drugs at the door

Guidance for venues and staff on handling drugs
drugs at the door

an annex to
Safer nightlife

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Acknowledgements

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This document is designed to provide guidance on the installation and management of drug amnesty boxes (sometimes called drug amnesty bins). It is designed as both a stand-alone document and an addendum to *Safer Nightlife*¹, the London Drug & Alcohol Policy Forum/Home Office guide to best practice in the night-time economy. Like *Safer Nightlife*, this document is based on the principle that the night-time economy is most effectively and safely managed when club owners/managers/event organisers work in partnership with local police and licensing authorities. Drug and Alcohol Action Teams and local community safety partnerships² also have a key role to play. Therefore this document seeks to assist all these groups.


² Local partnerships with responsibility for drug issues now go by a number of different names.
There is an essential challenge in tackling drug use in the night-time economy. Suspected illegal and legal high drug use is, for many people, an integral part of a night out. While certain forms of music are more closely associated with particular types of drug use it is likely that in any establishment the customers will include people that use drugs. Club and venue owners alongside promoters are therefore placed in a difficult situation; they are required to seek to prevent drug dealing and drug use in an environment which is associated with these activities. Nonetheless the full responsibility is with licence holders to ensure they work within the law, and make every effort to control the use and supply of drugs on their premises. If they fail to be rigorous in their efforts to tackle drug use, club owners are liable to have their licence withdrawn under section 53a of the Licensing Act 2003 which allows the local chief police officer to get a licence revoked if the premises are ‘associated with serious crime or serious disorder’. Drug dealing is considered a serious crime and clubs have been closed under these powers. Safer Nightlife provides comprehensive advice on how venues can develop a drug policy and tackle drug use on their premises through a wide range of co-ordinated activities. Drug amnesty boxes and appropriate training for all staff are just one component of an overall approach.
Why drug amnesty boxes?
Drug amnesty boxes are essentially secure boxes in which suspected illegal drugs or legal highs can be safely deposited. They serve a range of functions:

- **Staff have a safe place to dispose of any substances they find without fear of prosecution**
- **Venues can prevent drugs coming onto their premises**
- **Venues can advertise that they do not tolerate illicit drug use**
- **Clubbers can dispose of drugs safely without fear of arrest**
- **Police and licensing officers can ensure that venues have a secure method of storing illegal drugs before handing them over to the correct authorities.**
- **Drug and Alcohol Action Teams and Public Health Authorities can analyse drugs from the boxes and identify new substances or trends in drug use.**

All activities aimed at tackling drug use in the night-time economy are most effectively done as a partnership between owners/managers/promoters, licensing officers and local police. Drug amnesty boxes are no exception. Some venue owners worry that the introduction of an amnesty box gives out a message that their premises have a drug problem. However, licensing officers and police are almost always in favour of amnesty boxes, seeing them as an important element in combating drug use on the premises and providing the best
way of storing suspected illegal substances or legal highs safely and legally. Drug taking has become such a mainstream activity that even staff at conventional establishments which don’t play music particularly associated with drug use come across substances on the premises from time to time.

When venue managers, licensing officers and police meet to discuss setting up a drug amnesty box, there are four main issues:

1. **What sort of box to use**
2. **Where to site the box**
3. **The process for disposing of substances**
4. **Emptying the box**

This guide looks at each of these in turn. A useful first step for any venue considering the installation of an amnesty box is to undertake the specialist risk assessment, an example is reproduced on page 22. Further information can be found on the Health and Safety executive website.
A number of companies manufacture metal boxes for the safe deposit of drugs. Typically these are made from heavy duty steel and feature welded hinges to prevent tampering. They have a one way loading system which makes it safe to deposit substances and impossible to retrieve drugs from the box without unlocking it. Specialist boxes come fitted with two steel locks mounted in the door – best practice prescribes that the venue manager keeps one key while the police keep the other. The box can then only be opened by both parties together, safeguarding the venue and its staff from any accusations of removing drugs from the box. The boxes are designed to be wall-mounted. Police services or licensing authorities can recommend a reputable manufacturer.
Where to put it?

