

Adrian Overton
Licensing Team
London Borough of
Hammersmith & Fulham
Town Hall
King Street
Hammersmith
W6 9JU

Phone: 0208 942 2501 Mobile: 07729 888831

e-mail:

By email.

19th March 2021

Dear Adrian

<u>SEV renewal Secrets, 62 Glenthorne Road, London, W6 0LR. Licence number 2020/00781/SEV</u>

Please find attached an application for the renewal of the Sexual Entertainment Venue Licence for the above-named premises, along with all the relevant attachments.

I will pay the renewal fee of £3,121.20 today by credit card.

I also enclose the copy of the Notice of Application dated the 19th March 2021 which will be displayed on the premises from the 19th March where it can be seen by members of the public, and printed in a local newspaper that covers the area within 7 days of the application date.

The signed certificate confirming that the notice of application has been displayed on the premises will be emailed to you once the 21 days have passed after the application date.

I confirm that I have emailed a copy of this application to The Police Licensing Officer at Shepherd's Bush Police Station at email address AWMailbox.Licensing@met.police.uk

If I have omitted anything, I would be grateful if you could please let me know.

Many thanks.

Kind regards

Nicky Richards

Technical Manager

On behalf of Secrets Hammersmith Limited

Nicley Recross

Secrets Hammersmith Ltd. 62 Glenthorne Road, Hammersmith, London W6 0LR. Tel: 0208 563 7974 Reg. in England 11989989



HAMMERSMITH AND FULHAM COUNCIL

SCHEDULE 3 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982

Application for a Licence to use any Premises, Vehicle, Vessel or Stall as a Sexual Entertainment Venue

All questions must be answered, unless otherwise stated. If relevant questions are not answered, the application will be deemed incomplete and will be returned to the applicant.

Please delete as appropriate.

Section 1

Application details:
This licence is for the: Renewal
The application is made by:
A company or other corporate body
Section 2
(Answer only if the applicant is an individual)
What is the full name of the individual?
Permanent Residential Address
Any former names
Date of Birth Place of Birth
Date Became Resident in the UKor E.U Member State
National Insurance Number or E.U Member State Equivalent.
B. C. T. I. I. N. I.
Daytime Telephone Number

Name and address to	which correspo	ondence should be sent (if differ	ent from above)
Has the applicant a fir application? Yes / No	nancial interest	in the business which is the sub	ject of this
If "yes" to what extent			
Is the whole business	owned by the a	applicant? Yes / No	
Section 3 (Answer only if the A	Applicant is an	unincorporated body or a par	rtnership)
What is the full name	of the Applicant	?	
What are the names of	of the applicant's	s partners? Please complete the	e table below:
Full Name (inc title Mr/ Mrs/ Miss/ Other)	Date of Birth	Address of permanent residence throughout the six	Date became UK resident or
		months preceding this application	other EU member state
			other EU

Are there persons responsible for the management of the Applicant other than the partners? If so please state their names in the table below:

	Full name
Person One	ruii name
Person Two	
Person Three	
Person Four	
r craom r our	
Please confirm i	f the whole of the business is owned by the applicant?
YES	
Section 4 Answer only w	here the applicant is a company or other corporate body
What is the nam	e of the Applicant?
SECRETS HAM	MERSMITH LIMITED
Has the Applicar name?	nt previously been known by any other name and if so what
NO	
If the Applicant is private, limited b guarantee, etc.)?	
PRIVATE LIMIT	ED COMPANY
What is the regis	tered number of the Applicant ?
11989989	
What is the reg	gistered office address?
62 GLENTHORN	IE ROAD, LONDON, W6 0LR

In which country is the company incorporated?	
UK	
What is the date of incorporation of the company?	
10 TH MAY 2019	

Please complete the table in respect of each of the Directors, the Company Secretary or other persons responsible for the management of the body.

Full Name (inc title Mr/ Mrs/ Miss/ Other)	Date of Birth	Address of permanent residence throughout the six months preceding this application	Date became UK resident or other EU member state
MISS ANGELA DAWN JONES (DIRECTOR)			LIFE
MR GARY AARON KEARNEY NICHOLLS			LIFE
MR CHRISTOPHER THOMAS BELL			LIFE
MR MARK SEAN PRESCOTT			LIFE
MR CONG HONG			1981
MISS AGNIESZKA HELENA MITKOWSKA			2002
MR CHRISTOPHER BUNTING			LIFE
MR PAUL PHILLPOT OPERATIONS MANAGER)			LIFE

Does the Applicant use any other trading names? If so, please state the trading name(s).
SECRETS
What is the Applicant's trading address?
62 GLENTHORNE ROAD, LONDON, W6 0LR
······································
•••••••••••••••••••••••••••••••••••••••
Section 5
All Applicants
Please give details of the person (if any) who is to be responsible for the management of the premises in the absence of the licence holder:
First Name GARY
Surname NICHOLLS
Former Name (if any)
National Insurance Number or E.U Member State Equivalent
Permanent Address:
Date of Birth
Place of Birth LONDON
Has any person named at any place in this application been associated in any way with any other application for a licence for a sex establishment?
Yes
If "yes" give full details
PLEASE SEE SECTION 9

Section 6

1					
-	ran	nises	0	Otal	ile:
		11363	·	CLON	113.

