



Home Office

TOP-UP TRAINING FOR DOOR SUPERVISORS A CONSULTATION PAPER

15 December 2009

TOP-UP TRAINING FOR DOOR SUPERVISORS

A CONSULTATION PAPER

December 2009

MINISTERIAL FOREWORD



The introduction of regulation to the private security industry has done much to raise standards in the industry, and to reduce criminality.

The Security Industry Authority (SIA) requires an approved training qualification as part

of the criteria for obtaining a licence to work in designated sectors of the industry.

It is important that training reflects changes in the current operating environment, and equips security operatives with the knowledge and skills they need for the challenges they face.

The Government intends to act to improve public safety by ensuring that Door Supervisors access skills and knowledge in the areas of physical intervention, first aid, special considerations in dealing with young people, and awareness of the threat of terrorism.

This follows on from the SIA's work with the private security industry to review training specifications to ensure they meet current industry good practice. The

SIA is introducing new licence-linked qualifications next year, bringing the training up to date and introducing a modular format.

This follows an industry-led review of the content of the existing training to ensure that the new specifications meet current industry good practice and that all individuals working in the security sectors are properly trained for their role.

The content for most of the sectors has been updated, though is consistent with previous specifications. The exception is door supervision, where significant changes have been made at the request of industry to reflect changes to working practices.

We welcome your views on enhanced, or top-up training for Door Supervisors, and I would encourage you to respond to this consultation.

A handwritten signature in black ink that reads "Alan Campbell". The signature is written in a cursive style with a large initial 'A'.

Alan Campbell

Parliamentary Under-secretary of State for
Crime Reduction

INFORMATION SUMMARY

Scope of the consultation

Topic of this consultation:	Introducing an enhanced training requirement for door supervisors when they renew their licences. This will ensure they have the up to date skills, knowledge and understanding of their roles and responsibilities in the security industry.
Scope of this consultation:	To seek views on the merits and cost of the options identified.
Geographical scope:	UK.
Impact assessment (IA):	A consultation stage/partial IA is attached to this consultation document.

Basic information

To:	This consultation is open to everyone but we would particularly like to hear from those parts of the private security industry involved in door supervision and private security skills sector. We would also like to hear from users of door supervision services.
Duration:	15 December 2009 to 23 March 2010.
Enquiries:	<p>For enquiries about the content or scope of the consultation, requests for hard copies, or information about consultation events please contact:</p> <p>Home Office Door Supervisors Training Consultation Security Industry Authority Sponsor Team 1st Floor, Peel Building 2 Marsham Street London SW1P 4DF</p> <p>Email: DoorSupervisorsTraining@homeoffice.gsi.gov.uk</p> <p>Telephone: 020 7035 6834</p>
How to respond:	As above.
Additional ways to become involved:	<p>This will be a written consultation exercise. Copies of the consultation document will be made available in alternative formats on request. You should contact the Sponsor Team should you require a copy of this consultation paper in any other format, e.g. Braille, Large Font, or Audio.</p> <p>We will discuss the consultation at meetings with stakeholders</p>
After the consultation:	A report summarising responses will be published before or alongside Government plans for any further action.

Background

<p>Getting to this stage:</p>	<p>The Security Industry Authority (SIA) licenses those working in designated sectors of the private security industry, including door supervisors. The possession of a licence shows that the holder has no recent serious criminal convictions, has a right to work in the UK, and has a basic qualification appropriate to the licensable role involved. A basic standard of training is required to obtain a licence. The SIA sets training standards through its 'Core Competency Specifications'. It has recently refreshed the Core Competency Specifications, to reflect the skills and knowledge currently need to work in the private security industry. New areas, not currently covered, are:</p> <ul style="list-style-type: none"> • Physical intervention • First aid awareness • Special considerations in dealing with young people • Awareness of the threat of terrorism. <p>This consultation document sets out options identified for the standard of training required by door supervisors when renewing their licences. It does not cover training for first-time applicants, where plans are already in progress.</p>
<p>Previous engagement:</p>	<p>The private security industry has been involved in the refresh of the SIA's Core Competency Specifications. The refreshed specifications were developed by a panel of industry experts, the Expert Working Group, made up of leading door supervision companies and customer representatives. They were then put out to a public consultation, reaching over 12,000 industry contacts. As a result, the SIA's Core Competency Specifications will include new areas of training, in physical intervention, first aid, dealing with young people, and awareness of the threat of terrorism. The new standards required will apply to first-time applicants for door supervisors licences from June 2010.</p>

CONTENTS

1	INTRODUCTION	7
2	EXISTING REQUIREMENTS	8
3	THE ISSUES	9
4	OPTIONS FOR TRAINING REQUIREMENTS	10
5	HOW TO RESPOND	12
6	CONSULTATION QUESTIONS AND RESPONSE FORM	13
	ANNEX A: CONSULTATION CRITERIA	16
	ANNEX B: PARTIAL IMPACT ASSESSMENT	18

