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IN THE MATTER OF A SUMMARY REVIEW  
UNDER THE LICENSING ACT 2003

BEFORE THE ISLINGTON LICENSING AUTHORITY

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**WITNESS STATEMENT  
OF LUKE LAWS**

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I, LUKE LAWS of Fabric, 77A Charterhouse Street, London, EC1M 6HJ will say as follows:

**Background and experience**

1. My name is Luke Laws and I am the General Manager for Fabric nightclub. I have held this position since June 2011 and prior to holding that role I was the Bars Manager at Fabric and Matter between August 2008 up to becoming the General Manager in June 2011 at Fabric. Prior to that I was employed by Inventive Leisure (Revolution Vodka Bars) for six months and a year prior to that I was General Manager for 3D Entertainment. I moved to the position at fabric due to it's iconic status in the industry and due to the best practices that were known to be operated by the owners. I took the view on accepting the employment that this was my "premier league" promotion to work at London's top venue. I had declined at least six other offers of employment at other venues and have been headhunted nationally since.
2. We have consistently attempted to remodel our practices to deal with whatever the current live issue may be, whether that be theft of / loss of mobile phones, thefts of handbags and property within the venue, the outside of the venue being targeted by Somalian drugs and nitrogen oxide sellers, use of drugs by customers, the changes in society's drug use and the impact on our premises and all other security and management issues. I am still of the view that the systems we have in place are promoting the licensing objectives.

3. I was present at all of the meetings with the regulatory authorities in the run up to the original review hearing. I attended the review hearing, gave evidence at the appeal hearing and have been involved in trialling ID Scan and the drugs dogs at the premises since the original review hearing.
  
4. I like to think that I am a “hands on” manager of the premises. I have always had good personal contact with Police Licensing Officers and Local Authority Licensing Officers. I have regularly been praised for my proactive approach with the authorities. In 2013 I received a commendation from the Borough Commander due to the way I handled an incident at the club.

#### **Fabric - the venue**

5. Cameron Leslie has dealt with the venue in his witness statement and I will not repeat what he says other than endorse his comments.

#### **Fabric policy file**

6. We produced a bundle for the appeal at the Magistrates Court which contained within it the following documentation:-
  - 6.1. Bar support staff training pack.
  
  - 6.2. Bar staff training pack.
  
  - 6.3. Cloakroom / cashier training pack.
  
  - 6.4. Staff email training pack.
  
  - 6.5. External cleaning staff training pack.

- 6.6. Floor staff training pack.
  - 6.7. Guest list staff training pack.
  - 6.8. Safe work procedures - lifting and moving objects.
  - 6.9. Fabric search policy.
  - 6.10. Saber Security policy.
  - 6.11. Personal use policy.
  - 6.12. Prescription drug policy.
7. It was accepted that these policies were set at a significantly high level and that we take our staff training and the management of customers within the premises particularly seriously.
  8. We have not sent all of these policies again into this review hearing but a bundle of these policies is available for inspection should the need arise.
  9. Fabric has always had a significant security deployment plan which is again was scrutinised during the Magistrates Court appeal. At that time we had twenty nine door supervisors positioned as per our management plan. We had the most stringent measures already in place in relation to searching of people coming in and out of the premises. We have brought about our own initiatives such as exit searching where we will search people when they are leaving if there has been reports of thefts of or loss of mobile phones. We have received praise from the Police for being proactive with this initiative which has been offered to be used by other licensed premises.
  10. We have ensured we have a secure smoking area for the premises so no one is able to get in or out of the smoking area unless they have passed the front door entrance search which

includes metal detectors and a thorough physical search of every customer entering the premises. The smoking area is self contained and is constantly supervised.

11. I do not recognise the criticisms that have been raised in the police evidence in relation to the management of and security of the premises. However as a result of these proceedings we have now undertaken a full review of our systems and in the circumstances have devised a new drugs policy, queuing plan, security plan, toiler staff responsibilities and a new search policy. These are all attached to the representations against the interim steps. In summary I would suggest that the key changes to our policies are as follows:-

Search policy:

- All pockets emptied into search bowl for checking
- Explicit instruction to be checking articles thoroughly to staff
- ID scan entry for any contraband found
- Search Captain to constantly audit quality of search

Drug Policy:

- ID scan entry for any contraband found
- Toilets to be changed to reduce possibility of people taking drugs in them

Queuing plan:

- ID scan
- Body worn cameras deployed

Security plan:

- Active CCTV monitoring
- Enhanced CCTV system

- Independent auditor of security
- ID scan
- Staff training on interventions when drug activity suspected
- Staff training on welfare interventions
- Lighting changes throughout the venue
- Staffing increases within toilet areas
- Creation of incident heat map to help security evolve

12. I am aware of other premises from my previous employment and following other operations. I am not aware of any late night licensed premises which searches 100% of its customer base. In addition I am unaware of any operator who has such a significant security presence, systems in place and a complete searching policy. We even search all of our artists as well and we are the only operator who would do that. We always have female door supervisors at the premises and can only emphasise that our search regime goes as far as the law permits. If we went any further it would be described as an invasive body search and would be illegal.

