assistant director. I had responsibility for a wide ranging Safer Communities portfolio that included the licensing function and treatment regimes for drugs and alcohol. During the 10 years spent with the authority I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives and the borough licensing and enforcement policies.

As the principal officer for licensing in the local authority I worked closely with local community groups, ward councillors, and members of the licensing committee to develop knowledge and understanding of local enforcement policies and crime and disorder initiatives linked to drugs and alcohol and the supervision of licensed premises and the licensing objectives. I was responsible for delivering a structured approach to licensing management and supervision, the councils community safety plan, the enforcement policy, and licensing policy. My role also included the consultation, development, and delivery of the boroughs controlled drinking zone, cumulative impact zone, Sexual Entertainment Venues, late night levy, early morning restriction orders, Best Bar None, and alcohol treatment programmes.

On my retirement from Local Government I set up my own compliance consultancy and offer independent advice and compliance audits for licensed premises. I have given evidence at licensing hearings/reviews, and appeals on behalf of the Metropolitan Police, Local Authorities and individual premises in each of my respective roles.

I have a Masters Degree in Business Administration.

Ruxandra Niculescu



Personal Profile

I am a dynamic, professional, trustworthy and honest individual with a wide range of expertise in various fields.

I always aim to learn new things and have a very competitive spirit.

I have good communication, leadership and analytical skills.

I am a dedicated team player who leads by example, inspiring others towards shared goals, driven by a personal passion for excellence and professional loyalty.

Key Skills and Abilities

- IT astute: All MS Packages, Excel, Mail Merge.
- Thrives under pressure.
- Highly target focussed – Exceeding targets every time.
- Adaptable and able to learn new skills quickly.
- Able to research and find information as required to further the goals of the business.
- Good verbal, written, face to face communication skills.
- Good awareness of health and safety in the work place.
- Translation skills.
- First Aid trained and certified.
- Fire Marshal trained and certified.
- SIA trained and certified.
- Restaurant Hospitality and Management Diploma.
- Also holding a valid drinks Licence.

Employment History

September 2017- Present

Branch Administrator Shipways

Typing letters for Residential Sales/Lettings from our in-house estate agency software

Weekly send-outs of via email from our software

Telephone cover

Creating property details.

Obtaining vendors' approval

Getting sale details ready to go online.

-Performing mail-merges

- Vendor reports via Rightmove.co.uk

-Branch Profile maintenance.

-Staff profile updates

- Franking all post

- Ordering stationery etc/office supplies and maintaining/recording stock

- Ordering business cards

- Chasing for Compliance

June 2015- August 2017

General manager at DanSId Limited an entertainment club in the heart of Birmingham.

My role as a General Manager was to ensure that everyone is trained to the best of their ability and able to perform their duties without any difficulty.

My responsibilities included:

Creating rotas for the staff (duty managers, bar staff, promoters, door staff, DJs and entertainers).

Calculating staff wages and artist earnings for every shift they work.

Recruiting/Interviewing bar staff, door staff, DJ, promoters and new artists.

Responsible to do new starters' inductions and follow up every quarter with all members of our team to serve as a refresher and ensure everyone remembers and adheres to the terms and

conditions of our licence, health and safety policy, sexual harassment policy, fire risk assessment and fire drills procedures.

At the end of the induction I would provide them with a company/staff handbook, giving guidance and explaining rules and procedures to staff working on the premises, which I was entrusted to write by the company.

Also keeping a good record of all training records and questionnaires to be always available for inspection by the local authorities.

I was in charge with opening and closing the premises, checking the float and the tills making sure everything was compliant and ready for business.

I was also responsible for the tills and end of session cashing up.

Able to do Z-totals and X-totals for the tills and PDQ machines, add and remove products on the tills also change products prices.

Add and remove clerks' names on the tills.

Weekly summaries and wage lists were also my responsibility.

Handling customer complaints both in person, phone and via emails.

Stock count and stock orders.

Handling all the product payments to suppliers.

Making sure our liability insurance and all required licences are renewed in time.

Trained in working CCTV and making sure the police and traffic wardens are always provided with the video footage they require.

Always ensuring that our premises and staff was compliant with current laws and regulations.

