Clubs, Drugs and Doormen

Sheridan Morris
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Editor: Barry Webb
Home Office
Police Research Group
50 Queen's Gate
London SW1H 9AT
Police Research Group: Crime Detection and Prevention Series

The Home Office Police Research Group (PRG) was formed in 1992 to carry out and manage research relevant to the work of the police service. The terms of the reference for the Group include the requirement to identify and disseminate good policing practice.

The Crime Detection and Prevention Series follows on from the Crime Prevention Unit papers, a series which has been published by the Home Office since 1983. The recognition that effective crime strategies will often involve both crime prevention and crime investigation, however, has led to the scope of this series being broadened. This new series will present research material on both crime prevention and crime detection in a way which informs policy and practice throughout the service.

A parallel series of papers on resource management and organisational issues is also published by PRG, as is a periodical on policing research called 'Focus'.


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Foreword

The concentration of large numbers of young people at dance venues – night-clubs, pubs or large warehouses – provides an attractive lure to drug dealers who see these venues as potentially lucrative market places. This report shows how such venues can become the target of organised crime seeking to operate there through a strategy of ‘control the doors, control the floors’. Local drug misuse strategies must include action to disrupt and prevent such organised dealing from becoming established in dance venues. This report provides examples of good practice for the police, local authorities and venue managers in achieving this.

Two important ways in which this can be done are through improving and enforcing licensing conditions and registration of door staff, and both are areas which are currently receiving government attention. Guidance on introducing the new powers provided by the Public Entertainment Licences (Drugs Misuse) Act 1997 will shortly be published, and the Government is currently consulting on how the private security industry, which includes club door staff, might be regulated. Developments in both these areas will enable local action to better protect young people from drug misuse in dance venues.

S W BOYS SMITH
Director of Police Policy
Home Office
March 1998
Acknowledgements

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The Authors

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PRG would like to thank Dr Nicholas Dorn of the Institute for the Study of Drug Dependence, London, for acting as independent assessor for this report.
Executive summary

This report considers the links between dance venue door supervision and drug dealing, using case studies from two force areas (Merseyside and Northumbria) to illustrate the nature of this connection and develop proposals for its disruption.

Dance venues – whether these are large warehouses, night-clubs, pubs or bars – are potentially highly profitable sites of drug dealing. A recent survey by Release (1997) found that 97% of 517 respondents interviewed at dance events in London and the South East had taken an illegal drug at some point in their lives, and that 90% of these people had taken or planned to take an illegal drug that evening. The most common drugs involved were cannabis, ecstasy, amphetamines and LSD.

Door supervision at dance events takes several different forms. Some venues employ staff on a purely personal and individual basis; others appoint door supervisor teams, which may operate at more than one venue; and in some cases door supervision is provided by registered companies which are likely to be larger than the teams and may also be involved in non-entertainment security provision. The minority of door staff who are involved in drug dealing operate in various ways. Staff may simply turn a blind eye to dealing activity, receive payment in return for permitting dealing on the premises, or act as dealers themselves. The report examines two cases of door staff involvement in drug dealing. First, the strategy employed by a security company in Liverpool is discussed; secondly, the activities of door staff working as individuals and in teams in Newcastle are considered.

The Liverpool case study concerns a well-organised criminal operation in which a registered security firm took control of a large section of the door supervisor market in the city through intimidation and bribery. Once this was achieved, the criminals behind the firm used their position to facilitate and dominate drug dealing within the premises they were charged to protect; this strategy is summed up by the expression ‘control the doors, control the floors’. An intelligence-led police operation resulted in the conviction of this team, but within a year other members of the group created another security firm and were attempting the same strategy.

In Newcastle, a picture emerges of drug-based criminal groups which provide relatively few door supervisors themselves, but use intimidation and violence to force existing door supervisors to allow the operation of ‘approved’ drug dealers under their supervision. One estimate by local officers is that no more than ten per cent of door supervisors are selling drugs themselves, working for drug dealers as door supervisors or receiving a tax from dealing within venues they controlled; nevertheless this figure is a cause of concern. The situation in Newcastle may be a product of various local factors, including the absence of a criminal grouping with the inclination and commercial acumen to develop a significant door security ‘business’. A further factor is the introduction of a door supervisor registration scheme by Newcastle City Council in 1990, which prohibits a number of key criminals from continuing as door supervisors in the city area.
The report also presents a good practice case study, which illustrates a number of measures that can be taken in order to overcome the kinds of problems found in Merseyside and Northumbria. A code of practice between the Ministry of Sound night-club in London and the local Metropolitan Police Sector Inspector is the basis of a good working relationship which facilitates the exchange of information and the vigorous use of the powers of citizen’s arrest by club security personnel.

**Proposals**

Measures for disrupting criminal door teams and drug dealing in venues are proposed, which involve the police, local authorities and venue management:

**For the police:**
- Integrate and co-ordinate the intelligence and operations of uniformed and CID units.
- Make more vigorous use of licensing units that administer the licences required for the operation of venues.
- Monitor changes in door supervisor provision and the key figures behind door providers.
- Increase awareness of drug dealing techniques in clubs.
- Insert detainment teams prior to raids, following undercover observations and test purchases.
- Establish a relationship with venue managers and provide training in the powers of citizen’s arrest for club security staff.
- Carry out high profile police activity to deter dealing.

**For local authorities:**
- Introduce and enforce door registration schemes.
- Adopt a strategy to inspect venues and enforce registration and health and safety regulations.

**For club owners and managers:**
- Use only registered door supervisors from registered companies.
- Employ a split security team, with door supervisors from outside the area alongside local staff.
- Strengthen club management and training.
- Ensure door supervisors actively search out and arrest individuals found in possession of suspected drugs.
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1. Introduction

This report seeks to illustrate how focusing on the organised subversion of door supervision by criminals involved in drug dealing represents a means by which such groups can be identified, investigated and disrupted. The report does not intend to suggest that all door supervisors and door security teams are involved in drug dealing; indeed, as one case study illustrates, effective ‘clean’ security teams can produce good results in tackling the presence of dealers in clubs. Neither does it seek to suggest all significant drug-related gangs are involved in the provision of such services. What it does seek to illustrate is how a legitimate enterprise – venue supervision – can facilitate illegitimate activity – drug dealing – and can also itself be corrupted by criminal elements. The entry of organised criminal groups into door security, especially registered door provision, involves a level of exposure not found in their mainstream dealing activity and thus represents a potential window of opportunity for the police to target them.

Organised crime

The definition of organised crime has always been problematic. The Home Affairs Committee on Organised Crime were unable to define it, but rather felt that ‘... the law enforcement bodies should all be properly attuned to the various ways in which serious or complex crime can manifest itself’ (Home Affairs Committee on Organised Crime, 1995). One of the more functional definitions encountered, and one used by a force in this research, is that adopted by Merseyside Police who define organised crime as:

That committed by groups of people whose activities are primarily focused on illegal gains, and who systematically commit offences which have, or potentially have, serious consequences for society and who are capable of successfully protecting their interests, in particular by being prepared to use violence or corruption to control or eliminate persons (Merseyside Police, 1997).

Having proffered a definition of what organised crime might be said to be, albeit in the broadest of terms, one must then consider the characteristics of those groupings who commit it. In this respect the UK experience may be considered quite distinct from the experiences of the USA and Italy in tackling historical familial or syndicated organisations, as typified by the Mafia and the Cosa Nostra. Such organisations may be termed ‘federal’ structures, in contrast to the generally looser, entrepreneurial and task-oriented criminal groupings found in the UK. Hobbs (1995), one of the few British researchers to examine organised crime in the UK, makes the point:

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1. The term door supervisor has been adopted in this research although female staff are found very rarely and predominantly only in larger premises where they are required to search women.
INTRODUCTION

Certainly in relation to British organised crime, it is apparent that each criminal activity generates, and is reliant upon, organisational structures that are unique to that activity. Consequently, in the absence of traditional hierarchically based Sicilian-American organised crime, British professional criminals have developed from well-established configurations of acquaintances and family to ad hoc coalitions that can be adapted to the exigencies of the contemporary market, with ‘alliances and networks flow[ing] from their exceptionally flexible frame’.

