Door Supervision and Physical Intervention

Security Industry Authority consultation

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## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td>4</td>
</tr>
<tr>
<td><strong>The Licensing of Door Supervision and Close Protection</strong></td>
<td>6</td>
</tr>
<tr>
<td>Licence integration</td>
<td>7</td>
</tr>
<tr>
<td>Deciding whether someone is fit and proper</td>
<td>7</td>
</tr>
<tr>
<td>Training and qualifications</td>
<td>8</td>
</tr>
<tr>
<td>Safety Awareness for Door Supervisors Award</td>
<td>9</td>
</tr>
<tr>
<td><strong>Securing Public Safety and Promoting Equality of Opportunity</strong></td>
<td>11</td>
</tr>
<tr>
<td>The Equality Act 2010</td>
<td>11</td>
</tr>
<tr>
<td>Public safety and the safety of door supervisors</td>
<td>11</td>
</tr>
<tr>
<td>The ability to act to protect others and themselves</td>
<td>13</td>
</tr>
<tr>
<td>Fulfilling the role of a door supervisor</td>
<td>15</td>
</tr>
<tr>
<td>Fit and proper and physical capability</td>
<td>16</td>
</tr>
<tr>
<td>Options for assessing door supervisors</td>
<td>17</td>
</tr>
<tr>
<td><strong>Requiring Close Protection Licence Holders to have done Physical Intervention Training if they work as door supervisors</strong></td>
<td>21</td>
</tr>
<tr>
<td>Previous consultation</td>
<td>21</td>
</tr>
<tr>
<td>Proposal for a new physical intervention training requirement</td>
<td>22</td>
</tr>
<tr>
<td>Requiring completion of the Safety Awareness for Door Supervisors Award</td>
<td>23</td>
</tr>
<tr>
<td>Changing training requirements between granting and renewing a licence</td>
<td>23</td>
</tr>
<tr>
<td><strong>How to Respond</strong></td>
<td>26</td>
</tr>
<tr>
<td>Workshops</td>
<td>26</td>
</tr>
</tbody>
</table>
Consultation on Door Supervision and Physical Intervention

Alternative formats  26
Enquiries          26
Confidentiality and Data Protection  26
Consultation Questions  28
Introduction

1. The Security Industry Authority (SIA) regulates the private security industry in the United Kingdom. Our aim is to improve public safety by reducing criminality and raising standards in the private security industry. We are a non-departmental public body that reports to the Home Secretary. The Private Security Industry Act 2001 established the SIA and sets out its two main duties.

2. The first duty is to manage the compulsory licensing of individuals undertaking designated activities within the private security industry. We aim to ensure that only fit and proper people are licensed. Decisions on whether or not to grant a licence are made under the terms of the Private Security Industry Act 2001 and against criteria that are published in the document Get Licensed. These criteria have been agreed by the Home Secretary, who must agree any changes to these criteria.

3. Our criteria require individuals to have the relevant, recognised security qualification(s) in order to get a licence. This usually involves completing a training programme and achieving a recognised qualification. Alternatively, someone can get prior training and qualifications taken into account so that they may be able to get the recognised qualification without taking the training or only needing to do refresher training.

4. We set the competency requirements for these qualifications. Qualification awarding organisations use these to create qualifications that are accredited by qualifications regulators and recognised by the SIA. The training itself is given by training providers. By requiring people to undertake this training, we ensure that operatives have sufficient skills and knowledge to carry out their duties safely.

5. We take the criminal records of individuals into account when deciding whether or not to grant a licence.

6. To be granted a licence, individuals must also have the right to work in the UK and be aged 18 or older.

7. The majority of licences last for three years and cost £220.¹

8. Our second duty is to manage the voluntary Approved Contractor Scheme. This involves suppliers of private security services being independently assessed against a set of operational and performance standards. Suppliers that meet these standards are awarded Approved Contractor status. This

¹ Vehicle immobilisation licences (available in Northern Ireland only) last for one year.
accreditation provides those who buy private security services with independent assurance of a supplier’s commitment to quality.

9. This consultation asks for views on two issues relating to the regulated activity of Door Supervision and the requirement that holders of Door Supervision licences must have successfully completed training that involves demonstrating physical intervention skills. We brought in this training to ensure that door supervisors have knowledge and skills needed to protect themselves, their colleagues and members of the public. This training covers such things as how to escort someone out of premises and disengagement in a violent situation. We were prompted to introduce this training:

   a) in order to address the violence that door supervisors regularly experience;

   b) to reduce the number of incidents in which members of the public have come to harm due to the use of inappropriate physical restraint by door supervisors; and

   c) in response to coroners’ reports into deaths of members of the public that involved door supervisors.

10. The first issue we are consulting on is how the licensing system should manage situations in which someone who wants to work as a door supervisor has a disability that means that they may be unable to physically intervene to protect themselves and/or members of the public. This raises questions around how disabilities may or may not affect the ability to fulfil the role of a door supervisor and whether physical capability should be a requirement for a door supervisor licence.

