

# BROADWAY



## Drugs Policy



**Date Created: May 2024**

**Date of last review: 11.05.2024**

### Expected Standards

This policy relates to the use of illegal drugs or other harmful substances on the premises.

Its purpose is to:

- a) Comply with the Misuse of Drugs Act 1971 by ensuring that Nottingham Media Centre (Broadway Cinema) does not knowingly permit use or supply of controlled drugs on its premises.
- b) Provide a safe working environment for staff and customers.
- c) Minimise and deter drug use at the venue.
- d) Prevent drug dealing in the premises.
- e) Safeguard customers who have used drugs or misused other substances.
- f) Support customers seeking help regarding their own or others' drug use.

*The policy will be communicated to customers by:*

- Posting a copy on the Broadway website.

The possession of illegal drugs is a criminal offence and as such is viewed very seriously by Broadway Cinema. We do not permit any employee or customer to take, use, possess, sell or be under the influence of any controlled substance whilst on Company premises. Any staff member breaching this may be subject to disciplinary procedures; customers may be subject to ejection, bans and potentially be reported to the police.

If not confronted head on, drug use on licensed premises will not go away, in fact it is likely to increase as the premises will develop a reputation of somewhere where drug use is tolerated; **we do not want to develop that reputation.**

We are also aware that "turning a blind eye" could be construed as "permitting"; again this will not be tolerated on these premises.

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The **Misuse of Drugs Act 1971** splits controlled drugs into three Classes defined by the amount of harm that have the potential to cause. **They are categorised as follows:**

**CLASS A:** Which includes Cocaine, Crack Cocaine, Heroin, Ecstasy, Cannabis Oil and LSD

**CLASS B:** Which includes Cannabis, Cannabis Resin and Amphetamine

**CLASS C:** Which generally include prescription drugs which are abused such as Diazepam and Steroids.

**In addition to the classification of controlled drugs, the 1971 Act also creates the offences with the main ones being:**

**Possession:** Also known as **personal use** where the individual has a small amount of a controlled drug on their person.

**Possession with Intent to Supply:** This is where an individual has a controlled drug in their possession and the reason for this is to supply it to another.

**Supply:** This is where a person supplies or offers to supply a controlled drug to another person.

Possibly the most important part of the Act which directly effects licensed premises is: Section 8 of the 1971 Act.

This states creates an offence to **“Knowingly permit or suffer any drug related activity on the premises”**. Activity in this instance will relate to any of the above offences. The burden here is on the licensee and staff of the premises to prevent the use of controlled drugs on their premises.

**Psychoactive Substances Act 2016** Consideration will also be given to preventing the use of so-called “legal highs” in contravention of this legislation items such as Spice, Laughing Gas (NO<sub>2</sub>), Mephedrone, and Slavia (not an exhaustive list) will be treated in the same way as any illegal drug under the Misuse of Drugs Act.

All staff members and managers have a duty to support this policy to make sure that people coming into our venue feel safe and are able to enjoy themselves in a drug free environment.

**All employees** are expected to remain vigilant for any signs or symptoms of drug use and act accordingly.

## **Venue Physical countermeasures**

- Clear signage on a ‘Zero Tolerance Policy’ to be placed in key staff areas, e.g. at the entrance, toilets etc.
- Strategic positioning of mirrors to cover secluded areas
- Strategic lighting levels in café bar and toilets
- High-vis presence of staff ‘front of house’
- High levels of housekeeping, e.g. clearing and wiping tables, general maintenance
- Having toilet cisterns etc. behind panelling
- Frequent staff visits to toilets

Specifically, all employees should remain vigilant for:

## **High-risk areas**

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All staff will regularly monitor key areas within the premises for suspicious activity. These have been identified as follows: All toilets, terrace, Mezz Bar.