This application is in respect of: **Premises**

Is the premises, vehicle, vessel or stall in use for sexual entertainment at the date of this application? The premises are temporarily closed due to Government restrictions.

currently operating the business :
SECRETS HAMMERSMITH LIMITED, 62 GLENTHORNE ROAD, HAMMERSMITH LONDON, W6 0LR
What is full address of the premises for which a licence is sought?
62 GLENTHORNE ROAD, HAMMERSMITH, LONDON, W6 0LR
If the application is in respect of a vehicle, vessel or stall, please state where it is to be used as a sexual entertainment venue :
Under what name is, or will the premises be known?
SECRETS
Is the whole of the premises to be used under the licence? NO
If no, please state:
a) which part of the premises is to be used for the purposes of the licence
GROUND FLOOR OF PREMISES ONLY
b) the use to which the remainder of the premises are to be put
OFFICES/DRESSING ROOM/STORAGE
c) the names of those responsible for the management of the remainder of the premises

PAUL PHILLPOT

If the Applicant's interest in the premises is a leasehold one, please state:

a) Head-lease

b) the name and address of the landlord and of the superior landlord where applicable



c) the length of the unexpired term

13 YEARS AND 9 MONTHS

Section 7

Proposed operation times and activities

Give the times it is proposed to operate the Premises for the purpose of this Licence;

Start	Finish	State any seasonal variations or non standard timings
18:00	04:00	where you intend to use the Premises, which are different to those listed in the column on the left.
18:00	04:00	amoronic to those holed in the column on the left.
18:00	04:00	
18:00	04:00	
18:00	04:00	
18:00	04:00	
18:00	00.00	
	18:00 18:00 18:00 18:00 18:00	18:00 04:00 18:00 04:00 18:00 04:00 18:00 04:00 18:00 04:00 18:00 04:00

Please give full details of the nature of the relevant entertainment e.g. lap-dancing, pole-dancing, stage strip show etc:

TABLE DANCING,	NUDITY, STAGE	E SHOWS INCLU	DING POLE	ANCING

Please confirm if the relevant entertainment involves full nudity?
YES
Section 8
If the application is for the Transfer of a Premises Licence
Name of current Premises Licence Holder
Please give the reason/s for the transfer application
Section 9
Has the Applicant or any persons named in this form been convicted of a criminal offence whether in the UK or elsewhere?
NO
If so, please give details of unspent convictions below:

Forenames	Surname	Former Name (if any)	Court	Date	Offence	Penalty or Sentence
	#					

Has the Applicant or any persons named in this form been cautioned whether in the UK or elsewhere ?

NO

If so, please give details below:

Forenames	Surname	Former Name (if any)	Offence	Date of Caution	Where caution administered
11					

Has any person or the corporate or unincorporated body referred to in this application: -

Been disqualified from holding a licence for a sex establishment?

NO

Been refused the grant / renewal / transfer of a licence for a sex establishment?

NO

Been the holder of a sex establishment licence when that licence has been revoked?

NO

Been associated in any way with any other application for a sex establishment licence?

YES

If 'Yes' to any of the above please provide further details:

SECRETS 2 CRAVE ININI DOAD WOLVEY OUR IL D. CAL

ANGELA JONES, DIRECTOR, PAUL PHILLPOT, OPERATIONS MANAGER AND THE FOLLOWING MANAGEMENT: GARY NICHOLLS, MARK PRESCOTT, CONG HONG LE, AGNIESZKA MITKOWSKA AND CHRISTOPER BUNTING, ARE ASSOCIATED WITH OTHER VENUES DETAILED BELOW:

SECRETS, 5 GRAYS INN ROAD, WC1X 8HG (L.B. CAMDEN) SECRETS, 51 PARKER STREET, WC2B 5PS (L.B. CAMDEN) THE GASLIGHT OF ST JAMES'S, 4 DUKE OF YORK STREET, SW1Y 6LA (WESTMINSTER COUNCIL)
Is there any information in this application which you would not wish to be seen by members of the public?
Yes
If yes, state which information and the reasons why you would not wish it to be seen
HOME ADDRESSES OF ANY INTERESTED PARTIES FOR REASONS OF SECURITY
······································
······································
s there any further information which the Applicant would wish the Council to take into account when considering this application?
SECRETS HAVE BEEN TRADING FROM 62 GLENTHORNE ROAD SINCE 1997. THERE HAS NEVER BEEN A REFUSAL TO GRANT OR RENEW OUR LICENCES

Please read the checklist below to confirm you have enclosed all of the required information/documents;

- . I have made or enclosed payment of the fee will pay by webt code
- I have enclosed a plan showing the interior layout of the premises and where relevant entertainment will take place for consideration by the Licensing Authority
- I have enclosed a copy of the "club rules". Such club rules must contain the required conduct of performers which shall include for example, no sex acts, no giving or taking phone numbers (including exchange of business cards).
- I have enclosed a scheme showing the exterior design for consideration by the Licensing Authority
- I understand and agree that I must send a copy of my completed application to the Chief Officer of Police no later than seven days after the date of the application. I also understand that I must produce evidence of due service of the Notice of Application upon the Chief Officer of Police as required by paragraph 10(14) of the Third Schedule of the Local Government (Miscellaneous Provisions) Act 1982.
- I understand that I must now advertise my application on or near the Premises for 21 days starting with the date of the application.
- I understand that I must advertise the application in a local newspaper within seven days after the date of the application and that a copy of the notice of application which has been published must be given to the Licensing Authority in accordance with paragraph 10 (8) of the Third Schedule of the Local Government (Miscellaneous Provisions) Act 1982.

DECLARATION: I declare that the details in this application are true to the best of my knowledge and belief and acknowledge that if there are any omissions or incorrect statements of a serious nature this may result in the application being refused. I further declare that I have read and agree to abide by the conditions of Licence for a Sexual Entertainment Venue made by Hammersmith and Fulham Council in accordance with Section 2 Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 should my application be granted.

A. Rielede

APPLICANTS ARE INFORMED THAT ANY PERSON WHO, IN CONNECTION WITH AN APPLICATION FOR THE GRANT, RENEWAL OR TRANSFER OF A LICENCE, MAKES A FALSE STATEMENT WHICH HE KNOWS TO BE FALSE IN ANY MATERIAL RESPECT OR WHICH HE DOES NOT BELIEVE TO BE TRUE, IS GUILTY OF AN OFFENCE AND LIABLE, ON SUMMARY CONVICTION, TO A FINE NOT EXCEEDING £20,000.

