



Hackney Best Bar None Award Scheme

On Licence
Guidance



**METROPOLITAN
POLICE**

Working together for a safer London



LONDON FIRE BRIGADE



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How to use this Guidance

This guidance sets out the processes to be employed for the implementation of the Hackney Best Bar None Award Scheme (“the scheme”) and the principles to be applied when determining applications. This guidance is in no way intended to be a comprehensive breakdown of all the considerations that may apply in decision making. It merely seeks to share the general principles and practises which will be adopted to ensure a consistent, proportionate, transparent and fair approach when assessing applications.

Any licensee, applicant or otherwise, may wish to peruse this guidance to obtain information on good practice and responsible trading. This will also be available to assessors and to the general public.

It is advised that applicants read this guidance in conjunction with the Council’s Statement of Licensing Policy which provides detail on the types of measures applicants are encouraged to apply where appropriate. Copies of the licensing policy are available from the Licensing Service or via the website at www.hackney.gov.uk/licensing.

1. Introduction and Background

- 1.1 The Hackney Best Bar None Award Scheme acknowledges and recognises the licensed trade's contribution to making Hackney a safe and professional environment in which to live, work, visit and socialise.
- 1.2 Run jointly by Hackney Council, London Fire Brigade and Hackney Police ("the organisers"), the scheme builds on the Home Office recognised model of Best Bar None and seeks to establish a standard of operational excellence in Hackney's licensed premises. In doing so, the scheme recognises:
 - Good management practises
 - Customer care programmes
 - Safe drinking promotions
 - Prevention of crime and disorder practises
- 1.3 The award will be judged on the efforts that the licensed trade make to provide a safe and pleasant environment for their patrons, as well as in reducing unnecessary problems for those who live nearby. The scheme is based on the licensing objectives, each holding equal weight, which are:
 - The prevention of crime and disorder
 - Public safety
 - The prevention of public nuisance
 - The protection of children from harm
- 1.4 The scheme is a comprehensive yet locally flexible accreditation process that makes use of multi-agency inspection visits to licensed premises.
- 1.5 Participation in the scheme will initially be open to a specific geographical "application area" as defined by the organisers. Where resources permit, it is the intention that the scheme is extended throughout the Borough to all on-licence and off-licence premises.

2. Consultation on the Guidance

2.1 This guidance has been circulated to the following authorities who support the scheme:

- The Home Office
- Hackney Police
- Trading Standards
- Environmental Health (Health and Safety)
- Environmental Health (Noise and Pollution)
- Environmental Enforcement
- Child Protection
- Planning Authority
- Community Safety
- Fire Authority

