Aegis

Is it safe to deploy just one Door Supervisor at a Licensed Premises?

Welcome!

In this paper, Jim O'Dwyer, Senior Consultant at AEGIS Protective Services explains why it will never be safe to deploy just one Door Supervisor at a Licensed Premises.

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Is it safe to deploy just one Door Supervisor at a Licensed Premises?

Many licensed premises across the UK employ a Door Supervisor to protect their premises. Some do it because it is a condition of their Premises Licence (i.e. a requirement imposed by the Local Authority, usually on recommendation by the local police, based on intelligence known), while others are motivated by a well-intentioned desire for a 'security presence' to deter anti-social and criminal behaviour, help patrons and bar staff feel safe and generally protect against loss or harm happening.

I accept there is an abundance of evidence supporting the ability of lone Door Supervisors to successfully accomplish these basic aims. However, this 'success' is not without a price. The scale and severity of the 'collateral damage' in terms of physical and psychological injuries being suffered by Door Supervisors in the process is strikingly high.

Although, large numbers of licensed premises employ lone Door Supervisors to protect their premises (and, ergo, many Door Supervisors are prepared to accept the associated risks of working alone), that doesn't mean they have a 'safe system of working'.

Many factors have collectively contributed to help conceal and obscure the true extent of the risks faced by lone Door Supervisors including, not least that there is no official national register of assaults on Door Staff – thus reducing opportunity to specifically correlate adverse incidents with lone working.

In addition, under-reporting is endemic across the sector and RIDDOR reports are not always submitted, thus denying HSE information that might provoke an investigation into the efficacy of safety arrangements onsite.

However, information and statistics are freely available online to any concerned employer highlighting that Door Supervisors face a very high risk of assault and **lone worker Door Supervisors are effectively just sitting ducks!**

I would be very surprised if anyone who has ever worked a shift as a lone Door Supervisor at any Licensed premises would argue to the contrary. Yet, despite the excessively high level of risk to lone Door Supervisors being widely acknowledged across the Licensed Trade sector, it has not yet been sufficiently acknowledged by employer organisations, in terms of the level of care and attention needed to ensure a safe system of working, warranted by the higher level of risk.

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A major problem for lone Door Supervisors is that, owners of Licensed premises, having identified violence as a Health and Safety Hazard, can tend to just see 'hire a security officer' as the solution to their problem, instead of fully (i.e. sufficiently) exploring the practicality of a lone Door Supervisor being able to safely accomplish their role responsibilities and objectives and then going on to ensure (i.e. by testing) the efficacy of the Violence Prevention and Emergency Procedures at the premises where they are deployed. In other words, a failure by employers to carry out a 'full and sufficient' risk assessment i.e. as required by the Management of Health & Safety at Work Regulations.

In my opinion, if an employer conducted a full and sufficient health and safety risk assessment for the role of a lone Door Supervisor at a licensed premises, which properly incorporated meaningful consultation with the staff taking the risks, the process would identify that to employ just one Door Supervisor at a Licensed premises is inherently, dangerously unsafe and that wherever Door Supervisors are required to be employed, there should always be a minimum of at least two.

I have set out below, key points which support this assertion.

Employers duty to provide a 'safe system of working'

Following the death of a social worker in 1986, Lord Skelmersdale said in 1988: "Where violent incidents are *foreseeable** employers have a duty under Section 2 [of the Health and Safety at Work Act 1974] to identify the nature and the extent of the risk and to devise measures which provide a safe workplace and **a safe system of work**."

**Foreseeable:* There must be reasonable foreseeability of a risk which a reasonable person would not ignore. The risk must be 'real' in the sense that a reasonable person "would not brush [it] aside as far-fetched (see Lord Reid in Overseas Tankship (UK) Ltd v Miller Steamship Co Pty (The Wagon Mound No 2) [1967] 1 AC 617, 643.)

Note: As the possible adverse consequences increase in seriousness, so will a lesser degree of likelihood of occurrence suffice to satisfy the test of 'reasonable foreseeability'.

HSE statistics on the frequency of violence in licensed premises

An HSE literature review of effective management of the risk of violence in licensed premises 2009 (*HSE rr698*) provided references to research relating to violence in licensed premises and the frequency of occurrence.