Signature
nicky Rierose
J
Name of Signatory
NICKY RICHARDS
Designation of Signatory
TECHNICAL MANAGER
Date (9-3-202)

The Licensing Authority

Hammersmith & Fulham Council

FAO: Licensing Section

Town Hall, King Street, London, W6 9JU. Phone: 020 8753 1084 E-mail: licensing@lbhf.gov.uk Website: www.lbhf.gov.uk

The Chief of Police

Metropolitan Police

FAO: The Police Licensing Officer Shepherd's Bush Police Station, 252 - 258 Uxbridge Road London, W12 7JB

Phone: 020 8246 2886 Fax: 020 8246 2963

E-mail: AWMailbox.Licensing@met.police.uk

THE SECRETS GROUP

PERFORMERS' WELFARE POLICY

The Secrets Group provides opportunities for hundreds of Performers to dance on a selfemployed basis. These opportunities will be enhanced if Performers feel that they are dancing in a safe and supportive environment and are therefore able to enjoy the atmosphere and conditions in which they dance and communicate that enjoyment to customers.

With that in mind, Secrets have decided to identify in this Welfare Policy all of the various measures which have been adopted over the years to reassure Performers that they are not "on their own".

Behaviour by Customers

- 1. Customers at Secrets are required to behave in a respectful and polite manner towards Performers. No aggressive, intimidating or sexually predatory behaviour towards Performers will be tolerated by Secrets Management and Staff.
- 2. Customers may not touch a Performer during a performance nor may customers remove any clothing except a tie and jacket. Customers are totally forbidden to engage in masturbation or other sexual behaviour.
- 3. If any customer behaves in a way which breaches any of these rules, the Performer should report the matter immediately to Secrets Security or Management who will address the problem. Performers will never be expected to deal with an unruly or ill-behaved customer themselves.
- 4. Serious misbehaviour by a customer will result in the customer being ejected from the premises. Minor breaches of the "Customers House Rules" may only result in a warning as to the customer's future behaviour, but no Performer will ever be put under any pressure to perform or continue to perform for a customer about whom she is unhappy.
- 5. The expected response from Secrets Security or Management to a complaint by a Performer about customer behaviour will be to support the Performer. Only in the most exceptional circumstances will this not happen. This would only be where Secrets Security or Management genuinely believes, after investigation, that the Performer's complaint is frivolous or vexatious (not serious or petty/annoying).

Behaviour by Other Performers and Staff

1. The same standards of behaviour towards Performers are expected from other Performers and Secrets Staff, as are expected from customers. Any aggressive, intimidating or sexually predatory behaviour by Secrets Staff, Security or other Performers must be reported to Secrets Management or Senior Management, who will deal with the problem.

2. It is obviously important that everyone's personal property should be secure whilst Performers are at Secrets. All Performers' changing rooms have lockers which Performers may use to store personal items while performing. These lockers can be secured by a padlock. Performers are advised to bring their own padlock and key so that no-one else can have access to their locker.

Non-Discrimination

- 1. When considering whether to offer anyone the opportunity to perform at Secrets, and in dealing with existing Performers, Secrets will not discriminate on the grounds of race, colour, sexual orientation or political or religious beliefs.
- 2. The criteria for being able to perform at Secrets will always be having the ability and right attitude to perform to the high standards which Secrets expect.
- 3. If a Performer believes that she is being discriminated against on an unacceptable basis, this should be reported to Secrets Management or Senior Management who will deal with the problem.

Performers' Health and Wellbeing while at Secrets

- 1. Drinking water will always be available to Performers at no cost.
- 2. If a Performer feels unwell whilst at Secrets she should speak to a member of Management or the Performer Co-ordinator (House Mother). A first aid kit is always available, including tampons, and a comfortable place to rest will be made available.
- 3. If a Performer's medical condition warrants it, an ambulance will be called by Secrets Security or Management.
- 4. If a Performer has any concerns about her working environment, including any personal problems which may impact on her dancing or anything else in any way related to her time at Secrets, the venue Performer Co-ordinator will always do her best to help, if at all possible.
- 5. If talking to an individual Performer Co-ordinator doesn't seem right in the circumstances, then the club Manager will also try to help out.

In summary, it is in Secrets own best interests for Performers to feel comfortable and secure about their performing at Secrets. So, don't feel hesitant about asking for help if you need it.

The Dancer's Code of Conduct - Secrets Hammersmith, Secrets Holborn, Secrets Covent Garden & The Gaslight

- a. Dancers may not intentionally touch a customer during a performance.
- b. Dancers may not permit a customer to touch them during a performance.
- c. Dancers may not straddle the customer.
- d. If a customer attempts to touch or speak to a Dancer inappropriately, the Dancer shall stop the performance and advise the customer of the Rules of the Code of Conduct. If the customer persists in inappropriate behaviour, the Dancer shall stop the performance and inform premises management immediately.
- e. Dancers may not intentionally touch the genitals, anus or breasts of another Dancer, nor knowingly permit another Dancer to touch their genitals, anus or breasts.
- f. Dancers shall not solicit for gratuities or payment for sexual favours.
- g. Dancers shall not engage in any act of prostitution, i.e. the receiving of gratuities or payment for sexual favours.
- h. Dancers may not perform any act which simulates masturbation, oral sex or sexual intercourse including the insertion of any object, including their own finger, in to the anus or vagina.
- i. Dancers may not touch their own breasts, anus or genitals with their fingers, lips or tongue.
- j. Dancers may not be in the company of a customer unless it is in an area of the premises that is open to the public.
- k. Dancers shall not perform if under the influence of alcohol or drugs.
- I. If a customer engages in acts of masturbation or other sexual behaviour, the Dancer shall cease the performance immediately and inform the premises management.
- m. Dancers shall use the dressing room facilities provided for their exclusive use to change for their performance.
- n. Dancers shall only use the smoking area provided specifically for their use.