11. The second issue is a proposal to require Close Protection licence holders (AKA bodyguards) and applicants for Close Protection licences to have successfully complete physical intervention training if they want to work as a door supervisor.

12. We are particularly interested in the views of disabled people and holders of door supervisor and Close Protection licences. We have hired an independent consultancy to run a workshop for disabled people and disabled people’s organisations. This workshop is to enable discussion of the issues and questions raised in this consultation. Details of this workshop are on page 26.
The Licensing of Door Supervision and Close Protection

13. It is a criminal offence under s.3 of the Private Security Industry Act 2001 for someone to perform a licensable activity without an appropriate licence. The activities requiring a licence are:

- Cash and Valuables in Transit;
- Close Protection;
- Door Supervision;
- Key Holding;
- Public Space Surveillance (CCTV);
- Security Guarding; and
- Vehicle Immobilising (only in Northern Ireland).

14. The Private Security Industry Act 2001 defines Manned Guarding (which includes Door Supervision, Cash and Valuables in Transit, Close Protection, Security Guarding and Public Space Surveillance) as activity that involves guarding:

- premises against unauthorised access or occupation, against outbreaks of disorder or against damage;
- property against destruction or damage, against being stolen or against being otherwise dishonestly taken or obtained; or
- one or more individuals against assault or against injuries that might be suffered in consequence of the unlawful conduct of others.

15. “Guarding” includes providing a physical presence, patrolling or surveillance. It includes activities done in order (a) to deter or discourage harm or loss to premises, property or persons or (b) to provide information about what has happened if there is harm or loss to premises, property or persons.

16. A Door Supervisor licence is required if Manned Guarding activities are undertaken in relation to licensed premises. Licensed premises means those premises that are open to the public at times when alcohol is being supplied for consumption on the premises or regulated entertainment is being provided.

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2 The exception to this is where the activity only involves the use of CCTV equipment or falls within the definition of Cash and Valuables in Transit or Close Protection.
17. A Door Supervisor licence is required if an individual (a) is performing this activity on behalf of themselves or an employer or (b) they are supplying their services for the purposes of, or in connection with, any contract to a consumer.

18. A Close Protection licence is required if someone is guarding one or more individuals against assault or against injuries that might be suffered as a result of unlawful actions by other people. This only applies if this person supplies these services for the purposes of, or in connection with, any contract to a consumer.

19. There are two types of licences – front line and non-front line. A front line licence is required if undertaking designated licensable activity (other than Keyholding). A non-front line licence is required for those people who manage, supervise and/or employ individuals who do licensable activity, as long as these people do not do front line activity themselves. This consultation is concerned with the requirements relating to front line licences.

**Licence integration**

20. Under licence integration the holder of one type of licence is allowed to do a different type of licensable activity. This is because meeting the criteria to be granted one type of licence is considered sufficient to demonstrate that a person is competent to do a different type of licensable activity.

21. Licence integration allows someone with a Close Protection licence to work as a door supervisor. This saves them the effort and cost of doing the door supervisor training and applying for a separate Door Supervisor licence.

**Deciding whether someone is fit and proper**

22. Central to our decision about whether someone should or should not have a licence is whether that person is fit and proper to hold a licence and to do that licensable activity. In general terms, we consider the following when deciding whether someone is fit and proper:

- has their identity been confirmed, are they aged 18 or older and do they have the right to work in the UK?
- are they of good character; and
- do they have the competence necessary to perform the role?
23. In deciding whether someone is of good character, we will look at whether they do or do not have a history of relevant criminality or other inappropriate conduct. We will consider the nature of the criminality, patterns of criminal behaviour and how long ago the crime was committed.

24. In deciding whether someone has the competence necessary to perform a frontline role, we will make sure that the individual has obtained the required qualification for that role.

25. Our licensing criteria do not explicitly consider whether a person is physically capable of doing a designated activity. However, if we are told that someone is or has been compulsorily detained or treated in the last five years because of serious mental ill health, we will consider whether this might mean that they are incapable of performing their role.

26. A fuller explanation of our licensing criteria can be found on our website – www.sia.homeoffice.gov.uk.

Training and qualifications

27. There are two ways that someone will have obtained the qualification needed to apply for a licence. The first is to successfully complete training we have approved. The second is through a process called Recognition of Prior Learning that allows people to ask training providers to take into account other training or qualifications they have successfully completed in the past. Training providers may decide that this prior learning means that the person does not need to do further training, must do refresher training or must still do the full course. Even those who had not have to do further training may still have to take tests and assessments to get the qualification.

28. We do not design training courses. We set learning and qualification specifications for each of the licensable activities. These set out the core knowledge and/or skills that individuals must demonstrate. Qualification awarding organisations then use these specifications as the basis of qualifications that are accredited by qualification regulators. We recognise these qualifications as qualifying individuals for their frontline licence.

29. Individuals buy the training and assessment they need to obtain these qualifications from training providers. These training providers are approved by awarding organisations. These awarding organisations are regulated by Ofqual in England, Wales and Northern Ireland, and the Scottish Qualifications Authority in Scotland.