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Excerpts:

Leather et al (1997) reported that a significant proportion of licensees are exposed to either verbal or physical violence on a regular and alarming basis with statistics such as 38% experiencing shouting or abusive language at least once a week, 17% experiencing it daily, 30% experiencing fights without weapons, 22% experiencing fights involving weapons and only 6% saying they had never experienced any of these types of incidents.

An earlier study, Marsh and Fox (1992) reported 36% of pubs experience disruptive arguments between customers only once a month and that the majority of pubs have little violence with only 6% of pubs reporting fights every week and only 5%/1% of managers reporting being attacked monthly/weekly.

Coomaraswamy and Shepherd (2003) reported that glasses and bottles were used as weapons in about 10% of all assaults and bar glassware had been identified as the principal weapon in licensed premises violence.

In my opinion, the research statistics demonstrate that violence happening in any licensed premises is reasonably foreseeable.

Risk of violence to Door Supervisors

Violence is a 'real' and prevalent workplace safety hazard for Door Supervisors.

For example:

In 2015, the SIA commissioned a report titled 'Research on violence reduction' showing (page 2) **more than 80% of Door Supervisors have been subjected to violence and 44% have needed hospital treatment after being assaulted at work!**

The SIA research report showed violence was a significant problem in and around venues and services operating in the night-time economy, also that **violence was apparent everywhere, irrespective of location** or size of city/town, i.e. no substantial regional variations had emerged.

The SIA publication (page 1) states:

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*"Violent crime is a significant feature of the night-time economy: about 50% of all violent crime occurs at times and in places associated with the night-time economy. Evidence for this comes from a variety of sources, including studies of police, A&E, local authority and British Crime Figure studies, all of which point **to** the greater prevalence of violence during the evening and night, particularly at weekends. Many of the businesses in the night-time economy sell alcohol and much of the violence is linked to alcohol consumption."*

The SIA research also showed the more time spent in the job, the greater the risk of suffering a serious assault!

The SIA research found the growing prevalence of drug use was a contributory factor in violence in the night-time economy. The concern being that drugs can significantly exacerbate the effects of alcohol and make people more unpredictable in their tendency to become violent.

Responses to a 2008 survey "Taking it on the Chin - Violence Against British Door Supervisors" by Andrew Perkins, published 2009, of 266 British Door Supervisors (comprising 91.4% males and 8.6% females) with career service's ranging from 1 to 30 years showed 57.1% of respondents had suffered a serious assault*, with 40% being repeat victims of two serious assaults and 30% of the sample experiencing three or more serious assaults.

* A 'serious assault' is one that results in an injury that requires hospital treatment (or should have).

Assaults involving weapons

The 2008 survey by Andrew Perkins showed more than two thirds (69.5%) of the 266 Door Supervisors had been assaulted with a weapon, with 49% being repeat victims and 34% experiencing multiple victimisations.

Risk of serious injury to Door Supervisors

When violence happens, the potential for serious injury to Door Supervisors is high.

Every time a Door Supervisor intervenes in a situation, there is a risk of them being assaulted, seriously injured and even killed.

They also face the prospect of being arrested and losing their SIA licence (on conviction) if they use excessive force.

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Door Supervisors who work alone at Licensed premises will, throughout their tour of duty, be acutely aware of their isolation from support.

Being alone, means they cannot perform all the required security functions – e.g. if they are dealing with a fight, they can't control who comes in through the door.

Knowing they are on their own if an incident happens will inevitably be likely to raise anxiety (stress) to unhealthy levels which, besides being an unmonitored long-term health risk, can have a negative impact on ability to think clearly and rationally. It can also result in lower levels of tolerance and unreasonable behaviour.

It's not just the Door Supervisors who are at risk. Door Supervisors who are on their own when an incident commences will be more likely to overreact and to use more force than may, in the circumstances, be 'reasonably' necessary and proportionate to the harm being prevented (i.e. the legal standard).

Serious incidents - frequency of occurrence

Responses to the 2008 survey "Taking it on the Chin - Violence Against British Door Supervisors" by Andrew Perkins, 2009, showed that the frequency of serious incidents equated to:

- a serious assault* every two and a half years
- a weapon related assault every 20 months
- a firearms incident every 12 - 16 years.

* A 'serious assault' is one that results in an injury that requires hospital treatment (or should have).