SECRETS 1 HAMMERSMITH

SUPPLEMENTARY INSTRUCTIONS TO ALL PERFORMERS

FULL NAME OF PERFO	RMER:	3 4 6 6 8 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		
STAGE NAME:-	e d 4 5 m e b 2 e 0 4 5 0 0 1 0	pp=coppcoscopscopocopocoppcopodoqo6ocopocopobba		
A LAN THE THOMA OF THE THE THE THE	ed to provide table dancing y conditions imposed on this perform. The effect of these	at Secrets under a licence issued by the Local licence, but there are two that directly affect conditions is as follows:-		
1. No performer shall make physical contact with the breasts or genitalia of any other performer during a performance nor shall there be performances or demonstration of simulated sex and related activities.				
2. The only physical of	contact permitted between co	istomers and performers is:-		
a) The placing hand at the	of money in garter worn by conclusion of a performance	a female performer or in the performer's		
b) A brief han	dshake at the læginning or e	nd of a performance.		
c) A kiss by the clothing at	e performer on the custome the end of a performance.	r's cheek after the performer has replaced her		
If performers break these The Club could even be c performers at all times.	; rules the Club could be pro losed down. It is therefore e	secuted and fined a very great deal of money. ssential that these rules are obeyed by all		
Breaches of these rules al	so cause additional manager	nent time and expense.		
discretion of the Manage	not obey these rules will not ment but may also be subje fee payable to the Performe	only be liable to suspension for a period at the ct to an increase (at the discretion of the cr Co-ordinator.		
Repeated infringements from working at Secrets	of these instructions will res 1 (Hammersmith).	ult in the performer being permanently banned		
display in the changing r	ooms at Secre's 1, Hammers et out above I will be liable t	nent and acknowledge that there is a copy on mith, which I have seen. I understand that if I o both payment of an increased fee to the otal exclusion from Secrets 1, Hammersmith.		
Signature	54 5 4 4 4 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Date		

Supplement to the Code of Conduct for Table Performers

SECRETS 1 HAMMERSMITH SECRETS 3 HOLBORN SECRETS 6 COVENT GARDEN THE GASLIGHT

62 Glenthorne Road,3 Grays Inn Road,51 Parker Street,4 Duke of York Street

London W6 0LR London WC1X 8HG London WC2B 5PS London SW1Y 6LA

Stop-and-Search of Performers

- 1. The Secrets Group employs a random 'Stop-and-Search' policy, which will be carried out by a member of Female Management or Performer Co-ordinator and witnessed by a member of Senior Management and/or Security, in accordance with the Police & Criminal Evidence Act 1984, Section 24 (4). Notices are displayed in the Performers changing room.
- 2. The Stop-and-Search of possessions (including bags and clothing) will be conducted in private but will, however, be recorded on CCTV.
- 3. Any refusal by a Performer to adhere to Secrets Stop-and-Search Policy will constitute a breach of their contractual agreement (Code of Conduct) and will result in the immediate termination of any agreement.
- 4. Any Performer found in possession of illegal substances will lead to the termination of any agreement with Secrets and the illegal substances disposed of.

(PLEASE PRINT CLEARLY IN BLOCK LETTERS)

Stage Name:	Name:
Signed:	Date:
Witnessed by name	
Signed	Date:

TO ALL PERFORMER CO-ORDINATOR, MANAGERS AND ASSISTANT MANAGERS

PLEASE MAKE SURE THAT ALL PERFORMERS READ AND STRICTLY ADHERE TO THE RULES BELOW:

TO ALL PERFORMERS AT SECRETS 1 HAMMERSMITH, 3 HOLBORN, 6 COVENT GARDEN AND THE GASLIGHT

WE WANT TO KEEP OUR LICENCE, DON'T YOU?

JUST SO YOU FULLY UNDERSTAND. YOU MUST **NOT** BREAK THE FOLLOWING DANCING RULES AND CONDITIONS:-

- 1. NO BREASTS CAN TOUCH ANY CUSTOMER'S FACE.
- 2. NO SLIDING UP OR DOWN ANY CUSTOMER'S BODIES.
- 3. NO TOUCHING ANY CUSTOMER'S GROIN WITH ANY PART OF YOUR BODY, WHICH INCLUDES YOUR KNEE IN HIS CRUTCH.
- 4. NO FRICTION OR GRINDING.
- 5. NO MASTURBATING, SIMULATED MASTURBATING OR SEEN TO BE MASTURBATING YOURSELF OR OTHER DANCERS.
- 6. NO TOUCHING OTHER PERFORMERS BREASTS OR GENITALIA.
- 7. THE SELLING OF SEXUAL FAVOURS (EITHER ON OR OFF SECRETS'S PREMISES) TO ANYONE IS STRICTLY NOT ALLOWED.
- 8. PROSTITUTION ACCEPTING A CUSTOMER'S OFFER OF PAYMENT (OR THE DANCERS SUGGESTION) IN RETURN FOR SEXUAL FAVOURS, WHETHER OR NOT THE PERFORMER ACTUALLY INTENENDS THEM, IS PROHIBITED.
- 9. ASSIGNATION OF PROSTITUTION PROMISING TO MEET A CUSTOMER AT A LATER TIME, IN RETURN FOR GRATUTITIES, IS FORBIDDEN, WHERE OR NOT YOU INTEND MEETING THEM.

IS THIS CLEAR ENOUGH FOR YOU? - IF NOT ASK YOUR PERFORMER CO-ORDINATOR.

DEPENDENT ON THE SEVERTITY OF THE BREACH, CONTRAVENTION OF THE ABOVE RULES WILL RESULT IN WARNINGS OR IMMEDIATE 'OFF THE FLOOR' SUSPENSION OR INSTANT EXCLUSION FROM ALL SECRETS VENUES.

These rules must be observed, some of which are also in the Code of Conduct, which all Performers sign.

I have read and fully	understood the above	e rules and a	gree and understar	nd the consequences
as detailed above.			*	

SIGNED	STAGE NAME	DATE
WITNESSED BY PER	FORMERS CO-ORDINATOR	*******************************

THE SECRETS GROUP

DISCIPLINARY PROCEDURES FOR DANCERS

Table dancing is a very regulated industry, constantly under the scrutiny of the Police and Local Authorities. This is why we have a detailed Code of Conduct for dancers, which must be adhered to at all times.

However, we know from past experience that, occasionally, some dancers try to bend the rules, in the hope of earning more money from customers. This is simply not acceptable and any dancer found to be breaching either the Dancers Code of Conduct or any additional rules relating to a particular Secrets Venue will be subject to the disciplinary procedures set out below.