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3 The exception to this is Keyholding.
30. When a qualification has been achieved, training providers forward the details of the learner to the relevant awarding organisation. The awarding organisation in turn uploads to our IT system information on the qualification and who has achieved it. When someone makes an application to us for a licence, we marry this information with the application. Should we decide that the applicant is otherwise fit and proper, we will grant them a licence.

31. Training providers are required by the Equality Act 2010 to make reasonable adjustments to enable people with protected characteristics, including disabilities, to do training.

**Safety Awareness for Door Supervisors Award**

32. In 2010, we introduced a physical intervention module to the training that new applicants for a Door Supervisor licence are required to do.

33. In February 2013, we introduced the Safety Awareness for Door Supervisors Award (also known as Upskilling Door Supervisors). This was top-up training (that included physical intervention training) that all existing Door Supervisor licence holders were required to do if they:

- had done their original Door Supervisor training before the introduction of the physical intervention module in 2010; and
- were renewing their licences.

34. As licences last for three years, all of these existing Door Supervisor licence holders had completed this top-up training by 4 February 2016. We ended the requirement for the Safety Awareness for Door Supervisors Award after this as all existing licence holders had completed the training.

35. The Safety Awareness for Door Supervisors Award is made up of two units - Safety Awareness and Physical Intervention Skills. The Safety Awareness part covers training on dealing with vulnerable people (young people under the age of 18, people on their own, in a vulnerable state and/or at risk of exploitation) terrorism awareness and awareness of first aid. The training for Physical Intervention Skills covers an introduction to physical intervention skills, disengagement and escorting techniques.

36. We wrote a training specification and a guidance document to help in developing this qualification. This document envisaged learners demonstrating physical intervention skills. This was written in to the assessment requirements of the qualifications by the awarding organisations. This means that people achieve the physical intervention unit
by successfully demonstrating the techniques that they have been taught. This is therefore a practical test.

37. The introduction of requirements to do physical intervention training was done to address the risk of serious harm and death that arose from Door Supervisors using physical intervention techniques on the public. We were prompted to take action by the views of industry and stakeholders as well as the findings and recommendations of inquests in which members of the public had died following the use of inappropriate physical restraint by door supervisors. We were also aware of cases in which inappropriate physical intervention had led to serious injuries. It was felt to be essential to public safety that door supervisors have the knowledge and skills to de-escalate potentially violent situations as well as appropriately disengage and/or escort (i.e. remove from the premises) people being violent. The intention is that those doing training enables door supervisors to protect themselves, their colleagues and members of the public.
Securing public safety and promoting equality of opportunity

38. It is our role to ensure that our training specifications and guidance protect public safety and fulfil our duties under the Equality Act 2010 to have due regard to promoting equality of opportunity for disabled people.

The Equality Act 2010

39. The Equality Act 2010 protects people from discrimination on the basis of their protected characteristics. One of these protected characteristics is disability.

40. S.149 of the Equality Act 2010 created the Public Sector Equality Duty to ensure that public bodies work to protect people from discrimination. The Public Sector Equality Duty requires us to think about how we eliminate discrimination, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not share it. We have to consciously think about this when we are making decisions on our services and policies. This includes the decisions we make on the content of training specifications.

41. In relation to advancing equality of opportunity for disabled people, we are required to have a particular focus on the need to:

- remove or minimise disadvantage;
- take steps to meet the needs of disabled people that are different from the needs of persons who are not disabled; and,
- encourage disabled people to participate in public life or in any other activity in which their participation is disproportionately low.

Public safety and the safety of door supervisors

42. Door supervisors have a crucial role in protecting public safety and maintaining public order. It is their responsibility to:

- guard licensed premises against unauthorised access, outbreaks of disorder and damage;
- guard property in licensed premises against destruction, damage and theft; and
safeguard the customers of, and staff in, licensed premises against assault, injury or other forms of harm.

43. It is our role to ensure that people who want to be door supervisors are fit and proper to meet these responsibilities. If they cannot meet these responsibilities, then they will not be able to protect public safety, themselves and their colleagues. This is a major issue for us because of the violent situations that door supervisors are likely to regularly encounter. This is because their role involves guarding premises where people drink alcohol, may be under the influence of illegal drugs or be attempting to engage in illegal activity (e.g. drug dealing, theft).

44. This risk of violence is highlighted by the Crime Survey of England and Wales 2015, which found that 28% of violence crimes happen in pubs or clubs. It also found that 19% of incidents of wounding occurring in pubs or clubs. The 2014/15 Scottish Crime and Justice Survey estimates that 17% of violent crimes happened in pubs or clubs in Scotland.

45. This violence can be against door supervisors, against door supervisors’ colleagues or between customers. Research we conducted in 2015 found that violence in the night time economy tends to involve:

- customers attacking door supervisors after being refused entry;
- customers being refused drinks and attacking bar staff, then attacking the door supervisors who come to remove them from the premises;
- customers fighting each other; and
- a gang attacking customers or members of another gang in a venue.

