

# Imperial College Union

## Retailing of Alcohol Policy

### Introduction

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

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

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

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

The Finance & Risk Committee (F&R) in co-operation with the Union's Commercial Services team will ensure the Code of Practice is adopted, adhered to, and further developed. This policy will be reviewed annually by F&R at the last meeting of the academic year.

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## 1. Responsible Retailing

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

The advertising of alcohol, events, and promotions spans both the supply and demand side in the context that advertising is our opportunity as a supplier to influence customer demand. We believe that control over advertising and promotions are further effective levers to encourage responsible consumption. As such our drinks service policy and alcohol promotion policy are detailed and also represent a level we believe is responsible in the industry.

### 1.1 Consumer Safe Drinking

Our main consumers are our members, the student body of Imperial College Union. The members who can purchase alcohol from our outlets (i.e. those over 18) are adults. We are not here to dictate or control their actions or choices. We also recognise that there are plenty of alternatives to the Students' Union as a venue. Our general policy is one of awareness and education. We do not wish to "preach" or take a "moral high ground". We do aim to use our knowledge of how to market effectively to students, to get key messages across regarding their safety and well-being, by providing relevant and timely information and reminders.

### 1.2 Drinks Service Policy

1. We will not sell spirits in quantities greater than a double serve measure in one glass other than in a recognised cocktail.
2. We will not serve spirits mixed into the same glass other than in a recognised cocktail.
3. We will not serve spirits into draught alcohol products e.g. put whiskey into a pint of lager.
4. We will not normally stock any product over 50% ABV. Where we do, it will be only with the approval of the F&R Committee.
5. Mobile service is defined as the offering of a specific promoted drink brand (away from the bar area) dispensed immediately by the server. We recognise that the mobile service of shooter drinks, for example the use of tequila belts, could be considered part of a binge drinking mentality. However, when used responsibly these add a fun element to events appreciated by the majority of customers. The following measures apply to this specific type of service:
  - a) Activity not to be undertaken after 12am
  - b) All spirits above 40% ABV will only be served diluted at least 50/50 with an appropriate non-alcoholic mixer
  - c) Service limited to a single measure

- d) There will be no competition elements that involve volume or speed drinking incentives
  - e) Alcohol will never be dispensed directly into a customer's mouth
6. We will refuse service of alcoholic products to those who our bar staff deem to have already drunk too much. We will encourage them to have a soft drink or water instead, and in extreme cases (e.g. when they are posing a threat to others or the buildings) ask them to leave the premises

### 1.3 Alcohol Promotions Policy

All central promotional activity agreed with suppliers will comply with the Portman Group Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks (5th edition), and therefore should not in any direct or indirect way:

1. Give the higher alcoholic strength, or intoxicating effect, undue emphasis. A product's lower alcoholic strength may be emphasised proportionately when it is below the average strength for similar beverages. Factual information about alcoholic strength may be given
2. Suggest any association with bravado, or with violent, aggressive, dangerous or anti-social behaviour;
3. Suggest any association with, acceptance of, or allusion to, illicit drugs;
4. Suggest any association with sexual activity or sexual success;
5. Suggest that consumption of the drink can lead to social success or popularity;
6. Encourage illegal, irresponsible or immoderate consumption, such as drink-driving, binge-drinking, or drunkenness;
7. Urge the consumer to drink rapidly or to "down" a product in one;
8. Have a particular appeal to under 18s; incorporate images of people who are, or look as if they are, under 25 years of age, where there is any suggestion that they are drinking alcohol or they are featured in a significant role. Images may be shown where people appear only in an incidental context.
9. Suggest that the product can enhance mental or physical capabilities.

In line with the BBPA (British Bar and Pub Association) Social Responsibility Standards, promotions or promotional materials will not:

1. Condone, encourage or glamorise excessive drinking or drunkenness or encourage anti-social behaviour. Effects of intoxication should not be referred to in any favourable manner.
2. Be linked to sexual imagery implying sexual success or prowess;
3. Refer to consuming alcohol to recover from previous over-indulgence;
4. Be disrespectful of contemporary, prevailing standards of taste and decency, and avoid degrading or gratuitously offensive images, symbols, figures and innuendoes. Promotional material should not be demeaning to any gender, race, religion, age or minority group.
5. Appeal, through images/symbols, primarily to those under the legal purchase age.
6. Characters should only be used if it is clearly established that their primary appeal is to adults. Use of any cartoon character popular with children is unacceptable.
7. Contain any direct or indirect references to drug culture or illegal drugs.
8. Have any association with violence or anti-social behaviour.