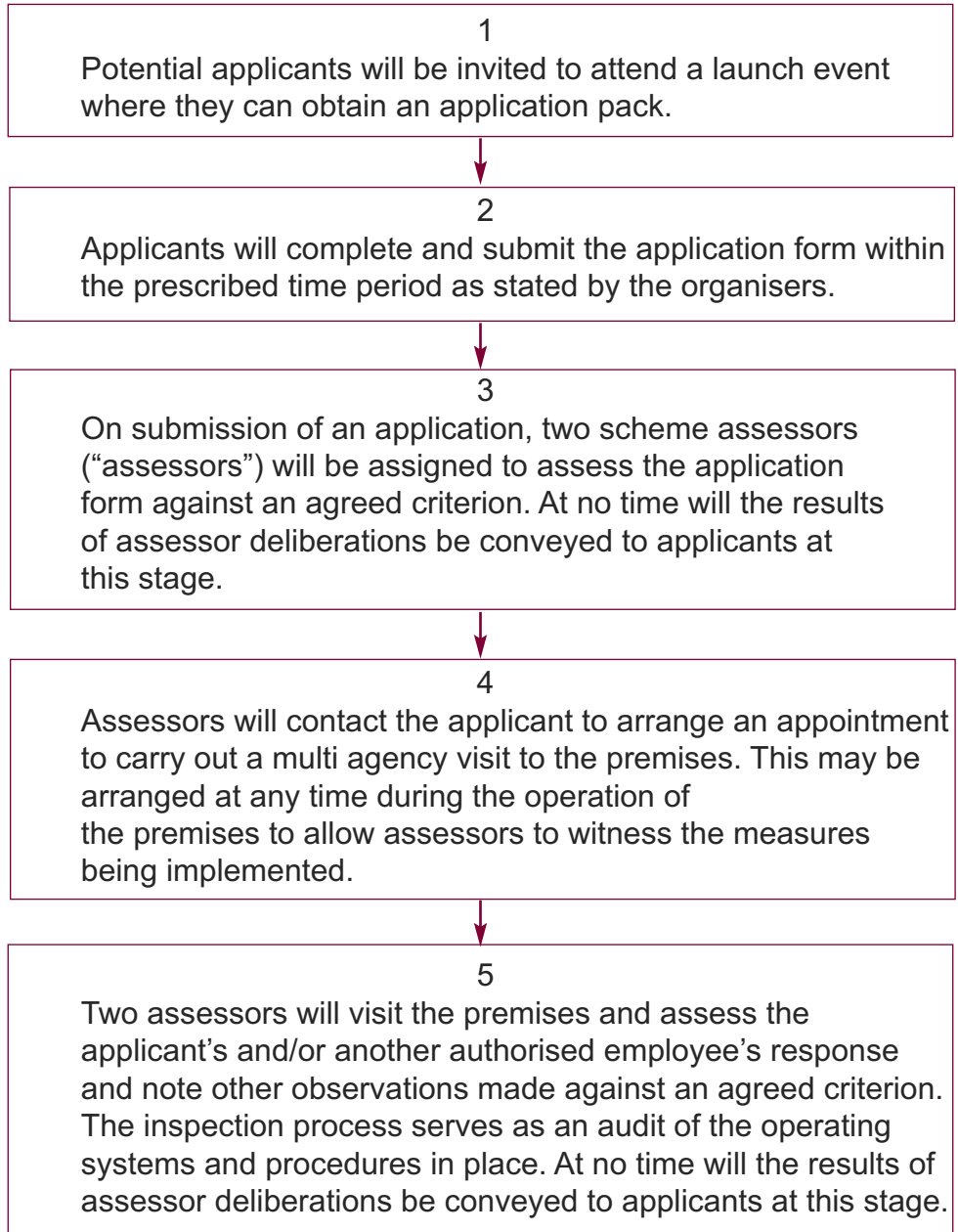
3. Aims of the Scheme

3.1 By implementing the scheme and working together with licensees, Hackney Council and Hackney Police aim to achieve the following:

- Promote Hackney's Statement of Licensing Policy and the licensing objectives
- Establish standards of excellence for the management and operation of Hackney's licensed premises
- Promote good practice
- Encourage a responsible drinking culture within Hackney
- Judge on the efforts made to create a safe and pleasant environment for patrons, visitors, staff and local residents
- Encourage liaison with licensees, enforcement agencies and the licensing service
- Assist in the management of Hackney's night time economy

4. Application Process: An Overview

4.1 The application process involves a program of assessment as detailed below.



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The assessors will report their conclusions to a judging panel arranged by the organisers.

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The judging panel will consider the report of the assessors to accredit and/ or award premises. They may take into account any factors relating to the licensing objectives which they deem appropriate in their decision making.

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An awards ceremony will be arranged where the results of the scheme will be announced. Accredited premises will receive an accreditation certificate. The top three premises with the highest marks will be awarded a wall plaque to be displayed on their premises. This aims to create a “benchmark” for safe and well run licensed premises.

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All applicants will be offered feedback sessions to receive advice and guidance on how to further improve the operation of their premises.

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In an effort to share best practice, the organisers will prepare a briefing on the best practices highlighted and evidenced during the application process.

5. Eligibility

5.1 Applicants may apply to take part in the scheme where they are:

- a) The Designated Premises Supervisor (“DPS”) of a licensed premises situated within the application area;

- b) The Premises Licence Holder of a licensed premises situated within the application area; or
- c) An employee of the licensed premises who has been authorised by those individuals mentioned in either a) or b) above to take part in the scheme.

5.2 Applicants from the following class of licensed premises within the application area may participate in the scheme:

- Pubs
- Bars
- Clubs
- Restaurants where alcohol can be served where it is not ancillary to a table meal
- Off-Licensed premises

5.3 Applications will not be considered for accreditation where:

- The application form has not been submitted within the specified time period
- There are pending prosecutions relating to the premises
- A noise abatement notice or other enforcement notice has been served within 12 months of the scheme's launch date
- The premises are operating without the relevant licensing and planning permissions in place.