1 INTRODUCTION

- 1.1 The Private Security Industry Act 2001, created the Security Industry Authority (SIA) as a Non-Departmental Public Body (NDPB) with responsibility for licensing individuals to work within designated sectors of the private security industry. The SIA determines whether or not to grant a licence against published criteria, to ensure that only fit and proper people are employed in designated positions.
- 1.2 An SIA approved training qualification is needed as part of the criteria for obtaining a licence. This ensures that operatives have sufficient skills and knowledge to carry out their duties safely.
- 1.3 The SIA sets training standards through its 'Core Competency Specifications'. A recent [review](#) conducted by the SIA (August 2008-June 2009) has highlighted the need for additional skills and knowledge by Door Supervisors, including:
- **Physical Skills – learning outcomes describing what a learner needs to know and do to apply physical interventions safely.**
 - **First Aid Awareness - knowledge required of an individual to make an appropriate response if present at an accident.**
 - **Understanding of the sensitivities involved in how to eject and/or refuse entry to those aged 14-18.**
 - **Awareness of the threat of terrorism.**
- 1.4 These areas will be added into the 'Core Competency Specifications', and will form part of the licence-linked qualification for new entrants to the private security industry who are seeking a door supervisor's licence for the first time from June 2010. The SIA believes there is also a need for existing licence-holders (those who hold the older version of the Door Supervisors qualification that does not include the areas listed above) to update their skills with top-up training, when they next renew their licences. This is to ensure they demonstrate the skills and knowledge needed in the current work environment. The consultation document refers to top-up training only that would be required by existing licence-holders for them to renew their licence and continue to work in the industry.
- 1.5 We recognise that there are many existing Door Supervisors that will need to undergo top-up training. We also recognise the need to give the private security industry fair notice of changes to requirements. If this consultation supports the introduction of top-up training, we propose that the requirement should be implemented from May 2011.
- 1.6 All Door Supervisors wishing to renew their licence after May 2011 who hold a qualification gained before June 2010, when the additional training will be included for new applicants, would need to take the top-up training. The top-up training requirement would be between one and two days duration. Ongoing refresher training in physical skills would also be required.

2 EXISTING REQUIREMENTS

Regulation and legislation

- 2.1 The SIA's powers are derived from the Private Security Industry Act 2001. It has responsibility for licensing individuals to work within designated sectors of the private security industry and approving providers of security industry services.
- 2.2 The functions of the SIA include 'to set or approve standards of conduct', and also 'to make recommendations and proposals for the maintenance and improvement of standards in the provision of security industry services'. Furthermore the SIA 'may include such criteria as the Authority considers appropriate for securing that those persons have the training and skills necessary to engage in conduct for which they are licensed'.
- 2.4 The current training and assessment for those wishing to obtain a Door Supervisors licence-linked qualification is 30 guided learning hours. The SIA recently refreshed the Core Competency Specifications for the licensable sectors to ensure that the licence-linked qualifications:
- **reflect the knowledge and understanding needed by individuals to work safely in the private security industry today;**
 - **are up to date with developments in how qualifications are regulated;**
 - **make the most of lessons learnt by the SIA; and,**
 - **allow the SIA to have a coherent, modular framework of licence-linked qualifications that will benefit operatives and the industry.**

Training standards

- 2.3 The SIA has a training and qualification requirement as part of its published criteria against which it considers granting licences. The SIA sets training specifications for each of the designated sectors it currently licences with the exception of Keyholding. The knowledge and/or skills that operatives must demonstrate are listed in the SIA document that in the past was known as 'Core Competency Specifications', and will in future be known as the 'Learning and Qualifications specification'. These documents specify the core knowledge and/or skills needed by industry operatives. The documents are used by awarding bodies as the basis of qualifications that the SIA recognise as qualifying individuals for their front-line licence. Any individual looking to become a Door Supervisor must have a licence-linked qualification that has been awarded by an approved awarding body. Further information can be found on the SIA's [website](#).

3 THE ISSUES

Refresh of training standards

- 3.1 Proposals for the revised Core Competency Specifications were developed by a panel of industry experts, the Expert Working Group, made up of leading door supervision companies and customer representatives. They were then put out to a public consultation, reaching over 12,000 industry contacts. In addition, there was close consultation with SIA stakeholder groups, including Skills for Security Sector Development Groups, stakeholder groups organised by professional associations such as the British Security Industry Association (BSIA), and interest groups convened by stakeholders such as awarding bodies. The consultation was also publicised at events such as the Working the Doors annual conference. This meant the industry had the opportunity to review proposals to refresh the content and suggest changes. The new areas that the industry felt needed to be included were:
- **Physical intervention**
 - **First Aid awareness**
 - **Special considerations in dealing with 14-18 year olds**
 - **Awareness of the terrorist threat.**
- 3.2 These areas were not covered by the older version of the Core Competency Specifications, but consultation by the SIA revealed that they are now considered by the industry to be core to the role of Door Supervisor. The new areas have now been included in the new 'Learning and Qualification specification' and will form part of the content of the new licence-linked qualifications that will be required from June 2010 in England, Wales and Northern Ireland, and from later in 2010 in Scotland. This means that anyone coming in new to the industry in England, Wales and Northern Ireland from June 2010, and in Scotland from later in 2010, will cover these areas as part of their training for qualification for their first door supervisor's licence.
- 3.3 This will lead to a situation where newly-qualified licence-holders will be trained in aspects now considered core to the role of Door Supervisor, whilst existing licence-holders will not have had this training. The SIA consider that, because the additions to the new specification are significant, that those Door Supervisors with the previous version of the training qualification should need to take top-up training. This would ensure that all licensed Door Supervisors have the same core level of skill and knowledge.
- 3.4 The SIA received representations in particular in favour of the inclusion of physical skills training. These included correspondence from the members of the Police, a coroner, MPs and private individuals. This view was also expressed by the larger Door Supervisor companies, and often from front-line practising Door Supervisors themselves. The SIA has also been made aware of a number of deaths and injuries that have occurred in the past three years during ejection of customers from bars and clubs. There is evidence to suggest that some of these incidents were as a result of unsafe handling during ejection.
- ### Additional training
- 3.5 Existing door supervisors are not currently required to undertake training in this area. This consultation is on proposals for compulsory top-up training that will include physical skills to help reduce potential harm to the public.
- 3.6 This consultation seeks views on proposals for top-up training for door supervisors when they renew their licences from May 2011. The next section sets out options for training requirements when door supervisors next renew their licences.

