



**J D Wetherspoon's
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 the public may 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 create the congenial atmosphere of the traditional pub combined 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; Prevention of Crime and Disorder, Preservation of Public Safety, Prevention of Public Nuisance and Protection of Children from Harm. At all times we operate to ensure that our commercial imperatives do not override the core values set out in the Code. The first edition of the Code was developed in April 2004 as a result of our experience in dealing with different local authorities, police forces and various other statutory bodies at the time of licensing reform. The Code formed an integral part of all applications that we submitted to convert and vary licenses prior to the introduction of the new licensing regime. Today we continue to offer a commitment to the principles set out in the Code with each and every application for a new premises licence.

The Code is divided into four sections, one for each of the four 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 four 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 interested parties. We are always sensitive to concerns raised by interested parties or responsible authorities in response to our applications for new licences. We are always willing to modify our applications to address those concerns when that is deemed necessary.

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. A full menu is available in our premises from opening until 10pm, 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, in the past few years we have seen our food sales increase significantly. Food currently amounts to 29% of the total sales across the estate. In a number of our pubs a figure of 50% and higher is achieved. 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 8:00am or 9:00am to cater for customers who want to join us for breakfast. We pioneered the availability of breakfasts across all our pubs. We now sell approximately 250,000 breakfasts per week. In a similar vein, we now sell over 400,000 cups of Lavazza coffee every week. Our coffee sales now approximately match those of Caffé Nero in volume and are about a quarter of Starbucks. We believe that we now have approximately 6 per cent of the United Kingdom 'chain' coffee market.
- 1.1.4 Our Curry Club, Grill Night and Sunday Club are a key offer available in all of our of pubs. These promotions are typical of our approach to responsible drinks retailing where we link drinks promotions with the sale of affordable food. For example, during Curry Club customers are offered a drink inclusive with their meal and can choose from a pint of lager, bitter, Guinness or cider, a bottled lager, a glass of wine, a single gin or vodka and tonic, or they can choose a coffee or tea, a bottle of water or a non alcoholic soft drink such as Pepsi or J2O.
- 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, cod from sustainable stocks, the beef in our burgers is 100% British and cooking oils without trans-fats.
- 1.1.6 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.

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 and we cannot therefore take the moral high ground, but we strive to operate our pubs in such a way that we create a safe and convivial atmosphere which encourages people to behave well. We closely work with the statutory authorities to ensure that any initiatives designed to achieve these goals are fully supported by our local operators. We are continually looking for new ways to ensure that the facilities and promotions offered in our pubs do not encourage the excessive consumption of alcohol and unruly behaviour that often goes with it.
- 1.2.2 The provision of food throughout 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. We encourage adults to drink in moderation and to enjoy alcoholic beverages in a sensible manner, preferably around mealtimes.
- 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. Our practices and procedures are frequently held-up by the police and local authorities as 'best practice' for others to follow.
- 1.2.4 We sell a wide range of soft drinks, fruit juices and coffee. We ensure that low-alcohol and non-alcoholic beverages are prominently advertised in our 'table talker' menus. Where drinks are promoted we always offer a range of drinks including ones of different alcoholic strengths, soft drinks and coffee.
- 1.2.5 We concentrate on the provision of cask conditioned beers - selling more than any other pub company. Throughout the year we run 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 – 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 Wetherspoon pubs, Lloyds No1 bars, Wetherspoon Lodges and the company's head office. It is provided free-of-charge to customers. Wetherspoon News is an invaluable method of communicating responsible retailing messages to our customers. We also devote a large 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.

- 1.2.7 We recognise the importance of informing customers about the alcoholic strength of products and unit measurements. We always try to source alcoholic products (wine, RTDs, bottled lagers and beers) that prominently advertise both the alcohol-by-volume ('ABV') content and units as a part of their packaging. All of our table talker/drinks lists record the ABV content for draught ales, lagers, spirits & bottled beers & ciders. Unit measurements for all alcoholic products are available through our website.
- 1.2.8 We adopt a socially responsible approach to marketing. We place our responsible retailing messages in prominent positions in public areas to ensure that our customers are kept well-informed about our commitment to these practices. The majority of our drinks promotions form part of food promotions such as our Curry Club or Grill Night where customers are offered a drink inclusive with the meal offer. We ensure that low-alcohol and non-alcoholic beverages are prominently advertised in our table talker/drinks lists. Where drinks are promoted we always offer a range of drinks including ones of different alcoholic strengths, soft drinks and coffee.