June 2013 – June 2015

Duty Manager at DanSid Limited an entertainment club in the heart of Birmingham.

My role as a Duty Manager was to make sure everything is run smoothly and without disruption in the absence of the General Manager.

My responsibilities included:

I was in charge with opening and closing the premises, checking the float and the tills making sure everything is compliant and ready for business.

I was also responsible for the tills and end of session cashing up.

Able to do Z-totals and X-totals for the tills and PDQ machines, add and remove products on the tills also change products prices.

Add and remove clerks' names on the tills.

I was also responsible for the tills and end of session cashing up.

Stock count.

Handling customer complaints both in person, phone and via emails.

Supervising employees and artists to ensure all the rules and regulations under which our premise was operating were being followed.

April 2013- March 2010

Bar Staff and Waitress at Poppy Red in the Arcadian.

January 2009- April 2005

Working on the checkout till in a supermarket in Bucharest Romania.

January 2005- July 2001

Bar Staff and waitress at Bavaria Pub and Club in Bucharest Romania

Education and Training

- First Aid trained and certified.
- Fire Marshal trained and certified.
- SIA trained and certified.
- Restaurant Hospitality and Management Diploma (Online Course).
- Duty/DPS Manager Diploma.

Equivalent of A levels studies in Romania.

1997 – 2001 High school Ion-Luca-Caragiale-Bucuresti-sector-1

Also attended Dudley College in 2009 to perfect my English and IT skills.

Interests and Hobbies

- Travel
- Listening to music.
- Getting together with friends/socialising/dinning out.
- Decorating.

References available on request.

ZVIAD TSIKLARI

PROFILE SUMMARY

I am a qualified close protection operative and senior door supervisor with a wealth of experience and knowledge of security management and operations. Having worked in many different sectors from construction sites, offices, casinos, nightclubs, gentleman's clubs, to high profile celebrity close protection, possess me with extensive knowledge of relevant safety equipment, policies, procedures and strategies to deal with emergency situations. With a good friendly outlook, this enables me to relate to the public well and build up an excellent rapport instantly. I am proactive in recognising and defusing tensions in hostile or violent situations and taking relevant action before they escalate into criminal matters. I am confident, highly motivated and as a professional, I am well presented and take pride in my work. I have experience in leading teams; I also work well on my own and enjoy being part of a good team who are able to work well together.

CAREER HISTORY

HEAD DOOR SUPERVISOR **LEGS11 GENTLEMAN'S CLUB** **FEBRUARY 2014 – AUGUST 2017**

Key Responsibilities:

- Lead a team of four door supervisors
- Hold briefing meetings with door staff
- Conduct discipline meetings with door staff
- Conduct welfare meetings with door staff
- Meet and greet high profile VIP clients
- Conduct searches for weapons
- Conduct searches when drug use confirmed
- Monitor clients for drunkenness/drugs
- Keep observations of all staff within individual rooms via CCTV to detect offences
- Enforce the high standard of regulations of the venue at all times
- Conduct patrols within venue
- Provide assistance to door supervisors in case of emergencies
- Provide close protection security of dancers on stage when necessary
- Crowd control of the stage area/outside of venue
- Keep constant radio contact with staff
- Liaise with police when apprehension of offenders
- Provide evidential statements/CCTV to police when necessary

HEAD DOOR SUPERVISOR **SECURE-IT** **JULY 2013 – JANUARY 2014**

Key Responsibilities:

- Meet and greet clients attending the Casino
- Check identification for authentication and confirmation of clients age
- Check if clients are impaired through drink or drugs
- Search clients for weapons and drugs
- Crowd control inside and outside of venue
- Enforce evenly and fairly regulations of venue if necessary
- Eject clients who are aggressive or committing offences and liaise with the Police
- Conduct patrols within venue to ensure all fire exits are kept clear in case of emergency
- Keep observations within venue to ensure safety of all staff and clients and prevent offences

occurring

- Provide emergency First Aid whenever required
- Check CCTV is in working order and provide to the Police as necessary

HEAD DOOR SUPERVISOR

AMARA VIP

DECEMBER 2011 – JULY 2013

Key Responsibilities:

- Lead a team of six door supervisors
- Held briefing meetings with door staff to update on clients attending venue everyday
- Discipline door staff where code of conduct had been breached
- Meet and greet high profile VIP clients attending the gentleman's club
- Keep observations of all staff within individual rooms via CCTV to detect offences
- Enforce the high standard of regulations of the venue at all times
- Conduct patrols within venue to provide assistance to door supervisors in case of emergencies
- Provide close protection security of dancers on stage
- Crowd control of the stage area
- Keep constant radio contact with door staff as well as director of venue as requested

CLOSE PROTECTION

AMARA VIP

DECEMBER 2011 – JULY 2013

Key Responsibilities:

- Provide constant security service to very high profile football player
- Attend meetings with client nationally and internationally
- Attend private functions with client
- Carry out tasks requested by client
- Provide protection for clients family
- Close protection security provided to very high profile musical artist NEYO
- Close protection security provided for Tinchy Stryder
- Close protection security provided for Alexandra Burke
- Close protection security provided for Chipmunk
- All protection provided on individual basis as requested by client
- Crowd control to ensure artist was not bombarded by fans
- Escorting artist onto the stage
- Stage control to allow artist to perform without disruptions
- Escorting artist of stage
- Escorting artist to personal vehicle and attending other venues nationally

DOOR SUPERVISOR

SECURE SERVICES

JANUARY 2009 – DECEMBER 2011

Key Responsibilities:

- Meet and greet clients attending nightclub
- Check identification for authentication and confirmation of clients age
- Search clients for illegal substances, weapons and alcohol
- Conduct patrols of whole venue to ensure fire exits are kept clear
- Keep observations of clients within premises to prevent offences
- Liaise with Police officers in order for them to conduct "walk throughs"
- Escort clients out of premises who have committed offences and liaise with Police
- Assist in removing clients from premises after venue closing

DOOR SUPERVISOR**PLATINUM SECURITY****MAY 2005 – DECEMBER 2009****Key Responsibilities:**

- Meet and greet clients attending nightclub
- Ensure clients identification is authentic and client is of correct age to enter
- Search clients to ensure drugs, alcohol and weapons are not taken into venue
- Keep observations inside and outside venue in order to detect potential offences
- Assist other team members in removing clients from venue

SECURITY GUARD**PLATINUM SECURITY****MAY 2005 – DECEMBER 2009****Key Responsibilities:**

- Have a briefing meeting with previous security guard
- Report to base on hourly intervals
- Provide high visibility patrols of whole construction site
- Provide written accounts of any issues or break-ins and report to management
- Have a briefing meeting with staff working on site the following day

PROFESSIONAL SKILLS

- Close Protection Operative
- Advanced Driver
- Firearms Trained
- Covert/Overt Surveillance Trained
- Fully SIA Front Line Trained
- First Aid Trained
- British Judo Master (3rd Dan)
- Self Defence Instructor
- Team Leader
- Customer Services
- Excellent Observational Skills
- Analysing Situations
- Crowd Monitoring/Control
- Door Supervision
- Close Protection
- Conflict Resolutions
- Fire Safety Trained
- Drugs Awareness Trained

PERSONAL SKILLS

- Honest
- Punctual
- Reliable
- Efficient
- Confident
- Excellent Judgement
- Assertive
- Energetic
- Perceptive
- Flexible
- Multi Lingual

QUALIFICATIONS

- SIA Door Supervisors Training Course
- Close Protection Course
- International Degree

OTHER ACHIEVEMENTS

- British No1 Heavyweight Judo Champion
- Commonwealth Judo Masters Champion
- International Judo Gold Medalist

INTERESTS

- Judo – competing for England
- Voluntary judo instructor
- Gardening
- Going to the gym
- Socialising
- Cooking

REFERENCES AVAILABLE UPON REQUEST

TAB 5

PERSONAL DOCUMENTS OF GARY BROWN

TAB	DOCUMENT
5.1	DBS certificate
5.2	Personal Licence
5.3	Personal Licence Card
5.4	BII Level 2 certificate

BASIC Certificate



Disclosure &
Barring Service

DBS fee charged

Certificate number: 000893377530

DBS ID number: P0000A02MN5

Date of issue: 26 FEBRUARY 2018

Applicant personal details

Surname: BROWN

Forename(s): GARY RAYMOND

Other names: NONE DECLARED

Date of birth: [REDACTED]

Place of birth: [REDACTED]

Gender: MALE

Police Records of Convictions, Cautions, Reprimands and Warnings

NONE RECORDED

BASIC Certificate

This document is a basic certificate within the meaning of section 112 of the Police Act 1997.

