



J D Wetherspoon

Code of Conduct for Responsible Retailing

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Overview

J D Wetherspoon began trading in 1979. Over time we have developed a sophisticated range of practices and procedures aimed at providing a safe and convivial environment in which our customers can enjoy the wide range of facilities which we offer. The procedures that we have put in place are subject to constant review and improvement and are the result of careful consideration by our experienced team of directors, managers and professional advisors.

Overall, our aim is to provide a distinctive kind of pub which attracts a broad range of customers. We aim to retain the congenial atmosphere of the traditional pub and couple it with features found in modern cafés, restaurants and bars. We successfully achieve this through a combination of high-quality design, good management and the provision of an all-day menu and a range of quality products.

J D Wetherspoon was the first company to develop a Code of Conduct for Responsible Retailing. This Code sets out the operational procedures that we as a company have put in place to ensure we are actively promoting the four licensing objectives under the Licensing Act 2003 in England and Wales; the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. It also covers the promotion of Public Health which is a fifth licensing objective applicable in Scotland.

At all times we operate to ensure that our commercial imperatives do not override the core values set out in the Code. The Code was developed in April 2004 and formed an integral part of all applications that we submitted to convert and vary licenses prior to the introduction of the new licensing regime. The Code is regularly reviewed as a result of our experience in dealing with local authorities, police forces and various other statutory bodies to ensure it reflects best practice.

The Code is divided into five sections, one for each of the five licensing objectives, with specific practices and procedures identified under the relevant objective. There is, however, considerable overlap between our practices and the objectives so that some of our procedures simultaneously address more than one of the objectives. For example, our staff training procedures address all five objectives and our CCTV policy meets both the crime prevention and the prevention of public nuisance objectives.

Our approach has always been to work closely with the statutory authorities and with local residents to ensure that the licensing objectives are being actively promoted. We appreciate that the success of the licensing regime depends on the continuation of strong partnerships between the licensed trade, responsible authorities and local communities.

1 Prevention of Crime and Disorder

1.1 Food

- 1.1.1 At J D Wetherspoon the provision of good quality food at reasonable prices is at the core of our business. Where there are no external restrictions, a full menu is available in our premises from opening until 2300, 7 days of the week.
- 1.1.2 Food has become an increasingly important element of our operation in recent years and in particular since the introduction of the smoking ban in England and Wales in 2007. Our experience is that a smoke-free pub provides a much more conducive atmosphere in which to eat, especially for families with children. As a consequence, since the smoking ban, we have seen our food sales increase significantly. Food and soft drinks currently amounts to 37% of the total sales across the estate. In a number of our pubs a figure of 50% and higher is achieved especially in newly opened pubs. Including bar purchases made in association with table meals, diners now account for approximately two-thirds of sales.
- 1.1.3 The majority of our pubs open from 0800 and some even earlier to cater for customers who want to join us for breakfast. We pioneered the availability of breakfasts across all our pubs. In addition, we now sell over 1,000,000 hot drinks every week including Lavazza coffee, tea and hot chocolate.
- 1.1.4 Our Curry, Chicken, Steak and Fish Friday Clubs are key offers available in nearly all of our pubs. These promotions are typical of our approach to responsible drinks retailing where we link drinks promotions with the sale of affordable food. During all our Club promotions, customers are offered a drink inclusive with their meal and can choose from a pint of lager, real ale, Guinness or cider, a bottled lager or beer, a glass of wine, a single spirit and mixer, or they can choose a coffee or tea, a bottle of water or a non-alcoholic soft drink. In addition a large number of our meals available at all times offer a similar inclusive drink.
- 1.1.5 We always use high quality ingredients and increasingly offer regional dishes and locally sourced products. We also take great care to ensure that artificial ingredients are avoided wherever possible. For example we use free range eggs, fish from sustainable stocks, the beef in our burgers is 100% British and our cooking oils are without trans-fats.
- 1.1.6 Our children's menu is available throughout our trading hours. A number of our children's meals use only organic ingredients. All of our children's meals come with a bag of fresh fruit as well as milk, juice drinks or water as the drink options. We provide nutritional information about the meals offered on the children's menu to help parents make informed decisions about what their children are eating.