Lone workers are recognised by the HSE as being at higher risk

Lone workers are recognised by the Health and Safety Executive as being at higher risk of serious injury because, being isolated on their own in the event physical violence happens renders them vulnerable to more serious assault than if they had the close support of colleagues.

For the same reasons, lone Door Supervisors will be at higher risk of serious injury in the event violence happens.

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The role of a Door Supervisor

The definition of a Door Supervisor given in British Standard BS 7960:2005 is:

"A person employed by any person responsible for the management of any licensed premises or event, who has the authority of the owner, licensee, manager or organiser, exclusively or mainly to decide upon the suitability of customers to be allowed on to those premises and/or to **maintain order and public safety."**

Door Supervisor - Primary Tasks

Door supervisors are required to control the door and the behaviour of patrons inside the venue. In performing these duties, they will have two distinct roles.

Preventing people from entering the venue who:

- Are intoxicated or under the influence of drugs
- Do not comply with the venue dress code
- Are known troublemakers
- Are banned or subject to an exclusion order
- Cannot pay the admission fee
- Are known to be under-age

And, monitoring behaviour inside the venue and dealing with those people who:

- Place the management's licence in jeopardy
- Threaten the safety of other patrons
- Spoil the general enjoyment of other patrons
- Breach any criminal or licensing laws, or any house rules

Door Supervisors also have a responsibility to control the numbers of people permitted into the venue, specifically with regards to Local Authority and occupancy figure requirements.

A Door Supervisor role means dealing with conflict is inevitable

Performing the role of a Door Supervisor is, sooner or later, inevitably and unavoidably going to bring the jobholder into conflict with people who may be likely to be dis-inhibited through intoxication with drink or drugs, emotional, unstable and potentially armed with a weapon or else prepared to use an improvised weapon (such as a bottle).

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These people may be on their own or they may be in a group with others, who may side with them against the Door Supervisor in the event of physical conflict commencing.

Door Supervisors are required to wear their SIA badge visible in order to be readily identifiable to members of the public.

Door Supervisors may also be expected to wear a 'uniform' that highlights they are 'security'. Door Supervisors reflect the establishment and when conducting enforcement duties may expect to be the target of hostility and aggression from disaffected members of the public.

Employers instructions are often impractical and unworkable

Employers may advise lone Door Supervisors that the risks of confrontation and violence can be reduced by:

1. Good communication skills
2. Patrol of the venue at regular intervals
3. Support of team members as a visible deterrent
4. Working together as a team to minimise harm and risk where actual violence is occurring
5. Complying with employer's policies and procedures
6. Working to the instructions of your supervisors
7. Seeking immediate assistance in a potentially threatening situation

However, if a Door Supervisor is working alone, they cannot implement either 2, or 3 in the list above and that would put them in breach of 5 and 6, rendering them subject to formal disciplinary hearing and dismissal.

If a Door Supervisor is working alone, who can they rely on to provide immediate assistance in a potentially threatening situation? Colleagues, Police? How long would it take for support to arrive?

These are questions that a Health & Safety Risk Assessment should answer, but in my experience rarely do, perhaps because of the 'inconvenient truth' that would emerge, i.e. that a minimum of two Door Supervisors would be needed.

Impossible for lone Door Supervisors to comply with employer's (generic) guidance

Security service suppliers, especially the bigger organisations, provide their employees with generic Instructions and Guidance which does not take into account that lone workers would not be able to comply with it.

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For example:

Lone Worker Duties

*As a Lone Worker your function is to meet and greet, and where appropriate correct behaviour within the venue and, if necessary, advise customers of the reasons why they will not be allowed entry into the venue**. You are not at any time to become involved in a situation that could escalate into conflict**.*

Whilst carrying out these duties you will comply with the following instructions:-

1. *You will use tact, diplomacy and humour when dealing with customers, always remember behaviour breeds behaviour.*
2. *Where appropriate you will politely advise customers as to the reason{s) why they will not be allowed into the venue or why they are being asked to leave the venue.*
3. ***Do not under any circumstances become involved in a conflict situation with them**. (My Bold)*
4. *If they become verbally abusive it is imperative you remain cordial and calm, if the abuse continues **do not become physically involved,** inform the Duty Manager who will decide on the need to inform the police.*

How would it ever be practicable for a Lone Door Supervisor to comply with these instructions?