BIRMINGHAM CITY COUNCIL



LICENSING ACT 2003

PERSONAL LICENCE

Licensee Name
Mr Gary Raymond Brown

Licence Number : 10735

Licensee Address

Issue Number : 1
Issue Date : 16/03/2018

BIRMINGHAM

Relevant Offences

Country	Conviction Date	Offence	Sentence

The photocard and paper counterpart together make up the complete personal licence and should be kept together. Both must be produced when required.

Granted By:

A handwritten signature in black ink, appearing to read 'Bhandhra'.

Bhapinder Nandhra
Senior Licensing Officer

Please Note: This document should NOT be relied upon as a form of identification. The requirement to renew Personal Licences was abolished as of the 1st April 2015. The Licensing Authority has therefore not been able to conduct a Criminal Records Check upon the licence holder, to ascertain whether they have been subsequently convicted of any relevant or foreign offences since the licence was first granted.

Birmingham City Council

Licensing Act 2003



Licence N° **10735 / 1**

Surname

Brown

Forenames

Gary Raymond

Address

[REDACTED]
[REDACTED]
[REDACTED]

PERSONAL LICENCE

This is to certify that

GARY BROWN

has been awarded the

**BIIAB Level 2 Award for Personal Licence
Holders**

Qualification Accreditation Number: 003/2488/6
Certificate Number: 188582

Date Achieved: 12/02/2018
Learner Number: 190438



Denise Thomson
Responsible Officer

TAB 6

PERSONAL DOCUMENTS OF DANIEL PARMA

TAB	DOCUMENT
6.1	Birth Certificate
6.2	Personal Licence & SIA Card
6.3	DBS Certificate




008063372

REPUBLIKA E SHQIPËRISE
Republic of Albania
République d'Albanie
Republica de Albania
Republik Albanien
Repubblica d'Albania
Δημοκρατία της Αλβανίας

Zyra e Gjendjes Civile Balkdre i ri
Civil Registry Office
Office de l'Etat Civil
Servicio del Registro Civil
Standesamtsbehörde
Ufficio dello Stato Civile
Ληξιαρχείο

CERTIFIKATE LINDJE

Birth Certificate - Certificat de Naissance - Certificado de Nacimiento - Geburtsurkunde
Certificato di Nascita - Πιστοποιητικό Γέννησης

Emri - Name - Prénom - Nombre - Vorname - Nome - Όνομα	Elton
Mbiemri - Surname - Nom - Apellido - Familienname - Cognome - Επώνυμο	LEKSTAKAJ
Numri personal - Personal number - Numéro personnel - Número personal - Personal nummer - Numero personale - Προσωπικός αριθμός	[REDACTED]
Emri i babait - Father's name - Prénom du père - Nombre del padre - Vorname des Vaters - Nome del padre - Όνομα Πατρός	Pjeter
Emri i nënës - Mother's name - Prénom de la mère - Nombre de la madre - Vorname der Mutter - Nome della madre - Όνομα μητρός	Marije
Data lindja - Date of birth - Date de naissance - Fecha de nacimiento - Geburtsdatum - Data di nascita - Ημερομηνία γεννήσεως	[REDACTED]
Vendi lindja - Place of birth - Lieu de naissance - Lugar de nacimiento - Geburtsort - Luogo di nascita - Τόπος γεννήσεως	[REDACTED]
Vendbanimi - Place of residence - Lieu de domicile - Domicilio - Wohnort - Luogo di domicilio - Τόπος κατοικίας	[REDACTED]
Gjinia - Sex - Sexe - Sexo - Geschlecht - Sesso - Φύλο	M
Gjendja civile - Civil status - Etat civil - Estado civil - Familienstand - Stato civile - Οικογενειακή κατάσταση	
Beqar/e - Single - Célibataire - Soltero/a - Ledig - Celibe - Άγαμος/η	X
i/e Martuar - Married - Marié/e - Casado/a - Verheiratet - Coniugato/a - Έγγαμος/η	[]
i/e Shkurorëzuar - Divorced - Divorcé/e - Divorciado/a - Geschieden - Divorziato/a - Διαζευγμένος/η	[]
i/e Ve - Widower/Widow - Veuf/veuve - Viudo/a - Verwitwet - Vedovo/a - Χήρος/α	[]
Shtetësia - Citizenship - Citoyenneté - Ciudadanía - Staatsangehörigkeit - Cittadinanza - Ιθαγένεια	ALB
Mbiemri para martesë - Surname before marriage - Nom avant le mariage - Apellido antes del matrimonio - Geburtsname - Cognome prima del matrimonio - Επώνυμο πριν/ μετά το γάμο	-----
Data e lëshimit - Date of issue - Date de délivrance - Fecha de expedición - Ausstellungsdatum - Data del rilascio - Ημερομηνία χορήγησης	27-10-2015
Emri, Mbiemri, Nënshkrimi i Nëpunësit të Gjendjes Civile, Vula Name, Surname, Signature and Seal of Keeper Prénom, Nom, Signature, Sceau de l'Officier de l'Etat Civil Nombre, Apellido, Firma y Sello del Oficial de Registro Civil Vorname, Familienname, Unterschrift und Dienstsiegel des Standesbeamten Nome, Cognome, Firma e Timbro del Pubblico Ufficiale dallo Stato Civile Όνομα, Επώνυμο, Υπογραφή και Σφραγίδα του Υπαλλήλου του Ληξιαρχείου	<p>PRENË PËRPALË</p> 