Additionally, in response to the 'Licensing Act 2003 (Mandatory Licensing Conditions) (Amendment) Order 2014' we will avoid:

1. Any promotional activity which implies drinks being 'downed in one' or which incentivises speed drinking.
2. Any promotion that relies on an unpredictable event e.g. 'first goal scored', and therefore encourages urgent and / or unplanned alcohol consumption.
3. Promotions that involve drinking games.
4. All-inclusive promotions – including large quantities of, or all drinks, in the admission fee.
5. Directly dispensing alcohol by one person into the mouth of another
6. Activity that presents alcohol abstinence, or choosing soft drink alternatives, in a negative light.
7. Sampling activity involving staff under the age of 18.
8. Sampling activity which offers more than 1.5 units of alcohol per person.

The 'Alcohol: mandatory licensing conditions' (July 2017), issued by the government, can be accessed [here](#)

Examples of good promotions include:

1. Round-buying promotions of two or more
2. The inclusion of responsible drinking messages and alcohol units where appropriate
3. Promotions that are run over periods of time to ensure prizes such as drinks vouchers can be redeemed later, not just on the day they are won
4. All promotional activity will incorporate a soft drinks offer
5. Any time-limited promotion should be for the duration of the event or longer

#### 1.4 Clubs, Societies & Projects

This Policy will enforce all the points contained within the Clubs, Societies and Projects Policy in relation to activities of CSPs within our licensed venues, especially those which relate to initiation ceremonies.

The Clubs, Societies and Projects Policy can be accessed [here](#)

Additionally, the Union will enact, a ban on checklists of drinks to be consumed, and a limit of 8 units of alcohol on the number of free drinks per person provided at a social

If these rules are breached, disciplinary procedures will be invoked as per the Union Constitution & Bye Laws. Staff will be trained to recognise behaviour that breaches the above, and given guidelines for reporting any such behaviour.

The Union Constitution and Bye Laws can be accessed [here](#)

## 1.5 Consumption of Alcohol

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

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

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

## 1.6 Alcohol Safety Issues

Customers observed by Security inside, outside or leaving our premises are informally assessed. If their demeanour causes sufficient concern, that person will be monitored assessed further, and given appropriate assistance. This could include first aid, assistance getting home, or locating a friend to accompany them. Aggravating features to cause concern are people leaving alone, or when challenged the individual cannot positively identify a companion.

Where we suspect someone’s drink may have been spiked we will also treat it as a criminal act, investigate further to gain evidence, and involve the emergency services. We will run drink awareness campaigns throughout the year and have drink awareness POS continually on display within each venue.

## 1.7 Welcome Week

It is not unusual for many of our students to have consumed alcohol prior to coming to University. However, it may be the first time that many of them won’t have had to return home to their parents at the end of the night. The freedom this gives can lead to a less responsible approach to their drinking behaviour. Consumer campaigns during this busy period, however, are generally low impact. We will, therefore, run an internal drink awareness campaign across all of our bars during this time.

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

## 1.8 Membership & Age Verification

Staff serving alcohol must, in keeping with our license, require any individuals to produce, on request and before being served alcohol, identification stating their membership of Imperial College Union or proof that they meet the criteria for those persons that are allowed to be served alcohol as determined by our Premises Licences.

Examples of appropriate identification include:

- Imperial College ID
- An Associate or Lifetime Membership card
- A Refectory Membership card

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

ICU will also operate an age verification policy. This policy applies in relation to the sale or supply of alcohol on ICU premises. For this policy the responsible person is the designated premises supervisor for each bar/venue.

Upon presenting their College ID card, before being served alcohol, those with a red box around their photo, indicating that they are under 18, will be refused service. Under 18s are welcome in our bars, except on certain event nights where the policy is over 18s only.

Any individual that does not have their College ID card with them, is not a student or staff of Imperial College or at the request of the bar staff, will be required to present identification bearing their photograph, date of birth, and a holographic mark:

Examples of appropriate identification include:

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

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

## 2. Appropriate Atmosphere

The Union wishes to recognise its heritage, whilst providing a modern and appealing venue for all customers. As such, steps will be taken to enhance the atmosphere of all the Union's outlets.

### 2.1 Glass versus Plastic

In keeping with the Union's Environmental Policy, the Union shall provide glass to drink from, over plastic pint glasses at all times, other than for safety reasons at the following times:

- After 20:00 on Wednesday and Friday nights
- Other busy events where glass is a hazard

### 2.2 Tankards

Holders and past holders of positions of responsibility for the Union and its constituent parts, may, when the Union Bar is open 'take out' any tankard relating to their position of responsibility. This is on the condition that an acceptable form of identification, as determined by the bar staff, is left behind the bar and the tankard is returned by the end of the day. Failure to do so would be a contravention of this policy.

### 2.3 Yards

We recognise that the yard is an item of speed drinking apparatus and, as such, is subject to regulation and control. No other speed drinking apparatus is permitted. Subject to the permission of the licensee, yards, may when the Union Bar is open be 'taken out'. This is on the condition that

- The yard is returned at the end of the drink(s) authorised by the licensee
- Only the drinker touches the yard whilst drinking
- The drink is either beer or cider or a non-alcoholic beverage, not a mixture, or containing any spirits

Failure to do so would be a contravention of this policy.