46. 59% of door supervisors we surveyed had experienced a physical assault while on duty that had required first aid. 44% had been hospitalised due to physical assault while on duty, with 26% having been hospitalised in the last year. In the past year, 64% had seen a colleague attacked with a weapon and 57% had seen a colleague hospitalised as a result of a physical assault.

47. Since 2008 we have been named as an ‘Interested Party’ in a number of inquests into deaths of members of the public that have involved Door

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5 The Scottish Government, 2016, Scottish Crime and Justice Survey 2014/15 Main Findings, p.46
Consultation on Door Supervision and Physical Intervention

Supervisors. As a result of these inquests, Coroners have sent 8 Prevention of Future Death reports (PFDs) requiring us to make changes to prevent deaths in similar circumstances. The majority of these reports have focused on the requirements for physical intervention training for door supervisors. We have a legal obligation to fully respond to concerns raised and/or make changes to practice when served with a Coroner’s PFD. PFDs, and other incidents of harm to the public due to inappropriate physical intervention by door supervisors, are a major reason why we brought in the Safety Awareness for Door Supervisors Award.

The ability to act to protect others and themselves

48. Door supervisors need the knowledge, skills and physical capability to appropriately physically intervene to protect themselves, their colleagues and members of the public from violence and other dangerous situations. It is only by requiring that people who want to be door supervisors are able to physically intervene that we can make sure that they will be able to protect the public, themselves and their colleagues once they get a licence and then a job. An issue for us is how to set this requirement so that we:

   a) only give door supervisor licences to people with the ability to physically intervene; and

   b) do not unreasonably or unlawfully limit the opportunities for disabled people to apply for a door supervisor licence.

49. We must set this requirement in a way that works across the range of situations a door supervisor might face in which they need to act to protect the public, their colleagues and themselves. These situations can be difficult and/or dangerous and a door supervisor will require some level of physical capability to do their job in these situations. The challenge for us in ensuring that someone is able to do this role is demonstrated by the following scenarios that a door supervisor could find themselves in.

Scenario 1

50. A heavily inebriated customer has been refused another drink by a member of bar staff at a pub. The customer has reached over the bar and grabbed the member of bar staff by their collar. They have raised their fist and are threatening to hit the member of bar staff unless they are provided with another beer.

51. The role of the door supervisor is to de-escalate the situation and, if this does not work, appropriately restrain the customer until the police arrive. The door supervisor may need to escort the customer from the pub. They need to
prevent the customer injuring bar staff and other customers while protecting themselves and colleagues from injury.

Scenario 2

52. A group of young, drunk men have approached the entrance to a night club. A door supervisor denies them entry to the venue because he believes that they may cause disorder. The young men begin verbally abusing him. The door supervisors perform a “switch” so that the door supervisor who has denied them entry goes into the club and another door supervisor takes over talking to the men. The group of men are persuaded to leave.

53. About half an hour later the group returns and attempts to gain entry to the night club by mingling with other customers. When a door supervisor again refuses them entry, the group of men rush the door. They push and elbow door supervisors and customers in an attempt to get in. The door supervisors feel that they, customers and staff are at risk and so radio for assistance from colleagues inside the club. Their colleagues come as quickly as they can to the door to help.

54. The door supervisors have the difficult task of protecting themselves while also protecting customers and other staff from harm. This may involve escorting out of the club those who managed to get in. The door supervisors might have to close the club’s doors to protect themselves from any violence and stop an outbreak of disorder in the club.

Scenario 3

55. A drunk customer at a bar at a major sports event is loudly swearing at other customers. Two door supervisors attempt to calm the customer, but she becomes more abusive. The door supervisors decide to escort her from the premises. The bar is on the second floor and the exit can be reached by stairs or a lift.

56. The role of the door supervisors is to appropriately escort the customer from the premises. They need to do this in a way that the customer does not injure themselves (e.g. trip over). They also need to prevent the customer deliberately or inadvertently hurting them.

Scenario 4

57. A customer at a music venue has fallen down a flight of stairs and is bleeding profusely from the head. One of the two door supervisors working on the door has been asked to assist and they leave the door to help the injured customer.
58. The immediate role of this door supervisor is to assess the situation, ensure that an ambulance is called and provide whatever assistance is appropriate to the injured customer. The role of the other door supervisor is to continue to control access to the music venue, greet customers and manage any disorder that may occur. They will need to do this by themselves, so there will be an increased need for them to be able to protect themselves if disorder breaks out and they cannot de-escalate the situation.

Scenario 5

59. A fire breaks out in the toilets of a busy night club. Music is being played loudly and the club is dark apart from strobe lights, disco lights and some lights behind the bar. The club is spread over a ground floor and a mezzanine level that overlooks the dance floor. There are stairs connecting the floors, but no lift. The toilets are on the ground floor.

60. Customers leaving the toilets are attempting to alert people to the fire, but are struggling to attract attention. Although there is smoke coming out of the toilets, most customers are oblivious to it because of the smoke machines that are running. However, the smoke detectors in the toilets have alerted the night club's staff to the fire.