6. The Application – Terms and Conditions

6.1 As previously stated, eligible applicants will be invited to submit an application form where they will be asked about the measures, systems and operations they use in promoting the four licensing objectives.

6.2 By participating in the scheme, applicants will be signing up to the following terms and conditions:

1. As in paragraph 5.1 above applicants must be either:

- a) the Premises Licence Holder
- b) the DPS or
- c) an employee authorised by the Premises Licence Holder or DPS of the licensed premises situated within the stated

application area

2. Applications must be completed and returned to the organisers within the stated time limits
3. All winning and accredited premises will be judged by a panel on the basis of the application received
4. The judging panel's decision will be final and no correspondence will be entered into
5. All winning and accredited premises will be announced when the application period is finished and in a manner described by the organisers
6. Any prizes awarded are non transferable and there is no cash alternative
7. At the time the awards and/or accreditation certificates are presented to the premises, the premises have reached the agreed accreditation standard. If the standard at the premises falls at any time, the awards may be withdrawn and revoked at the discretion of the organisers
8. Receiving an award and/or accreditation certificate does not provide the premises with any immunity from prosecution for any offence. It is not a guarantee of the safety of the premises
9. All awards, plaques and accreditation certificates remain the property of Hackney Police and Hackney Council
10. The award winning premises do not represent an endorsement by Hackney Police, Hackney Council, London Fire Brigade or any other authority supporting the scheme.

7. Principles for Decision Making: Best Bar None?

- 7.1 The scheme encourages good, responsible practice throughout the licensed trade via a points-based accreditation process.
- 7.2 In order to meet the scheme's objectives, regard must be made to:
 - The assessment criterion, as defined by the organisers; and
 - The four licensing objectives

- 7.3 No greater or lesser weight will be attributed to each of the licensing objectives and each will be treated with equal importance. However, the impacts of premises' activities on the objectives will be considered on a case by case basis.
- 7.4 The objectives will be assessed against a series of agreed essential criteria. Essential criteria will typically set out the general standard expected of a responsible operator in the day to day running of their premises. To reach accreditation, all essential criteria must be evidenced through the application process.
- 7.5 It is not sufficient to merely state in the application form that a measure is in place. Assessors and the judging panel will expect to see that these measures have been evidenced and implemented to their satisfaction, whether this is demonstrated through the application form or via the inspection visit.
- 7.6 Where appropriate, further credit may be awarded where assessors are satisfied that there is a higher standard of operation and innovative practice being implemented in the premises. For more details of this, please see paragraphs 9 and 10 below.
- 7.7 Points will be awarded on the principles of proportionality. Decision making will be fair and proportionate. Marks will be achieved where measures and systems are demonstrated and implemented to the satisfaction of the assessors depending on the nature, size and capacity of the premises. All such measures will be taken on their individual merits and on a case by case basis.
- 7.8 When assessors report their conclusions to the judging panel, the panel will accredit and award premises where they deem it appropriate and where they are satisfied that:

- a. Since the scheme's date of launch, no formal enforcement proceedings have been lodged against the premises or its employees
- b. Accrediting or awarding the premises will not undermine the licensing objectives and
- c. Accrediting or awarding the premises will not undermine the aims and objectives of the scheme

7.9 Following the accreditation of premises, if at any time the premises operate in such a way that would undermine the aims and objectives of the scheme, the organisers may at their discretion withdraw and revoke the accreditation. This may also be publicised locally by the organisers.

8 All decisions relating to the scheme are final.

8. Essential Expectations

8.1 Applicants will note that in order to achieve accreditation, essential measures, systems and procedures must be implemented and operating to the satisfaction of the assessors. Applicants must score 100% on the essential criteria to be accredited.

8.2 The following sections give examples of the factors each assessor will take account of when determining an application. For ease of reference, these have been categorised into the relevant licensing objectives.