### 2.4 Music

Music in all our venues, when they are not being used as a club, should not be intrusive, but background music. All music should be appropriate to the time of day and audience of the venue.

### 2.5 Social Events

The Union will - with the assistance of DPFS, Constituent Unions, We Are Metric scheme and Commercial Services team – organise a variety of social events for its members.

## 3. Health & Safety

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

### 3.1 Health and Safety Management System

All outlets will have documentation and systems in place that include the following:

- Building Fire Risk Assessments
- Daily fire exit checks
- Periodic building checks conducted by the College, the frequency of which is based on the use of the building. The sale of alcohol is deemed to be high risk and therefore building checks in this regard are deemed by the College to be the highest priority.
- Control of Substances Hazardous to Health (COSHH) Procedure.
  - All cleaning products must be stored and used according to the manufacturers' instructions. All products must be stored in their original correctly marked containers and not decanted into other containers. Staff must be trained in the correct usage of the chemical products used in their area of work.
- Accident and Near Miss Reporting.
  - All accidents (staff and customer) are reported in the outlet incident log and online via SALUS
- Outlet-specific Risk Assessments

### 3.2 Venue Checklists

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

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

### 3.3 Glass Collecting Policy

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

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

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

### 3.4 Smoking in Licensed Trade Outlets

Smoking in enclosed public spaces was banned on 1 July 2007 (in England and Wales). This legislation came about as a result of the dangers of passive smoking. The Union complies with the law, and in this respect has banned smoking from all enclosed spaces.

In addition to this, Imperial College operates a [Smoke-Free Policy](#) which stipulates that smoking is not permitted 'on College land or within 20m of College land'. The limited exception to this is that smoking is permitted in Beit Quad 'on Wednesday and Friday evenings during term time when major ticketed events are being held'. As we do not have a designated non-smoking area outside we will monitor customer complaints to determine if any future action needs to be considered.

Under the Smoke-Free Policy, 'all staff and student members of the Imperial College community have the right to ask others to comply with this policy, and not to smoke'. Full details of the policy can be found [here](#).

Unfortunately, we cannot accept the use of electronic cigarettes indoors as they are too difficult to distinguish from the real thing. We believe this could lead to unfair confusion for both our staff and other customers.

### 3.5 Training Summary

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

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

### 3.6 Risk Assessments for Key Events

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

## 4. The Prevention of Crime & Disorder

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

### 4.1 CCTV

The Union has a CCTV surveillance system and a Code of Practice for its operation. The system covers most of the main internal areas and some of the external areas of Union buildings, and records on all cameras 24 hours a day. All images are automatically stored for a minimum of 30 days. The Code of Practice ensures that the Union's operation of the system complies with the General Data Protection Regulation 2018. The CCTV system is intended to contribute to the provision of a safe and comfortable environment in the following ways:

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

### 4.2 Noise Control

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

### 4.3 Customer Noise

Customer noise is noise resulting from those who are entering or leaving our outlets. We have no direct control over this noise. However we recognise we can play a part in the reduction of any inconvenience to the community resulting from this type of noise. We have an influence over the customers in our venues, and a responsibility in terms of good neighbourly behaviour. Therefore, we can educate students, who use our venues, as to what is good behaviour.

### 4.4 Off-site Alcohol

No externally purchased alcohol may be brought onto the Union's licensed premises for consumption. In such cases, alcohol will be confiscated by the bar staff and returned to the individual upon departure.

## 5. Dispersal

The buildings in which our venues are located, house a variety of activities including bars, nightclubs, retail outlets, student activity spaces, meeting rooms and offices. We need to take a holistic view of the buildings, not just the licensed activities which occur in them. Different activities take place on different days with different finish times, and there is no such thing as a standard week. As a result we apply only three key principles to dispersal:

- We will not usually close our activities and outlets such that the whole building empties within a 30-minute timeframe, where the whole building was open. That is to say we will attempt to consider and apply the principle of staggered closing hours between our various outlets.
- For the purposes of licensed bar trade, an outlet (FiveSixEight, Metric, Union Bar, H-Bar or Reynolds) of the Union will remain open until the advertised close time, unless the Duty Manager deems that is trade is insufficient to remain open.
- 15 minutes of “drinking up time” will be allowed, after sale of alcohol has ceased before the outlet is closed

Background music and lighting levels should be used to aid a gradual dispersal. The best way to achieve this in terms of timings will need to be assessed for each event dependant on the nature of the event. For example, at a carol concert, keeping the bar open for 30 minutes after the concert (the main event) has finished, and then the building open for a further 15 minutes “drinking up time” would aid gradual dispersal. In the case of a student disco event, closing the bar 15 minutes before the club music (the main event) finishes and then having no music or low level music and higher lighting levels for the remaining 15 minutes of “drinking up time” aids dispersal.

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