13. Our largest area of complaint from customers attending our premises, this can be seen on Trip Advisor, is where people are complaining about the invasive nature of our search regime. I am certain we lose some clients as a result of this searching regime but it is imperative for our venue. I find that this is the most significant issue that I have to deal with on my customer interaction.

### **Drugs and searching policy**

14. We have always had a full and comprehensive drugs policy and search policy at the premises. Our search policy is now to be offered at the heightened level which is the document contained as an annex to the representations against the Interim Steps.

15. Our security staff deployment and plans of where they are situated highlight the significant investment in constantly addressing our policies on searching.

16. We have now had Darrell Butterworth come on multiple occasions and undertake an independent review of our policies and he comments on our search policy and other operational issues in his report. He has made some minor suggestions to improve some areas and these were actioned immediately.

### **Drugs dog trials**

17. The owners and myself have concerns about having drugs dogs at the venue on a nightly basis. The issues in relation to drugs dog companies we have found is as follows:-

17.1. This is not a regulated industry. There are no central legal guidelines as to the drugs dogs procedures and practices, drugs dogs operators and no quality assessment of their performance. It is an unregulated industry.

17.2. We went to a significant number of drugs dog providers and asked the questions attached to the questionnaire with their responses shown.

17.3. As a result of our initial investigations we were concerned that there was no consistency to the answers that were given and it became very clear to us that this unregulated industry appeared to be making it up as they go along. The inconsistencies are major and reflect an unregulated industry.

17.4. We had undertaken a significant amount of research in relation to the number of false positives and the general quality of drugs dogs which Professor Measham deals with in her witness statement.

18. We then conducted live tests on 29 November 2014 and 28 August 2015. The results of the first of these tests can be seen at Paragraph 17 and the results of the second test can be seen at Paragraph 18. I was present through the whole of these searches and the main concerns are as follows:-

18.1. In both of the trials, when a positive drug indication was given by the dog I am certain that our searching policy would have found the drugs anyway. I was present when most of these indications and follow up searches took place. We were very careful to asses whether we thought that we would have found the drugs without the dog and I am certain from our robust searching policy that we would in each of the cases.

18.2. I feel our searching policies are stronger and more successful then the two drug dogs Companies that we have trialled. I am convinced that our searching policies would not be enhanced by the use of a drugs dog.

19. 29 November 2014

<b>Time</b>	<b>Dog Indications</b>	<b>Seizures/refusals as a result</b>	<b>False positives</b>	<b>Seizures from front door search with no dog indication</b>	<b>People in</b>
23.00 – 23.45	7	1	6	2	246
00.00 – 00.35	11	3	8	4	262
00.45 – 01.10	11	2	9	3	303
01.25 – 01.55	6	3	3	2	215
<b>Total</b>	<b>35</b>	<b>9</b>	<b>26</b>	<b>11</b>	<b>1026</b>
<b>% of attendance</b>	<b>3.41%</b>	<b>0.88%</b>	<b>2.53%</b>	<b>1.07%</b>	



20. 28 August 2015

Time	Dog Indications	Seizures/refusals as a result	False positives	Seizures from front door search with no dog indication	People in
23.00 – 00.00	n/a	n/a	n/a	n/a	514
00.00 – 01.00	5	0	5	3	374
01.00 – 02.00	8	1	7	11	623
02.00 – 03.00	5	1	4	5	249
03-00 – 03-45	1	0	1	2	104
<b>Total</b>	<b>19</b>	<b>2</b>	<b>17</b>	<b>21</b>	<b>1564</b>
<b>% of attendance</b>	<b>1.21%</b>	<b>0.13%</b>	<b>1.09%</b>	<b>1.34%</b>	