## Equipment used in Drug Taking

Drug takers use a variety of different materials when taking drugs. Some of the things to look out for include:

- Wraps – the folded paper, foil, small button bags, or clingfilm that drugs are sold in
- Torn, unlit cigarettes
- Torn up beer mats, packets of Rizlas – used for rolling joints, roaches
- Foam stuffing taken from seats/bits of foam left around
- Payment with tightly rolled banknotes or notes that have been tightly rolled
- Traces of blood or powder on banknotes
- Drinking straws left in toilets
- Tinfoil or spoons, especially if they are burnt, scorched or covered in soot
- Syringes – used for injecting drugs
- Tightly rolled banknotes or drinking straws
- Traces of white powder on any surface

## Typical Symptoms/Signs of Possible Drug Use

The signs and symptoms of drug use can vary depending on the type of drug but can include:

- Acting 'drunk'
- Acting in an erratic, excited, aggressive or silly nature
- Having a 'nothing can stop me' high
- Having bloodshot eyes
- Unnaturally dozey, vacant staring, sleepy euphoria, dancing
- Very dilated pupils
- "Jawing"

Also be on the lookout for:

- The excessive drinking of water or soft drinks unless someone is the designated driver.
- Traces of white marks or powder around nostrils
- The distinctive 'herbal' smell of cannabis smoke

## Signs of Drug Dealing

These can include

- A person "holding court", with a succession of "visitors" who only stay with him/her a short time

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- A person making frequent visits to the toilet, garden or car park followed by a different person/people each time
- People exchanging small packages or cash, often in secretive manner, but may be quite open (to avoid suspicion)
- Furtive, conspiratorial behaviour — huddling in corners and whispering
- Conversation includes frequent references to drugs (slang names)
- **Remember: dealers are not identifiable by appearance, they often look highly respectable. They are not always male.**

## Staff procedure and responsibilities:

**Searching** - see Customer Search Policy

## **Drugs seized or found on premises**

Where items suspected of being illegal drugs are found on an individual following a voluntary search, and the amount of drugs found on a person be a small quantity which could be construed as ‘for personal use’ then it is acceptable for the drugs to be seized and deposited in the [Ops office cash safe](#) as per the below procedure and the person may be refused entry, there will be no need for the Police to be called.

**However**, should the amount of any drugs found amount to more than ‘simple possession’ (i.e. possession with intent to supply) or if it is suspected that the subject is a drugs dealer, then in those circumstances the expectation is that the Police will be called and the items handed over to the attending officer as part of an evidential package. This should be done at the same time as the individual is handed over to the Police, having agreed to remain at the premises. A written statement documenting the search and the subsequent handover will be required to provide continuity of the evidence chain.

Where items are located inside the premises and a person is NOT identified and there is no prospect of doing so, we the management of the premises have a process in place that has been agreed with the Police and must be followed at all times.

The person finding is required to place the items in a sealable bag or envelope and seal it. Once sealed that person will sign across the seal and this will be counter signed by the duty manager. The staff member will then be required to record this by reporting it using the Incident Reporting procedure and depositing the package in the Cash Safe Once deposited in this safe, the item(s) must only be removed by a Police Officer who will be required to sign to confirm that it has been removed. This will need to be counter signed by a manager at the premises.

Where drugs are placed in the safe at any time, it is the expectation of the Police that where drugs are deposited in the safe, a call is made to the control room of the local policing area to arrange collection. Such a call should be made as soon as is practical and an incident log created flagged for the attention of the Licensing Officer. Where the venue is busy and this occurs on a weekend or public holiday, this call **MUST** be placed no later than the first working day after the drugs are found and deposited.

Failing to adhere to this may amount to a staff member or manager committing an offence of unlawful possession as outlined above.

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The defence to this is knowing or suspecting it to be a controlled drug, he took possession of it for the purpose of delivering it into the custody of a person lawfully entitled to take custody of it and that as soon as possible after taking possession of it he took all such steps as were reasonably open to him to deliver it into the custody of such a person.