Such a description is similar to that adopted by Merseyside Police, a force with extensive experience in tackling organised crime groups:

... crime groups may be described as an extended network in which numbers of people, often operating in cliques or groups, are connected to each other in either transitory or (semi) permanent relationships. Sometimes family based, sometimes 'friends of friends'. These groups, in whole or in part, come together when the need arises.

In these networks private figures and individuals and groups with more power may be discerned. Many of these relationships are not stable. Often group, sub-group, or individual interests clash creating violent conflict, resulting in groups fragmenting, shifting allegiance and consequential new coalitions (Merseyside Police, 1997).

Thus the structures considered in this report are predominantly based around often short-lived criminal ‘groupings’ operating at times in an organised manner, rather than permanent groups possessing an identifiable internal structure.

Drugs and clubs

The market that the criminal groups in this report are targeting developed during the mid 1980s with the emergence of the ‘dance drug’ scene amongst popular youth culture, representing a new front for both criminals and enforcement agencies. The term venue has been used in this report to cover large warehouses, premises traditionally recognised as night-clubs, and pubs or bars, especially those which feature music and a dance floor. In discussing the recent links with dance venues and drugs, the early term of ‘rave’, frequently used to describe this type of leisure/musical milieu, is now misleading. This type of music and venue has changed and multiplied extensively, the illegal warehouse parties of the 1980s having given way to permanent, legal locations. The combination of drug use with a strong dance orientation can now be found amongst attendees of regular ‘high street’ night-clubs and disco bars.
Some insight into this new market is provided by a recent survey conducted by Release (1997) in dance venues in London and the South East. Ninety-seven per cent of the survey's 517 respondents had taken an illegal drug at some point in their lives. This is twice the level of drug use as that found amongst 16-29 year olds by the 1996 British Crime Survey (Home Office, 1997). The respondents in the Release survey were nine times more likely to have taken ecstasy (81%) and 5 times more likely to have taken amphetamines (81%) compared to the wider BCS sample. In looking at drug use at the dance venues on the evening of the interviews, four key drugs emerged: cannabis (59%), ecstasy (53%), amphetamines (39%) and LSD (16%). Ninety per cent of those who had ever taken a drug intended to do so that evening, suggesting that most were current users. Sixty-eight per cent named ecstasy as their favourite 'dance' drug – a finding supported by other studies (Handy et al [forthcoming], cited in Release, 1997) – although the most popular 'general purpose' drug was cannabis (64%), with only 28% naming ecstasy as the drug they preferred for domestic consumption. Focusing on ecstasy use, a large number (39%) only used it at dance events, though a similar number (41%) occasionally consumed the drug outside such venues.

Forty-six per cent of respondents to the Release survey generally bought from 'a dealer who sells regularly'. Whether such dealers were present inside venues was not reported, though numerous anecdotal reports and the results of police operations clearly indicate that dealers operate close to the consumers inside the venues themselves. Of the remaining Release survey respondents, 50% bought drugs from 'a friend who did not sell regularly', though of course such friends have in turn to obtain the drugs from another source, possibly a dealer.

Organised door supervision

A door supervisor has been defined by the Home Office as 'a person employed on premises which have a music and dancing licence [Public Entertainment Licence – PEL] in operation with authority from the owner or landlord, exclusively or mainly, to decide upon the suitability of customers to be allowed on those premises; and/or to maintain order on those premises' (Home Office, 1995). Extensive discussions with detectives and uniformed officers, and consideration of police intelligence, led to the identification of varying levels of organisation in the provision of door staff to licensed premises.

Individual employment. The owners or managers of a club or pub may employ staff on a purely personal basis, with each door supervisor employed as an individual rather than as part of a contract or agreement to a named company or team of individuals.
INTRODUCTION

Staff may be employed on a contract or non-contractual basis, with individuals being paid cash-in-hand on a nightly basis at smaller premises. This is the least organised form of door supervisor provision.

'Team' employment. The most common form of organised security was found in the provision of door supervisor 'teams'. A 'team' is retained to provide an agreed number of door staff at certain times at a specified venue. Such a team will normally, though not always, have a name, maybe even company headed paper and a presence in two or more venues; however, such an organisation will not be a legally registered company. A team's reputation and survival generally depends on the local credibility of the key individual(s) who 'front' it and the relationships they have with other head door supervisors. Such teams tend to focus purely on entertainment premises.

Security company employment. The most organised form of door supervision is that provided by registered companies. A greater level of management will generally exist beyond that of the 'team' and a 'head door supervisor' figurehead. Such firms may be larger and control more venues than a team outfit, the result of an aggressive drive for expansion, leading to inevitable clashes with other, smaller door security providers. Such firms may also be involved in other non-entertainment security provision such as construction sites and retail areas.

An important distinction amongst door supervisors is between those who are registered with a local authority-run scheme and those who are not. Many local authorities in England and Wales now administer schemes which require individuals who wish to work as door security staff to meet certain standards with regard to training, the wearing of identity cards and the submission of details of any criminal convictions. The employment of only registered door staff is a condition of the granting of a Public Entertainment Licence by the issuing authority to venues such as night-clubs. Pub type premises, holding merely liquor licences, are generally outside this scheme as their licences are granted by local magistrates, who have not sought to attach such conditions.

The role of door supervisors in drug dealing

Discussions with police officers and club managers identified varying types of door staff involvement in the availability of drugs - if they were not directly dealing themselves - within the premises they were charged with overseeing:

• The least ‘active’ role is that of turning a blind eye to drug dealing activity, sometimes as a result of intimidation from drug dealers.

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4 The term ‘registered company’ refers to the registration under the 1948 Companies Act of an enterprise with Companies House in Cardiff. Such registration requires the recording, for public access, of basic details such as a memorandum of association (i.e. its purpose), directors and an address.

5 The Home Office and ACPO have supported the creation of such schemes and practical guidance can be found in Home Office Circular 60/1995 (Registration Schemes for Door Supervisors). Registration schemes have largely been set up using powers conferred on the authorities responsible for the licensing of places used for public music and dancing which are found in the Local Government (Miscellaneous Provisions) Act 1982 and the London Government Act 1963.

6 A noticeable exception (from February 1997) being Manchester Licensing Justices, who, at the request of the police, attach to all new liquor licences a requirement for only registered door supervisors to be engaged where door security is required.
A more involved role is played by door supervisors who, whilst not actually involved in the supply of drugs, receive payment – in cash or drugs – from dealers for allowing them to trade. This role will also involve the removal of competing dealers not part of the organised protection.

The most active role played by door supervisors is that of a primary dealer, holding drugs for the floor dealers who actually sell the drugs to the customers. Once the floor dealers have sold their stock they will obtain further drugs from the door supervisor acting in a wholesaler role. The doorman may or may not hold enough merchandise for the whole evening, possibly having himself to obtain further suppliers from a main drug dealer.

The role of venue management in drug dealing

Again, discussions with police officers and club managers identified a number of scenarios regarding venue management involvement in drug dealing within premises they own, manage or are hiring as promoters. Managers may be:

- genuinely unaware of drug dealing;
- aware but not involved, and unable/unwilling, due to intimidation, to prevent drug dealing;
- aware but not involved, happy to turn a blind eye to drug dealing; and
- aware and involved in drug dealing.