1.3 Price Structure

- 1.3.1 J D Wetherspoon offers reasonable 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 The Office of Fair Trading has consistently stated that price fixing or minimum pricing is prohibited under United Kingdom and European Competition Law. Accordingly, we do not adopt a minimum pricing policy in our pubs. We continually review the pricing structure of our alcoholic and non-alcoholic products to ensure that we are encouraging sensible drinking at all times.
- 1.3.3 Our approach to the sale of alcohol is to concentrate on the range and quality of the products on offer rather than to use price as an incentive. Our approach has been both welcomed and supported by the police and other statutory authorities around the United Kingdom. In 2005 we won the national 'Responsible Drinks Retailer - Pub Chain Company' award organised by the Morning Advertiser and supported by the Home Office and were short listed for the same award in 2006.

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. 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.
- 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') for two consecutive years. We have also won the National Innkeeping Training awards for Best Catering Training, Best Training in Managed Estates and in 2007 the Best Training Scheme by Institutions of Further and Higher Education in Partnership within the Licensed Retail Industry.
- 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.
- 1.4.4 An essential element in having a well trained staff is our ability to retain our employees. Turnover of Pub Managers is around 12% which is less than 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 "Britain's Top Employers" for 5 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 manager supervising the bar and 'walking the floor'.
- 1.5.2 Pub Managers have the support of their Area Manager who in turn reports to 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 In recent years 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.
- 1.6.2 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 inspections of all pubs at any time during trading hours. These visits are completed by senior J D Wetherspoon managers and also by a body of independent professional advisers. There are specific questions on the visit report form regarding the perceived presence of drunk and disorderly customers on the premises and all employees participate in a monthly bonus scheme which is directly linked to the results of these visits.
- 1.6.3 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.
- 1.6.4 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' initiatives which ensure that a consistent approach is taken by licensed premises 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 customers are searched upon entry and where illegal substances are found, they are confiscated and given to the police at the earliest opportunity.

1.9 Door Staff

- 1.9.1 The vast majority of our premises operate successfully without the need for door supervisors. We continually '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.
- 1.9.2 Where door staff are engaged they work in accordance with our policies and procedures under the control of a Head Door Supervisor. 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 safer environment. We expect that they can control and handle themselves 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. We ensure that all door supervisors are registered and in possession of an SIA badge and refuse to allow any unbadged door supervisor to work on our premises.

1.10 Toughened Glassware & Polycarbonates

- 1.10.1 J D Wetherspoon is 100% committed to working with the police to improve industry standards for customer safety in licensed premises and in particular reduce the risk of 'glassing' incidents.
- 1.10.2 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 possible 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 throughout trading hours from 0900 hours to 2200 hours, 7 days a week. 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 poor behaviour and glass-related violence.

1.10.3 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 a Town Centre then we accept that this approach may assist to address the problems at specific licensed premises. 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 football grounds. The issue of whether we are willing to adopt polycarbonates involves a very delicate balancing exercise between our desire to work with the police to eradicate glass-related violence, 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 J D Wetherspoon sits on the National PubWatch committee. We are one of the few pub companies that are involved in this organisation at a national level. 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.

1.11.2 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.

1.11.3 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.

1.11.4 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 thirty 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.

1.12 Drinkaware

1.12.1 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 their strategic aims and hope to raise their profile and highlight their valuable work by communicating their sensible drinking messages within our pubs.

1.12.2 We actively promote the Trust by including a reference to their website www.drinkaware.co.uk on most 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 website is advertised on any promotional materials for our bi-annual beer and wine festivals. The link features routinely in the header of the 'responsible drinking' section of Wetherspoon News. We offer the Trust a free page to communicate sensible drinking messages in every edition of Wetherspoon News.

1.12.3 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.

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 to ensure that each new pub is designed and built to the highest specification. We aim to provide comfortable, efficient and ergonomic dining 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 large in size 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 Disabled 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.

2.2.2 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.

2.2.3 All new buildings will 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 the 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 CORGI registered engineers and thereafter maintained within the planned maintenance scheme.

2.3.3 Electrical safety procedures form part of the overall health and safety management system.

2.4 Health and Safety

- 2.4.1 All 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. Monthly records of types of accidents are collated using computer software. Accidents are investigated where necessary and RIDDOR reporting is undertaken.

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 J D Wetherspoon operates a dispersal policy designed to minimise the negative impact of our premises on their locality. A key element of encouraging customers who are leaving our pubs to behave in a responsible fashion is ensuring that they are well-managed whilst on the premises. We set out previously the measures that we adopt to ensure customers are well managed on our premises.