1.2 Responsible Drinks Retailing

- 1.2.1 J D Wetherspoon takes the issue of responsible drinks retailing extremely seriously. We understand that we are in the business of selling alcohol but we strive to operate our pubs in such a way that we create a safe and welcoming atmosphere which encourages people to behave well and consume alcohol in a responsible fashion. We work closely with the statutory authorities to ensure that any local initiatives designed to achieve these goals are fully supported by our pubs.
- 1.2.2 The provision of food for a high percentage our trading hours is a vital component of our approach to responsible drinks retailing. The consumption of food both before and during the consumption of alcohol is widely recognised to slow down its absorption into the blood stream.
- 1.2.3 We do not engage in irresponsible drinks promotions. We do not offer ‘all inclusive’ promotions where our customers can drink unlimited amounts for a set fee. Neither do we offer promotions that entice customers with free alcoholic drinks such as “buy-one-get-one-free” promotions. The majority of our drinks promotions form part of our food promotions.
- 1.2.4 We sell a wide range of soft drinks, fruit juices, tea and coffee. Where drinks form part of a promotion, we always offer a range of drinks including ones of different alcoholic strengths, soft drinks, tea and coffee. The mandatory condition requiring the provision of small measures is fully complied with.
- 1.2.5 We concentrate on the provision of cask conditioned beers and sell more than any other pub company. Our premises regularly feature in the CAMRA “Good Beer Guide”. Throughout the year we run national and regional festivals showcasing the very best ales from local microbrewers as well as larger provincial brewers. The vast majority of our premises are accredited by Cask Marque for the quality of their ales. Real ale typically attracts a broader, often older, cross-section of customers. This broad customer base creates an atmosphere within our pubs that we believe leads to better behaved customers.
- 1.2.6 We are the only pub company in the United Kingdom to produce a comprehensive, bi-monthly customer magazine called Wetherspoon News. The print run per issue is 250,000 however there is an estimated readership of 1,000,000 (4 readers per copy). Wetherspoon News is distributed nationally throughout all our pubs, Wetherspoon Hotels, the company’s head office, via our website and through the Wetherspoon News App. It is provided free-of-charge to customers. . We also devote a proportion of this publication to recognise and highlight our staff who have worked hard to promote responsible retailing and sensible drinking messages in their pubs.

1.3 Price Structure

- 1.3.1 J D Wetherspoon offers competitive prices across the full range of products on offer to our customers and not just on alcoholic drinks. This approach has always been an attractive part of our offer from the customer point of view. In our view, customer behaviour is primarily influenced by strong management, highly trained staff, and a robust approach to responsible drinks retailing rather than the pricing of alcoholic products.

- 1.3.2 Our approach to the sale of alcohol is to concentrate on the range and quality of the products on offer rather than solely to use price as an incentive.

1.4 Highly Trained Staff

- 1.4.1 At J D Wetherspoon there is a very strong culture of thorough induction training and on-going refresher training increasingly by e-learning and other interactive methods. Training is provided for all employees regardless of their role, their age or their hours of work. It is widely recognised that the level and quality of staff training is a significant factor in controlling the behaviour of customers on licensed premises. Our employees are extensively trained on their obligations under licensing law particularly the legal requirement not serve drunks and the restrictions of the sale and consumption of alcohol to and by under 18s.
- 1.4.2 Our training systems have been consistently praised by employees and by the industry. We have won many awards including the Supreme Training Award from the British Institute of Innkeeping ('BII').
- 1.4.3 Training of our management personnel is conducted on a modular basis with continuing assessment throughout their employment period. Bar staff training is primarily carried out on site by management personnel coupled with on-line training modules
- 1.4.4 An essential element in having a well trained staff is our ability to retain our employees. Turnover of Pub Managers is on average half the industry average. Moreover, 75% of all management employees began with J D Wetherspoon as hourly paid employees and, typically, anyone appointed to run one of our pubs for the first time is likely to have been employed by the Company for at least 5 years.
- 1.4.5 The quality of our training, recruitment and employment practices have been recognised by J D Wetherspoon being included in "Top Employers UK" for 15 consecutive years.

1.5 Management Structure

- 1.5.1 Our management structure is designed to ensure that we encourage responsible behaviour on our premises. Our pubs each have an average of five managers and the majority of these hold personal licence qualifications or are working towards them. There is always at least one manager, often more, on duty in every pub throughout trading hours and at peak times there will be a designated managers supervising the bar and 'walking the floor'.
- 1.5.2 Pub mangers have the support of their Area Manager who in turn reports to a Regional Manager who is overseen by a general manager. The Operations Director maintains regular contact with management at all levels. This management structure ensures that if any employee has any question or requires further support they can immediately ask for assistance from their management team. Area Managers look after an average of only 12 pubs each which is a low number of pubs in comparison to regional managers in competitor pub companies.