4 OPTIONS FOR TRAINING REQUIREMENTS

Option 1: Do nothing

- 4.1 This option is to make no change to the current requirements for door supervisors renewing their licences. Individuals with a licence would have been in the industry for at least three years, and provided the fit and proper person criteria are met, this option proposes that a further training requirement should not be mandatory.
- 4.2 This would mean that new door supervisors are likely to receive a higher level of training than existing licence-holders. This would be problematic where the additional training represents knowledge that has been deemed to be core to the role of door supervisors. It would mean that the training undertaken by a Door Supervisor obtaining a licence before June 2010 would not be seen by the industry as covering the knowledge and/or skills required by Door Supervisors in today's environment.
- 4.3 Under this option the SIA would continue to promote continuous professional development as it has done, through the Approved Contractor Scheme (ACS) and working with key partners such as Skills for Security, the skills body for the private security industry. There would not, however, be a requirement for additional training that the SIA would stipulate and monitor.

Option 2: Compulsory top-up training

- 4.4 This option proposes that the SIA implements a requirement for existing licence-holders to update their knowledge and skills with compulsory top-up training, which should be achieved at the point when the licence-holder seeks to renew their licence. The purpose of this would be to make sure that licence-holders that have achieved the previous version of the training qualification are able to access the skills that have been recently identified by the industry, the SIA and other stakeholders as being core to the role.
- 4.5 The review of the Core Competency Specifications identified the following new

areas that the industry and other stakeholders felt should form part of the compulsory training requirement for Door Supervisors:

- **Physical Skills - learning outcomes describing what a learner needs to know and do to apply physical interventions safely. This would ensure trainees know how to reduce risks of harm when physical intervention is necessary. It would demonstrate appropriate disengagement and escorting techniques. These learning outcomes focus on the low-impact, low-risk techniques that are felt to be skills that a Door Supervisor is highly likely to need to the course of their work.**
- **First Aid Awareness - knowledge required of an individual to make an appropriate response if present at an incident. This does not refer to an existing First Aid certificate, although the use of any existing certificates may be considered as evidence towards how they fulfil this.**
- **Knowledge and understanding of the considerations and sensitivities in dealing with those aged 14-18. This would be likely to be delivered in the context of communication skills and conflict management.**
- **Awareness of terrorist activities, and how a Door Supervisor can work to lessen risk to themselves and others from terrorism.**

- 4.6 Option 2 proposes that these new areas form the basis for top-up training by door supervisors who are already licensed. Making this a compulsory requirement will ensure that all existing licensed Door Supervisors will be trained to the same level as those entering the industry after June 2010 who will have attained the new licence-linked qualification. The SIA is proposing that top-up training covering the four areas listed above becomes a compulsory requirement at a date from May 2011.

- 4.7 It is envisaged that the top-up training needed would be between one and two days duration. Door Supervisors would need to evidence that their top-up training has been achieved before being able to renew their licence. The SIA would work with awarding bodies so that the top-up training will result in a certificate that can be uploaded directly onto the SIA's qualifications database.
- 4.8 Training would be run by the existing base of training providers, which would include those companies that are accredited to offer training in-house. The preference of the SIA is that the training is assessed and leads to an accredited unit from one of the regulated qualifications frameworks. The SIA would also consider training that was accredited by an awarding body endorsed by the SIA, where that awarding body was fully compliant with existing SIA criteria.

Option 3: Compulsory top-up training, with a compulsory requirement to refresh Physical Intervention skills on a regular (3 yearly) basis.

- 4.9 The SIA recognises that Door Supervisors need to keep their skills current. This will be especially important when Physical Skills training is a compulsory part of the requirement.
- 4.10 Under this option, the Door Supervisor would be required to undertake compulsory top-up training, exactly as described in Option 2 above. In addition to Option 2, this option would require the Door Supervisor to take compulsory renewal training every three years, before renewing their licence.

Preferred Option

- 4.11 The options are set out in the partial Impact Assessment at Annex A, which also includes details of potential costs. At present the Government believes that option 3, compulsory top-up training for door supervisors when they renew their licences, with ongoing refresher

training in physical skills, offers the most effective approach. We are keen to receive the views of the public and the industry and you are encouraged to propose other solutions.

Monitoring consequences of these proposals

- 4.12 The SIA would keep under review the possible consequences of introducing top-up training in the new areas proposed. The SIA plans to conduct research about violent incidents involving Door Supervisors. They are working with Camden police to develop a measurement so that the benefits of the introduction of the new training regime can be measured in future years. Together they are considering how they can work to establish a baseline of data, which will be used as a measurement of the use of top-up training in the future.

Extending additional training to other sectors

- 4.13 This consultation is solely about the Door Supervision sector. If consideration were to be given to extending compulsory top-up training to other sectors of the private security industry further consultation would be required. As the recent review of the Core Competency Specifications did not identify major changes in the requirements for other sectors, there are no proposals for changes that would make the case for the need for compulsory top-up training.

5 HOW TO RESPOND

The closing date for responses to this consultation is 23 March 2010.

Please send your replies on the questions raised using the questionnaire.