REPUBLIKA E SHQIPERISE
 Prefekti i Qarkut Lezhë
 Nr. 8604

Më 24.10.2015

Qazim Lajçaj
 Udhëheqës i Qarkut Lezhë
 Udhëheqës i Qarkut Lezhë
 Udhëheqës i Qarkut Lezhë

24.10.2015





Birmingham City Council

Licensing Act 2003



Licence N **8348 / 1**

Expires **22/06/2024**

Surname **Parma**

Forenames **Daniel**

Address



PERSONAL LICENCE

1018 5163 4881 5288

LICENCE

Security Industry Authority

EXPIRES
14 JAN 2021



DOOR SUPERVISOR

STRICTLY PRIVATE AND CONFIDENTIAL

DANIEL PARMA

Standard Certificate

Page 1 of 2

Certificate Number: MD080118-03

Date of Issue: 18 DECEMBER 2017

DBS Fee charged

Applicant Personal Details

Employment Details

Surname: PARMA

Position Applied For:
1313220443564

Forenames: DANIEL

Name of Employer:
SECURITY INDUSTRY AUTHORITY

Other Names:
DANIEL LEKSTAKA
ELTON PARMA
ELTON LEKSTAKA

Date of Birth:

Countersignatory Details

Place of Birth: DIAKOVA, OBSOLETE SEES
TERRITORY

Registered Person/Body:
THE SIA

Gender: MALE

Countersignatory:
BENJAMIN HARRISON

THIS CERTIFICATE IS NOT EVIDENCE OF IDENTITY

Police Records of Convictions, Cautions, Reprimands and Final Warnings

1

Standard Certificate

This document is a Criminal Record Certificate within the meaning of sections 113A and 114 of the Police Act 1997

THIS CERTIFICATE IS NOT EVIDENCE OF IDENTITY

Disclosure and Barring Service, PO Box 165, Liverpool L69 3JD Helpline 03000 200 190

TAB 7

PERSONAL DOCUMENTS OF RUXANDRA NICULESCU & ZVIAD TSIKLAURI

TAB	DOCUMENT
7.1	Personal Licence- Ruxandra Niculescu
7.2	Professional Certificates: Ruxandra Niculescu: Level 3 Certificate in Mortgage Advice & Practice; Restaurant & Hospitality & Management Diploma; SIA licence
7.3	SIA licence: Zviad Tsiklauri



Licensing Act 2003

Licence N° 7950 / 3



Surname **Niculescu**

Forenames **Ruxandra**

Address



PERSONAL LICENCE

BIRMINGHAM CITY COUNCIL



LICENSING ACT 2003

PERSONAL LICENCE

Licensee Name
Miss Ruxandra Niculescu

Licence Number : 7950

Licensee Address
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Issue Number : 3
Issue Date : 03/10/2013

Relevant Offences

Country	Conviction Date	Offence	Sentence

The photocard and paper counterpart together make up the complete personal licence and should be kept together. Both must be produced when required.

