



19th March 2010

Door Supervisors Training Consultation
Security Industry Authority Sponsor Team
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Dear Sir/Madam

Top Up Training for Door Supervisors – A Consultation Paper

The Association of Licensed Multiple Retailers (*ALMR*) welcomes the opportunity to comment on the Government's consultation on the introduction of mandatory top-up training for door supervisors. As the only national trade body dedicated to representing the pub and bar trade we are well placed to comment on the impact of the proposals on the main customers of door supervisory services, whose businesses will incur the additional costs imposed as result of these proposals.

Overview

By way of background, the *ALMR* is the only national trade body solely dedicated to representing the interests of licensed retail companies – principally pub, bar, club and restaurant operators. Currently we have just under 70 companies in membership, between them owning and/or operating just over 10,000 outlets – around half the UK pub and bar estate. Whilst we have a number of national companies within membership, over two-thirds of our membership is derived from small independent companies operating 50 pubs or less under their own branding.

There are currently over 70,000 licensed door supervisors in the UK and we estimate that at least two thirds of these will currently be working in the pub and bar sector. The *ALMR* carries out an annual survey of operating costs. Total operating costs currently account for 52% of average pub turnover. Security costs account for, 4% of these costs, rising to 15% in respect of nightclubs. These are significant and substantial as they stand at present, but the proposal under consultation suggests that these will double from 2011 as a result of new mandatory training requirements.

Many pubs and bars will have a requirement for door supervision as a condition on their premises licence, particularly in the late night market or city centre premises. These outlets will have no choice but to comply with these provisions and have no option but to bear the additional costs inherent in these proposals. Whilst the majority of door supervisors are self-employed and will directly bear the cost of their licence and training, these nevertheless translate into the charge made by security companies to their customers for the provision of their services. There is little doubt, therefore, that the costs of security in pubs will increase as a result of these proposals.

For some outlets, door supervision is not a legal requirement but is something that they invest in for the well-being of their customers. Door supervisors are not employed primarily for control or

security but to supervise the outlet and act as a public face and welcome to the outlet. In some cases, our members anticipate that this discretionary spend will be reduced as a result of the proposals as the costs are simply unsustainable.

Our members also anticipate that there will be a significant drop in door supervisor numbers as the effective doubling of the cost of licence renewal in 2011 will not be manageable. This occurred both when the SIA licence was first introduced and when the cost of a licence rose in 2007. We anticipate it will occur again.

For all of the above reasons, we are unable to support a proposal which will significantly increase pub operating costs at this point in time. The proposals cannot be introduced without a direct negative impact on pub revenues. This is in direct contradiction of the announcement made on 19th March by Rt Hon John Healey that pubs in the community should be supported.

For ease of reference, we have grouped our comments according to the consultation questions.

Which Option do you prefer?

The ALMR supports Option 1 as outlined in the consultation document. Whilst we understand the objective behind the proposals, we cannot countenance the introduction of a new compulsory or mandatory requirement in this area in light of the increased costs which will be imposed on pubs as a result.

The cost of a door supervisor licence has already increased by 29% since it was first introduced. As yet, we have no details on what the licence fee will be for 2010, but a further significant increase cannot be ruled out. The costs of top up training discussed in the paper do not take account of the fee for licence renewal. When this is taken into account, the total cost of reapplication in 2011 will have doubled to around £450-500 per individual. Based on the total cost to the industry outlined in the RIA, we estimate that the cost increase per pub will be £750-850. For many, this will be unsustainable.

We are not opposed to the principle of ongoing training or continuous professional development but believe that this does not need to be delivered by means of mandation. For example, the Metropolitan Police currently run training seminars on counter-terrorism and the advice, guidance and support offered to pub managers, barstaff and doorstaff is invaluable as demonstrated when the bomb plot in the Haymarket was defused thanks to the timely intervention of Tiger Tiger doorstaff.

Whilst we accept that a voluntary option will not be cost free, it does avoid a blanket or unsustainable increase in costs for outlets where the skills and training referred to are not essential. For example, a suburban or rural pub may well have doorstaff on busy nights as part of the effective management of the premises and door control, but these staff are less likely to need to be trained in the areas suggested by the consultation document.

Staff could be incentivised to undergo voluntary training or CPD by means of a fast track renewal process or even a lower fee to offset training costs. More effort should be spend exploring voluntary and non-legislative interventions and compulsory top up training should be a last resort.

Do you believe this option will lead to the protection of public safety, the reduction of harm to the public or a safer environment at pubs, bars and clubs?

This is an extremely leading question and presupposes support for the introduction of a new training requirement.

We do not believe that the consultation paper provides sufficient objective quantitative or qualitative evidence to support an assertion that the proposed requirements would dramatically improve public safety and reduce crime and disorder. Equally, there is no evidence to suggest that failure to act would be detrimental in these areas. Only anecdotal information is provided on injuries eg “we have been made aware of” and there is no evidence of a link between injuries and unsafe handling which is remediable by the means proposed. This is not an appropriate basis for introducing significant costs on business.

The consultation document (para 4.12) proposes carrying out some research into problems arising in this area. We strongly recommend that this is introduced before any mandate of top-up training in order to provide both a baseline for assessment of the impact of the change and also to demonstrate the justification for the imposition of such significant costs.

We would submit that the above question cannot be answered – either by the government or any other external party – unless and until this research is carried out.

Regulatory Impact Assessment

We are extremely concerned at the partial nature of the Regulatory Impact Assessment and in particular the failure to identify concrete benefits which will offset the substantial and significant costs being imposed. That the Government appears to have concluded that compulsory training with ongoing refresher training is the most effective means of delivering an unstated policy objective without attempting to quantify this or identifying how many supervisors will leave the industry or how many discretionary posts will disappear as a result is worrying.

The key assumption underpinning the Regulatory Impact Assessment is that training in the areas identified will make door supervisors more effective and equip them to deal with potentially dangerous or serious situations – when there is violence or risk of conflict in and around licensed premises, when there is an injury or where there is a terrorism threat. There is even talk of door supervisors becoming an “emergency response”. This appears to significantly mis-represent the role of the door supervisor and is regarded by the industry as an unwelcome shift in emphasis.

The benefits outlined in the RIA will only be realised if we transform door supervisor role from one of controlling what happens inside licensed premises to one which is a front line emergency presence engaging in events outside the premises. Door supervisors cannot and should not be expected to be an extension of the emergency services, and it is a very dangerous step to encourage their greater involvement in these areas.

We should be happy to provide additional information or to expand on any of the points raised above.

Kind regards

Kate Nicholls
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