The best place to site the Amnesty Box for festivals and most venues is within sight of the entrance so that prospective customers who have drugs on them can see the related searches being undertaken by door supervisors. Door supervisors who are properly licensed by the Security Industry Authority\(^3\) (SIA) should be searching everyone in a professional way which may prompt clubbers to get rid of drugs in the amnesty box rather than risk having them found and being refused entry.

By placing the box prominently, the venue is clearly advertising the fact that it will not tolerate drugs on the premises. Drug amnesty boxes are located in the entrance queues at many Festivals and are widely used. It is helpful to have the box in plain view of a CCTV camera.

There should be a clear sign next to the box with three clear messages:

**Drugs are not allowed on these premises**

**All customers will be searched**

**If you are concerned you have an illegal substance, please place it in the amnesty box provided**

Some premises do not wish to place their boxes so conspicuously for fear of associating their premises with suspected illegal drug or legal

\(^3\) [http://www.sia.homeoffice.gov.uk/Pages/home.aspx](http://www.sia.homeoffice.gov.uk/Pages/home.aspx)
Where to put it?

high use. As we have already noted, police and licensing officers are well aware that a significant proportion of people going clubbing use drugs and are very likely to see the installation of an amnesty box in a public place as a positive step rather than any indication of a problem. Indeed, some licensing teams require venues to install a box as a condition of their licence.

It is best practice to site amnesty boxes in the entrance area to the venue. However, for premises who do not wish to place amnesty boxes so prominently, there is still considerable value in installing a box in a secure part of the venue. It is then possible to advertise the box to customers informing them that they can speak to a member of staff if they want to dispose of a substance. The leaflet shown opposite is used by a range of licensed premises in the City of London. Although very few customers are likely to use an amnesty box installed in a venue’s office, the box still provides a safe and legal means for staff to dispose of substances found on the premises.

Medication
Some people may have to bring medication into the venue this can create problems for staff as there is little way of knowing whether this is prescribed or illicit, it may well come in a medicine type container. Several options are open to the venue but you must consider the safety of the individual and make decisions on the information you have at the time.

Some issues to consider:-
• Is it in proper packaging with customers name on the label
• Can the individual provide a reasonable explanation for what the medication is used for (without breaching confidentiality issues)
• Can they tell you who or where it was prescribed
• Date of issue

Most of this information should be on the label
Drugs are not allowed on these premises

You are liable to be searched

To get rid of substances speak to any member of staff who will direct you to the Amnesty Bin
Disposing of substances

One of the key benefits of drug amnesty boxes is that staff have a safe and robust way of disposing of substances which safeguards them from any accusations of impropriety. Some customers will deposit substances in the boxes themselves. This section deals with the two other most common scenarios: when security staff find substances on a customer when searching them and when any member of staff finds substances (usually lost or discarded) on any part of the premises.

Finding drugs on a search

*Safer Nightlife* provides complete guidance on the legal framework and best practice for searching customers. The key facts to remember are:

- **Door supervisors have no statutory legal rights to search customers.**
- **Searches can only be conducted with the customer’s consent, as a condition of entry.**
- **The fact that searches will be conducted should be clearly advertised.**
- **Any customer refusing to consent to a search should be politely but firmly refused entry to the venue.**

Where suspected controlled drugs are found on customers during a search, door supervisors have three options:

1. They can seize the items and allow entry to the customer
2. They can seize the items and refuse entry
3. They can seize the items, make a citizen’s arrest, and hand the customer and confiscated items over to the police when they arrive.
The local police service should make it clear which approach they favour and the license holder’s drug policy should make it clear what is expected of staff. As recommended in *Safer Nightlife*, all licensed premises should develop a drug policy in consultation with local stakeholders.

Most police services will ask licensed premises to make a general distinction between small amounts of substances which are clearly for personal use and larger amounts which appear to indicate drug dealing. In discussions, police officers should be as specific as possible when defining what amounts they consider to be for personal use and what constitutes dealing.

