

From: [Nick.Bailey](mailto:Nick.Bailey)  
Sent: 15 September 2022 10:56  
To: Neil Chapple  
Subject: SIA Door Staff Conditions

Good Morning Neil,

I have a query regarding the current conditions on premises licences relating to door staff requirements and would, if possible ask for some guidance about the method of dealing with request to vary premises licence conditions as I have been asked for advice by a number of premises and cannot, at this stage, give them a definitive answer.

Since the NTE re-start there have been some well documented request from the industry highlighting the issues of loss of numbers withing the SIA sector due to the Covid lockdown and asking whether a light touch approach could be adopted should premises not be able to get the level of SIA cover required by their licence conditions. Clearly, as the response to that request from both Govt & responsible authorities showed, we cannot pick and choose which licence conditions we enforce and which we don't. As a result I have already had a number of enquires from premises operators about removing the more prescriptive specifying days and numbers of SIA door staff. Their reasoning appears to be that since Covid there are not as many SIA available, the companies are demanding longer fixed hours booking before accepting premises and the cost per hour has increased dramatically.

We as a responsible authority are looking to move more towards the use of a licence condition for new applications requiring the DPS to take more responsibility for their premises and risk assess the occasions and numbers of staff required and be held to account for these decisions should they be widely inaccurate, rather than dictate the occasions and numbers of SIA required. As this appears to be the way forward with new applications the question of how to deal with requests to remove prescriptive conditions and replace them with the risk assessment requirement for existing licences become very real as I have faced this question on a number of occasions recently.

My start point would be that each application from a premises would still be judged on its own merits considering impact factors for those premises but on a technical basis how would these applications be dealt with? These conditions mainly appear in Annex 3 as having been imposed by committee. The difficulty is that there is no easy way of differentiating between conditions agreed following negotiations during the application process from those imposed following reviews or those imposed by committee because they felt it necessary at the time of the hearing, all of which would appear in Annex 3.

Are you in a position to advise whether, if premises are to apply for changes in the conditions relating to door staff, the request would these be dealt with by way of a minor variation or would it require a full variation?

I would be grateful for your views in this matter so that I am able to give a more informed response to premises in the future.

Regards

Nick Bailey