Please bear in mind that no-one is forcing you to perform at Secrets. We are glad that you have chosen to do so and we hope that you earn a good living by doing so, but if you do want to perform at Secrets, you must be prepared to comply with the rules and suffer the consequences if you fail to do so.

PERSONS AUTHORISED TO INVOKE DISCIPLINARY PROCEDURES

- (a) Dancer Co-ordinators
- (b) Dancer Co-ordinator Supervisor
- (c) Senior Management Team
- (d) Stephen Less Principal Executive of The Secrets Group

THE SANCTIONS WHICH CAN BE APPLIED

- (a) Verbal or written warnings. Copies of written warnings will be kept on your file and may be referred to again if these disciplinary procedures have to be invoked again in the future.
- (b) Exclusion from the dancing area, either for a fixed period of up to 48 hours (the length of time to be determined by the Dancer Co-ordinator).
- (c) Exclusion from all Secrets venues for a period of up to three months.
- (d) Total exclusion from all Secrets venues on a permanent basis.

WHO WILL DEAL WITH PARTICULAR BREACHES

Inevitably there will be some overlap between who deals with particular breaches, but some examples are listed below:-

(a) Allegations of theft, violence or damage to Secrets property would normally be dealt with by the Manager and Dancer Co-ordinator or Senior Management Team.

- (b) Failing to walk away from a customer who insists on removing his clothing would normally be dealt with by the Dancer Co-ordinator.
- (c) Allegations of a sexual nature (simulated masturbation, touching a customer's genitals, touching either your own or another dancer's breasts Anus or genitals etc) would normally be dealt with by the Dancer Co-ordinator Supervisor or the Senior Management Team.
- (d) Allegations of Prostitution (as referred to in paragraph 22 of the Dancers' Code of Conduct) will be dealt with by a member of the Senior Management Team.

WHICH SANCTIONS WILL APPLY TO WHICH BREACHES

There will always be a degree of discretion involved, depending on the severity of the breach. However, there are certain absolutes:-

- (a) Breaches of a sexual nature will mean, at the very least, your exclusion from the club for the remainder of the evening, but if they constitute a breach of licence condition this could result in your exclusion from all Secrets venues.
- (b) Breaches involving theft, violence or damage to Secrets property will mean your exclusion from the club for up to a week but could result in your exclusion from all Secrets venues and possibly referral to the Police.
- (c) Prostitution will inevitably mean your total exclusion from all Secrets clubs on a permanent basis.

YOUR RIGHTS TO APPEAL

If you believe that you have been treated unfairly as part of the disciplinary process, you have the right to appeal to Secret's Senior Management Team (or, if the sanction has been applied by the Senior Management Team, to the Principal Executive). However, in practical terms, this right cannot apply to being excluded from the floor by the Dancer Co-ordinator for a limited period of up to 48 hours.

If you wish to appeal, you should state this in writing within 48 hours and hand the letter to the Club Manager who will pass it on to the appropriate authority.

I confirm that I have read, received and understood this Disciplinary Procedures for Dancers.

Stage Name	Real Name	
Signed	Dated	
Witnessed By	Signed	

CODE OF CONDUCT FOR PERFORMERS

SECRETS 1 HAMMERSMITH SECRETS 3 HOLBORN SECRETS 6 COVENT GARDEN THE GASLIGHT OF ST JAMES'S

62 Glenthorne Road, 3 Grays Inn Road, 51 Parker Street, 4 Duke of York Street London W6 OLR London WC1X 8HG London WC2B 5PS London SW1Y 6LA

1. INTRODUCTION

As a Performer attending Secrets/Gaslight you will be expected to conduct yourself in a mature manner, at all times. Your sincerity, courtesy, thoughtfulness and friendliness should create a positive atmosphere, in which customers can relax, which should encourage them to return again and again. Every Performer's behaviour and performance at Secrets is important.

2. WHEN APPLYING TO PERFORM AT SECRETS/GASLIGHT

You must be at least 18 years of age and legally entitled to work on a self-employed basis in the United Kingdom and proof will be required.

3. CODE OF CONDUCT

A copy of the Performers' Code of Conduct and any Supplementary Instructions are always on display in the Performers' changing room, in all Secrets' venues. You must read these on a regular basis and familiarise yourself with their content and, in particular, clauses 19, 20 21 and 22, which are marked with a red border.

4. IF YOU ARE UNABLE TO ATTEND

If you cannot attend your chosen scheduled evening, you should call Head Office: 0208 942 2501 by 2:00p.m., on the day you have requested to attend Secrets.

5. FAILURE TO REPORT AS SCHEDULED

If you repeatedly fail to arrive on the evenings you say you will, it may result in your not being allowed to continue to perform at Secrets.

6. PARKING

There is restricted parking in and around Secrets premises. Please ensure that you do not park in the restricted areas. Full details of the restrictions will be advised dependant upon which Secrets venue you are attending. At the end of the evening Performers are advised to report to the Performer Co-ordinator who will arrange, if requested, for you to be escorted to your method of transport.

However, if you are being collected at the end of the evening, for security purposes, you should advise the Performer Co-ordinator at the beginning of the evening.

7. BEHAVIOUR OUTSIDE OF SECRETS

Your professional behaviour outside Secrets/Gaslight is very important in maintaining your image and Secrets popularity. You are, therefore, advised to arrive and leave Secrets/Gaslight in smart and appropriate clothing. You are also required not to arrive or leave in a noisy or offensive manner, as there may be residents living close by.

8. DRESSING ROOM

Lockers are provided for your convenience and security. If there are no lockers available you are advised to bring a small lockable holdall or suitcase. The Management strongly recommend that you do not leave anything of value unattended. Secrets will not accept responsibility for any loss of property.

If you do not attend on your chosen evening, the Management reserve the right to make your locker available for another Performer. The Management will remove the contents for which they will not be held responsible.