## **Confiscation of Drugs**

**Stay Calm and Professional:** If you suspect a customer of possessing drugs, approach the situation calmly and professionally. Avoid escalating the situation by maintaining a composed demeanour.

**Observe Closely:** Before taking any action, discreetly observe the customer's behavior to confirm your suspicions. Look for signs such as erratic behaviour, unusual Odors, or visible drug paraphernalia.

**Safety First:** Your safety is paramount. If you feel unsafe or threatened at any point, do not hesitate to seek assistance from security or a manager.

**Confiscation Procedure:** If you need to confiscate drugs from a customer, do so discreetly and securely. Avoid confrontation by calmly explaining the situation and requesting the drugs be handed over voluntarily.

**Communication with the Customer:** When communicating with the customer whose drugs are being confiscated, remain respectful and non-judgmental. Explain the establishment's policy on drugs and the reasons for confiscation. Offer them the opportunity to leave peacefully without further incident.

**Offer Assistance if Needed:** If the customer appears to be in distress or in need of assistance due to drug use, offer support in a non-confrontational manner. This could include providing information on support services or contacting medical assistance if necessary.

If any drug or other controlled substance is found during customer searches or general management of the venue, the substance should, wherever possible, be confiscated and The person finding is required to place the items in a sealable bag or envelope and seal it. Once sealed that person will sign across the seal and this will be counter signed by the duty manager. The staff member will then be required to record this by reporting it using the Incident Reporting procedure and depositing the package in the Cash Safe Once deposited in this safe, the item(s) must only be removed by a Police Officer who will be required to sign to confirm that it has been removed. This will need to be counter signed by a manager at the premises.

To record any drugs found do so as per the Incident Reporting Policy by emailing [complaints@broadway.org.uk](mailto:complaints@broadway.org.uk) with a subject line INCIDENT and the date. Make sure to record:

Name of member of staff who confiscated the drugs

Date, time

Any details about the person the drugs were confiscated from

Details of what was confiscated and any photos as proof

## **People/customers**

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## 1. Suspected Drug Use:

If a staff member suspects a customer of being under the influence of drugs, they should approach the situation with discretion and sensitivity. Staff should prioritise first-line customer care, offering assistance such as providing water to dehydrated customers. However, if the customer's behaviour poses a risk to themselves or others, staff should ensure their safety and the safety of others by intervening appropriately.

## 2. Possession of Drugs:

If a customer is suspected of being in possession of drugs, staff should not confront the individual directly. Instead, they should discreetly observe the situation and report their suspicions to a Duty Supervisor. It is important to maintain a duty of care and avoid serving alcohol to intoxicated customers, whether their intoxication is due to drugs or alcohol.

## 3. Supplying Drugs:

If staff suspect that a customer is supplying drugs on the premises, they should immediately report their concerns to a manager or Duty Supervisor. Staff should not attempt to confront the individual themselves, as this could escalate the situation and compromise their safety.

Duty Supervisors/Managers in this situation to prioritise customer and staff safety and record as much information as possible – time, date, description of individual, any evidence to support their suspicion and then to report to the police.

## 5. Care for Customers:

If a customer is suffering ill effects from drug use, staff should provide appropriate care and support. This may include offering assistance such as providing water, contacting medical services if necessary, and ensuring the customer's comfort and safety until help arrives.

## 6. Incident Reporting:

All incidents involving drugs should be reported promptly and accurately using the designated incident reporting procedures. This helps to ensure that appropriate action can be taken and that any necessary follow-up measures are implemented.

## 7. Observation and Monitoring:

Staff should be vigilant and observant for signs of possible drug-related problems among customers. This includes monitoring customer behaviour and maintaining awareness of any changes in mood or demeanor that may indicate drug use or intoxication.

## 8. Customer Information and Assistance:

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Staff should be prepared to provide information and assistance to customers who may have questions or concerns about drugs or drug-related issues. This may include offering information on support services or referring customers to appropriate resources for help.