A final scenario is one of club management aware of drug dealing within the premises, and being committed to tackling it. Case study three in the next chapter illustrates such a situation.
2. Links between clubs, drugs and door supervisors

The involvement of door supervisors in drug dealing in venues was examined in a number of ways. First, a review of police operations against pub and club venues over a two-year period was undertaken in Merseyside and Northumbria, to identify drug-related operations. Secondly, police records were reviewed to consider the extent of door supervisor involvement in drug dealing, violence and other organised offending. Finally, interviews were held with police officers from a number of departments including central crime teams, force intelligence officers and licensing units. The limits of such, often anecdotal, information are acknowledged but consideration of force intelligence and specific operations in each force do provide a qualitative insight into the complex and hidden world of the doors and drugs trade.

Study 1: Merseyside

During the period January 1995 to December 1996 six large-scale raids were undertaken against night-clubs, drug dealing being the primary target in all but one, though drug-related charges were brought in all. Examples of four operations, each of which targeted one venue, are given in Box 1:

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<th>Box 1: Drug-related operations against night-clubs in Merseyside 1995-96</th>
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<tr>
<td><strong>Operation 1</strong> (1995)</td>
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<td>A nine-month operation identified 20 floor dealers, overseen by door supervisors. Twenty-two individuals were charged with drug-related offences including intent and conspiracy to supply, one of whom was the head of security. Thirteen individuals were found guilty including one door supervisor. Charges against the remaining door staff are still pending.</td>
</tr>
<tr>
<td><strong>Operation 2</strong> (1995)</td>
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<tr>
<td>A three-month operation identified an ecstasy factory above a public house. Five individuals were convicted for conspiracy to supply, with sentences up to 14 years.</td>
</tr>
<tr>
<td><strong>Operation 3</strong> (1996)</td>
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<tr>
<td>A four-month operation identified a number of floor dealers. Following a raid, 10 arrests led to 10 custodial convictions for drug offences.</td>
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<tr>
<td><strong>Operation 4</strong> (1996)</td>
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<tr>
<td>A four-month operation led to a raid and 11 arrests for drug possession and supply. Eleven door supervisors were also charged with violent disorder. £2000 worth of drugs were recovered during the raid.</td>
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Unusually for its size and recent problems, Liverpool does not have a local authority door supervisor registration scheme. Four other local authorities in the force area (Knowsley, Sefton, St. Helens and Wirral), however, do administer such schemes; these authorities had 531 registered doormen between them in early 1996.
A police search of their force intelligence system found 49 door supervisors who were currently of interest to them in the Merseyside area. It is important to recognise that this figure does not show the proportion of individuals involved in door security who have criminal backgrounds. It will not include those individuals whose records make no mention of any connection to the door security world, and it will also miss those people with criminal records who have not attracted entries onto the intelligence system. These data do, though, help to illustrate the backgrounds of some door supervisors.

Nine of these 49 individuals had previous convictions for drug offences. Six of these nine had been found guilty of possessing drugs; two of them twice, three others with further charges pending. One individual had been convicted for drug production, another for drug supply and another for conspiracy to supply; the doorman convicted of drug production had been a director of security company A (discussed below), whilst the individual charged with conspiracy to supply had been the head doorman of a night-club in Liverpool. Two further individuals carried drug possession 'flags' on their files, indicating they were considered to be potentially in possession of drugs.

In relation to other offences, the 49 individuals, at the time of writing, had 28 convictions for violence and 27 more pending, between them, including three attempted murders and two murders. One had been convicted of witness intimidation and another had a charge relating to a juror pending. Ten individuals carried warning 'flags' relating to the possession of weapons (other than firearms). Regarding other forms of organised criminality, one individual had two convictions for possessing counterfeiting equipment, another had been convicted for possession of counterfeit currency and four individuals had been found guilty of handling stolen property.

Door supervisors, drugs and organised crime in Merseyside

During the late 1980s and early 1990s there had been continued, but low level, violence between door supervisors throughout the Merseyside area. At that time, no single group had a controlling influence over the provision of door supervisors in Merseyside.

Door supervisors were generally employed by individual clubs or pubs, though there was a loose 'clustering' of door supervisors in the key areas of Merseyside e.g. Liverpool city centre, Kirby, St. Helens etc; in such areas local individuals moved from venue to venue but stayed within their area. Thus, it would be unusual and generally not accepted if a city centre team were to undertake a contract in the Kirby area.

In December 1993 Merseyside police began an extended operation against company A, the most organised 'drugs and doors' crime group identified during this research. An established guarding security company, it moved into Liverpool city centre and began taking over the provision of door security at numerous entertainment venues.
This organisation was a registered company which, until its expansion, was known as a provider of security in the local construction and retail sectors, but had not previously come to the attention of the police.

The swift displacement of existing door security firms was engineered by making cash payments to key incumbent door supervisors to secure their services - physical intimidation and violence was metered out to those who refused. Any licensees who refused to accept their services were threatened with disturbances in their premises. The company appeared to be run by two key directors, one of whom was known to the police. This individual - brother A - was considered, along with two brothers (B and C), to be involved in drug dealing and club security.

Information was received which indicated that the company's door supervisors either sold drugs in the premises they regulated or otherwise vetted and took a cut from - 'taxed' - other dealers operating within 'their' premises. The philosophy of this approach is given in the expression 'control the doors, control the floors'. A secondary criminal concern related to alleged extortion against venue proprietors. The venue owner would pay the door supervisors cash each night whilst an additional invoice would be issued by company A for services provided.

Operation Aladdin was originated by a divisional CID Inspector in December 1993, involving a Detective Sergeant and eight Detective Constables. Four months of intelligence gathering gradually revealed the size of the criminal operation they were facing and highlighted the human and electronic surveillance resources required to mount a major operation. The scale of the drug dealing overseen by company A, with its large share of club and pub door supervision and the contacts it had in the region's drug supply fraternity, made the organisation unusual in that it controlled large aspects of the drugs marketplace as well as being responsible for drug supply at a local level. Company A was considered a valid target for the central Serious Crime Squad (SCS). With an additional two Detective Sergeants and two Detective Constables, led by an Inspector from the SCS, the key management figures and associated premises of company A were put under 24 hour physical and electronic surveillance.

During the eight-month period of surveillance little was initially directly gained as the suspects were very surveillance conscious and were cautious in their communications. However, a number of incidents contributed to the disruption and termination of company A's activities. Following intelligence, brother A (a director of the company) was arrested after making a major drugs purchase from an associate in Sunderland. The purchase was observed and the offender was later stopped and found with 250 ecstasy tablets in his car. Whilst on bail for this offence, intelligence again enabled the observation of another drugs purchase some months later. Another strike was undertaken, and on this occasion 2000 ecstasy tablets were found.
in the offender’s car, whilst another thousand were found in a search of his home, along with cocaine and heroin. Brother A received eight years after pleading guilty to conspiracy to supply drugs, thus avoiding any disclosure of the police surveillance operations. The Sunderland associate who supplied the drugs received four years for possession and the supply of drugs.

One night a fire broke out at the company’s business premises which were under surveillance. Subsequent review of the video recording system showed suspicious behaviour by the key members of the company both before, during and after the fire. It was later established that the fire had been set by the management in order to claim the destruction of financial records and thereby disrupt a VAT fraud investigation by Her Majesty’s Customs and Excise, initiated by information received from the SCS.