3.1.2 We accept that our responsibilities cannot simply end at our front door and that, by contributing to a better managed pubs at the end of the night, we can help deliver a safer town centre. We acknowledge that by the very nature of our operation we can be potential sources of nuisance, anti-social behaviour and crime which may create concern for the immediate neighbourhood, its residents and the authorities. We therefore implement a dispersal policy in our pubs which will seek to reduce the pressure on the police 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 actively 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 not hesitate to speak to any groups that congregate in the vicinity of the premises after closing time and ask them to move on.
- We generally request that 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 all 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 Regular Meetings with Local Residents

- 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 with no history of complaint. We have always emphasised the importance of building close relationships with local residents. Our Pub Managers are expected to resolve any complaints from local residents 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 Pub Managers, Area Managers and General Managers are always willing to convene regular meetings with residents whenever such meetings are sought by our neighbours. 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 A large number of our premises do not have permission to provide regulated entertainment. However, where music is provided in Lloyds No.1 branded pubs it is provided by means of high quality sound systems controlled by central computers 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 To ensure that neighbouring premises are not adversely affected by escaping noise a site specific noise survey is undertaken by an independent specialist and their recommendations incorporated into the scheme. Their recommendations are based on either general guidelines or on local authority policy with respect to monitored existing noise levels.
- 3.3.4 Before the development of any site that may be considered noise sensitive we commission an environmental survey to establish background noise levels. Design specifications are then set to ensure that equipment does not breach agreed levels.
- 3.3.5 All premises are developed to a high standard to ensure good sound attenuation.

3.4 Standards Monitoring Visits (CQSMA)

- 3.4.1 J D Wetherspoon sets very high standards when it opens a new pub 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 operational head office employees and all senior head office employees including Directors are required to undertake between 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 an independent third-party company on at least two occasions every month.
- 3.4.3 Every pub must receive at least five CQSMA visits each month but most will receive as many as 8-10 visits and every pub receives a minimum of 60 CQSMA visits per annum 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 difficulties to be identified so that improvements can be made.
- 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 two thirds. 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 Since the introduction of the smoking ban 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 deliver 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 going about their business using the public highway.
- 3.5.2 While each area is developed specifically for the environment it occupies we operate all outdoor dining areas in accordance with the following principles; revision 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.

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 most of our pubs which, together with our award-winning children's menu, further increases the age and range of our customers. In a large number of our premises we set aside an area that is suitable for family dining and erect signage to define the family dining area.
- 4.1.2 Legally, unaccompanied children aged between 16 and 18 are permitted to enter a pub provided that they do not consume alcohol. However, children in this age bracket are only permitted in our pubs provided they are accompanied by an adult and are there to dine. If adults are visiting the pub with children and young people and purchasing alcoholic drinks then we 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.

4.2 Challenge 21

- 4.2.1 We abide by a Challenge 21 policy in all of our premises. Under this policy, all of our employees are trained to ask any customer who appears to be under the age of 21 years to provide valid proof of age. We apply this policy not just to the sale of alcohol, but also to the use of AWP (amusement with prize) machines and the sale of tobacco products. 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 Challenge 21 policy when they commence employment with J D Wetherspoon and then receive regular refresher training. All employees complete video training, quizzes and sign a letter to confirm that they have had this training and understand their responsibilities. All training records are retained on personnel files and these files are 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 Challenge 21 policy is actively promoted within the premises using self-adhesive signs at every entrance, staff badges and back-of-house posters throughout the premises. Every customer that is refused entry to the premises or is asked to leave the premises is logged via the 'Refusal' or 'Refused Service' button on the EPOS till system.
- 4.2.5 J D 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.
- 4.2.6 If a young person tries to use ID which is fake or has been altered in any way, the ID is retained by the pub management team and given to the police at the first reasonable opportunity.
- 4.2.7 We were the first pub company to enter into an exclusive arrangement with CitizenCard, the United Kingdom's leading proof of age and ID card. Under this arrangement, any customer who does not possess any form of proof-of-age has the opportunity to purchase a CitizenCard at half the normal retail price.

4.3 Gambling

- 4.3.1 J D Wetherspoon upholds the principles of the Gambling Act 2005. Our employees are trained to adopt a Challenge 21 policy towards the use of AWP (amusement with prize) machines and take proactive measures throughout trading hours to prevent children and young people from accessing these machines.