61. The role of the night club's door supervisors is to coordinate an orderly evacuation of the building, inform the emergency services and liaise with the emergency services once they arrive. They must ensure that they keep themselves safe while keeping customers and night club staff safe too.

Scenario 6

62. A team of door supervisors on the door of a city centre night club hear a popping sound that they believe to be gun fire. After a couple of minutes, they hear an explosion in the vicinity of the night club. This is followed a few minutes later by the sound of sirens.

63. The role of the door supervisors is to safeguard customers and staff by responding appropriately to this incident. They must do this in a way that protects themselves and does not involve exposing themselves to unnecessary risk.

Fulfilling the role of a door supervisor

64. We are interested in views on how someone having a disability or disabilities may or may not affect their ability to fulfil the role of door supervisor. This will help us set the requirements for door supervisor licences in such a way
that we protect public safety while meeting our responsibility to give due regard to promoting equality of opportunity for disabled people.

65. We recognise that training providers will be able to make reasonable adjustments to enable some disabled people to complete the training and get the qualification they need to apply for a door supervisor licence. However, we suspect that training providers may feel that they cannot make reasonable adjustments for disabled people with more severe impairments.

Q1: How might a disability or disabilities affect the ability of someone to fulfil the role of a door supervisor? (Please refer in your answer to the scenarios we have described on pages 13-15 or to any other scenario that you describe)

**Fit and proper and physical capability**

66. We also need to consider how the current method of assessing physical intervention skills affects disabled people and how the physical capability of people who want to be door supervisors might be assessed. We want to consider this as it has been suggested to us that the requirement to demonstrate physical intervention skills prevents some disabled people from obtaining the qualification. This may be because the nature of these people’s disability or disabilities means that:

a) the training provider is unable to make reasonable adjustments to enable them to do the demonstration of physical intervention; and/or

b) they cannot fully perform a practical demonstration of physical intervention.

It is the training provider’s responsibility to make decisions on reasonable adjustments. The Scottish Qualifications Authority and Ofqual oversee how training providers make these decisions. We have no power to make training providers make reasonable adjustments for particular people. We also have no power to say how training providers should make reasonable adjustments. However, these decisions by training providers are made in relation to a training specification and guidance that we have formulated. The requirement to demonstrate physical intervention is meant to be a test of physical intervention knowledge and skills. It was not set with the aim of testing the physical capabilities of applicants. However, we recognise that the current means of testing might end up being a test of people’s physical capabilities because it requires them to do particular physical tasks.

67. A test of physical capability is reasonable if it is necessary to establish that someone is able to protect public safety and themselves from violence or other harm when working as a door supervisor. Other jobs that involve
protecting public safety (e.g. police officers, firefighters) have explicit physical capability tests for a similar reason.

68. We would like views on whether or not there should be an assessment of physical capability as part of deciding whether someone is fit and proper to hold a door supervisor licence. If you believe that there should be an assessment of physical capability, we are interested in your views on how this assessment should be done. This could involve continuing with what we do now or doing a different assessment of physical capability.

**Options for assessing door supervisors**

69. Any assessment must be appropriate to the role of door supervisors and proportionate. This means that any form of assessment must have some means of testing whether applicants for Door Supervisor licences have the capability and ability needed to protect public safety. It also means that this must be done in a way that does not place an undue burden on people wanting to be a door supervisor.

70. There are several options for how this assessment could be done.

**Option 1 – demonstration of physical intervention skills**

71. This is the current approach. People wanting to qualify as door supervisors would be required to demonstrate physical intervention skills in order to pass the training.

72. Training providers would continue to be responsible for making reasonable adjustments to enable disabled people to complete the training.

73. The main advantage of this option is that it is clearly aimed at the requirements of the role. There would also be no new costs for training providers and those seeking to get a door supervisor licence.

74. It is possible that a disabled person would not get the qualification if a training provider was unable to make reasonable adjustments and/or a disabled person was unable to demonstrate physical intervention during the test.

**Option 2 – demonstration of physical intervention skills and an additional test**

75. This would involve continuing the current approach of requiring a demonstration of physical intervention skills. It would add to this a new test specifically looking at physical capability. There are several different ways we could do this test.
76. **Self-declaration** – everyone applying for a Door Supervisor licence would have to formally declare to us that there is nothing that would prevent them from physically intervening if necessary. *Get Licensed* would be changed to make such a truthful declaration a condition of holding a licence. This would enable us to issue a warning, place another condition on a licence, suspend a licence or revoke a licence if someone did not do what they had declared they could do. This might deter people from applying for a licence if they could not physically intervene.

77. The advantage of self-declaration is that it recognises that people can be the best judges of their own abilities.

78. The disadvantage of self-declaration is that it does not add much to our ability to protect the public. This is because we would only find out that someone had lied or misjudged what they could do after:

   a) an incident had happened in which this person had not physically intervened to protect public safety, their colleagues or themselves; and

   b) someone had told us that this incident had happened.