In January 1995, police arrested a number of individuals in a day of raids in the Merseyside area. Those arrested were charged with a number of drug-related offences and arson. Brother B and two other door supervisors were sentenced to three years for arson regarding the company’s premises. Following the discovery of £12,000 in his loft, brother C, who had acted primarily as a drugs courier for the company, received nine months after pleading guilty to the concealment of drug trafficking money. His car and the money were also confiscated under the 1986 Drug Trafficking Offences Act. Another director is still awaiting trial for the £250,000 VAT fraud.

Epilogue

With the removal of company A a void was created in the door security and drug dealing markets in Merseyside. As expected there was an increase in inter-door supervisor rivalry, with numerous teams vying to take up the opportunities in the market place. Within 12-15 months of the intervention against company A, company B emerged as a major force in door security both in Merseyside and in Warrington, Manchester and Southport. The catalyst for this rapid expansion was the need for door supervisors in pubs during the summer of Euro ’96, when inordinately large numbers of customers presented potential public order problems for licensees. Three key figures involved in the running of company B’s door operations were identified as being former head supervisors under company A. Again this organisation is a registered company, although the focus is purely on entertainment venues. During 1997 a number of incidents have occurred as door supervisors from company B have clashed with those of other teams, including the non-fatal shooting of a number of prominent door supervisors, both at work and in drive-by shootings of their homes. The partner of one security firm which resisted the loss of one of its contracts to company B was subsequently stabbed, allegedly by company B’s door supervisors.
Study 2: Northumbria

During the two-year period January 1995 to December 1996, 26 drug-oriented operations, including surveillance only jobs, were undertaken against pubs and night-clubs in the Northumbria area. Twelve such operations involved raids and arrests against premises, four of which were night-clubs, the rest being pubs, hotels and an entertainment complex. Examples are given in Box 2:

As of November 1997, Newcastle City Council had 507 registered door supervisors, whilst the force area as a whole had around 1200. Northumbria Police identified thirty-eight door supervisors who were currently of interest to their force. As for Merseyside, this figure does not show the proportion of individuals involved in door security who have criminal backgrounds. It will not include those individuals whose records make no mention of any connection to the door security world. These data do, though, again help to illustrate the backgrounds of some door supervisors.

Four door supervisors had been cautioned for possession of drugs, and a further nine carried drug possession ‘flags’ on their files. In relation to other offences, 25 of the 38 individuals held a total of 54 convictions for violence, including murder and manslaughter. Three individuals held firearm-related convictions, and a further six had been found guilty of offences relating to offensive weapons. Other convictions included arson, threats to kill, kidnap and false imprisonment. Thirteen individuals carried warning ‘flags’ relating to violence, three to firearms and five to the possession of weapons (other than firearms). Regarding other forms of organised criminality, two individuals had two convictions for handling stolen property, one for selling CS canisters and another for illegal beer importation.

Box 2: Drug-related operations against night-clubs in Northumbria

<table>
<thead>
<tr>
<th>Operation</th>
<th>Details</th>
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<tbody>
<tr>
<td>1 (1995)</td>
<td>Test purchases were made every weekend for three months in this club. On the night of the raid, 30 undercover officers were inside the premises to detain 10 targeted dealers. Seventeen arrests lead to 15 convictions for the supply of ecstasy and amphetamine, with sentences of 3-5 years.</td>
</tr>
<tr>
<td>2 (1997)</td>
<td>Ten weekends of observations and test purchases were made to identify dealers in one club. External video surveillance assisted in identifying target individuals. On the night, undercover officers detained dealers whilst 120 uniformed officers raided the club. Thirteen individuals were arrested for drug possession and supply. Four have been convicted as of 9/9/97.</td>
</tr>
</tbody>
</table>

As of November 1997, Newcastle City Council had 507 registered door supervisors, whilst the force area as a whole had around 1200. Northumbria Police identified thirty-eight door supervisors who were currently of interest to their force. As for Merseyside, this figure does not show the proportion of individuals involved in door security who have criminal backgrounds. It will not include those individuals whose records make no mention of any connection to the door security world. These data do, though, again help to illustrate the backgrounds of some door supervisors.

Four door supervisors had been cautioned for possession of drugs, and a further nine carried drug possession ‘flags’ on their files. In relation to other offences, 25 of the 38 individuals held a total of 54 convictions for violence, including murder and manslaughter. Three individuals held firearm-related convictions, and a further six had been found guilty of offences relating to offensive weapons. Other convictions included arson, threats to kill, kidnap and false imprisonment. Thirteen individuals carried warning ‘flags’ relating to violence, three to firearms and five to the possession of weapons (other than firearms). Regarding other forms of organised criminality, two individuals had two convictions for handling stolen property, one for selling CS canisters and another for illegal beer importation.

* Offences included assault, ABH, GBH, wounding, violent disorder and affray.
Door supervisors, drugs and organised crime in Newcastle-upon-Tyne

A number of differences were identified when it came to studying door supervision and drug dealing in Northumbria. First, the level of door supervision was not as organised or centralised as had been found in Merseyside. Door security was provided predominantly by individuals or relatively informal 'teams' headed and organised by a single key door supervisor. There was very little evidence of door provision by registered companies other than at the largest of clubs, nor was there evidence that any single door supervisor provider had a particularly significant stake in, and control of, the door business within the force area, although a handful of individuals were considered key players.

In the absence of any truly dominant players in security provision, a link between venue security and drug dealing did exist but was less organised, more indirect and on a smaller scale than that found in Merseyside. The picture that has emerged is one of drug-based criminal groups providing relatively few door supervisors directly themselves but forcing existing door supervisors, through intimidation and extreme violence, to pay a 'tax' for running a door, whilst also requiring them to allow 'approved' drug dealers to operate in the premises under their supervision. One estimate by local officers was that no more than ten per cent of door supervisors were proactively involved in drug dealing within premises by selling drugs themselves, working for drug dealers as door supervisors or actually receiving a tax from dealing within venues they controlled.

An illustration of the aggressive tactics of such criminal groups was the calling of a 'strike' by door supervisors in Newcastle. A call to a local newspaper, supplemented by word of mouth, indicated that on a chosen night door supervisors in the city would not work. The episode was organised to demonstrate the influence - to club owners, the police and other door teams - of a powerful unregistered doorman, allied with a violent drugs-oriented crime family. Those who ignored the strike were threatened with violent retaliation. Numerous door supervisors did not work that evening and many larger venues were forced to bring in security teams from outside the area.

Although no clear reason exists for the contrast with what happened in Merseyside, it may be that none of these organised criminals possessed the inclination or ability to manage a legitimate enterprise in a competitive environment on a day-to-day basis. It should be remembered that company A in Liverpool was an ongoing concern with an apparently legitimate and relatively successful manager, before its association with the criminal individuals who were to prove its downfall.

Another factor was the introduction of a door supervisor registration scheme by Newcastle City Council in 1990 which prohibited a number of key criminals from continuing as door supervisors in the city area. Whilst the impact of this initiative...
LINKS BETWEEN CLUBS, DRUGS AND DOOR SUPERVISORS

seems to have been overwhelmingly positive, police intelligence indicates that there are some criminal figures who maintain an element of influence in the city centre by intimidating or acting as the ‘hidden hand’ behind registered door supervisors. The loose nature of such teams and the lack of registered company details thus allow organised criminals and violent individuals to remain involved in ‘legitimate’ door supervision. Ongoing police operations are based around targeting key criminals in the hope that their absence through custodial sentences will break their influence on the relatively clean registered door supervisors and teams.

Study 3: Good Practice - The Ministry of Sound, London

The Ministry of Sound (MoS) is one of the major dance clubs in London. Opened in 1991, the club is located in south east London and comes under the operational auspices of Area 4 (South East) of the Metropolitan Police. Despite its prominence in the UK ‘dance drug’ music scene, its owner has consistently sought to tackle the drug consumption associated with clubs such as the MoS. The adoption of a partnership approach with the local police and vigorous action by the club itself has gained it a reputation as a ‘clean club’, although the management freely admit that the dealing within its premises can never be fully prevented and does occur.