Granted By:

Handwritten signature of Carolyn Bennett in black ink.

Carolyn Bennett
Senior Licensing Officer

Please Note: This document should **NOT** be relied upon as a form of identification. The requirement to renew Personal Licences was abolished as of the 1st April 2015. The Licensing Authority has therefore not been able to conduct a Criminal Records Check upon the licence holder, to ascertain whether they have been subsequently convicted of any relevant or foreign offences since the licence was first granted.

This is to certify that

Ruxandra-Cristina Niculescu

has been awarded the following qualification

**LIBF Level 3 Certificate in Mortgage Advice
and Practice - 501/0629/6**



PROF STEVEN HABERMAN

Chairman



ALEX FRASER

Chief Executive



27 June 2018

A338466

Regulated by

Ofqual

For full details of the regulatory framework, please visit www.ofqual.gov.uk



Restaurant Management Diploma

Certificate No
XGEVG9UD

This certificate is to verify that

Ruxandra
Niculescu

Has successfully completed the

RESTAURANT MANAGEMENT DIPLOMA COURSE

20th June 2016

Date



D. Morgan

Head Tutor

Restaurant Management

Academy

This certificate can be verified online at: <http://www.restaurantmanagementdiploma.co.uk>

1015 3498 6423 3686

LICENCE

Security Industry Authority

EXPIRES
29 FEB 2020

BY NICK LESCO



DOOR SUPERVISOR

0130 1122 7151 5628



Security Industry Authority
LICENCE

EXPIRES

10 APR 2019

Z. TSIKLARI



DOOR SUPERVISOR

TAB 8

COMPANIES HOUSE DOCUMENTS

TAB	DOCUMENT
8.1	Companies House Documents

Companies House

Companies House does not verify the accuracy of the information displayed
(<http://resources.companieshouse.gov.uk/serviceinformation.shtml#complinfo>)

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

Registered office address

23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR

Company status

Active

Company type

Private limited Company

Incorporated on

23 January 2018

Accounts

Next accounts made up to **31 January 2020**
due by **31 October 2020**

Last accounts made up to **31 January 2019**

Confirmation statement

Next statement date **7 January 2020**
due by **21 January 2020**

Last statement dated **7 January 2019**

Nature of business (SIC)

- 68209 - Other letting and operating of own or leased real estate

[Is there anything wrong with this page?](#)

Companies House

Companies House does not verify the accuracy of the information displayed

(<http://resources.companieshouse.gov.uk/serviceinformation.shtml#compInfo>)

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/11164703/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/11164703/persons-with-significant-control)

Filter officers

☐

Current officers

Apply filter

2 officers / 0 resignations

BROWN, Gary Raymond

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Role **Active Director**

Date of birth **December 1975**

Appointed on **29 October 2018**

Nationality **British**

Country of residence **England**

Occupation **Co Director**

PARMA, Daniel

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Role Active **Director**

Date of birth **September 1977**

Appointed on **23 January 2018**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Co Director**

Is there anything wrong with this page?

Companies House

Companies House does not verify the accuracy of the information displayed
(<http://resources.companieshouse.gov.uk/serviceInformation.shtml#complinfo>)

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

- [Officers \(https://beta.companieshouse.gov.uk/company/11164703/officers\)](https://beta.companieshouse.gov.uk/company/11164703/officers)
- [Persons with significant control](#)

1 active person with significant control / 0 active statements

Mr Gary Raymond Brown Active

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Notified on **2 January 2019**

Date of birth **December 1975**

Nationality **British**

Nature of control **Ownership of shares – More than 50% but less than 75%**

Country of residence **England**

Mr Daniel Parma Ceased

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Notified on **23 January 2018**

Ceased on **2 January 2019**

Date of birth **September 1977**

Nationality **British**

Nature of control **Ownership of shares – 75% or more**

Country of residence **United Kingdom**

[Is there anything wrong with this page?](#)