1.6 Preventing Drunkenness and Disorderly Behaviour

- 1.6.1 We have taken numerous positive steps to ensure that the facilities and promotions offered in our pubs do not encourage the excessive consumption of alcohol. All of our employees are provided with intensive induction and refresher training on our “Don’t Do Drunk” policy. This policy is designed to ensure that alcohol is not served to anyone who appears to be drunk or to anyone who is trying to purchase alcohol on their behalf. Our employees are trained to continually assess the state of sobriety of any customer purchasing alcoholic drinks or consuming alcohol within the premises. As part of this training we reassure our employees that if they ever feel uncomfortable dealing with a situation then they must notify the pub manager and ask for their assistance. Our management teams are asked to support the decision of any employee not to serve a customer who appears to be drunk or disorderly.

We monitor the effectiveness of this training by reviewing the use of the ‘Refusal’ button on the EPOS till system (pressed whenever a customer is refused alcohol) and from feedback given by enforcement authorities, customers and company representatives. Adherence to our “Don’t Do Drunk” policy is closely monitored through regular visits to all pubs at any time during trading hours. These visits are completed by senior Wetherspoon managers and also independent “mystery” visitors.

- 1.6.2 All employees are trained to immediately notify the pub manager if any customer becomes insulting, threatening or aggressive. The pub manager is then able to act to prevent this behaviour escalating into violence. If such disorderly behaviour does occur on our premises the pub management team will take immediate action to diffuse the situation. If the disorderly individual refuses to leave the premises then, if necessary, the police will be called to assist in the ejection.
- 1.6.3 Details of disorderly customers are circulated to other licensed venues via the Pubwatch or similar local intelligence systems. We will always support ‘Banned from One - Banned from All’ or similar initiatives which ensure that a consistent approach is taken by licensed premises in a town or city to refuse entry to anyone who has been included on the Pubwatch ‘banned list’.

1.7 Zero Tolerance to Drug Use

- 1.7.1 J D Wetherspoon operates a zero tolerance policy towards drug use and we will take whatever measures are necessary to ensure this policy is being actively promoted. In particular, we co-operate with the police to ensure that wherever a risk has been identified appropriate action is taken and where illegal substances are found, they are confiscated, securely stored and given to the police at the earliest opportunity in accordance with any protocol requested by the police.
- 1.7.2 Where a search policy is in place, we make every effort to ensure that customers are aware that this is a voluntary procedure and that they have the right to decline this condition of entry. If a customer does decline and our door staff or employees remain concerned that the person is in possession of illegal substances, they will make every effort to notify the police of these concerns so that a police search can be considered.

1.7.3 Employees are expected to be extra vigilant to prevent drug use occurring and there are specific procedures on how to deal with such issues should they arise. Our pub managers will always welcome any additional site specific training that local police wish to offer that may be particularly relevant to their locality.

1.7.4 Toilet checks are carried out by employees at frequent intervals during peak trading times and they are carried out at least once every hour during all other trading hours. These checks help ensure that no illegal activities take place in these areas.

1.8 CCTV

1.8.1 CCTV is provided throughout our premises. It has proved to be an active deterrent for anti-social behaviour and we are committed to continuing its provision. All our existing premises are fitted with digital equipment.

1.8.2 A number of premises are also provided with body cams for wearing by management and the door team, if there is a requirement.

1.8.3 We are committed to training adequate numbers of employees in each pub in the use of the CCTV system so that immediately following an incident a trained member of staff is always available to replay footage or download material. This material will always be made available to the statutory authorities without delay where the necessary justification for its release is met under the Data Protection Act.

1.8.4 All CCTV footage will be retained for a period of at least 30 days and is subject to the required Data Protection Act processes.

1.9 Door Supervisors

1.9.1 The vast majority of our premises operate successfully without the need for door supervisors. We risk assess the need to provide door supervision and are willing to follow any reasonable recommendations of the police to engage door supervisors where that is deemed necessary.

1.9.3 Where door staff are engaged they work in accordance with agreed policies and procedures. Their primary function is to ensure that the points of exit and entry and outside areas remain under supervision while also monitoring the interior of the premises to maintain a safe and relaxing environment for customers and employees alike. We would always expect door staff to meet the high standards of service and behaviour that we would expect from our own staff. We expect them to give customers confidence in their ability and our ability to create a safe environment. We expect that they behave in an appropriate manner in any situation where customers are rude, aggressive, violent and know how, when deemed necessary, to use proportionate force in controlling a situation.

1.9.4 We ensure that all door supervisors are registered and in possession of an SIA badge and refuse to allow any unlicensed door supervisors to work on our premises.