The basis of the partnership approach between the club management and Area Commander is a code of practice for dealing with drug offences (Appendix A), established in 1995. The code covers a number of areas, namely:

- Drug use - general principles
- Common offences
- Powers of search
- Drug collection box
- Making an arrest
- Drugs on entry
- Types of drug
- Drugs within the club
- Drug dealers
- Drugs found in the club
- Drugs information
- Contacts.

Despite the code, the basis of co-operation between both parties are informal meetings, which occur at least once a month between the Sector Inspector, who has the primary responsibility for the club, and the venue’s management.

The club employs security staff wearing casual black clothing featuring the Ministry of Sound logo. One team secures the club entrance and searches customers as they enter, whilst another floor team patrols the interior of the venue, though individuals rotate positions throughout the evening. All security staff are linked by radio communications and trained in basic first aid, particularly in how to deal with drug-related incidents such as potential overdoses.

As well as responding to any problems within the club such as fights, the internal security team is charged with actively searching out floor dealers who have escaped the body search by the door team. When such an offender is identified the security
team will make a citizen’s arrest and inform the police. The police have provided basic training in evidential requirements to all the door and security staff, covering issues such as hearsay and continuity of evidence.

Occasionally, the security staff will patrol the streets in the vicinity of the club, especially if there have been any problems or at the informal request of the police. Concerns are drug dealing, disorderly or disruptive behaviour by clubbers, and theft from or of the cars of clubbers who park nearby. If security staff spot a suspicious individual they will phone the police with details.

To undermine possible links between the door staff and local drug dealers, half the door team, including the head of security, is brought in from the West Midlands every Thursday night and given accommodation in London until Sunday. The club adopted this approach after problems with its original, locally recruited door team. In addition to this measure, the club management monitors the performance of the security staff by indicators such as the number of citizen’s arrests made within the club. Finally, the club also uses the occasional ‘mystery clubber’ approach to test security procedures and the level of general service offered within the club.

Co-operation with police operations

As well as handing over suspected drug dealers to the police on a regular basis, the club is keen to bring in the police when it suspects that there are problems which are beyond its resources. During the summer of 1997 the police undertook a number of test purchase operations, at the club’s request, against dealers in the club who it was believed were part of a large oriental drugs organisation. When such operations strike, the club is keen to publicise its support and co-operation with the police. As well as seeking to prevent the tarnishing of the club’s reputation with local magistrates and the police, it wishes also to deter other potential dealers.

By the entrance to the club, where individuals are searched, is a secure-letterbox type facility. This is the ‘Amnesty’ box, where suspicious items seized from individuals – e.g. a pill – are disposed of on a no-questions-asked basis. Box 3 shows what was recovered from the box during a three-month period. There are only two keys for this box, held by the Sector Inspector and the Home Beat Officer. The box is emptied about once a month. The contents are recorded and then destroyed.

**Box 3: Seizures from the MoS Amnesty box, 1 June - 21 August 1997**

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>22 capsules of brown powder</td>
<td>3</td>
</tr>
<tr>
<td>15 wraps of white powder</td>
<td>2</td>
</tr>
<tr>
<td>61 white pills</td>
<td>1</td>
</tr>
<tr>
<td>17 coloured pills</td>
<td>6</td>
</tr>
<tr>
<td>21 shaped tablets</td>
<td>4</td>
</tr>
<tr>
<td>2 ‘pebble’ type pills</td>
<td>1</td>
</tr>
<tr>
<td>3 reefers</td>
<td></td>
</tr>
<tr>
<td>2 bags of herbal cannabis</td>
<td></td>
</tr>
<tr>
<td>1 piece of cannabis resin</td>
<td></td>
</tr>
<tr>
<td>6 bags of white powder</td>
<td></td>
</tr>
<tr>
<td>4 bags of brown powder</td>
<td></td>
</tr>
<tr>
<td>1 ‘tear gas’ canister</td>
<td></td>
</tr>
</tbody>
</table>
If an individual is found with a more significant amount of suspected drugs on their person or in their bag, or is spotted dealing in the club, they will be arrested and detained by the club security. Box 4 details the number and outcome of citizen’s arrests at the club during an eighteen-month period.

Box 4: Citizen’s arrests of drug dealers by MoS security staff, 10 June 1995 - 30 November 1996

During an 18-month period 46 incidents were recorded involving a total of 67 arrests for possession of drugs. Of those arrested, eight were women, eight were described as working in pairs and two ‘teams’ of two or more dealers were arrested. Among the 40 arrests where the amount seized was given, 18 individuals were found to be in possession of 20 tablets or more, the largest amount being 84 tablets.

Records indicate the seizure of over 761 tablets, 7 wraps containing white powder, 1 bag of white powder and 7 bags of suspected herbal cannabis. Twenty-seven arrests also led to the recovery of additional unspecified amounts of drugs.

The MoS was the forum for the launch of the London Drug Policy Forum code of practice on health and safety at dance venues during 1996 (part of which has been reproduced in Appendix B), and the management have supported a number of initiatives to tackle the drugs orientation of the ‘dance drug’ culture.
CONCLUSIONS AND RECOMMENDATIONS

3. Conclusions and recommendations

Police operations

Four differing police units were identified during the research as playing key roles in tackling the problems examined in this report: licensing, plain clothes, local CID and central squads.

Licensing units primarily administer licence applications and provide police representation to the magistrates court and the local authority regarding the granting of various licences required for the operation of venues. Most are also the force contact point with local authority door supervisor registration schemes. These officers often have detailed knowledge of the owners and managers of venues. For this reason, the gathering of information regarding police operations against Public Entertainment Licensed premises for this report was undertaken via licensing officers, rather than the central force intelligence bureaus. Such units also play a critical role in the revocation or prevention of the granting of licences to venues, providing them with a potentially powerful role in dealing with club management. One good example of this role was found in the test purchasing function of the Greater Manchester Police Central Licensing Unit, described in Box 5. Given the significant leverage the licensing unit has with venue managers, the development of a more vigorous role for such units should be considered.

Plain clothes teams, where they exist, are often a good source of intelligence regarding the activities of door supervisors and the character of various premises. In Merseyside, these officers are responsible for investigating all incidents involving door supervisors in the city centre, such as complaints of assault. With such frequent contact with door supervisors they are well placed to develop valuable knowledge of key individuals and the relationships between door teams.

Area and central CID teams often have a focus on the more organised aspects of criminality on the door security scene. Such activity may come to the attention of

Box 5: Greater Manchester Police Central Licensing Unit Covert Operations Team

As well as fulfilling the traditional roles of a licensing unit, the GMP CLU provides a service to all divisions in the force requiring investigations or intelligence gathering in licensed premises. The covert operations team is led by an Inspector who manages a Sergeant and five Constables placed with the unit on a secondment basis. Most officers are trained to level two test purchaser. Their objective is to detect offences, compile evidence and submit files to the relevant Sub-Divisional Commander. The team is used for a variety of investigations, breaches of the licensing laws, drug-related offences and of course can monitor the activity of door supervisors.
detectives via an informant or indirectly, perhaps via an investigation into violent incidents between groups. As in Merseyside, an investigation may begin with divisional CID officers and then be handed over to a specialist central squad when the extent of the problem becomes apparent and the resources are available.