79. **Medical certificate** – applicants for a Door Supervisor licence would be required to get a medical certificate or note from a GP or other medical professional stating that there is no reason why they could not physically intervene.

80. The advantage of medical certification is that it may provide more certainty than just asking for a demonstration of physical intervention skills.

81. There are several disadvantages to this. The first is that it would put the onus on medical professionals to decide if someone is capable of being a door supervisor. There is a risk that some medical professionals will refuse to provide these certificates or notes because they feel that they do not know enough about door supervision to judge whether someone can do the job. Another disadvantage is that there is a risk is that some medical professionals will issue certificates or notes even though they do not know enough about door supervision to judge if someone can do the role safely.

82. Applicants are likely to be charged by GPs for these certificates or notes. It could be argued that applying this cost to all applicants is disproportionate considering the small number of door supervisors who may have a disability. A more proportionate way of doing it might be to only require these certificates or notes when concerns have been raised (e.g. by a training
provider or employer) about someone’s capability to physically intervene. We could then use this certificate or note in deciding whether to let someone have a Door Supervisor licence.

83. **Third party medical assessment** – before submitting an application for a Door Supervisor licence, individuals would be required to pass a medical assessment. This medical assessment would be conducted by a third party contracted by us to do this work and would look at someone’s physical capability to be a door supervisor.

84. If we did decide to go ahead with medical assessments, we would have to widely consult in order to work out how to set the standards used in these assessments in a way that was fair, proportionate and relevant to the work of Door Supervisors.

85. A disadvantage of medical assessments is that they would involve extra costs for people as they would have to travel to these assessments and might have to take time off work while they were done.

**Option 3 – written test of physical intervention knowledge**

86. The requirement to demonstrate physical intervention skills would be replaced with a written test of applicants’ knowledge of physical intervention.

87. The main advantage of this option is that it would address the concern that the current approach may prevent some disabled people getting the qualification. However, this approach depends on a written test being as good as a practical test for assessing whether someone can fulfil the role of door supervisor (including the ability to physically intervene). It is questionable whether a written test can be as good.

88. There would be a risk to public safety if this option meant that people could work as door supervisors who had knowledge about physically intervention, but were unable to actually physically intervene if needed.

**Option 4 – written test and a test of physical capability**

89. Option 4 is like Option 3 in that the requirement to demonstrate physical intervention skills is replaced with a written test. An extra test is included to reduce the possibility that a written test might lead to someone being licensed who could not physically intervene to protect public safety. This extra test would involve assessing someone’s physical capability and would probably be done before someone applied for a Door Supervisor licence.
90. The most likely ways that this extra test could be done are the same as the additional tests in Option 2 –

- Self-declaration
- Medical certificate
- Third party medical assessment

Q2: Should physical capability be part of the requirement to decide whether someone is fit and proper to be a door supervisor?

Yes / No / Don’t know

Q3: Which of the options (on pages 17-20) might be the best way to assess whether someone is able to fulfil the role of a door supervisor?

- Option 1 – demonstration of physical intervention skills
- Option 2 – demonstration of physical intervention skills and an additional test
- Option 3 – written test of physical intervention knowledge
- Option 4 – written test and a test of physical capability
- Don’t know
- Other (please specify)

Q4: Please give your reasons for your answer to question 3.

Q5: Please provide any other comments and suggestions on how we can balance our responsibilities to protect public safety and promote equality of opportunity for disabled people.
Requiring Close Protection Licence Holders to have done Physical Intervention Training if they work as Door Supervisors

91. Licence integration allows holders of Close Protection licences to work as door supervisors without having to do door supervisor training and without having to get a Door Supervisor licence.

92. The Certificate in Close Protection is required in order to apply for a Close Protection licence. It does not involve training on physical intervention. A requirement to do physical intervention training was not added to the Certificate in Close Protection when such a requirement was added to the Door Supervisor qualification in 2010.

93. The requirement to complete the Safety Awareness for Door Supervisors Award only applied to Door Supervisor licence holders qualified before 2010. A similar requirement was not introduced for existing Close Protection licence holders working as door supervisors.

94. This means that Door Supervisor licence holders will have done physical intervention training, but Close Protection licence holders will not, even if they do Door Supervision. What this would mean in practice can be shown by looking at an example of two licence holders on the doors of a nightclub on a Saturday night. The door supervisor with a Door Supervisor licence would have done training on how to appropriately physically intervene. The door supervisor with a Close Protection licence would not have done training on appropriate physical intervention. We are concerned that this disparity risks public safety and want to end it.

Previous consultation

95. We originally consulted on this issue between August and September 2012. At that time, we proposed either:

a. ending the statutory licence integration between Close Protection and Door Supervision so that people who only hold a Close Protection licence could not work as door supervisors; or

b. requiring all existing and new Close Protection licence holders to do additional physical intervention training so that they can continue to work as door supervisors.

96. 67% of respondents to this consultation stated that they preferred the option of additional physical intervention training. Of the remainder, 24% favoured
breaking the integration link and a further 9% did not choose either of the options.