1.10 Toughened Glassware & Polycarbonates

- 1.10.1 J D Wetherspoon is 100% committed to working with the police and other authorities to improve industry standards for customer safety in licensed premises and in particular reduce the risk of glass related injuries.
- 1.10.3 We strive to eradicate glass-related incidents in our pubs through strong front-of-house management, staff training, effective door and customer management policies, regular glass collection, well-maintained premises and the use of toughened glass. Wherever available, the glassware used in our pubs is toughened glass. Due to the methods employed in the manufacture of toughened glass, the glass, if broken, tends to break into very small pieces thereby reducing the possibility of it being used as a weapon. Our employees are trained to ensure that when customers leave our premises they do not leave taking glassware or bottles with them. Our employees are also tasked to ensure empty drinking vessels are cleared away in a timely fashion so as to reduce the risk of breakages and their use as weapons. Most importantly, however, J D Wetherspoon, unlike the vast majority of pub companies, has an extensive food offer which is available to customers in the vast majority of our pubs throughout trading hours from opening to 2300 hours, 7 days a week. In the majority of our pubs this means food is available from 0800 or even 0700 up to 2300. The result of this is that our pubs attract a much broader range of age groups and types of clientele than many of our competitors. We consider that this is a significant factor in reducing the potential for alcohol-related violence and anti-social behaviour which can result in injury.
- 1.10.4 We will always consider whether polycarbonates should be introduced on a premises-by-premises basis. When problems have been identified with a particular pub or location then we accept that this approach may assist to address those problems. Similarly, there may be specific occasions when a temporary use of polycarbonates is appropriate, for example, on match days in premises that are situated close to major sportsgrounds. The issue of whether we are willing to adopt polycarbonates involves a very delicate balancing exercise between our desire to work with the authorities to reduce the risk of glass-related injury, the need to promote customer and staff safety whilst at the same time accommodating and respecting the expectations of our customers.

1.11 Pubwatch and Best Bar None

- 1.11.1 J D Wetherspoon is a member of the National Pubwatch organisation and a senior representative of Wetherspoon sits on the National Pubwatch committee. We also support the organisation financially via an annual contribution and one off funding for particular projects. National Pubwatch is an entirely voluntary organisation that is set up to support local Pubwatch schemes and encourages the creation of new schemes. The National Pubwatch organisation has the key aims of achieving a safe, secure and responsible social drinking environment in all licensed premises throughout the United Kingdom and helping to reduce alcohol-related crime.
- 1.11.3 Our pub managers are expected to take an active role in their local Pubwatch scheme. We will support the establishment of a local Pubwatch where one is not already in existence. The type of support we can provide includes providing expertise on how to set up a local Pubwatch scheme and/or Pubwatch online, offering our premises as venues in which Pubwatch meetings can be held and chairing those meetings.

- 1.11.4 We always support initiatives introduced by local Pubwatch schemes to reduce crime and disorder in town centres. For example, many of our premises operate the 'Banned from One - Banned from All' initiative and subscribe to the Radio-Link scheme which provides radio contact with other licensed operators and with the town centre CCTV operators.
- 1.11.5 We provide national support for the Best Bar None Award scheme. The UK-wide scheme, which is backed by the Home Office, was piloted in Manchester in 2003 and has since been adopted by over 100 other towns and cities with great success. Best Bar None aims to promote the responsible management and operation of alcohol-licensed premises with the ultimate intention of offering and maintaining a safer, more welcoming, attractive and lively drinking experience. The scheme encourages local operators to act responsibly and take pride in their premises and surroundings and, in so doing, put something back into the town and their local community. Wetherspoon pubs have won numerous awards throughout the UK in the Best Bar None Awards scheme.
- 1.11.6 We also actively back other partnership based initiatives to promote safe, vibrant and welcoming late night economies such as late night Business Improvement Districts ("BIDs") and Purple Flag schemes.

2 Maintaining Public Safety

2.1 High Quality Design

- 2.1.1 J D Wetherspoon works closely with planning officers, listed building specialists and where appropriate, English Heritage and Scottish Heritage to ensure that each new pub is designed and built to the highest specification. We aim to provide comfortable and efficient facilities and accessible customer areas suitable for all types of customer.
- 2.1.2 Customer areas are designed aesthetically and surfaces are carefully chosen to ensure safety. The majority of our premises are spacious and this allows us to provide ample seating space which in turn prevents overcrowding and creates a safer and more welcoming atmosphere. All floor coverings are assessed for suitability and are slip resistant so as to minimise slips and trips. The sanitary accommodation consists of ceramic tiles and either quarry tile flooring or non-slip flooring similar to the kitchen and behind the bar. Again, consideration is given to maximising slip resistance when choosing flooring.