You can email your views to us at:

DoorSupervisorsTraining@homeoffice.gsi.gov.uk

Or you can write to us at:

Home Office
Door Supervisors Training Consultation
Security Industry Authority Sponsor Team
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

This consultation and questionnaire can be downloaded from our website at <http://www.homeoffice.gov.uk/about-us/haveyoursay/current-consultations/>

(or go to www.homeoffice.gov.uk about us>consultations>current consultations).

Alternative formats

Copies of this document can be made available in alternative formats on request.

6 CONSULTATION QUESTIONS AND RESPONSE FORM

All respondents are asked to reply to all the questions below. The consultation ends on 23 March 2010. Please print off this questionnaire and post to the Home Office Door Supervisors Training Consultation, Security Industry Authority Sponsor Team, 4th Floor, Fry Building, 2 Marsham Street, London SW1P 4DF. Or respond by emailing your answers to DoorSupervisorsTraining@homeoffice.gsi.gov.uk

1 Which option do you prefer?

- Do nothing
- Compulsory top-up training
- Compulsory top-up training with refresher training in physical intervention skills

2 Reasons for your choice of options?

Comments

3 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?

Comments

4 Which of the following best describes your relationship with the private security industry?

- Door Supervisor
- Business that employs Door Supervisors directly
- Member of the public
- Training organisation
- Purchaser of Door Supervision Services
- Other (please specify)

Comments

5 Do you believe this proposal could have a negative or positive impact on any individual or representative group for reasons such as nationality, ethnicity, disability or sexual orientation?

Comments

6 What impact do you believe compulsory top-up training, with or without compulsory refresher training in physical intervention, will have on you or your business?

- Negative
- Neutral
- Positive

Comments/reasons for your view

Comments

7 If your business employs less than 20 people, do you think that compulsory top-up training, with or without refresher training in physical intervention, will have a disproportionate effect on small businesses like yours?

- Yes
- No

Comments

ANNEX A

CONSULTATION CRITERIA

The Consultation follows the Government's Code of Practice on Consultation – the criteria for which are set out below:

Criterion 1 – When to consult – Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2 – Duration of consultation exercises – Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3 – Clarity of scope and impact – Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4 – Accessibility of consultation exercises – Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5 – The burden of consultation – Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6 – Responsiveness of consultation exercises – Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7 – Capacity to consult – Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

The full Code of Practice on Consultation is available at: <http://www.berr.gov.uk/whatwedo/bre/consultation-guidance/page44420.html>

Consultation Co-ordinator

If you have a complaint or comment about the Home Office's approach to consultation, you should contact the Home Office Consultation Co-ordinator, Nigel Lawrence. Please DO NOT send your response to this consultation to Nigel Lawrence. The Co-ordinator works to promote best practice standards set by the Government's Code of Practice, advises policy teams on how to conduct consultations and investigates complaints made against the Home Office. He does not process your response to this consultation.

The Co-ordinator can be emailed at: Nigel.Lawrence@homeoffice.gsi.gov.uk or alternatively write to him at:

Nigel Lawrence, Consultation Co-ordinator
Home Office
Performance and Delivery Unit
Better Regulation Team
3rd Floor Seacole
2 Marsham Street
London
SW1P 4DF

Responses: Confidentiality & Disclaimer

The information you send us may be passed to colleagues within the Home Office, the Government or related agencies.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 [FOIA], the Data Protection Act 1998 [DPA] and the Environmental Information Regulations 2004).

If you want other information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

ANNEX B

PARTIAL IMPACT ASSESSMENT

Summary: Intervention & Options

Department /Agency: Home Office

Title: Impact Assessment of introducing enhanced training for Door Supervisors renewing their licences

Stage: Public consultation

Version: 1

Date: 15 December 2009

Related Publications: Security Industry Authority (SIA) Competency for Licensing Renewal Strategy; Specification for Core Competency Training and Qualifications for Door Supervisors

Available to view or download at: <http://www.homeoffice.gov.uk/about-us/haveyoursay/current-consultations>

Contact for enquiries:

DoorSupervisorsTraining@homeoffice.gsi.gov.uk

Telephone: (020) 7035 6834

What is the problem under consideration? Why is government intervention necessary?

The SIA licenses individuals working in designated sectors of the private security industry, including Door Supervisors. The requirements for obtaining a licence include the need for a qualification. The SIA sets training standards through its Core Competency Specifications. A review of these has highlighted that additional knowledge and skills are needed by Door Supervisors to protect the public. Only Government intervention will ensure this is delivered as it needs to be consistently applied across the industry.

What are the policy objectives and the intended effects?

To introduce enhanced (or top-up) training for current Door Supervisors when they renew their licences. A review of the Core Competency Specifications has highlighted the need for additional skills and

knowledge by Door Supervisors in the current work environment to improve public safety. New areas, not currently covered, are physical intervention, first aid, special considerations in dealing with young people, and awareness of the threat of terrorism. This policy does not cover new applicants because their initial qualification will now contain these areas.

What policy options have been considered? Please justify any preferred option.

Option 1: to make no change to the current requirements for Door Supervisors renewing their licences.

Option 2: to introduce compulsory top-up training for current Door Supervisors looking to renew their licences, where they have the previous version of the training qualification. **Option 3:** as Option 2 but with a further requirement for ongoing refresher training in physical skills on a three-yearly basis.