Prevention of crime and disorder

8.3 Applicants will be expected to demonstrate to the satisfaction of the assessors that the premises has effective and proportionate measures, systems and/or policies (written, where appropriate) in operation to:

- a. Manage and control the premises' capacity at all times
- b. Review the security systems at the premises. This is to assess whether change(s) can be implemented in response to particular situations

- c. Maintain an Accident Log which complies with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995)
- d. Monitor the level of drunkenness of customers and take appropriate action where required
- e. Understand licensee legal responsibilities with regard to the sale of alcohol
- f. Train all staff on drunkenness. Such training must include:
 - i. How to deal with a customer who appears to be drunk and attempts to be served
 - ii. How to deal with a customer who is excessively drunk within the premises
 - iii. The legal obligations for staff
- g. Maintain a zero tolerance policy against the use of drugs on the premises. This may include:
 - i. The maintenance and display of notices in prominent places
 - ii. Drugs amnesty safe
 - iii. Full search policy for drugs on entering the premises
 - iv. Regular toilet checks for drug use and/or supply
 - v. Removal of smooth surfaces in toilet areas
 - vi. Lubricant such as vaseline over smooth surfaces
 - vii. Staff training on drug awareness
 - viii. How staff should treat any dubious substances (ie. call the police)
 - ix. Membership with Pub Watch which raises drug awareness
 - x. Cooperation with the Police using Drug Ion Itemiser equipment to detect the use of drugs in the premises
- h. Maintain a crime prevention/ anti-theft strategy whereby measures are adopted to prevent thefts of property belonging to customers. This may include:
 - i. Bag clips under tables
 - ii. Mirrors
 - iii. Roving security patrols
 - iv. Notices in prominent places displayed and maintained
 - v. Cloakroom facility

- vi. DJ announcements
- vii. Regular toilet checks
- viii. CCTV
- i. Train staff on what licensees can do to prevent offences of theft from occurring in the premises
- h. Maintain adequate physical security to protect the premises
This may include:
 - i. An operational alarm system
 - ii. Secured staff, residential area or manager's office
 - iii. Secure window locks
- k. Maintain a policy on potential outbreaks of disorder. This will involve how the premises identify problems and how these are dealt with

Public Safety

- 8.4 Applicants will be expected to demonstrate to the satisfaction of the assessors that the premises has effective and proportionate measures, systems and/or policies (written, where appropriate) in operation to:
- a. Maintain a first aid facility
 - b. Collect drinking glass. This may include:
 - i. Dedicated glass collectors
 - ii. Licensee or Manager collects glass
 - iii. Glass is collected by bar staff on rotation
 - iv. A table service is offered
 - v. Notices are displayed prominently and maintained
 - vi. Consideration for polycarbonate glasses
 - c. Maintain a fire detection system at the premises
 - d. Ensure all fire exits are free from obstruction at all times and are well lit
 - e. Carry out a fire risk assessment and monitor this
 - f. Train all staff in fire evacuation procedures
 - g. Ensure building safety with a policy to effect building repairs or building contents in an efficient manner
 - h. Carry out a health and safety risk assessment and monitor this

Prevention of Public Nuisance

- 8.5 Applicants will be expected to demonstrate to the satisfaction of the assessors that the premises has effective and proportionate measures, systems and/or policies (written, where proportionate) in operation to:
- a. Effectively manage noise emanating from the premises and from customers arriving and departing from the premises, particularly from 23:00 – 07:00 hours

Protection of Children from Harm

- 8.6 Applicants will be expected to demonstrate to the satisfaction of the assessors that the premises has effective and proportionate measures, systems and/or policies (written, where proportionate) in operation to:
- a. Deal strictly with customers under the age of 18 years old who may enter the premises and attempt to purchase alcohol. This may include:
 - i. Notices prominently displayed at the premises
 - ii. Staff training
 - iii. Identification checks to those suspected of being under the age of 21 years old
 - b. Ensure staff are trained on under age sales

9. Desirable Practices

- 9.1 Applicants may wish to consider the implementation of the following examples of desirable practises in licensed premises. Again, these will be assessed on the basis of proportionality. These measures set out a higher standard of operation that licensees should aim to achieve. However, it should be noted that irrespective of how many points are scored under this section or the bonus points section, if applicants do not meet the entire essential criterion, they will not be accredited.
- 9.2 This list is not exhaustive and merely seeks to illustrate the types of activities recognised as good practice.