The challenge for forces is to integrate and co-ordinate the roles of such departments which may be divided by the uniform/detective distinction and by geography. Area and central squad officers need to establish lines of demarcation whilst maintaining adequate lines of communication. Targeted operations require a continuous stream of germane and timely intelligence. The role of the force intelligence bureau (FIB) is crucial in integrating the concerns of the licensing officers regarding premises, the knowledge of the plain clothes team of who is working where, and the insights gained by detectives from informants. It was found that in one force, areas were not required to inform the FIB of locally-mounted operations. In the other, whilst such a requirement did exist, the registration of operations was patchy. Such problems represent a potential gap in the effective gathering of all available information.

Investigation

The basis of obtaining a window into the complex and changing nature of doormen provision and associated drug dealing is comprehensive and timely intelligence gathering. A few specific points of analysis can be highlighted:

**Monitoring doorman providers.** A reason to watch for are significant changes in doorman provision and large-scale doorman provision by a single individual, team or company. Given the territorial and volatile nature of doorman providers, significant changes in doorman provision may be considered as potential tension indicators, as ousted teams or individuals are likely to retaliate either against the new doorman providers or the management. Door staff changes may indicate a drive for expansion by an existing player. As a firm expands its share of the market so it is able to increase its control. The implications of such control are an enhanced ability to:

- intimidate other door supervisors;
- intimidate venue managers; and
- control and develop drug selling within venues.

As with company A in Merseyside, the sheer number of door staff the company was able to call upon enabled it to intimidate and neutralise other door providers. Venue managers then had little choice over whom to choose for their door security, leading to a further strengthening of the organisation’s position.
Monitor the key figures behind door providers. Door ‘teams’ will be led by a key figure or figures, whilst formal companies will be required to have registered directors. As was found in Northumbria, the introduction of a registered door supervisor scheme may lead to the registered door teams being controlled by un-registered individuals, barred from registration. Standard intelligence-based approaches will have to be relied upon for identifying such individuals. With registered security companies, individuals may be identified by obtaining invoices provided to venue management and then accessing the Companies House database. Identified individuals will be checked for associations with drug dealing and other organised crime activity. As was found when door supervisors were examined for this research, however, surprisingly few may have previous convictions for drugs offences and the basis of most targeting must be well graded intelligence.

Awareness of the drug dealing process in clubs. Plain clothes officers need to be aware of the techniques employed by dealers, their associates and doormen. Clearly, if door supervisors are not selling directly themselves, it will be necessary to first identify floor dealers and work back. In larger venues, dealing teams may number as many as 10-12 individuals, often with defined roles e.g. primary dealer, floor dealer, referrer, spotter/protection. A few points to consider are:

- Females are reported as increasingly being used to bring drugs into clubs (due to the absence of, or cursory, searching) and may also work the floor, referring customers to a dealer in a fixed, less exposed location.
- Any organised dealing operation will invariably feature floor dealers holding only a small amount of drugs. These individuals will re-stock from a dealer who will generally adopt a fixed and less exposed location. The drugs may not be kept on the latter’s person in case of his/her interception by security staff.
- Dealing teams may also separate the holding of cash and drugs, minimising the loss if one individual is identified.
- Solitary or floor dealers may adopt a certain ‘trade mark’ to identify themselves as dealers. Such signals are not obvious to the non-informed and constantly evolve. Previous examples include the blowing of a whistle or the flourishing of a fan when ‘open for business’.

Insert detainment teams prior to raids. As plain clothes police spotters and test purchasers are used to identify dealers in clubs when an operation is in preparation, their function can be switched to one of detaining targeted individuals at the moment uniformed officers enter premises during a large-scale raid. This practice was identified by officers as essential in ensuring dealers are arrested in possession of drugs as it takes only seconds for an individual to dispose of their drugs on the floor.

CONCLUSIONS AND RECOMMENDATIONS

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13 In one incident the primary dealer took up position sitting on a giant speaker cabinet. Afer his removal by security, his ‘stash’ was found inside the speaker cabinet, but could not be conclusively linked to him.
CONCLUSIONS AND RECOMMENDATIONS

Support from door supervisors. It should not be assumed from the occasional arrest or seizure by door security that supervisors are not involved in drug dealing within the premises. Such incidents often serve to mislead the police by merely offering up to them the odd ‘unprotected’ dealer, whilst also removing the competition to their own dealers.

Prevention

Any attempt at crime reduction must include preventive as well as detective elements.

Establish a relationship with venue managers. As illustrated in the Ministry of Sound case study, such liaison may be formalised with a code of practice. A relationship may help increase the police presence in a club and be a source of intelligence. Such contact also allows management concerns regarding door staff and/or drug dealing to be communicated to the police.

High profile drug dog visits. A new initiative is the use of sniffer dogs along queuing club-goers and, at the owner’s request, inside the venue. This service is now also being offered by private security firms and used by some national club companies. Most sniffer dogs are competent at detecting cannabis but not synthetic dance drugs, which are largely odourless. The use of sniffer dogs may, though, have a wider deterrent effect if young people are uncertain about the dogs’ capabilities. It is important, therefore, to ensure this response is both appropriate and proportionate to the local circumstances.

Help club staff to help the police. The effectiveness of citizen’s arrests by venue security and managers can be greatly aided by basic training regarding evidential issues and the recording of statements. Such training sessions may also be a two-way process, where officers learn from the door supervisors the latest dealing methods as previously discussed.

High visibility policing. High visibility police patrols both inside and outside clubs, supplemented by Armed Response Vehicle (ARV) protection for vulnerable clubs, seek to re-assure the public and deter criminal activity. Frequent checks on venues are made to ensure that only registered doormen are working, and liaison with the Benefits Agency allows additional scrutiny of the doormen. Numerous searches of doormen, their cars and their premises for weapons and drugs have sought to drive weapons off the street and to disrupt dealing within the clubs through the fear of detection by the increased police presence. A related operation, undertaken by traffic units, involves the establishing of road blocks at natural traffic ‘choke points’.

Impromptu checks are established at targeted times and locations (pre/post clubs, near hotspots) where vehicles and individuals are searched. Northumbria police have

14 Using the Section 60 powers of PACE.
conducted similar operations to deter the casual carrying of weapons in the city centre. These strategies echo the zero tolerance approach to policing, where a number of offences are countered by increasing the perceived risk to offenders, in this case door supervisors and associated drug dealers carrying either weapons or drugs.

The role of the local authority - doormen registration

A key measure lies with the door supervisor registration schemes run by the local authorities. Home Office guidelines exist regarding good practice in this area, but there are variations as local authorities tailor such schemes to their own needs, resources and police input. As with most regulatory mechanisms, however, such schemes are only effective if vigorously enforced. Enforcement can be done by local authority staff and police officers at any time, though a multi-agency approach may be considered more effective (see Box 6).

Box 6: A multi-agency approach to enforcement regarding night-clubs

The Wigan MBC Task Force is a multi-agency group of officers, comprising police, fire officers and representatives of the Council’s Environmental Health, Building Control and Licensing Departments. When the Task Force makes unexpected visits to premises during their peak operating hours, each officer enforces his/her own area of legislation. Clubs are checked for door supervisor registration and the required employment register, under-age drinking, occupancy limits and unobstructed fire escape routes. Results of infringements can include a verbal warning, a report to the Licensing Committee, or prosecution by an individual agency.

The vigorous enforcement of door registration schemes serves not only to drive out the use of unregistered door staff but also enables the monitoring of who is working where. Visits, if handled correctly, are also a source of contact with door staff, helping to engender relations and provide an opportunity to receive information from individuals who would not otherwise approach the police with fears or concerns. Such opportunities would be particularly valuable in scenarios where door staff are under pressure from other door teams or drug dealers. Inspections also continually remind venue managers of the potential threat of licence revocation if their premises are found to be poorly run or serving as venues for drug dealing. Although such revocations are rare, the threat of revocation or non-renewal is often sufficient for the owners of a venue to install new management, or for managers to install new security staff.