## 9. Water Availability:

Water should be readily available to customers, particularly those who may be dehydrated due to drug use or intoxication. Staff should proactively offer water to customers and ensure that water stations are well-stocked and easily accessible.

## 10. Calling Paramedics:

If a customer is in need of urgent medical attention due to drug use or intoxication, staff should not hesitate to call paramedics. It is better to err on the side of caution and seek medical help promptly rather than risk the customer's health and safety.

## **Cleaning staff procedures and responsibilities;**

### **Checking Toilets and Other Areas**

During Operating Hours:

- Regularly inspect toilets and other common areas (e.g., staff restrooms, storage areas) for signs of drug use or paraphernalia.
- Pay special attention to secluded spots where drug use might occur.
- Report any suspicious findings to the management immediately.

After Operating Hours:

- Conduct a thorough inspection of all areas, including toilets, storage areas, and secluded spots.
- Document any unusual findings and report them to the management.

### **Actions to Take**

If You Find Drugs on the Premises

- Do Not Touch: Do not handle or move the drugs.
- Secure the Area: If possible, secure the area to prevent anyone else from accessing the drugs.
- Report Immediately: Notify the management or security team about the location and description of the drugs.
- Document Findings: Write a detailed report of the incident, including the time, location, and description of the drugs found.

## **Management procedure and responsibilities;**

This policy applies to all management and supervisory staff at [Hospitality Business Name].

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## Procedures and Responsibilities

### 1. Handling Found or Confiscated Drugs

- **Immediate Action:**
  - Secure the area where the drugs were found to prevent access by others.
  - Do not handle the drugs directly if possible. Use gloves or other protective measures if handling is necessary.
  - Place the drugs in a secure container and store them in a locked, designated area until they can be handed over to the authorities.
- **Notification and Documentation:**
  - Notify the General Manager and security team immediately about the discovery.
  - Document the incident in detail, including the time, location, description of the drugs, and circumstances of the discovery.
- **Liaison with Licensing Authorities:**
  - Contact the appropriate licensing authorities (POLICE) to report the discovery of drugs.
  - Ensure proper procedures are followed for handing over the drugs to the authorities.

### 2. Ensuring Overall Safety of the Venue and Operation of the Drugs Policy

- **Decision Making at Incidents:**
  - Assess the situation quickly and make decisions to ensure the safety of all guests and staff.
  - Coordinate with security personnel to manage the incident effectively.
- **Incident Reporting:**
  - Report all drug-related incidents to the designated email: [complaints@broadway.org.uk](mailto:complaints@broadway.org.uk).
  - Ensure that detailed reports are filed

### 3. Observation for Possible Problems

- **Routine Inspections:**
  - Conduct regular inspections of the premises, especially high-risk areas, to identify any signs of drug activity.
  - Ensure that all staff members are vigilant and report any suspicious activities immediately.
- **Placement and Upkeep of Zero Tolerance Messages:**
  - Ensure that zero-tolerance messages regarding drug use are prominently displayed throughout the venue.
  - Regularly check and replace signs as needed to maintain visibility and effectiveness.

### 4. Provision of Training for All Staff on Drug Awareness

- **Training Programs:**
  - Organize regular training sessions on drug awareness and the venue's drug policy for all staff members.
  - Include information on identifying drug use, handling drug-related incidents, and the importance of maintaining a drug-free environment.



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## 5. Management of Incident Reporting

- **Filing and Logging Reports:**
  - Ensure that all drug-related incidents are properly reported, filed
  - Maintain a secure and confidential system for storing incident reports.

## 6. Upkeep and Management of CCTV

- **CCTV Monitoring:**
  - The General Manager is responsible for the upkeep and management of the CCTV system.
  - Ensure that all areas of the venue are adequately covered by CCTV and that footage is regularly reviewed.
  - Use CCTV footage to assist in investigating drug-related incidents and to provide evidence to the authorities if needed.