9.2.1 Prevention of crime and disorder

- a. Assessing the premises' capacity using:
 - i. Mechanical clickers, numbered tickets, till sales or similar;
 - ii. The "comfort factor". For example, whether the DPS or manager prevent the admission of further customers for any of the following reasons:
 - To ensure customers do not feel hemmed in
 - To ensure customers do not have to queue for prolonged periods at the bar which may cause agitation
 - To ensure the temperature does not rise to a point where the venue becomes hot and customers' agitation levels rise comparably
 - To ensure that the DPS or manager can retain control of all customers and all aspects of the general management of their premises
 - To prevent opportunist thieves taking advantage of any dense crowds which may make pick pocketing easier
 - To ensure that all routes to the bar, exits, toilets and other facilities are clear enough to allow easy access
- b. SIA registered door staff are employed to carry out one or more of the following functions:
 - i. Age checks of customers entering the venue
 - ii. Age checks of customers consuming or buying alcohol
 - iii. Toilet checks
 - iv. Ejecting customers
 - v. Dealing with injured persons
 - vi. Dealing with vulnerable customers
 - vii. Monitoring customer intoxication levels
 - viii. Dealing with lost and stolen property
 - ix. Recording details of incidents at the venue
 - x. Carrying out search policy
 - xi. Emergency evacuation procedures
 - xii. Detaining persons believed to have committed an

offence

- c. Written incident recording register
- d. Written lost or found property recording system
- e. Written ejected persons register
- f. Uniformed staff
- g. Effective CCTV system in place. That is, there is:
 - i. An accessible hard drive system OR
 - ii. VHS system
which complies with the following:
 - There are a minimum of 28 tapes, preferably 31 tapes (one for each day of the month) and these are kept in a locked and secure cabinet
 - Spare tapes are kept at the premises
 - There is written documentation relating to who inserts the tape on each day, who removes the tape each day and any details of police seizures of tapes
- h. Responsible drinks promotions which conform to a recognised industry code of practice. This will not include promotions which would in any way encourage drunkenness or anti social behaviour such as promotions:
 - i. That are an incentive to speed drinking
 - ii. Linked to unpredictable events, for example a “free drink with every goal scored”
 - iii. Which involve large quantities of free alcohol, for example “women drink free”
 - iv. Linked to images of sexual success or prowess
 - v. Which involve driving
 - vi. Which link entry fees to amounts of alcohol
 - vii. With indirect or direct reference to drug culture or illegal drugs
 - viii. Which encourage drinking by offering rewardsFor more information, visit:
 - British Beer and Pub Association website on www.beerandpub.com for “Point of Sale Promotions: Standards for the Management of Responsible Drinks Promotions including Happy Hours”

- Portman Group website on www.portmangroup.org.uk for “The Portman Group Code of Practice on the Naming, packaging and Promotion of Alcoholic Drinks”
 - Advertising Standards Authority website www.asa.org.uk for “British Code of Advertising, Sales Promotion and Direct Marketing”
- i. Staff training which ensures staff are aware about the policies on:
- Drunkenness
 - Responsible drinking
 - Toilet checks and/or drugs policy
 - Dealing with outbreaks of trouble or disorder
- j. Duty of care – a policy that all members of staff are aware of for dealing with customers incapacitated or vulnerable due to drink or drugs. This may involve a written procedure or simply calling the ambulance.
- k. Initiatives not to drink and drive, such as:
- Scooterman
 - “I’ll be Des” campaign
 - Free or reduced price soft drinks to the driver of the group
 - Free phone calls to local taxi offices or providing a service in arranging transport home for customers
 - Display of posters and publicity
- l. Use of documented code of practice on safer drug use. For example, the Home Office publication “Safer Clubbing” guide includes the following as a desired method of operation:
- Free drinking water available from the bar at all times
 - Isotonic drinks available from the bar
 - Signs advertising free water prominently displayed on the premises
 - Defined seating areas away from any main dance area
 - Air conditioning/ temperature control
 - Door staff trained in basic first aid/ drugs awareness
 - First aider trained to deal with basic drug associated