2.2 Fully Accessible Facilities

- 2.2.1 We are fully aware of our obligations in respect of accessibility for disabled persons and we aim to make all new developments as accessible to everyone as is possible within the constraints of the building.

J D Wetherspoon is highly respected by consumer and enforcement bodies interested in the provision of services and facilities for those with disabilities. Significant emphasis is placed on designing premises which will provide easy access to toilet facilities and also lifts for customers with disabilities where they are required.

A number of our pubs now provide Changing Places toilet facilities. People with profound and multiple learning disabilities, as well people with other physical disabilities such as spinal injuries, muscular dystrophy and multiple sclerosis often need extra facilities to allow them to use the toilets safely and comfortably.

Changing Places toilets are different to standard accessible toilets (or "disabled toilets") as they have extra features and more space to meet the needs of people who use them.

- 2.2.1 All new buildings meet the requirements of Part M of the Building Regulations 2002.

2.3 Electrical and Gas Safety

- 2.3.1 All electrical systems are installed in accordance with Part P Building Regulations and are under the supervision of an electrical services consultant. The Company follows good electrical practice guidance and ensures that all equipment is maintained in a safe condition in accordance with the Electricity at Work Regulations 1989.

- 2.3.2 All gas appliances are installed by Gas Safe registered engineers and thereafter maintained within a planned maintenance scheme.
- 2.3.3 Electrical safety procedures form part of our overall health and safety management system.

2.4 Health and Safety

- 2.4.1 All pub management staff and associates are trained in basic health and safety to a level commensurate with their job responsibilities.
- 2.4.2 A Safety Policy Statement is displayed on the staff notice board or in the staff room of every pub and detailed procedures in respect of safe working practices etc are contained in the written Safety Policy Manual.
- 2.4.3 Regular audits of all our pubs are carried out by senior managers and by independent consultants. These audits are often unannounced and are made throughout the entire estate.
- 2.4.4 An extensive accident and incident reporting and monitoring system is in place, with all accidents / incidents being reported to our independent health and safety consultants. Weekly records of types of accidents are collated and analysed using computer software. Accidents are investigated where necessary and RIDDOR reporting is undertaken.
- 2.4.5 We have developed a wide range of standard operating procedures which we call “SOPs” to ensure our policies and procedures are easily understood and implemented by our employees.
- 2.4.6 We work closely with our Primary Authority Partner, Reading Borough Council, across all relevant areas to ensure best practice is implemented and maintained.
- 2.4.7 We are the highest scoring pub company in the Food Standards Agency maintained food hygiene “Scores on the Doors” scheme.

2.5 Fire Safety

- 2.5.1 All Wetherspoon premises comply with the terms of the Regulatory Reform (Fire Safety) Order. We engage independent consultants to conduct regular fire risk assessments focusing on the safety of all relevant persons in situations of fire. We identify and define the nature and extent of both the fire precautions that must be put in place to protect against fire and the inherent risks that remain, and take steps to remove or reduce those risks where appropriate.
- 2.5.2 All employees are trained in basic fire safety and regular refresher training is undertaken. Daily, weekly and monthly logs of fire safety checks are kept and all fire protection / precaution systems are regularly maintained.

3 Prevention of Public Nuisance

3.1 Dispersal Policy

3.1.1 A poorly managed pub can be a potential source of nuisance, anti-social behaviour and crime which may create concern for the immediate neighbourhood, its residents and the authorities. J D Wetherspoon places great importance on ensuring that our premises do not have such a negative impact. We accept that our responsibilities cannot simply end at our front door and that by operating a well-managed pub throughout the time that we trade, we can help deliver a quieter safer environment in the immediate vicinity of our premises.