When door supervisors seize the items (whether they allow the customer entry or not), they should place the drugs in an evidence bag and deposit the bag in the amnesty box, *in front of the person* from whom they were taken and, if possible, a colleague. As an additional precaution, it is recommended that door supervisors hold the evidence bag up in plain view of the CCTV camera (where available.) This safeguards the door supervisor from any accusations of taking the drugs for personal use. The door supervisor should then immediately complete a Drug Find Record Log entry like the example shown on page 17. It should be noted that a door supervisor taking drugs from a customer in this way is protected under the law4.

It is best practice for venues to issue each door supervisor with several numbered evidence bags at the start of the night’s work. The numbers should be recorded and signed for by door supervisors so that all bags can be accounted for at the end of the night. Evidence bags are self-sealing, individually numbered and tamper-proof, they are normally provided by the local police service.

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4 The Misuse of Drugs Act 1971 section 5 sub-section 4.
Finding drugs on the premises
If any member of staff finds a substance they believe to be a drug, they should place it in a bag in front of a colleague and place the bag in the drug amnesty box. The member of staff should then complete a brief Drug Find Record Log form as described above.
Emptying the box

If the amnesty box is in a secure place within the venue premises, it should be emptied by local police. As stated earlier, the recommended boxes have dual locks with the venue manager and local police each holding a different key. The police should arrange to visit the venue regularly to take away the substances from the amnesty box along with copies of the Drug Find Record Log.

However, if the box is situated in an open area, for instance in the main entrance, then the box should be emptied daily. This should be done by two members of staff and as much as possible out of the view of customers or passing members of the public. The box should be emptied at different times of day to avoid any local criminals who think there is an opportunity to steal the contents. Staff should use needle-proof gloves when emptying the box, as there is a slight risk that a needle or knife has been deposited in it. All substances should be taken inside the venue and locked in the safe. Any items not in an evidence bag should be placed in such a bag and the Drug Find Record log completed. One venue emptied its amnesty box every evening after all customers had been admitted. They then left the box open so that departing customers could see that it had been emptied.

It is recommended that the police, in cooperation with their local Drug and Alcohol Action Team, make arrangements to transport the recovered substances to a local laboratory where they can be analysed and destroyed, or via police for destruction. Analysis of drugs from amnesty boxes has proved to be a significant way of discovering new substances, new patterns of drug use or contaminated drugs. The findings are used to inform local drug strategies and, where appropriate, to publicise any new health concerns about particular substances.
This process of analysing drug finds has become even more important recently with the trend towards the use of new psychoactive substances which are often produced abroad. TICTAC Communications Ltd\textsuperscript{5}, based at St George’s University of London, specialises in this work and receives a large proportion of the drugs it analyses from amnesty boxes. TICTAC also maintains a comprehensive database for the visual identification of drugs, (primarily Tablets and Capsules) and substances that may resemble drugs.

A guide to common illegal substances is provided on page 18 of this document. Although, a substance or tablet cannot be confirmed as being suspected illegal drug or legal high until it has been analysed, it is helpful for staff to be able to recognise the most common recreational drugs.

It is recommended that only police officers transport substances from the amnesty boxes to safeguard other individuals from any allegations of criminality or taking the drugs for sale or personal use. Appropriate local arrangements should be made to have substances analysed or destroyed in accordance with legislation.