### The medical centre

21. Fabric has always had a licensing obligation to provide medics on duty whilst we are operating. We were undertaking this from the moment that the premises opened to trade. This is an area which Fabric take extremely seriously. This is not always the case at other venues that I have seen and worked in. Lots of premises have paid lip service to providing medical assistance to customers who may become ill whilst they are in the venue. I also do not know of any other venue that has multiple dedicated medics on duty every night as well as numerous other staff who are trained to give medical assistance and be able to cease their normal duties and exclusively aid medics should the need arise.
22. These facilities are constantly being reviewed to ensure that we have the best possible facilities should we need them. Our medical room has been refurbished more times in my tenure at Fabric than any front of house area, which is also extremely unusual in my

experience of nightclubs and venues. The improvements have been numerous and have included:

- Extension of the area to accommodate four beds.
- Installation of dedicated air conditioning unit to service the area.
- Expansion of equipment available for medics to use both in the medical centre and around the venue in reaction to customer needs (such as blood sugar tests for people with diabetes).
- Provision of free taxis should somebody need to get somewhere for a medical reason (which does not require an ambulance) - such as getting medicines from home should someone feel unwell.
- Improved and enhanced training of staff.
- Advice taken from university professors on how to improve this part of our operation.
- We are the only venue that I know of that has a dedicated defibrillator and staff trained on how to use it.

23. Whilst Fabric's facilities are the best I've seen in a nightclub environment (which has been vindicated by both the London Ambulance Service report and Coroners comments) - Fabric has and always will strive to improve wherever possible.

#### **Introduction of Professor Measham / The Loop in to the premises**

24. As we are constantly trying to understand the issues that cause potential difficulties to our customers in relation to drugs we have introduced Professor Measham and The Loop to our

organisation. Clearly the education side of drug use is an important feature for us to understand changing trends in customers use of drugs and being able to deal with them.

25. Professor Measham details in her report the role that she is now undertaking in the venue and the additional support that is given from her and The Loop.

26. Some of the key issues where she can add benefit is in education and information sharing from her vast experience. This will add another layer to our ability to deal with customers who will have taken drugs and to understand the trends that are current.

### **Interaction with Police and evidence for the Summary Review**

27. I have concerns that our relationship with the Central Police Licensing team is very different to the relationship we have with the Islington Police Licensing team. This has created a mixed message and difficulties for us which I have highlighted with the owners and our solicitors. This caused us so much concern that we had asked for a meeting with the Borough Commander to explain that we were getting these mixed messages from Central Licensing. This meeting had been set up prior to the launch of the Summary Review.

28. I have been concerned for some time with the way that we have been almost set up to fail by the Central Licensing team. This is reflective in Ian Graham's comment to me on a recent visit when he was watching the search procedures. He said "I am not going to make the same mistakes as Commander Chisty and comment on you has being the beacon of best practice."

29. I have always felt that he has been highly confrontational in the way that he has spoken to me and my team.

30. I think that their stance is most easily summed up by their wording of what happened on the 25<sup>th</sup> June 2016 in relation to a girl who became poorly at the premises. The police evidence states that we did not notify the police of this incident. By implication they are suggesting

that we are not doing what we are meant to do. However the CAD reference of this call is 155425/06/2016. Their account is clearly incorrect.

31. Within the recent documentation that we have had there are instances where they suggest we have had minor non-compliance with the conditions on our premises licence. These are incorrect.
32. Whilst Ian Graham has said he wouldn't make the same mistake as holding us out as a beacon of best practice we have been recommended to other operators by the Islington Police as someone to seek advice from in relation to aspects of what we do well. We have also been approached directly by other operators who have sought advice from us on how to manage security and search procedures particularly focused on customers trying to bring amounts of personal use drugs into their venues.
33. We appear to be being held up as the only premises that have a problem. Central Licensing told me during the visit of the 2<sup>nd</sup> July 2016 that there had been six drugs deaths within London venues in the previous three weekends from similar type drug overdoses.
34. It has been constantly alluded to that people do not come to our venue and use the bar facilities with the inference that they are solely relying on drugs. We have undertaken a close analysis of our bar taking up to date from 1<sup>st</sup> January 2016 and the average spend over the bar per customer is £17.20. This equates to just over four drinks. The industry average for nightclubs is 2.5 drinks and therefore we are significantly above the industry average on alcoholic drinks spend per customer.
35. The drinks revenue contribute in excess of 50% of our overall revenue from the premises so this suggestion is factually incorrect.

STATEMENT OF TRUTH

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Signed: \_\_\_\_\_  
Luke Laws

Dated: \_\_\_\_\_