3.1.2 We also implement a dispersal policy in our pubs through which we manage customers leaving the premises. The policy allows us to reduce any pressure on the authorities at the end of trading, ease customers' passage home and minimise the likelihood of local residents being disturbed. The key factors of that policy are:

- Where music is provided in our pubs, music levels will be reduced towards the end of the evening to assist in the quiet and orderly dispersal of customers. Our experience is that because customers have not been using raised voices against the background of loud music immediately prior to leaving the premises they tend to leave more quietly.
- Wherever possible, lighting levels are manipulated to become 'brighter' at the end of trading hours to encourage the gradual dispersal of patrons during the last part of trading and the drinking up period.
- On dispersal, our staff encourage customers not to congregate outside the venue, direct customers to the nearest taxi ranks or other transportation away from the area and ensure the removal of all bottles and glasses from departing customers.
- Our managers will speak to any groups that congregate in the near vicinity of the premises after closing time and ask them to move on.
- A minimum of 30 minutes drinking-up time is incorporated in the premises licence as an aid to the gradual dispersal of all customers in the premises at the end of the evening.
- We ensure that there is strong management and staff presence in the customer area and at exit points during the dispersal period.
- We routinely place signage at exit doors asking customers to respect the rights of our neighbours to the quiet enjoyment of their homes.
- Where it is deemed appropriate, we can provide customers with site-specific information on how they can get home safely. Where customers require individual assistance in obtaining safe transport from our premises, we do whatever is reasonably possible to help, for example by providing details of bus routes or contacting taxi and private hire operators on their behalf.

3.2 Liaison with Our Neighbours

- 3.2.1 We attach the utmost importance to the careful investigation and prompt resolution of any complaint made in relation to the day-to-day running of any of our pubs. This includes the effect any pub may have on its surrounding area. Over a third of our premises have residents living above or adjacent to them. We have always emphasised the importance of building close relationships with our neighbours, whether residents or local businesses. Our pub managers are expected to resolve any complaints from the local community quickly and effectively. If they cannot be resolved on a premises level they are referred to an area or general manager for resolution.
- 3.2.2 We are always willing to convene meetings with residents. These meetings provide a useful forum for residents to raise any concerns that they may have regarding our operation and provide our local management teams with an opportunity to become a better neighbour.

3.3 Music and Dancing

- 3.3.1 The vast majority of our premises operate without music of any kind, even background. For many that is a key appeal of a Wetherspoon pub. However, where music is provided in some of our Lloyds branded pubs, it is provided by means of high quality sound systems controlled by central computers or carefully selected DJs so that we maintain control over the style of music played. Where it is deemed necessary sound limiters will be installed. The sound systems allow for music to be zoned within the premises. This means that the level of music can be varied in accordance with the use of each area and ensures that particularly sensitive parts of the premises can be kept quieter. Music levels are reduced towards the end of the evening to assist in the quiet and orderly dispersal of customers.
- 3.3.2 Designated dance floors are generally provided where customer dancing is allowed and, to ensure the safety of customers, it is company policy that drinks are not permitted in these areas.
- 3.3.3 All premises are developed to a high standard to ensure good sound attenuation.

3.4 Standards Monitoring Visits (CQSMA)

- 3.4.1 Wetherspoon sets very high operational standards and these standards are maintained through constant supervision and monitoring using a system of mystery visits to the premises to assess 'Cleanliness, Quality, Service, Maintenance and Atmosphere' (CQSMA).
- 3.4.2 All senior head office and operational employees including Directors are required to undertake at least 15 and 60 'mystery visits' to Wetherspoon pubs every month. They are required to assess the premises in a number of areas varying from the cleanliness of the toilets to the friendliness of the staff. In addition. Every single premises is visited and assessed by "mystery shoppers" on at least two occasions every month.

- 3.4.3 Every pub must receive at least five CQSMA visits each month (60 visits per annum) but most will receive 8 to 10 visits to assess quality and standards. Any pub which is assessed as being below standard in any way is highlighted and revisited the following week. Monthly bonuses based on the CQMSA results are paid to all employees in the pubs, including bar staff.
- 3.4.4 The CQSMA results assist in maintaining high standards but also allow pubs experiencing operational difficulties to be identified so that improvements can be made quickly
- 3.4.5 The CQMSA scheme is the cornerstone of our business and employees at all levels are trained and incentivised to deliver the highest standards. Management staff earn around 40% of their total bonus through CQSMA and bar staff around 60%. As far as we are aware, no other company places so much emphasis (or awards such a high percentage of bonus) on this non-financial aspect of running a pub.