symptoms

- Search and drugs policy:
 - The management reserve the right to conduct searches of customer's outer clothing by same sex staff for their health and safety to prevent weapons/ drugs from entering the club. There should be signs at the entrance on this
 - Anyone refusing to be searched will be refused admission
 - Any seized drugs which are for personal use will be placed in a secure drug safe, in view of the person from whom they have been taken. The safe should be located near the entrance of the premise and be regularly emptied by Police
 - Persons found in possession of drugs for dealing or who are supplying drugs will be detained for the Police
- Policy on the disposal of drugs including:
 - A member of staff should seize the item and make a record of this seizure
 - The item should be placed into a sealed envelope with the description of the item and details of the date and time and person finding it written on the envelope
 - The item should be placed in a safe
 - The Police or other authorised authority should be contacted to collect and dispose of the item. A record of this is kept on the premises.
- m. Toilet checks and the management of toilet areas.
- n. Adoption of the Hackney Police and Council Drugs and Weapons seizure policy.
- o. For weapons other than firearms, a similar approach to drug recoveries should be adopted ie.
 - A member of staff should recover the item
 - A record of the recovery is made
 - The item is placed in a sealed envelope with description, date and time it was found

- The above should be witnessed
 - The item should be stored in a safe place
 - The police or other authorised authority are contacted to collect and dispose of the weapon
 - This disposal is to be recorded
- p. Firearms are NOT to be touched. The area of the firearm must be cordoned off and the Police must be contacted immediately.

9.2.2 **Public Safety**

- a. A first aider is on duty at all times
- b. Contact the Police and responsible authorities where events other than normal trading is to take place
- c. Provision of secure bottle bins within the venue
- d. Use of plastic glasses
- e. Regular perimeter checks outside the premises to maintain a glass free environment
- f. Any fire equipment is to be serviced and inspected regularly
- g. Completed daily/ weekly fire safety checks are documented
- h. Staff training on fire safety issues is provided
- i. A spillages policy is in place
- j. Telephone numbers of reliable taxi offices and/or bus timetables are displayed or available

9.2.3 **Prevention of public nuisance**

- a. Deliveries and servicing are carried out at times which are least likely to impact on neighbours
- b. Evidence engagement of attending 'Pubwatch' or similar group
- c. Regular litter patrols around the outside of the premises or other steps to maintain a litter and flyer free area
- d. Effective policy to minimise odour, light, antisocial behaviour, fly posting and highway/footpath obstructions from the premises and its customers
- e. Deal with the impacts of customers smoking and/or drinking in any authorised outside drinking areas (for more information, please refer to the Council/Police guidance

document on Outside Drinking available from the Licensing Service)

9.2.4 **Protection of children from harm**

- a. Documented staff training on child protection
- b. Posters warning of age restrictions are displayed and maintained on the premises
- c. Use only the following recognised forms of identification:
 - i. Driver's licence
 - ii. Passport
 - iii. Accredited "PASS" (Proof of Age Standards Scheme) card scheme (these cards carry a hologram)

A student card should NOT be used as a form of identification.

10. Bonus contributions to promote customer care and safety

10.1 Applicants may wish to consider the implementation of the following practises which are considered worthy of additional credit for ensuring the safety and comfort of customers. This will be applied on the basis of proportionality. However, it should be noted that irrespective of how many points are scored under this section, if applicants do not meet the entire essential criterion, they will not be accredited.

This list is not exhaustive and merely seeks to illustrate the types of activities recognised as good practice.

10.1.1 **Prevention of crime and disorder**

- a. Written policy available to staff on dealing with overcrowding, capacity management etc
- b. Dedicated CCTV operator or CCTV control room
- c. A written search policy. This may for example be a notice on the entrance door or bound document
- d. Documented security reviews detailing the issue, action taken and impact of this on the issue
- e. Use of mapping systems to identify crime hotspots within the premises

- f. Documented risk assessment of any drinks promotions, for example, managing and refusing entry, serving drinks to customers, monitoring customers and dealing with drunkenness
- g. Written tests for staff on:
 - i. Drunkenness
 - ii. Drugs
 - iii. Crime prevention
 - iv. Weapons
- h. Demonstration of use of an effective:
 - i. Drugs disposal policy
 - ii. Weapons recovery policy
- i. Regular liaison with the Police on lost/stolen property to cross check records
- j. Staffed cloakroom
- k. Property patrols. For example, staff with uniform patrol the premises whilst collecting glasses
- l. Designing out crime. Whereby the premises layout is considered for facilitating crime reduction/ prevention
- m. Crime scene preservation whereby customers are moved away from the scene of the incident and the area is undisturbed until examined by the Police