Option 3 is the preferred option. It will ensure that Door Supervisors have the skills and knowledge identified by the private security industry necessary in the current work environment.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

Should a requirement for top-up training be introduced, the SIA would aim to review and assess the impact one year after implementation. This SIA is developing mechanisms to measure benefits in conjunction with Police contacts.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options

Signed by the responsible Minister:

Date: 15 December 2009

SUMMARY: ANALYSIS & EVIDENCE

Policy Option: 2

Description: To introduce compulsory top-up training for existing Door Supervisors when they renew their licences

COSTS		
ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Costs to individual Door Supervisors renewing their licences = £142-182 per day for one to two days training.
One-off (Transition)	Yrs	
£0		
Average Annual Cost (excluding one-off)		
£3.6m to 9.2m		
		Total Cost (PV) £ 10.1m to 25.9m
Other key non-monetised costs by 'main affected groups'		

BENEFITS		
ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' N/A
One-off	Yrs	
£Unknown		
Average Annual Benefit (excluding one-off)		
£Unknown		
		Total Benefit (PV) £Unknown
Other key non-monetised benefits by 'main affected groups' Standards of training would be raised, increasing police and public confidence. Public safety would be improved. This is difficult to quantify, but for example there have been at least 10 deaths that have occurred during ejections from licensed premises since 2003.		

Key Assumptions/Sensitivities/Risks The assumed number of Door Supervisors expected to renew their licence from May 2011 to May 2014 is around 76,000. The additional training is envisaged to be for one to two day's duration, with the cost for individuals for each day's training expected to be between £80 and £120.

Price Base	Time Period	Net Benefit Range (NPV)	NET BENEFIT (NPV Best estimate)
Year 2009	Years 3	£ -10.1m to -25.9m	£ -18.0m

What is the geographic coverage of the policy/option?	UK			
On what date will the policy be implemented?	May 2011			
Which organisation(s) will enforce the policy?	SIA			
What is the total annual cost of enforcement for these organisations?	£ Not yet known			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	No			
What is the value of the proposed offsetting measure per year?	£ Unknown			
What is the value of changes in greenhouse gas emissions?	£ N/A			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No

Impact on Admin Burdens Baseline (2005 Prices)				(Increase - Decrease)	
Increase of	£ Unknown	Decrease of	£ Unknown	Net Impact	£ Unknown
Key:	Annual costs and benefits: Constant Prices		(Net) Present Value		

SUMMARY: ANALYSIS & EVIDENCE

Policy Option: 3

Description: To introduce compulsory top-up training for existing Door Supervisors when they renew their licences plus compulsory ongoing refresher training in physical skills

COSTS

ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups'
One-off (Transition)	Yrs	
£0		Same as Option 2
Average Annual Cost (excluding one-off)		
£3.6m to 9.2m		Total Cost (PV) £ 10.1m to 25.9m
Other key non-monetised costs by 'main affected groups' There would be an additional cost of £80 every three years for re-training. This cost has not been included as we only have data for the number of door supervisors due to renew their licences for 3 years. Therefore the cost horizon for this IA is over 3 years, and the cost of re-training would apply in the fourth year.		

BENEFITS

ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups' N/A
One-off	Yrs	
£Unknown		
Average Annual Benefit (excluding one-off)		
£Unknown		Total Benefit (PV) £Unknown
Other key non-monetised benefits by 'main affected groups' Same as Option 2, but with additional longer-term benefits for public safety, and refreshed skills for Door Supervisors.		

Key Assumptions/Sensitivities/Risks

Price Base	Time Period	Net Benefit Range (NPV)	NET BENEFIT (NPV Best estimate)
Year 2009	Years 3	£ -10.1m to -25.9m	£ -18.0m

What is the geographic coverage of the policy/option?	UK			
On what date will the policy be implemented?	May 2011			
Which organisation(s) will enforce the policy?	SIA			
What is the total annual cost of enforcement for these organisations?	£ Unknown			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	No			
What is the value of the proposed offsetting measure per year?	£ Unknown			
What is the value of changes in greenhouse gas emissions?	£ N/A			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	No	No

Impact on Admin Burdens Baseline (2005 Prices)				(Increase - Decrease)	
Increase of	£ Unknown	Decrease of	£ Unknown	Net Impact	£ Unknown
Key:	Annual costs and benefits: Constant Prices		(Net) Present Value		

EVIDENCE BASE (FOR SUMMARY SHEETS)

A. Strategic Overview

1. Licensing for door supervisors was first introduced in April 2004, with licences due for renewal every three years. Since April 2004, Door Supervisors have been required to take a licence-linked qualification before being issued with their first-time licence. The current cost of a licence is £245.
2. The standards for training have recently been reviewed to ensure qualifications reflect accepted good practice. The review exercise has revealed that the skills now required by Door Supervisors in today's industry have changed. Some new areas have been added to the standards specified. These areas are critical, as they will improve public safety. They will therefore be included in the training specification for first-time applicants from June 2010.
3. The introduction of compulsory training in the new areas for existing Door Supervisors will mean that they will need to provide evidence that they have undergone the training before their licences can be renewed. It would be desirable to have the training infrastructure in place for at least six months before the training qualification becomes compulsory. The SIA would work with awarding bodies to ensure that the training is in place from October 2010, before top-up training would then be made a compulsory requirement from May 2011. Top-up training costs will therefore be incurred from October 2010.
4. The assumed number of Door Supervisors expected to renew their licence from May 2011 to May 2014 is around 76,000. Proportionally, training takes up a significant amount of time for Door Supervisors, many of whom work part-time. It will be important to ensure we are not imposing an unfair burden on the industry and individual.

B. Issue

B.1 Groups Affected

5. Under Options 2 and 3 there would be training costs to reach the newly required standard.

Costs for the introduction of top-up training would most likely to be borne by individual Door Supervisors and some of the larger Door Supervision companies. Most Door Supervisors are contracted to a supplier or self-employed. There are also a number of Door Supervisors who are employed in-house by a particular venue. But for our analysis we will assume that all door supervisors are self-employed.