\textsuperscript{5} http://www.tictac.org.uk/Introduction/
<table>
<thead>
<tr>
<th>Bag No</th>
<th>Date &amp; Time</th>
<th>Staff Member</th>
<th>Details</th>
<th>Location</th>
<th>Notes</th>
<th>Signed</th>
</tr>
</thead>
<tbody>
<tr>
<td>34760</td>
<td>9:30 pm 17/2/11</td>
<td>Tom Jones</td>
<td>Two white tablets with Smiley Face</td>
<td>Young male searched in queue</td>
<td>Regular customer, refused entry. Pills in amnesty box</td>
<td></td>
</tr>
<tr>
<td>34761</td>
<td>11:15 pm 18/2/11</td>
<td>S. Patel</td>
<td>Wrap of white powder</td>
<td>Female toilet cubicle #3</td>
<td>Put in amnesty box</td>
<td></td>
</tr>
<tr>
<td>34762</td>
<td>4.15 am 19/2/11</td>
<td>Peter Brown</td>
<td>Blue tablet with word 'pfizer'</td>
<td>Amnesty box</td>
<td>Found when box emptied</td>
<td></td>
</tr>
<tr>
<td>34763</td>
<td>10.15 am 19/2/11</td>
<td>Anne Smith</td>
<td>Bag of cannabis leaf</td>
<td>Behind speaker, main dance floor</td>
<td>Found by cleaner. Placed in amnesty box</td>
<td></td>
</tr>
</tbody>
</table>

**Notes**
The drugs recognition page

Cannabis
CLASS B
Cannabis can be smoked or eaten. To smoke the form of leaves, buds, stems and seeds, this solid dark leafy leaves or resin are pressed into one and then locked in a blowpipe and burned or ignites a fire. Cannabis can be smoked, the use of cannabis is illegal and there are also concerns about links to mental distress.

Cocaine & Crack
CLASS A
Cocaine is usually found as a white powder that is either nascent or dissolved in a form of water. Cocaine is a high or illegal drug and is taken by injection or intravenous routes. Cocaine is addictive and can cause tremors, chest pain and heart problems.

Ecstasy
CLASS A
Ecstasy can be found as a white crystalline powder, but normally takes the form of tablets that can vary in size and volume. The tablets are swallowed and can cause overheating and dehydration if taken when dancing energetically. Ecstasy has also been linked to death and taking problems.

Opiates
CLASS A
Opiates are found as a brownish-white powder that can be swallowed caused or dissolved in a form of water. Methadone is usually found in a form of tablets and is a form of water that is also found in tablets and injection forms. Opiates are highly addictive and can overdose can lead to signs of death.

Amphetamines
CLASS B
Amphetamines can be found in a variety of forms. As a grey, white or pink powder. It is a crystalline and is a form of water that can be swallowed or crystals that are smoked. It can cause panic attacks, hallucinations, heart strain and mental distress.

Methamphetamine
CLASS A
Methamphetamine can be found as a crystal for smoking or dissolved for injecting, powder for smoking and also is a form of water. It can cause hallucinations, panic, depletions, nausea and vomiting. Methamphetamine effects include damage to the brain, loss of motor control and vision and can ultimately lead to death.

Training
Training

Training is an essential element to any scheme as it has been shown that a lot of staff lack good understanding of the issues of drugs and their use or how to deal with them. The training requirements of door supervisors, customer service staff and cleaners will vary. Refresher training should be delivered as appropriate taking into account staff turnover and local issues.

There are numerous elements that should be included in a good training programme. Firstly that of health and safety and any member of staff that has occasion to come in contact with suspected illegal drug or legal high substances must understand the risks and how to eliminate them. Some of this is apparent on the risk assessment on page 22. Secondly there is the issue of recognition of someone who may have taken a substance, so signs and symptoms should be included, with a note that not everybody will present with the same symptoms. There is also the issue of how illicit substance can have a detrimental effect on the venue and thus on the licence to trade. It must be acknowledged that the staff are the best people to initially deal with any incident and as such must always be aware of the potential for illicit substances to have played a part and it is useful to understand the issues involved.

All staff should be informed of the legal issues involved, this should include the offences that can be committed as well as the legal defence to stop the commission of certain crimes on premises. The venue’s licence could be affected by these issues so a good knowledge of these laws is essential.

Door staff should have specific training on this issue and it is always useful in the interests of local understanding to give them the latest information available in the area in which they work, as well as a reminder of the basics. Venues looking for training should talk to their local licensing team, police service or Drug and Alcohol Action Team to see what they can offer. Alternately the London Drug and Alcohol Policy Forum may be able to assist with a range of specialist training developed for those working in the night-time economy.
Conclusion
Drug amnesty boxes are a small but significant component of an effective strategy to tackle drug use in the night-time economy. As with all other innovations, it is important that staff understand the purpose of the boxes and receive training on how to use and empty them in a safe and professional way.