10.1.2 **Public Safety**

- a. A separate room within the venue to treat customers or staff (not necessarily a first aid specific room)
- b. The following actions are carried out when an event is to take place beyond the normal operation:
 - i. Communicate with local licensees on specific problems
 - ii. Attend local partnership meetings regularly
 - iii. Communicate with neighbours who may be affected
 - iv. Undertake a CIMOS risk assessment in consultation with the Police. Application forms can be obtained from Hackney Police Station
- c. Glass storage for outside areas. This may involve storing waste glass securely or covering outside drinking areas
- d. Use only of plastic glasses or safety glass

- e. Mock evacuations procedures are carried out (for example, with low lighting and smoke machines)
- f. Practical training on the use of fire blankets or extinguishers
- g. Written tests for staff on fire safety
- h. Provision of assistance in calling a taxi free of charge, free phone service or waiting area for customers. The “NOCTIS” dispersal policy may also be adapted as follows:
 - i. Operate a concierge facility or waiting area
 - ii. Advertise reliable taxi services with free phone numbers for licensed mini cabs, locations of mini cab offices, bus and other public transport timetables and available car parking facilities
 - iii. Agree with local taxis not to blow horns after 11pm
 - iv. Discuss the location of suitable taxi ranks with the Council
 - v. Consider with the Council and Police the use of stewards/marshals
 - vi. Work with the Council/TFL to agree bus routes, stops and timetables

To visit the NOCTIS website, go to www.noctisuk.org.

10.1.3 **Prevention of public nuisance**

- a. Tackling noise break out effectively by providing an indoor waiting area for customers leaving the premises
- b. Music policy to create a calm mood on departure
- c. DJ announcements to customers to leave quietly
- d. Noise report carried out and actioned to the satisfaction of the Noise Team

10.1.4 **Protection of children from harm**

- a. Written tests for staff on underage sales
- b. Involvement in Challenge 21 scheme

11. Contact us

For further information on this guidance, please contact:
Licensing Service, 263 Mare Street, London, E8 3HT
Tel: 020 8356 4970

Other useful contacts:

The Chief Officer of Police
Hackney Licensing Unit, Hackney Police Station, 2 Lower
Clapton Road, London E5 0PA
Tel: 020 8217 3339 / 020 8217 3385
Fax: 020 8217 3372

The Fire Authority
North East Area Fire Safety (Regulation) Team, East Ham Fire
Station, 210 High Street South, London E6 3RS
Tel: 020 8555 1200

The Local Planning Authority
Development Control Manager, Planning Department, 263
Mare Street, London, E8 3HT
Tel: 020 8356 8061/8067

The Area Child Protection Advisor
Area Child Protection Advisor, Social Services Department,
205 Morning Lane, London, E9 6LG
Tel: 020 8356 6082

The Environmental Health Authority (Pollution and
Environmental Enforcement)
Head of Pollution and Environmental Enforcement, Pollution
Department, 28-33 Independent Place, Shacklewell Lane,
London E8 2HE
Tel: 020 8356 4589

The Environmental Health Authority (Health & Safety)
Head of Environmental Health (Health & Safety),
81 Downham Road, London N1 5TR
Tel: 020 8356 4911
email: environmental.health@hackney.gov.uk

Weights & Measures Authority
Chief Trading Standards Officer, 81 Downham Road,
London N1 5TR
Tel: 020 8356 4929

The Portman Group
7-10 Chandos Street, Cavendish Square,
London W1G 9DQ
Tel: 020 7907 3700
Fax: 020 7907 3710
email: info@portmangroup.org.uk

British Beer and Pub Association
Market Towers, 1 Nine Elms Lane, London SW8 SNQ
Tel: 020 7627 9191
Fax: 020 7627 9123
email: web@beerandpub.com

British Institute of Inn Keeping
BII, Wessex House, 80 Park Street, Camberley, Surrey
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Tel: 012 7668 4449
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