B.2 Consultation

Within Government

6. The views of Other Government Departments have been sought in preparing this Partial Impact Assessment and the Home Office consultation paper it accompanies.

Public Consultation

7. This Partial Impact Assessment accompanies a Home Office consultation paper seeking views from the private security industry and members of the public.

B.3 Rationale for government intervention

8. The review of training standards for licence-linked qualifications highlighted the need for additional skills and knowledge by Door Supervisors in the current work environment to improve public safety. New areas, not currently covered, are physical intervention, first aid, special considerations in dealing with young people, and awareness of the threat of terrorism. There is no guarantee that public safety related training would be taken consistently and to the same standard across the industry, and as such government intervention is required.

C. Objectives

C1. Objectives

9. This consultation document sets out options identified for the standard of training required by door supervisors when renewing their licences. It does not cover training for first-time applicants, where plans are already in progress

for introduction in June 2010. The objective is to ensure that existing Door Supervisors have attained the same level of knowledge and skills and that public safety is maximised.

C.2 Background

10. The Security Industry Authority (SIA) licenses those working in designated sectors of the private security industry, including door supervisors. The possession of a licence shows that the holder has no serious criminal convictions, has a right to work in the UK, and has a basic qualification appropriate to the licensable role involved. A basic standard of training is required to obtain a licence. The SIA sets training standards through its 'Core Competency Specifications'. It has recently refreshed the Core Competency Specifications, to reflect the skills and knowledge currently need to work in the private security industry. New areas, not currently covered, are:
 - **Physical intervention**
 - **First aid awareness**
 - **Special considerations in dealing with young people**
 - **Awareness of the threat of terrorism.**
11. Plans are already in progress to add these into the 'Core Competency Specifications', which will in future be know as the 'Learning and Qualifications specification'. They will form part of the content required for training qualifications for first-time applicants for Door Supervisor licences from June 2010 in England, Wales and Northern Ireland, and Scotland from later in 2010.
12. The SIA is aware of at least 10 deaths that have occurred during ejections from licensed premises since 2003. There is anecdotal evidence to suggest that the figure could be even higher than this. Of the 20 Door Supervisors that have been involved in these incidents it appears that none were trained in physical intervention. In

addition there have been a number of incidents where there have been serious injuries caused by the use of dangerous ejection techniques.

D. Options

13. This impact assessment only covers existing licence-holders.

Option 1 is to make no changes (do nothing).

Option 2 is to introduce compulsory top-up training for renewals.

Option 3 is to introduce compulsory top-up training as above but with ongoing refresher training in physical skills.

E. Costs and Benefits

General Assumptions and Data

14. The costs of Option 2 would apply for a period of three years after introduction, which would be from May 2011 to May 2014, as Door Supervisors obtaining their licences before then renew those licences. If Option 3 is adopted, the costs for refresher training would re-occur for further renewals, and therefore be ongoing.

Option 2 – to introduce compulsory top-up training

Costs

Costs for Door Supervisors

15. SIA projections for the number of Door Supervisors due to renew their licences from 2011 to 2014 are as follows:

May 2011 – April 2012	29,000
May 2012 – April 2013	25,000
May 2013 – April 2014	22,000
Total	76,000
16. We assume that the additional training (covering physical intervention, first aid, awareness of the

threat of terrorism and dealing with minors) would take between one and two days. The cost of the training per individual is assumed to be between £80 and £120 per day. This is based on discussions the SIA has had with training providers. There may also be some travel costs involved, although as there is currently a good geographical spread of training and assessment centres we can assume that this will be on average not more than £12, which is the average cost of a 30 mile round trip costed at 40p per mile. We also assume that some door supervisors work on a part-time basis and have other employment. This means that the compulsory requirement proposed may have an impact on any second job. We can make an assumption that this could mean as much as a loss of 10 hours work paid at £10 per hour, which gives a figure of £100. We note that training providers will schedule courses around the needs of the industry so we feel that only a minority of Door Supervisors will be affected by this. For the basis of establishing a cost, we have made an assumption of an average loss of £50 to each Door Supervisor.

17. If we take the range of costs as being £92 – £132 + £50 lost revenue, then costs for Door Supervisors under Option 2 are projected to be around £3.6m to £9.2m per year. The present value (PV) cost is estimated to be around £10.1m to £25.9m over a 3 year period. The figures for the final year in the 3 year period could be slightly reduced, because they will include some renewals of Door Supervisors who were new entrants post the introduction of enhanced training for new Door Supervisors from June 2010.

Opportunity costs

18. Door Supervisors will often have other jobs, and training outside of door supervising hours could have an impact on their earnings. This is taken into account by calculating the amount of lost revenue and travelling time.

Additional costs for time out of the workplace
See above.

Administrative costs

19. Any extra administrative costs by the SIA would be insignificant. An extra field would be required in the Qualifications Database that the SIA use. The awarding bodies would feed the information into the automatic upload that is used to keep a record of who has a licence-linked qualification. This uploading would be performed by the awarding body although the admin costs would be insignificant. The costs of the certification and quality assurance arrangements are included in the costs given for the overall training.
20. Costs to awarding bodies are covered in the training fee.