Door registration schemes, even when well enforced, are however not a panacea for the problems discussed in this report. In Northumbria, registered door teams were suspected of being controlled by organised criminals involved in drug dealing or
alternative forms of venue security provision. Such individuals clearly saw recognised door supervisor status as a way into lucrative drug markets and intimidated those already part of the scheme.

It must also be stressed that such schemes do not cover non-Public Entertainment Licence (PEL) venues such as pubs which frequently employ door staff and undoubtedly experience drug dealing. Until magistrates regularly attach such conditions to alcohol licences as are adopted by local authorities in granting PELs, then such venues are outside the most basic form of control regarding the activities of their door supervisors. Some senior officers also expressed concern that registration schemes only covered individual door staff, who could work for a company owned or managed by known criminals. It was strongly felt that there was a need for the statutory regulation of those on the boards of security companies which provided door supervision services. At the time of writing, the government has announced its intention to address such concerns by introducing statutory regulation of the private security industry as a whole, including door staff, and possibly the managers and owners of the companies that supply them.

The role of venue management

A number of strategies and tactics were identified that club managers and owners can adopt, depending upon the size of the venue.

Use only registered door supervisors. A basic and often legally required first step.

Employ door supervisors from registered companies. Another basic measure, as such companies may be considered less inclined towards criminal involvement and are easier for police to investigate if required. Good firms may also rotate security staff among venues (preventing local involvement) and maintain discipline amongst the door staff, something venue managers may find difficult.

Employ a split security team, with door supervisors from outside the area. It is less likely that non-local security staff will be involved in the drug dealing scene and they are less exposed in terms of intimidation if they live outside the area. There are, however, benefits of employing some local door staff as their knowledge of local criminals can be valuable and prevents any single team from establishing a dominant grip on the venue.

Strengthen club management and training. Venue managers should be supported by at least one managerial assistant, and at large venues no manager should have to work alone when the club door team is on duty. A strong management team permits a greater presence in the club and provides mutual support in overseeing the door team. The potential for intimidation of managers should not be underestimated.
Inexperienced managers or licensees should receive training on drugs awareness and how to manage door staff, as was found with one brewery/leisure organisation. 

**Ensure door supervisors actively search out dealers and arrest individuals found in possession of suspected drugs.** Although door staff will only occasionally seize drugs from club-goers or dealers entering venues, further interception is possible through the provision of security staff to patrol club floors and genuinely attempt to spot dealing. The seizures and arrests made at the MoS indicate what is possible. Such seizures should be recorded and possibly looked upon as an indicator of the security staff’s vigilance.

**An integrated approach**

As the offending activity of organised criminal groups occurs on a number of levels – within venues, against door supervisors, through door supervisors – so measures to tackle them must also be multi-faceted and aimed at the principal components of the problem. This approach, illustrated in Figure 1, requires an integrated strategy and a partnership between the police, venue managers and owners, and local authority departments. Acting together, these parties can introduce tactics which directly disrupt the selling of drugs in venues, improve the standard of security staff and club managers and challenge the corrupting influence of drug dealing on the legitimate function of door supervision.

**Figure 1: An integrated approach to policing clubs, drugs and doors**

- **Police operations**
  - Integrated intelligence and operations
  - Identify key players in door provision
  - Identify door-drug links
  - Awareness of floor dealing methods

- **Venue measures**
  - Registered, split teams
  - Strong, trained management
  - Thorough searches, active patrolling
  - Citizen’s arrests and seizures to the police

- **Agency liaison**
  - Local registration schemes
  - Vigorous multi-agency venue regulation
  - Police-venue liaison
  - Arrest and evidence training
REFERENCES

References


Drug use – general principles

Southwark police recognise that the circumstances of drug possession and use that you will come across may vary enormously. Some people will be carrying drugs for their own recreational use. Some tourists may not realise that possession of drugs for personal use is a criminal offence in this country. And others, of course, will have set out to make as much money as possible from trading in drugs, regardless of the consequences for those who consume them. This code of practice is set out to help you take the correct action in each set of individual circumstances, acting always within the law, taking account of what is safe and practicable. Our combined priorities must be to prevent all forms of drug-taking within the premises and to thwart the drug dealers, so that they may be dealt with according to the law.

Types of drug

The Misuse of Drugs Act 1971 classifies controlled drugs in three groups:

I. Class A – 'hard drugs' including heroin, LSD, ecstasy and cocaine;

II. Class B – 'soft' drugs including herbal cannabis, cannabis resin and amphetamine; and

III. Class C – other less dangerous drugs.

Common offences

• Unlawful possession of a controlled drug (a 'user')
• Unlawful supply of a controlled drug (a 'dealer')
• Being concerned in the unlawful supply of a controlled drug (a 'lookout', 'go-between' or somebody holding the drugs or money for a dealer)
• Offering to supply a controlled drug without lawful authority (a 'dealer' or 'go-between')

Powers of search

Only the police have powers to search people without their consent. The only way that you can lawfully search somebody or their belongings is with their consent or in exceptional circumstances, to protect yourself or others from harm, under common law. Even if you make a lawful arrest as described below, there is no automatic power to search the arrested person.
Drug collection box

The Ministry of Sound will provide a strong metal lockable box, the keys for which will only be kept by police. During the hours that the club is open, this box will be firmly secured at the main entrance to the club, so that it cannot be removed by any unauthorised person. You should direct each person’s attention to the box as laid out in the instructions that follow and allow them to deposit in it anything they wish. You should also place in it anything that you suspect to be a drug which you have found abandoned within the club. On no account may anybody attempt to remove anything from it. Police will subsequently collect the box’s contents and arrange for their safe destruction.

Making an arrest

Most drugs encountered are likely to be of either Class A or Class B. If this is the case, any person may arrest anyone whom he has reasonable grounds for suspecting to be committing one of the offences listed earlier.

Arresting somebody simply means depriving them of their liberty. Take the person to a convenient place (away from any others arrested if possible) and make it clear to the person that they have been arrested and will be handed over to the police. You may use no more force than is reasonable and necessary, not forgetting that your personal safety is paramount. Call police immediately through the 999 system. Keep hold of any drugs that you have seized but remember that even after arrest, you may only search the person with their consent or to protect yourself or others from harm. One particular member of staff should stay with the person throughout: this will prevent too many people later having to give evidence at court. Occasionally, more than one witness will be involved and all staff must be prepared to give a statement to police on request.

Should it ever become apparent that an offence has not been committed you should release the person immediately and inform the police.

If for any reason it is impractical to arrest or detain somebody you should eject them from the premises and, if applicable, terminate their club membership. A manager should make a record of the incident (including a description of the person and details of any video recording of them) and inform the police.

Drugs on entry

It should be made clear to everybody on arrival that taking drugs into the club is not acceptable. You should tell them that they will be asked to agree to a search as a condition of entry and that if any drugs are found on them during that search, you
will have no alternative but to detain them and call the police. You should then point out the locked box which will be fixed at the main entrance so that they may deposit anything they are carrying, if they wish. If you do find any Class A or Class B drugs when they are searched, you should arrest them. Those who refuse to agree to a search will not be admitted.

**Drugs within the club**

If you see somebody within the club who appears to be in possession of drugs, you should take them to the main entrance and remind them that drug use within the club is not acceptable. You should tell them that if they wish to be re-admitted they will have to agree to a further search and that if any drugs are found on them during that search, you will have no alternative but to detain them and call the police. You should then point out the locked box so that they may deposit anything they are carrying, if they wish. If you do find any Class A or Class B drugs when they are searched, you should arrest them. Those who refuse to agree to a further search will not be re-admitted.

