



18 Soho Square, London W1D 3QL

10 February 2020

Premises Licensing Team
Westminster City Council
Westminster City Hall
4th Floor, 64 Victoria Street
London SW1E 6QP

Dear Licensing

RE: SUNSET STRIP, BASEMENT TO FIRST FLOOR, 30 DEAN STREET LONDON W1D 3SA - APPLICATION FOR RENEWAL OF A SEXUAL

We refer to the above application listed for hearing on 13 February 2020.

Mr Forde will be attending the hearing and he is one of the owners of Sunset Strip. Mr Forde is of good character and has no criminal convictions or bankruptcy and has owned Sunset Strip for more than 20 years. Mr Forde aims to provide the best customer experience in terms of service and facilities in a well-managed compliant environment and has always operated in complete openness with all the responsibility authorities, which can be verified by the officers.

As the inspectors can verify, the venue's policies are enforced by a series of procedures ranging from mere interventions, verbal and written warnings to the termination of a performer's contract. New performers sign a contractual agreement, attend an induction meeting, staff emphasise that Sunset Strip is a no touching club.

There is full CCTV in the venue, which is available to be viewed at any time by the Responsible Authorities.

Currently, there are always a minimum of two SIA on duty at the venue when it is trading. One is stationed at the entrance and one is roaming within the venue. There is also a CCTV monitor at the entrance to the premises, which shows the cameras recording in the basement of the premises. Security and bar staff can view the CCTV monitor and as officers will know, there have been moments when security and/or management have gone downstairs to view dancers more carefully based on observations from the monitor. Security staff are employed to enforce the rules of Sunset Strip more than for crime and disorder purposes.

In relation to the Licensing Authority's objection to the renewal of the sex establishment licence, the physical contact outlined are not in any way performers/customers engaging in sexual activities. The licence holder certainly acknowledges that some clips show deliberate touching and that the performers involved have been reprimanded. For example, the 2 dancers from the 19 October footage were dismissed from the venue as their conduct was not acceptable. Further comments as to this footage and the circumstances surrounding it will be raised at the hearing.

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Since the complaints the venue has improved signage and ensuring the refresher training is carried out on a more formal basis with the performers having to re-sign the codes of conduct. Supervision in the basement has also improved and at busier times security will also be positioned in the basement.

It is also noted that in between the visits of August and October 2019 the inspectors attended the venue and checked CCTV and watched dances taking place. There were no issues raised during this visit and the inspectors witnessed and commented that a number of dancers were self monitoring each other for compliance with the code of conduct- a practice the operator discussed with the dancers as another way to ensure compliance with the rules and regulations. This visit is not mentioned in the inspectors statements but it is important to mention it.

Respectfully, in considering the physical contacts described by the Inspectors, the City Inspection Team previously in charge of Sexual Entertainment Venues had not viewed casual brushing as serious or worth remarking on during their inspection visits. This is stated not as an excuse and the licence holders are aware that moving forward no touching means 'no touching'. We confirm that if there had been any doubt about that in the past the licence holders are clear going forward and on this basis it is important to note that the licence holders have not had any issues at the venue over the previous months.

In terms of the anonymous objections, which appear to have been written by the same person when considering language, punctuation and content, the comments presented are hearsay evidence. The complaints made by the objectors do appear serious on the paperwork, however the inspectors have visited the venue on numerous occasions each year, and we confirm that there have been no concerns of drug sales, overcharging, fake drinks etc raised with the operator over this time, based on actual observations of the inspectors.

In reply to the matters raised by the anonymous objector/s:

- a) Drug sales- this is vehemently denied. No previous concerns of this have been raised by inspectors or police. Staff and management are anti drugs and any performers or staff members found holding or taking drugs would be immediately dismissed and the Police called. Nevertheless, the venue has introduced a weekly drugs swiping regime where public and back of house areas will be randomly tested to prove this is not the position.
- b) Exchanging numbers- Again, this has not been raised previously. The prohibition of this is covered in the dancer induction and refresher training as well.
- c) Payment via own phone apps/overcharging- in the 20 years that Mr Forde has operated Sunset Strip he has never witnessed this activity and it is denied that it takes place. The pricing is displayed at the venue for customers and this is also told to customers.
- d) No duty manager- the officers will be aware that there is no merit in this claim. Mr Forde spends time in the venue in the day and evening and in his absence one of the managers is appointed the duty manager. Officers and Police have always known who is in charge when they enter the venue.
- e) No dancer schedule- the dancers are self employed and they may inform the venue if they are attending on a day/night (there are 2 shifts in a day), or they can just turn up (there is no requirement to tell management). This process has worked well over the

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years and the dancers and management know regular patterns of the performers, meaning that the venue always has performers in place. There is no requirement to have a formal performer rota and the business model of Sunset Strip does not require this.

- f) Selling fake drinks- this is not untrue and has no evidential basis. Trading Standards visited some time ago (6 years ago) and no issues were found and Mr Forde would have no difficulty should they attend again.

The venue further takes performer welfare very seriously and has welcomed Soho Illuminate into the Sunset Strip every week for some time. Members will have private conversations with the dancers to discuss safety and any other need they may have. They usually come on a Thursday evening and the dancers are aware of this- it provides another avenue to check on performer welfare and provide an inclusive environment for the dancers.

Mr Forde is not a known rule breaker and there is no evidence or accusation that either Mr Curran or Mr Forde knowingly permitting breaches of the licence conditions to take place. Our clients are very willing to work with the Council to ensure their venue operated in the appropriate and expected manner set out in the sex establishment licence.

We enclose some letters and messages of support from the dancers working at Sunset Strip for the benefit of Members.

Yours sincerely

LANA TRICKER