Benefits

21. There would be a range of potential benefits under Option 2. Standards of training would be raised for all Door Supervisors, increasing police and public confidence. Public safety would be improved. This is difficult to quantify.
22. The SIA is aware of at least 10 deaths that have occurred during ejections from licensed premises since 2003. There is anecdotal evidence to suggest that the figure could be even higher than this. Of the 20 Door Supervisors that have been involved in these incidents it appears that none were trained in physical intervention. In addition the SIA is aware of a number of cases in the last two years where serious physical injury has occurred during an ejection from a licensed premises.
23. The SIA believe that this number is indicative of a lack of awareness of restraint related risks and how high risk restraint positions can be avoided. The proposed changes to the training requirement will discourage high risk restraint techniques, make door supervisors aware of the

- potential medical implications surrounding use of force and show measures they should take to reduce risk.
24. Door Supervisors are employed at pubs and clubs. This brings them into situations that involve conflict or the risk of violence.
 25. The 2001/02 British Crime Survey (BCS) found that 21% of all violent incidents occurred in or around a pub or club, and that 38% of violence between strangers occurred in that location (Allen et al., 2003). The 2008/09 BCS found that people who visited nightclubs more than once a week in the month prior to interview had a higher risk of violent crime (12.4%) than those who had visited nightclubs or discos less than once a week on average (6.6%) or not at all (2.5%).
 26. The Home Office Report 214: *Violence in the night time economy (2004) stated; 'Violent behaviour in and around pubs and clubs on weekend nights presents a significant public health, criminal justice and urban management problem'*. In addition, a national A&E study found people aged 15 to 25 were at highest risk of assault-related injuries in bars. 62% of assaults with a glass or bottle occurred in bars. (Hutchison et al., 1998).
 27. The SIA has worked with Camden police to get a more specific indication of levels of violence occurring on licensed premises. In 2008 there were 379 violent incidents reported as having taken place in licensed premises in Camden. Due to the impact of initiatives this figure had dropped substantially in the last three years but still represents a high level of violence. In total, there were 2,458 crimes related to licensed premises in Camden during 2008.
 28. Between August 2007 and July 2009, Door Supervisors were victims of violent crime on 35 occasions. Door Staff were arrested for violent crimes committed whilst on duty on 40 occasions in the same period.
 29. As well as the improvements to public safety there would be benefit for Door Supervisors in up-skilling and gaining an enhanced qualification.
 30. With the increase in public safety, there is also a potential saving in the economic cost of criminal compensation. For example, if a Door Supervisor is found responsible for an injury to a member of the public, then this could cost the public purse a substantial amount of money. The most serious type of injury could result in a payment of £175,000, and a more common injury could trigger a payment of £5,500 to £11,000.
 31. The economic and social costs of a homicide are around £1.5m. Six convictions for either murder or manslaughter over the past few years would have cost the taxpayer £9m.
 32. Any initiative that will lead to a decrease in violent crime will also result in reduced cost to the NHS.
 33. There are other, civil costs that need to be taken into account that are directly related to the use of high-risk restraint techniques. The SIA are aware of one payment made by a security contractor in the region of £220,200 for harm resulting from an unsafe ejection by a Door Steward. In addition, the SIA are aware of a claim for lifetime care that is being made by an individual who was paralysed during ejection from a nightclub for £5 million.
 34. There is also a high cost to the taxpayer in the cost to the legal system that results from court cases taking place following the death or injury of a member of the public from an unsafe ejection.
 35. As well as training in physical intervention, the inclusion of first aid awareness would also benefit the public. There are occasions where a customer has fallen or been injured after an assault where a Door Supervisor would be first on the scene. Enhanced training would enable

Door Supervisors to provide on-the-scene attention and provide an emergency response whilst waiting for an ambulance or designated first aid officer.

36. Door supervisors have already played a role in identifying terrorist activity, and terrorists have targeted bars and night clubs. In these instances, the actions of the Door Supervisors are likely to have saved many lives. The terrorist threat is still very real, and the inclusion of awareness of the threat of terrorism awareness training for door supervisors would help to reduce the risk of public harm as the result of terrorist action.
37. An increasing part of the role of a Door Supervisor is interaction with younger people, particularly those aged 14 to 18. Additional knowledge and understanding by door supervisors will address some of the potential risks in working with young people. There is a particular risk of harm to the public in a Door Supervisor being unclear on their responsibilities regarding 14-18 year-olds who may be under the influence of drink and/or drugs.

Option 3 – to introduce compulsory top-up training with ongoing refresher training

Costs

38. If Option 3 is adopted, and Door Supervisors are required to undergo top-up training every three years, then there will be additional costs for individuals could be in the region of an extra £80 every three years. This is because many experts feel that there is significant skills fade especially in the area of Physical Skills, and that those Door Supervisors who have not regularly practiced their skills would be best served by undergoing formal top-up training. The SIA will be producing a code of practice for Door Supervisors which will strongly recommend the need for some sort of refresher training, but having a compulsory refresher is the best way of ensuring that this training happens.

The cost of this option is estimated to be around £3.6m to £9.2m per year, with a present value of approximately 10.1m to £25.9m over a 3 year period. The top-up training cost of £80 has not been included as data is only available for 3 years, and the cost of the re-training would apply in the fourth year.

39. Under both options there will be opportunity costs for Door Supervisors, and costs for employers associated with time out of the workplace whilst training, as well as some low administrative costs.

Benefits

40. The benefits will be as for Option 2, but with additional longer-term benefits for public safety, and refreshed skills for Door Supervisors.

F. Risks

Option 2 – to introduce compulsory top-up training

41. There are some risks associated with this option. Firstly, there is extra cost to the system that may be difficult for some individuals. Also, there are the risks of injury during the delivery of the training, although this will be managed by ensuring that all training is subject to risk assessment including both medial and legal assessment.

Option 3 – introduce compulsory top-up training with ongoing refresher training

42. The risks involved in this option will be similar to above, except that there will be an ongoing commitment to refresher training.