You are reminded that CCTV covers the Performer's dressing room which will be inspected regularly throughout the evening by the Performer Co-ordinator and Management. The Management reserve the right to inspect your personal property, in your presence, at any time.

9. PERSONAL HYGIENE AND DRESS CODE

Performers are advised to shower daily before arrival, use an anti-perspirant/deodorant and have clean-shaven legs and underarms. Performers are also advised to always have breath spray or mints. All Performers are requested to wear perfume whilst in Secrets. The Performers dress code is extremely important both for your and Secrets image. You are requested to wear long evening dresses and thin high-heeled shoes unless otherwise advised. Hair, make-up and jewellery should also always be of the highest standard. Whilst you are in the public areas of Secrets/Gaslight, you must put your clothing back on immediately after each performance and remain clothed until your next performance begins.

10. DRINKING

It is the policy of Secrets/Gaslight not to encourage excessive drinking of alcoholic beverages by Performers and customers.

Each Manager or Performer Co-ordinator has the right and obligation to take you off the floor if they feel that you are becoming intoxicated. Water is always available from the bar.

11. SMOKING AND GUM

Smoking is not allowed, by law, in any part of Secrets/Gaslight. In some venues there is a small exterior smoking area for customers and Performers. Chewing gum is not allowed in Secrets/Gaslight, as its disposal is problematic.

12. MOBILE TELEPHONES

The Management request that all mobile telephones should be left in your locker or in the changing room whilst you are in the public areas of Secrets/Gaslight.

13. STAGE AND TABLESIDE DANCING (NOT A CHARGE IMPOSED BY SECRETS)

It is customary for Performers to expect to receive a customer's suggested gratuity, per single track, of £20 for each topless dance and £30 for each fully nude dance. Performers are requested to dance at the table where customers are seated, if at all possible. Performers are also requested to promote themselves by performing their stage show in order to make the customer more aware of each Performer.

14. GRATUITIES (NOT A CHARGE IMPOSED BY SECRETS/GASLIGHT)

If a customer invites you to their table, for any long period of time, you are advised to make it clear that whilst you are sitting with them, as their guest, it is the usual practice for a customer to offer a gratuity for Table Company, which can include table dances. The Management (purely as a suggestion) suggests that you could receive £300 per hour, or part thereof, from the customer, for the time that you are with a

customer at their table. It is the Performer's responsibility to collect any gratuities that the customer may give for table dancing, stage performance or table company with a customer. If possible, the amount should be discussed or agreed with the customer, which can be received prior to or after the dance being performed or the table company provided. Secrets/Gaslight staff or management will not become involved in collecting any gratuities if the customer does not give the Performer a gratuity.

15. 'MONEY FOR PERFORMERS' (OR ANY OTHER ARRANGEMENT THAT THE COMPANY DEEMS FIT)

In the event that customers are short of cash to tip the Performer for her table dance or stage performance or for Table Company, 'Money For Performers' is available for customers to acquire, via their credit/debit card or other currency. These can be exchanged at the end of the evening, via the Performer Co-ordinator (for Performer fees) or Manager (for UK Sterling), less the handling commission in force, at the time, on the face value.

16. RISK AND REWARD

There is no guarantee that the Performer will receive any gratuities from customers for table dancing or stage performances or table company or that there will be enough customers for all Performers on some nights.

It is the Performer's obligation, on her chosen evenings to attend, to:

- 1. Pay and make her own arrangement to travel to Secrets/Gaslight,
- 2. Pay for and make any domestic and other arrangements necessary, in order to attend Secrets/Gaslight,
- 3. Check in with the Performer Co-ordinator when arriving and pay the required entrance fee to Secrets/Gaslight before leaving the premises (there is no refund if the Performer leaves early),
- 4. Pay for and provide all clothes, shoes, handbags, jewellery, perfume, make-up, hair dressing, body tan, etc.
- 5. Pay for any drinks or food she may require, unless paid for by a customer, and;
- 6. Understand that any gratuities she may receive, via 'Money for Performers' can be converted to UK sterling, less the handling commission in force, at the time, on the face value.

17. DATING

It is the policy of Secrets/Gaslight that staff (including self-employed or provided by an Agency, such as DJs and Security) do not date any of the Performers, although they may do so if they work at another Secrets/Gaslight branch to the one you perform in. Contravention of this important aspect may result in one of you not being allowed on the premises, or you or the staff member (employed or self-employed) concerned being asked to relocate to another venue

18. RUDENESS TO ANY CUSTOMER

Secrets/Gaslight expect Performers to treat customers with courtesy and respect. At no time should a Performer attempt to deal with a disorderly customer.

19. YOUR CONDUCT WHILE PERFORMING

Each Secrets/Gaslight venue is licensed by the appropriate Local Authority and certain Conditions, Rules and Regulations apply. You, as a self-employed person within Secrets/Gaslights' licensed premises, must operate in accordance with those rules. The Rules and Conditions attached to the Premises Licence and the Sexual Entertainment Venue Licence, are in the Manager's office and relevant Conditions appertaining to each premises, in respect of your performances, are also on display in the performers' changing room and, if you are in doubt as to any of the wording, you are advised to request the Manager to explain it to you. Although additional specific rules may apply to each Secrets/Gaslight' premises, the main points are:

- a. Immediately before starting each performance, you must request the customer to sit with their back against the rear of their seat with their hands at their side or on the top of the seating. The customer must remain in either of those positions during the whole of your performance.
- b. You may not undo or adjust any part of a customer's clothing. You may not, with any part of your body, intentionally touch the customer's genitalia (or breasts if the customer is female) or the immediate vicinity thereof.
- c. You may not allow a customer to touch you during a performance. If the customer persists you must walk away from the customer and inform the Performer Co-ordinator, Management or Security.
- d. You may not perform any act, individually or with another performer, which clearly simulates masturbation, oral sex or sexual intercourse, including the insertion of any object, including your own fingers into your vagina or anus. You may cover your vagina or anus with your hands but must not caress them. You may not touch a customer, another performer or your breasts with your mouth, lips or tongue.
- e. You must not sit on the customer's lap. Straddling the customer is also forbidden this means that you cannot place both of your knees either side of the customer with your feet off the floor.
- f. You must remain on your feet at all times unless you are sitting or reclining on the floor, a table, a chair, a banquette or a sofa, or you are dancing on the stage or on a podium (see also 'g' below).
- g. If during a performance a customer either begins to remove, unbutton or unzip their clothing (apart from the removal of a jacket, the removal of a tie or undoing the top button of a shirt), you must immediately cease your performance and ask the customer again to keep their hands by their side. If the customer persists you must walk away from the customer and inform the Performer Coordinator, Management or Security.
- h. You must not intentionally make contact with the breasts or genitalia of any other Performer.
- i. Performances will be randomly supervised by the Performer Co-ordinator, members of Management and Security who will circulate within Secrets. The Performer Co-ordinator or Management will have the authority to remove you from the floor if you are in breach of this Code of Conduct and any Supplementary Instructions. In addition, all members of staff have been instructed to inform the Management of any inappropriate behaviour by Performers or customers.
- j. Whilst you are in the public areas of Secrets/Gaslight, you must put your clothing back on immediately after each performance and remain clothed until your next performance begins.

20. DEALING WITH CUSTOMERS

- a. When speaking to a customer, you may not use language of a sexually graphic nature at any time.
- b. Whilst within Secrets/Gaslight' premises, you must never be in the company of a customer except in an area open to the public. You may never enter the male or disabled toilets. At no time may you ever enter any of the cubicles in the ladies toilets with another person.
- You may never give a customer your telephone number, address or other contact details, although you are permitted to inform customers of the dates and shifts when you will be performing and at which Secrets/Gaslight venue.
- d. As a general rule, any Performer agreeing to meet a customer outside Secrets/Gaslight would be regarded as unsuitable to continue to perform in Secrets/Gaslight venues. However, it is accepted that there may be appropriate circumstances in which such a meeting would not be improper, such as being interviewed by a journalist or seeking medical treatment from a health care professional you have met in Secrets/Gaslight. Such a meeting may only take place with the prior permission of a member of The Senior Management Team and not the Manager or Assistant Manager.
- e. Photography by customers is not permitted in any Secrets/Gaslight. If a customer seeks to take your photograph, using either a camera or a mobile telephone, you must stop your performance, replace your clothing and walk away. If a customer tries to take your photograph when you are not performing, again you should leave the customer. Any attempts at photography by customers must be reported to the Performer Co-ordinator or Management.

21. PREMISES LICENCE CONDITIONS

Performers must abide by the Conditions of the Sexual Entertainment Venue and Premises Licence's, which are applicable to the branch of Secrets/Gaslight where you are performing. Any variation of these Conditions will be notified to you and displayed on the notice board in the Performers' changing room. Failure to abide by the such Licence Conditions, with regards to your performances, puts the Licences' for the venue at risk and will almost certainly result in you being denied the opportunity to continue to perform in Secrets/Gaslight venues.

22. PROSTITUTION

Secrets/Gaslight, in all its branches, offers adult entertainment which does not include any kind of service other than striptease, stage performances and table company, provided in accordance with this Code of Conduct. Under no circumstances will Secrets/Gaslight tolerate any offers of sexual services other than striptease and conversation with the customers. If any Performer offers a customer the possibility of other or additional sexual services (either within Secrets/Gaslight or elsewhere, and whether or not the Performer intends to provide those services), the Performer will be subject to Secrets/Gaslight Disciplinary Procedure, which may involve immediate exclusion from all Secrets/Gaslight premises. Equally, all Performers are required to refuse, politely but firmly, any request from a customer for services other than those permitted by this Code of Conduct.

23. LEAVING AND LEAVING EARLY

All Performers are expected to remain in Secrets/Gaslight until closing time. The only circumstances in which early leaving will be accepted are:-

- a. If you have a genuine medical emergency during your session, in which case (if necessary) an ambulance will be called and you will be taken to hospital.
- b. If you have the permission of the Manager at Secrets/Gaslight, or a member of The Senior Management Team.

If you leave early for your own reasons, other than to dance at another Secrets/Gaslight venue, you will not be allowed to enter or re-enter any Secrets/Gaslight venue on that night.

If you simply do not feel well you should immediately see the Performer Co-ordinator. They have a first aid kit, including tampons and band-aids etc and will find you a comfortable place to rest until you feel better and can resume your performances.

24. PARTNERS

Partners are requested not to attend Secrets/Gaslight when you are on the premises. If a special occasion arises where you have friends or relatives visiting and you or your partner would like to show them Secrets/Gaslight, the Manager may grant them entry, providing the Manager is notified in advance.

25. **DISHONESTY**

Theft by Performers of money or property from Secrets/Gaslight, its customers, employees (either employed or self-employed) or other Performers will result in your being barred from Secrets/Gaslight. Theft includes, but is not limited to, removal of money from customers' tables or their person or the giving away of Secrets/Gaslight' VIP or other promotion cards, without prior consent of the Management.

26. FIGHTING

Fighting or wilful acts resulting in injury to others whilst in Secrets/Gaslight premises is prohibited, as is harassment, arguing or fighting between Performers. Additionally, it is Secrets/Gaslight policy never to use force of any kind with a customer of Secrets/Gaslight, regardless of the situation. The one exception to this is if limited force (used for restraint or removal from Secrets/Gaslight) is necessary, in order to protect Performers, staff and customers from possible harm, and is limited to Security staff.

In no instance is it acceptable for a customer or any other individual to strike anyone, and if they do they will be removed from the premises. If you are harassed by any customer you should immediately call the Performer Co-ordinator, Manager or Security.

27. INTENTIONAL MISUSE OR DESTRUCTION

Misuse or destruction of Secrets/Gaslight property or equipment is not permitted. You are expected to dance with the utmost care at all times. Negligence or wilful destructive acts will not be tolerated.