97. We would like to bring in a requirement to do physical intervention training and are now asking for views on a proposal for how we do this.

Proposal for a new physical intervention training requirement

98. We propose that all Close Protection licence holders who work as door supervisors must have successfully completed the Safety Awareness for Door Supervisors Award in order to legally work as a door supervisor. This requirement would apply to existing Close Protection licence holders and new applicants for a Close Protection licence if they intend to do Door Supervision. This requirement would not apply to Close Protection licence holders who do not do Door Supervision.

99. This requirement would apply from a set date. Existing Close Protection licence holders would be informed of this new requirement 9 months prior to this date so that they would have sufficient time to do the training. We would begin informing new applicants for a Close Protection licence of this new requirement 9 months before it came into force. New applicants would be able to do the Safety Awareness for Door Supervisors Award prior to their application if they chose.

100. Training providers would inform awarding organisations who had successfully completed the Safety Awareness for Door Supervisors Award. They would in turn inform us using the automated system that is currently used. There would be no need for licence holders to inform us when they had completed the training.

101. After the set date, all Close Protection licence holders who had not completed the Safety Awareness for Door Supervisors Award would be sent a letter telling them that we are minded to put a condition on their licence that they cannot work as a Door Supervisor. Close Protection licence holders would then have 21 days to send us mitigation or to do the training. After this 21 days had passed, we would make a decision on whether or not to put a condition on these licences. Any mitigation we had received would be considered in making this decision. Licence holders who had successfully complete the Safety Awareness for Door Supervisors Award within these 21 days would not have a condition put on their licence.

102. All those Close Protection licence holders who had a condition put on their licence would be informed of this in writing. They would then have another 21 days to appeal our decision. All those that do not get the qualification within this 21 days and either failed to appeal, or lost an appeal, would get a
condition added to their licence. This condition would be displayed on the public register of licence holders.

103. We would expect that businesses that hire door supervisors would check the public register to ensure that any Close Protection licence holders they employ as door supervisors do not have this condition on their licence.

104. If we do this, then we will publicise these new requirements so that people know about them.

**Requiring completion of the Safety Awareness for Door Supervisors Award**

105. A requirement to do the Safety Awareness for Door Supervisors Award has been chosen as the best option for this physical intervention training. This is because it avoids the need to create a new training course or change the existing Certificate in Close Protection. This saves substantial time and cost for training providers and awarding organisations. Existing licence holders and new applicants would need to pay £70-£120 for the course (which takes two days to complete). We think that this cost is reasonable because of the risk to the public of Close Protection licence holders not doing physical intervention training if they work as door supervisors.

106. The Safety Awareness for Door Supervisors Award includes learning on, and demonstrating awareness of, first aid. There is some overlap between this and the requirement to have completed a first aid course before applying for a Close Protection licence. We believe that this overlap is not enough of an issue to outweigh the benefits of this approach. In particular, that this overlap is not enough of an issue to ask awarding organisations and training providers to go to the considerable effort of creating a new training course.

**Changing training requirements between granting and renewing a licence**

107. We do not currently have the ability to require existing licence holders to do additional training between being granted a licence and this licence being renewed. People are instead only required to do new training requirements at licence renewal. The disadvantage of this is that it means it takes three years (the length of a licence) from the introduction of a new training requirement for all effected licence holders to have completed the training.

108. Requiring Close Protection licence holders to do physical intervention training at the earliest opportunity (rather than on renewal) allows us to shorten the time it will take to get to the situation where all Close Protection licence holders who do Door Supervision have completed this training. This reduces the chances that a Close Protection licence holder will be involved in a restraint related death or injury while working in Door Supervision.
109. To do this, we propose changing the wording of the criteria in Get Licensed to:

- require new and existing Close Protection licence holders to complete the Safety Awareness for Door Supervisors Award in order to work as a door supervisor;

- give us the ability to add a training requirement to an existing licence or class of licences if it is in the public interest and proportionate to the individual case or across a regulated activity or activities; and

- make clear that we will take enforcement action where a licence holder does not do such training.

110. These amendments to Get Licensed would create a general ability to change training requirements between the granting and renewal of a licence or class of licences. This will allow the SIA to bring in additional training requirements more quickly in future if a need to require additional training to ensure public safety is identified (e.g. by a coroner). We would always give training providers, awarding organisations, licence holders, private security businesses and our enforcement partners sufficient notice of such changes.

Q6: Do you agree or disagree with our proposal (on pages 22-23) to require new and existing Close Protection licence holders to successfully complete physical intervention training if they work in Door Supervision?

Agree / Disagree / Don’t know

Please give your reasons for your answer to this question.

Q7: Are there any ways that the proposal to require Close Protection licence holders to do further physical intervention training might impact on people with protected characteristics (e.g. disability, race, gender) that you feel we should consider?

Q8: Are you answering on behalf of a business that employs people with Close Protection or Door Supervision licences? If you answer yes to this question, please answer questions 9 to 11.