**Drug dealers**

Catching drug dealers is one of our main priorities. If you find anybody trying to enter, or already within the club where there are reasonable grounds to suspect them of supplying drugs of any Class, you should arrest them. The same will apply where you have reasonable grounds to suspect anybody of offering to supply drugs, being concerned in the supply of drugs, or possessing a quantity incompatible with it being for personal use.

Remember that drugs are easy to hide and just because you only find a small quantity of drugs on somebody, this does not mean that they have not got larger quantities concealed. If you search somebody and find any quantity of Class A or Class B drugs on them whatsoever, arrest them. If they later turn out to have had them purely for their own use, we will deal with them accordingly.

**Drugs found in the club**

If you find drugs in the club and it is not clear to whom they belong, you must immediately place them in the locked box at the main entrance and inform a manager.
APPENDIX A

Drugs information
If you have any information about drug activities, you should report it to a manager who will notify the police. In urgent cases, this will be by telephone using the 999 system; in non-urgent cases, it will be by telephone to the Divisional Drugs Unit. You should also be aware of the Crimestoppers number 0800 555 111, which can be used anonymously and may lead to a reward from the Community Action Trust.

Contacts – Southwark police
• in urgent cases, dial 999 and ask for police
• in less urgent cases but where police attendance is needed, dial . . . . and ask for the control room at Southwark
• the Divisional Drugs Unit can be contacted on . . . . or paged by phoning . . . . and leaving a message on pager number . . . .
• your homebeat officer is PC XXX and s/he can be contacted on . . . . .

Borough Sector Inspector
Club security

• It is important to stress, once again, the need for all London local authorities to adopt registration schemes to ensure that door supervisors are appropriate for the job and well trained. Door supervisors are vital in reducing the supply of drugs in clubs, managing crowd safety, assisting those who may be experiencing drug-related problems and liaising with management, first aiders, drug workers and the police.

• If registered door supervisors are employed they must wear their identification badge at all times. The badges must also be clearly visible. At premises where door supervisors are not required to be registered it is strongly recommended that such staff wear an identification badge with a photograph, name and serial number. If a private security firm is used the name of that firm should be indicated on the badge. This will enable management to identify the person concerned should any problems occur. It will almost certainly not be appropriate for the identification badge to bear the full name of the door supervisors. This is because it could put staff at risk from people who, for example, have been refused entry. Door supervisors of both sexes should be employed.

• Those hiring outside security personnel should only deal with reputable firms. It is good practice for security firms to ensure that all personnel receive appropriate training. See the section on staff training for more details (page 14).

• Door supervisors should employ good queue management techniques at all times, both from the point of view of common decency, customer relations and that of safety. Crushing, which can lead to injury, and queue-jumping, which can arouse hostility and violence, must be prevented.

• Door supervisors should promote a smooth throughput of people, minimising a build-up of people immediately inside the venue. See the section on environmental factors for more details (page 8).

• Door supervisor work involves clearly a degree of supervisory responsibility. They must patrol a venue regularly and be easily located in case of an emergency. Uniforms worn by door supervisors should enable them to be easily distinguishable from patrons.

• Door supervisors must co-operate and communicate effectively with those responsible for first aid and any other workers or volunteers present to give advice and information.

Appendix B: Club security guidelines

Club security

Door supervisors

• It is important to stress, once again, the need for all London local authorities to adopt registration schemes to ensure that door supervisors are appropriate for the job and well trained. Door supervisors are vital in reducing the supply of drugs in clubs, managing crowd safety, assisting those who may be experiencing drug-related problems and liaising with management, first aiders, drug workers and the police.

• If registered door supervisors are employed they must wear their identification badge at all times. The badges must also be clearly visible. At premises where door supervisors are not required to be registered it is strongly recommended that such staff wear an identification badge with a photograph, name and serial number. If a private security firm is used the name of that firm should be indicated on the badge. This will enable management to identify the person concerned should any problems occur. It will almost certainly not be appropriate for the identification badge to bear the full name of the door supervisors. This is because it could put staff at risk from people who, for example, have been refused entry. Door supervisors of both sexes should be employed.

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• Door supervisors must co-operate and communicate effectively with those responsible for first aid and any other workers or volunteers present to give advice and information.
APPENDIX B

General security measures

- Licensees should formulate an appropriate policy on searching in consultation with their licensing authority and the police. This policy should include a complaints procedure. The greater the co-operation between security firms, licensees and the police, the better. Security can greatly reduce the number of people using or dealing drugs on the premises. Larger events will call for close liaison between these bodies in order to anticipate potential incidents. Details will vary from one event to the next and it is important to be flexible in implementing the recommendations set out below.

- **Searches** - Where appropriate, everyone entering the event, including those on the guest list, should be liable to a search of outer clothing, pockets and bags, to be carried out by a door supervisor of the same sex. Ideally, searches should be complemented by the use of metal detectors to deter the carrying of weapons, and to reassure customers. Management are reminded of their right to refuse entry.

- It is important to remember that door supervisors do not have the right to insist on performing a body search. Consent must be established – possibly by a prominently placed notice at the entrance. Door supervisors must not perform strip searches under any circumstances and could be charged with assault if they attempted to do so.

- Drugs or offensive weapons that are seized must immediately be handed over to the licensee for storage in a secure place until they can be handed over to the police.

- It is strongly recommended that all seizures are witnessed by the management and are recorded in an incident book. Management should also have written guidance on how to record incidents. This is particularly useful if door supervisors are required to give a statement to the police or give evidence in court.

- **Club policy** - Notices should be strategically and prominently placed at the entrance to the venue informing customers that the police will be informed in the event of individuals being found in possession of controlled substances or offensive weapons. Any policy on non entry and ejection must also be on display to reduce the likelihood of arguments with staff.

- **CCTV** - The purpose of CCTV is to deter and detect any drug dealing and violence, and to assist crowd safety and security. It is not to intrude on the privacy of club-goers. CCTV can be useful, particularly for the surveillance of the entrance to the club. CCTV may deter or detect the sale of drugs inside the venue. Where used, care must be taken to minimise the discomfort that the
The presence of CCTV might present to the vast majority of clubbers who are neither selling drugs nor causing a disturbance.

- At larger venues staff should be equipped with radio communication systems for added security.
- Regular patrols of the surrounding area by door supervisors and security staff are advisable for extra security and to reassure local residents. It is important that there is adequate liaison with the police and that door supervisors do not attempt to take over the role of the police in this respect.
- It is good practice to have an attendant in the toilets to discourage an unacceptable build up of people and to discourage the selling and the use of drugs in this area. Where no attendant is present, toilets should be regularly patrolled by door supervisors. It is, however, important to respect personal privacy. It is recommended that guidelines be formulated by the licensee for attendants which includes when it is appropriate for staff to try to enter a cubicle and when assistance should be sought.

**Liaison with the police** - Licensees should communicate and co-operate as much as possible with the police and have an agreed policy on what should happen in the event of disturbances and persons being found possessing or selling drugs. Subject to the views of the police it may be useful to warn customers, by way of notices, that covert police surveillance may be in operation.

- Records must be kept of any accidents or other incidents that occur such as a person being ejected from the venue. Records must contain as much detail as possible and be kept for reference purposes for at least a year. There should be an agreed format for recording information including the name and registration number of the door supervisor. All security staff, in particular door supervisors, should be aware of how to report incidents.
- The licensee must be aware of which door supervisors are on duty on any particular night. This information must be recorded in case individuals need to be identified for any reason.
- The licensee or a duty manager must be present at all times during an event and readily contactable by the police.
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