G. Enforcement

43. The SIA set the standards for training of Door Supervisors, and other designated sectors of the private security industry. The knowledge and/or skills that operatives must demonstrate

are listed in the SIA’s ‘Core Competency Specifications’, which will in future be known as the ‘Learning and Qualifications specification’. These are used by awarding bodies as the basis of qualifications that the SIA recognise as qualifying individuals for their licences. The SIA would work with awarding bodies to ensure a framework of quality assurance is applied. The SIA ensures that provision falls within the remit of the qualifications regulators, including OfQual and SQA in Scotland. This ensures that the licence-linked training and qualifications fall within the remit of a regulatory framework.

44. In addition the SIA continues to investigate and bring prosecutions where there have been offences under the Private Security Industry Act 2001. The SIA continues to work with partners such as the police in compliance and enforcement activities.

H. Summary and Recommendations

45. The table below outlines the costs and benefits of the proposed changes.

Table H.1 Costs and Benefits		
Option	Costs	Benefits
2	£3.6m to £9.2m/year	£ Unknown
	Cost to Door Supervisors or Door Supervision companies	Benefits to the public and Door Supervisors are a reduction in serious injuries and possibly deaths, and up-skilling of Door Supervisors
3	As above but continuing £80 per door supervisor every 3 years	£ Unknown
	Cost to Door Supervisors or Door Supervision companies	As above with additional longer-term benefits for public safety and refreshed skills for Door Supervisors

Source:

I. Implementation

46. The Government plans to implement these changes on May 2011 with training provision in place from October 2010.

J. Monitoring and Evaluation

47. The effectiveness of the new regime would be monitored by the SIA. The SIA intend to implement systems to measure the benefits in the proposed approach. The SIA intend to work with Camden police to establish a benchmark of how the current skill levels of Door Supervisors influence the way in which they deal with ejections in particular. The SIA also want to establish the degree of under-reporting of violent incidents that Door Supervisors may be involved in. The SIA will

then re-visit the area and establish how the new compulsory training regime has affected patterns of behaviour, and establish what benefits the training has had in driving down physical harms. This measurement will be capable of taking place on an annual basis.

SPECIFIC IMPACT TESTS: CHECKLIST

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	Results in Evidence Base?	Results annexed?
Competition Assessment	Yes	Yes
Small Firms Impact Test	Yes	Yes
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	Yes	Yes
Disability Equality	Yes	Yes
Gender Equality	Yes	Yes
Human Rights	No	No
Rural Proofing	No	No

ANNEXES

Equality impact assessment

1. Preliminary Screening: The SIA has consulted widely on the content of the Core Competency Specifications, and has attempted to contact all sectors of the Door Supervision Community.
 2. Gathering Evidence: As the proposal covers the renewal training only, the SIA do not consider that the preferred option described represents a barrier to entry to the industry. As the proposals are for the inclusion of knowledge statements, the SIA cannot see that the delivery of training would exclude any particular groups. We would welcome views on this point in particular from respondents.
 3. Assessment & Analysis: The proposed inclusion of the additional knowledge statements has been suggested by the industry itself. They represent what employers consider underpinning for the core employment requirements of a Door Supervisor. The preferred option would apply to each individual Door Supervisor wishing to renew their licence. The requirement will therefore affect each individual equally. The inclusion of these knowledge statements will lead to benefit for some vulnerable groups, for example the inclusion of awareness of issues specific to dealing with 14-18 year olds.
 4. We acknowledge that many Door Supervisors are in part-time employment and as such the cost of this could be seen as a significant proportion of the income that an individual may earn from Door Supervision activities. The SIA envisage that this additional training will be assessed and operated within the existing framework of delivery. We are keen that the awarding bodies in this area operate to the best practice of delivery, which includes consideration of the following reasonable adjustments to take account of the candidates needs, examples of which are as follows (but not limited to):
 - Communication and interaction needs
 - Cognition and learning needs
 - Sensory and physical needs
 - Behavioural, emotional and social needs
 - Candidates for whom English is an additional language.
 5. We welcome feedback on any Equality or social impact that the proposal might have.
- ### Administrative Burdens
6. The proposal described as the preferred option will not incur any additional administrative costs that are levied by the SIA. Individual Door Supervisors will be required to evidence the fact that they have gained the additional training. The SIA envisage that this evidence will take the form of an upload from an awarding body. The SIA will automatically check this record when the Door Supervisor applies for their licence renewal. The form for the renewal will not take any longer to complete as a result of this process.
 7. This option will, however, add administrative burdens to the industry as described in the main body of the Impact Assessment.
- ### Policy Costs
8. Implementation of the proposed policy would cost the individuals and the industry the figures as presented above. The SIA would look to lessen the admin cost by looking at allowing exemptions where individuals have gained previous relevant qualifications.
- ### Small firms impact test
9. The SIA licence is an individual licence, with typically Door Supervisors funding their own training. However, there would not be a disproportionate impact as all firms would have to comply with the new regulations. The SIA welcome feedback from Small Firms to help in the assessment of the impact of these proposals.

Competition assessment

10. The proposal would not directly or indirectly limit the number or range of suppliers, the ability of suppliers to compete or reduce suppliers' incentives to compete vigorously. The cost of training will be similar wherever it is delivered, so we do not expect there to be any implications for competition between Door Supervision Companies. This requirement is a small addition to the existing training burden and will not skew the existing market. This training will affect all practitioners equally.

ISBN: 978-1-84987-111-2
Title: Door Supervisor Consultation
[HO_01518_G](#)