Yes / No

Q9: Would a change that required Close Protection licence holders to undertake further physical intervention training in order to operate as a door supervisor increase your costs?
Yes / No

Q10: Please estimate how much (in £) the increase in costs might be.

Q11: Please explain how you have calculated the estimate of increased costs.

Q12: Do you agree or disagree with our proposal (on page 23-24) to enable us to make changes to training requirements between a licence being granted and it being renewed - if the change is in the public interest and proportionate?

Agree / Disagree / Don’t know

Q13: Please provide any other comments or suggestions that you have.
How to Respond

The deadline for responses to this consultation is midday 20 December 2016.

You can respond to this consultation by completing the online questionnaire at https://www.surveymonkey.co.uk/r/FY89B6N.

If you would prefer to respond to this consultation in a Word document or by email, please email your answers to the questions on pages 24 to 25 to intervention.consultation@sia.gsi.gov.uk.

This online questionnaire and email address are for responses to this consultation. This email is also for sending us questions about the content of this consultation. Any emails sent to this address or questionnaire responses that are not about this consultation will not get a reply and no action will be taken on any issues raised. Please use the contact information on our website (www.sia.homeoffice.gov.uk/Pages/contact-us.aspx) if you have a question about something other than this consultation.

Workshop

We have hired independent consultants to run a workshop for disabled people and disabled people’s organisations. This workshop is to enable discussion of the issues raised in this consultation and to enable people to express their views on these issues.

Please contact SIAworkshop@mottmac.com if you are a disabled person or represent a disabled people’s organisation and would like to participate in the workshop.

Alternative formats

Please contact us at intervention.consultation@sia.gsi.gov.uk if you would like this consultation document in a different format.

Enquiries

If you have any questions about this public consultation, please contact intervention.consultation@sia.gsi.gov.uk.

Confidentiality and Data Protection

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with
applicable access to information frameworks (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004). If you want certain information you provide to be treated as confidential, please be aware that, under the Freedom of Information Act 2000, 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, you should explain to us why you regard any information you have provided as confidential. If we receive a request for disclosure of the information we will take due account of your explanation, but we cannot give an assurance that confidentiality will be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on us.

We will process your personal data in accordance with the Data Protection Act 1998. In the majority of circumstances, this means that your personal data will not be disclosed to third parties.
Consultation Questions

Please read the accompanying consultation document before answering the following questions.

Securing Public Safety and Promoting Equality of Opportunity

Q1: How might a disability or disabilities affect the ability of someone to fulfil the role of a door supervisor? (Please refer in your answer to the scenarios we have described on pages 13-15 or to any other scenario that you describe).

Q2: Should physical capability be part of the requirement to decide whether someone is fit and proper to be a door supervisor?

Yes / No / Don’t know

Q3: Which of the options (on pages 17-20) would be the best way to assess whether someone is able to fulfil the role of a door supervisor

- Option 1 – demonstration of physical intervention skills
- Option 2 – demonstration of physical intervention skills and an additional test
- Option 3 – written test of physical intervention knowledge
- Option 4 – written test and a test of physical capability
- Don’t know
- Other (please specify)

Q4: Please give your reasons for your answer to question 3.

Q5: Please provide any other comments and suggestions on how we can balance our responsibilities to protect public safety and promote equality of opportunity for disabled people.

Requiring Close Protection Licence Holders to have done Physical Intervention Training if they work as Door Supervisors

Q6: Do you agree or disagree with our proposal (on pages 22-23) to require new and existing Close Protection licence holders to successfully complete physical intervention training if they work in Door Supervision?

Agree / Disagree / Don’t know

Please give your reasons for your answer to this question.
Q7: Are there any ways that the proposal to require Close Protection licence holders to do further physical intervention training might impact on people with protected characteristics (e.g. disability, race, gender) that you feel we should consider?

Q8: Are you answering on behalf of a business that employs people with Close Protection licences or door supervisors? If you answer yes to this question, please answer questions 9 to 11.

Yes / No

Q9: Would a change that required Close Protection licence holders to undertake further physical intervention training in order to operate as a door supervisor increase your costs?

Yes / No

Q10: Please estimate how much (in £) the increase in costs might be.

Q11: Please explain how you have calculated the estimate of increased costs.

Q12: Do you agree or disagree with our proposal (on pages 23-24) to enable us to make changes to training requirements between a licence being granted and it being renewed - if the change is in the public interest and proportionate?

Agree / Disagree / Don’t know

Q13: Please provide any other comments or suggestions that you have.

Q14: Do you hold a current SIA licence?

Yes / No

Q15: If you hold a licence issued by the SIA, please indicate which licence/s you hold –

- Cash and Valuables in Transit
- Close Protection
- Door Supervision
- Key Holding
- Public Space Surveillance (CCTV)
- Security Guarding
- Vehicle Immobilisation (Northern Ireland only)
- Non-front line

Q16: Do you represent any of the following organisations?

- Security Industry Business
- Training Provider
- Awarding Body
- Advocacy Group
- Non-Governmental Organisation
- None
- Other (please specify)