The table below summarises key responsibilities for each agency with respect to drug amnesty boxes.

<table>
<thead>
<tr>
<th>Agree to install drug amnesty box</th>
<th>Agree to install drug amnesty box</th>
<th>Agree to install drug amnesty box</th>
</tr>
</thead>
<tbody>
<tr>
<td>License holders, managers and promoters</td>
<td>Licensing authority</td>
<td>Police</td>
</tr>
<tr>
<td>Develop and agree advertising material for box</td>
<td>Organise the analysis of substances from box</td>
<td>Arrange transportation of substances to lab</td>
</tr>
</tbody>
</table>
# Risk Assessment

<table>
<thead>
<tr>
<th>Name of premises:</th>
<th>Drugs Amnesty Box risk assessment, date completed:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>What are the hazards</strong></th>
<th><strong>Danger of staff being accused of being in possession of drugs</strong></th>
<th><strong>Needle stick injuries</strong></th>
<th><strong>Danger of some individuals who may consider attack to gain contents of the bin</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Who might be harmed and how</strong></td>
<td><strong>Staff members/management. Emptying the bin being in physical possession of suspected illegal drug or legal high</strong></td>
<td><strong>Any person dealing with the contents of drugs box. Hepatitis and any blood borne infection</strong></td>
<td><strong>Staff members, physical violence towards staff</strong></td>
</tr>
<tr>
<td><strong>What are you already doing</strong></td>
<td><strong>Training staff to understand the statutory defence and how to dispose of substances appropriately</strong></td>
<td><strong>Supply appropriate clothing and training to those emptying the bins</strong></td>
<td><strong>CCTV coverage where appropriate and training for staff involved</strong></td>
</tr>
<tr>
<td><strong>What further action is necessary</strong></td>
<td><strong>Refresher training when appropriate</strong></td>
<td><strong>Ensure restricted person only empty the bins, preferably the police. This will depend on local agreements</strong></td>
<td><strong>Continual awareness training</strong></td>
</tr>
<tr>
<td><strong>Action by who</strong></td>
<td><strong>Managers</strong></td>
<td><strong>Management and selected staff members who empty the bins</strong></td>
<td><strong>Management</strong></td>
</tr>
<tr>
<td><strong>Action by when</strong></td>
<td><strong>Initial training on employment and on a regular basis</strong></td>
<td><strong>Ongoing to ensure appropriate level of equipment and training</strong></td>
<td><strong>Ongoing</strong></td>
</tr>
<tr>
<td><strong>Completed and signed off</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**The London Drug and Alcohol Policy Forum** was founded in 1991 and assists, supports and advises policy makers on drug issues affecting the capital to promote good practice on education and prevention, community safety and improving services for drug users.

www.cityoflondon.gov.uk/ldapf

**The City of London Substance Misuse Partnership** (formerly the Drug Action Team) was established in 1999 to coordinate the implementation of the National Drug Strategy at a local level and has been involved with numerous publications, including Safer Nightlife, that deal with the night time economy.

www.cityoflondon.gov.uk/smp

**Noctis** Noctis represents the interests of businesses operating in the night-time economy.

www.noctisuk.org/

**BII** is the professional body for the licensed retail sector and the industry’s leading membership organisation reflecting the views of thousands of individual members across the UK.

www.bii.org/home

**The Health and Safety Executive** is the national independent watchdog for work-related health, safety and illness. Its website contains a case study of a risk assessment for a nightclub.

www.hse.gov.uk/risk/casestudies/nightclub.htm

**TICTAC**

TICTAC Communications Ltd, TICTAC maintains a comprehensive database for the visual identification of drugs after analysis.

www.tictac.org.uk

**Russell Webster** is an independent consultant specialising in substance misuse and crime.

www.russellwebster.com
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