3.5 Pavement Cafés and Outside Areas

- 3.5.1 Pavement cafes and outside areas have become an increasingly important part of our premises. Whatever the scope, size or location of these areas, we ensure that we always create carefully managed areas that are both sympathetic to the premises and the surrounding environment and, more importantly, are designed to ensure that minimal impact is caused to the public who are passing by or who live in their proximity.
- 3.5.2 While each area is developed specifically for the environment it occupies, we operate all our outdoor areas in accordance with the following principles; provision of sufficient furniture to discourage vertical drinking, allocation of staff to ensure the areas are kept clean and empty glassware and bottles are regularly removed and, in the case of pavement cafes, a clear pedestrian route is always maintained for those walking past the premises.
- 3.5.3 All outside areas that are specifically used by smokers are closely managed to prevent any noise or litter nuisance occurring. All areas are equipped with adequate cigarette disposal bins and employees ensure that these bins are regularly checked and that any smoking materials discarded on the ground are removed. Outside areas are managed at all times to ensure that customer behaviour outside the premises does not adversely affect our neighbours or the general public. Our outside areas are the pub equivalent of a shop window and it is therefore commercially important to us that they create a good impression of our premises.
- 3.5.4 We cannot legally prevent customers from smoking on the pavement in front of our premises but where we have alternative areas in which they can smoke, we actively encourage them to use such an area, either by personal request from a member of staff, or via signage.
- 3.5.5 All our pavement cafés and outside areas are covered by CCTV.

3.6 Preventing Odour Escapes

- 3.6.1 All our premises have independently connected mechanical ventilation systems incorporating fans and ducting which terminate above the level of the eaves where applicable.
- 3.6.2 All kitchen extract ventilation passes through grease eliminating baffles at a rate that reduces the risk of odour-nuisance occurring. Kitchen extracts are usually located away from neighbouring properties. Where it is deemed necessary and subject to site survey, odour control equipment is installed.

3.7 Refuse Collections and Deliveries

- 3.7.1 Provision for refuse is made according to the limitations of the premises; for example, sometimes external storage facilities are not available and so an internal store is created. Refuse collection is conducted at frequent intervals either via the local authority contract services or through the use of a private refuse collection company.
- 3.7.2 We are conscious of the noise that the late night disposal of glass and refuse into external bins can cause and where we have residential properties in close proximity, will voluntarily limit the times these can take place to ensure no disturbance is caused.
- 3.7.2 We control and operate our distribution network from our main hub in Daventry. This allows us to minimise the number of separate deliveries to our premises and also to dictate the time of those deliveries to minimise any potential noise or traffic impact.

4 Protection of Children from Harm

4.1 Family-Friendly Environment

- 4.1.1 The limited amount of entertainment provided in most of our pubs together with the range of products mentioned previously and an emphasis on drinks such as traditional ales means that a broad range of age-groups are attracted to our pubs. We encourage families to dine with us in all of our pubs which, together with our award-winning children's menu, further increases the age and range of our customers.
- 4.1.2 Unaccompanied young persons aged between 16 and 17 years are welcome in the majority of our premises up to specific times where they may order and consume food and non-alcoholic drinks. We do not permit them to consume alcohol even though the law does allow them to do so in certain circumstances
- 4.1.3 Children aged 15 years or under are only permitted in our pubs provided they are accompanied by a responsible adult. Depending on the nature and location of the premises, if adults are visiting the pub with children and young people and purchasing alcoholic drinks then pubs may operate a 'house rule' which requires them to purchase meals for each member of the group. Once the meals have been finished and the tables cleared we recommend that only one additional alcoholic drink be purchased per adult. This approach is designed prevent children and young people being neglected by their responsible adult whilst in our pubs. There is no requirement for food to be purchased if no alcohol is being consumed.

4.2 Proof of Age Policy

- 4.2.1 We abide by a "Challenge 21" proof of age policy in all of our premises. Certain premises operate a "Challenge 25" proof of age policy either because of a premises licence condition or at the request of the authorities. "Challenge 25" is mandatory in Scotland. Under this policy, all of our employees are trained to satisfy themselves, via requesting valid ID where necessary, that any customer who appears to be under the age of 21 years (or 25 years as appropriate) are 18 or older. We apply this policy not just to the sale of alcohol but also to the use of licensed premises gaming machines. Employees are also trained to be vigilant to ensure that customers buying drinks at the bar are not buying them for underage individuals.
- 4.2.2 All employees receive induction training on our relevant proof of age policy when they commence employment with Wetherspoon and then receive regular refresher training via on-line learning modules. Training records are maintained electronically and training completion regularly reviewed by the pub management team and members of our Retail Audit department to ensure that the training system is being satisfactorily completed.
- 4.2.3 If any shortcomings are identified, the individual employee is required to undergo further training until the policy is satisfactorily understood by them and applied.

4.2.4 Our proof of age policies are promoted within the premises using self-adhesive signs at entrances and back-of-house posters throughout the premises. Every customer that is refused the sale of alcohol, entry to the premises or is asked to leave the premises should be logged via the 'Refusal' or 'Refused Service' button on the EPOS till system.