28. <u>DISCLOSURE</u>

Disclosure of any confidential company information is not permitted. Secrets/Gaslight take pride in the creation of its designs and entertainment format and, therefore, feel strongly about their confidentiality. You must not be in possession, either on or off the premises, of records, files, data, methods, plans, guest lists, trade secrets, price lists or other information, which is proprietary in nature and confidential or disclose the same to third parties.

29. PRESCRIPTION AND NON-PRESCRIPTION MEDICATION

If you are using prescription or over-the-counter medication you may bring such medication with you, providing it is in the original containers and the contents are clearly labelled, and on the provision that it is shown to the Performer Co-ordinator upon entry. Prescription or over-the-counter medication should <u>not</u> be mixed together.

30. REQUIRED STANDARDS OF PERFORMANCE AND BEHAVIOUR

You should be able to attain and maintain Secrets/Gaslight' required level of dance and stage performance. Repeated failure to follow any advice regarding your performance or behaviour may result in you no longer being allowed to dance in any or all Secrets/Gaslight venues.

31. <u>USE, POSSESSION OR BEING UNDER THE INFLUENCE OF ILLEGAL SUBSTANCES OR COMPARABLE SUBSTANCES</u>

You must not, at any time, be under the influence of, possess, distribute or use any controlled substance on your way to Secrets/Gaslight or on Secrets/Gaslight' premises (including car parks and surrounding buildings). Secrets carry out checks and random searches to ensure compliance with this Condition; this may include personal and bag searches of performers and, in signing this Code of Conduct, you confirm your understanding of, and consent to, such searches.

32. <u>ILLEGAL SUBSTANCES USED BY CUSTOMERS OR OTHERS</u>

If you have any suspicion that other Performers, members of staff (employed or self-employed) or customers are using or dealing in any drugs or other illegal substances, or a customer or anyone else offers you any illegal substances, you must immediately advise the Manager, Security or Performer Co-ordinator.

33. GAMBLING

No gambling is permitted on Secrets premises by any person.

34. <u>SOLICITATION FOR DRINKS OR TIPS</u>

Solicitation for alcoholic (or non-alcoholic) beverages is discouraged, as this could be construed as undue pressure. Secrets suggest you do not ask a customer to buy you a drink as the customer should ask you first. You should not ask for tips or money, as the customer should give it to you willingly. The waiter may ask the customer if he wishes to buy the Performer a drink, in which case the Performer may accept.

35. WEAPONS

No weapons or CS gas are permitted on Secrets premises, at any time, for any reason. It is everybody's responsibility to enforce this policy throughout Secrets.

36. SANITARY BINS

Sanitary bins are provided in all toilets. Please do not throw/flush sanitary products down the toilets as these block up the drains.

37. PERFORMER CO-ORDINATOR (ALSO KNOWN AS HOUSE MOTHER)

A part of their job is that they monitor as many of your performances as possible, for Licence compliance, and to ensure that you do not breach any of the Premises Licence Conditions or Performers' Code of Conduct whilst you are on Secrets' premises.

DECLARATION BY PERFORMER

I confirm that: -

- a. Secrets is not under any liability to make PAYE deductions on my behalf as I am not employed by Secrets.
- b. The onus is upon me to make a return to HM Revenue and Customs and it is my obligation to pay any taxes due, including VAT and income tax. It is also my responsibility to ensure that I am not claiming Job Seekers' Allowance or any other inappropriate benefit whilst earning money by performing on a self-employed basis at Secrets.
- c. I will not hold Secrets, or any other individual employed by Secrets or self-employed, responsible for any acts arising out of negligence on my behalf and it will be my responsibility to take out my own insurance to cover sickness, damage and loss of costumes.
- d. I confirm that, prior to my signing this Code of Conduct, I have declared to Secrets' Management (in writing, as set out below) any convictions that I may have for drugs and prostitution, or any other convictions, and that this may not necessarily preclude me from performing at Secrets. Should Secrets require it, I will obtain a copy of my CRO (Criminal Records Office) Report (obtainable from any Police Station), in support of my Disclosure below, as to whether I have a criminal record or not.

I have read, understood and agree to abide by all of the points in this Code of Conduct, which replaces all previous Codes of Conduct, the latest copy of which is always on display in the Performers' changing room in all Secrets' premises, along with any relevant Supplementary Conditions, in respect of the premises I am performing in. The entire Premises Licence Conditions are kept in the Manager's office and available from the Manager, to be viewed at all times, as referred to in clause 21.

DISCLOSURE OF CRIMINAL CONVICTIONS

<u>DATE</u> <u>NATURE</u>	OF THE OFFENCE
(PLEASE PRINT CLEARLY IN BLOCK LETTERS)	
	Name:
Full Address:	
	Postcode
Tel number:	Mobile No:
Date of Birth:	Signed: Date:

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 SECTION 2, SCHEDULE 3: CONTROL OF SEX ESTABLISHMENTS

Notice of Application for a Licence for a Sexual Entertainment Venue

NOTICE IS HEREBY GIVEN THAT

SECRETS HAMMERSMITH LIMITED

APPLIED ON 19TH MARCH 2021

TO HAMMERSMITH & FULHAM COUNCIL, IN RESPECT OF THE PREMISES KNOWN AS

SECRETS

OF

62, GLENTHORNE ROAD, LONDON, W6 0LR

UNDER THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982 FOR THE RENEWAL OF A SEXUAL ENTERTAINMENT VENUE LICENCE FOR THE INTENDED DAYS AND OPENING HOURS OF:

MONDAY TO SATURDAY 18.00 TO 04.00; SUNDAYS 18.00 TO 00.00.

ANYONE WISHING TO MAKE **OBJECTIONS** TO THIS APPLICATION MUST DO SO IN WRITING TO:-

The Licensing Authority

Hammersmith & Fulham Council

FAO: Licensing Section

Town Hall, King Street, London, W6 9JU.

Phone: 020 8753 1084

E-mail: <u>licensing@lbhf.gov.uk</u>
Website: www.lbhf.gov.uk

NO LATER THAN 28 DAYS AFTER THE DATE OF THE APPLICATION, STATING THE GROUNDS FOR OBJECTION.