4.2.5 Wetherspoon has adopted the industry standards and recognises only the following forms of identification as valid forms of proof of age:

- National passport
- Photographic Drivers' Licence
- United Kingdom 'PASS' accredited age identification card with photograph.
- UK Military ID
- Age Card (Republic of Ireland)

4.3 Gambling

4.3.1 Wetherspoon upholds the principles of the Gambling Act 2005. Our employees are trained to adopt a "Challenge 21" (or "Challenge 25" as appropriate) policy towards the use of licensed premises gaming machines and take proactive measures throughout trading hours to prevent children and young people from accessing these machines.

5 Protecting and Improving Public Health

5.1 Responsible Drinks Retailing

As a responsible retailer Wetherspoon fully acknowledges the harm to health that excessive consumption of alcohol can cause. We have striven as a company to ensure that whilst we are in the business of selling alcohol, we do so in a responsible manner with regard to the health of our customers.

5.1.1 The company's approach to responsible drinks retailing is set out at length in Section 1.2 of the Code. The key areas of that approach are:

- The provision of food during the vast majority of our trading hours.
- No irresponsible drinks promotions such “buy one get one free” etc. The majority of drinks promotions are linked to food such as Curry Club and Steak Night.
- A wide range of reasonably priced soft drinks, fruit juices and coffees which are prominently promoted.
- Promotion of responsible retailing messages to our customers via our in house magazine ‘Wetherspoon News’ ND and or website.

5.1.2 We recognise the importance of informing customers about the alcoholic strength of products and unit measurements. All of our drinks lists and menus record the ABV content for our alcoholic drinks range and since October 2014 the unit alcohol content per drink making us the first major pub company to provide this information.

5.1.3 We adopt a socially responsible approach to marketing. We ensure that low-alcohol and/or non-alcoholic beverages are prominently advertised in our drinks menu.

5.2 Drinkaware

5.2.1 J D Wetherspoon is one of only four pub companies in the UK who was a founding supporter of the Drinkaware Trust (“the Trust”). We fully support its strategic aims and hope to raise its profile and highlight its valuable work by communicating its sensible drinking messages within our pubs. We also provide a significant annual subscription to fund the Trust.

5.2.2 We actively promote the Trust by including a reference to their website Drinkaware.co.uk on the vast majority of our alcohol-related point-of-sale and marketing materials. Their website is recognised as the leading public source of information on sensible drinking behaviour. A link to their website is provided on our own company website. The website is also advertised on our table-talker/drinks list, our front-of-house posters and all single-issue flyers/mail-drops/vouchers. The link features routinely in the header of the ‘responsible drinking’ section of Wetherspoon News. We offer the Trust a free page to support its campaigns in Wetherspoon News. Wetherspoon also participates in local Drinkaware initiatives such as “Club Angels”.

- 5.2.3 We are continually working with the Trust to update our own sensible drinking messages and develop marketing material which can be used in our pubs to reinforce this message. We are pleased to be actively supporting the Trust to achieve their key objective, namely, change the United Kingdom's drinking culture in order to help reduce alcohol misuse and alcohol-related harms.

5.3 Healthy Eating

- 5.3.1 Our commitment to our customers' health is not solely confined to reducing potential harm from excessive consumption of alcohol. We are also concerned that our customers have the necessary information to make healthy eating choices from our food menu. A nutritional breakdown of all our food is displayed in all our premises and is available on the company website.
- 5.3.2 We always use high quality ingredients and increasingly offer regional dishes and locally sourced products. We also take great care to ensure that artificial ingredients are avoided wherever possible. For example we use free range eggs, fish from sustainable stocks, the beef in our burgers is 100% British and cooking oils without trans-fats.
- 5.3.3 We were the first major pub or restaurant company to provide the calorific content of our meals and drinks on our menus to allow customers to make informed choices.
- 5.3.4 Our award winning children's menu is available throughout our trading hours. A number of our children's meals use only organic ingredients. We have no preservatives or sugar or artificial colours or flavours in any of the meals in the children's menu. All of our children's meals come with a bag of fresh fruit as well as milk, orange juice or water as the drink options. We provide nutritional information about the meals offered on the children's menu to help parents make informed decisions about what their children are eating.
- 5.3.5 We now provide a range of 'Your Food, Your Choice' menus which are intended to assist customers to make an informed decision when ordering food. These menus highlight items from the main menu that are suitable for a particular nutritional category e.g. Gluten Free, Vegan, Vegetarian and Dairy-Free.