Violence can erupt spontaneously at any time and any place

A wide range of measures can be taken to deter, inhibit and minimise the risk of violence occurring. However, there is no known panacea for totally preventing violence in licensed premises. Ergo, sooner or later, physical violence (or else a need for physical intervention) is going to occur.

No time to withdraw

Whilst some employers instruct security operatives to withdraw from a situation if they feel unsafe, implementing the guidance is not always feasibly practical. The reality is that situations can escalate into physical violence very rapidly, leaving no option of withdrawing. This is especially true in the case of Door Supervisors, as they have an enforcement role and would generally be expected to go towards any trouble.

Verbal de-escalation does not always work to prevent violence, neither is it always an option.

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Other impracticalities for lone Door Supervisors

Other (typical) instructions may also be impossible for lone Door Supervisors to comply with.

For example, instructions on 'Incident Management/Ejections'.

- ***When an incident occurs, it must be quickly halted*** *to avoid customers who are not involved being injured or causing unfair distress to themselves.*

- *Wherever possible* ***the parties involved will be identified*** *and it will need to be worked out who was the aggressor party or individual and victim party or individual.*

- *The victim, party or individual will be taken to a holding area (usually a designated exit route).* ***The second party are not allowed to leave until the first party have been removed*** *from the venue and it is felt that it is safe for them to be removed if required. Once the victim is calm then consideration is to be given whether to allow them back into the venue, but this should only be done at the discretion of the Venue Manager and or Head Door Supervisor. Any persons ejected from the Venue must be done through an approved exit unless there is a shown (and justifiable) potential danger of innocent and un-associated persons becoming injured or involved.*

How does one Door Supervisor do all that on their own?

Impossible.

Handling quarrels and fights between customers

When a quarrel or a fight starts between customers, a Door Supervisor would generally be expected by the public to approach the parties and take positive action to quell the violence and restore order – not stand back, call for help and keep observation from a safe distance.

The pressure of this 'public expectation' can be immense, leading lone Door Supervisors to, in the public interest, over-extend themselves and risk falling foul of either the law or their employer's instructions.

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It will never be 'safe' for a Door Supervisor to attempt to restrain a person on their own

There are 18 different companies approved to train trainers to deliver the SIA DS licence-linked training in Physical Intervention Skills. To the best of my knowledge, all of them agree that it is simply not safe to try to physically intervene/restrain someone if you are on your own – and advise to summon support and wait for it to arrive before taking positive action to assert control and restore order. Similar advice is provided in NHS and Prison Service trainings.

The impracticality of lone Door Supervisors being able to implement this guidance is obvious yet is disregarded by employers when they make a decision to employ just one Door Supervisor.

The thing is, if a lone Door Supervisor does take positive action to physically intervene in a situation, they would automatically stand to be accused of engaging in 'recognisably unsafe practice', (i.e. contrary to their SIA training, their Common Law duty of care to themselves and their statutory duty under s7 Health and Safety at Work Act 1974, as well as, their employer's policy).

And, in the event that they suffer injury in the process, they could be accused of unnecessary risk taking and 'contributory negligence' and any compensation award reduced in proportion to how significantly their actions contributed to the severity of the outcome.

Clearly, this 'jeopardy either way' situation cannot constitute a 'safe system of working' i.e. as required by the Health & Safety Legislation.

A Petition to Parliament to ban 'One-man doors'

In or about 2015, a petition was raised on the Change.org web site to: Change Regulations / laws to prevent the use of one Door Supervisor at any Licensed venue which is required to have Door Supervisor Cover i.e. One Man Doors'. The petition was supported by 229 individuals - too few to result in the petition reaching the government, but together with the comments they left about their reasons for signing, it does support the case to ban 'one-man doors'.

A perpetual cycle

According to the research published by Andrew Perkins, 2009, the frequency of serious incidents equated to a serious assault every two and a half years.

When it happens, the injured Door Supervisor leaves and is replaced by another Door Supervisor.

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In my experience, there would not usually be any kind of post incident investigation aimed to establish the contribution to the incident made by the provision of only one Door Supervisor.

The cycle is perpetuated by the willingness of a seemingly endless army of (mostly young) people who are prepared to take any risks i.e. until they become seriously injured.

Conclusions

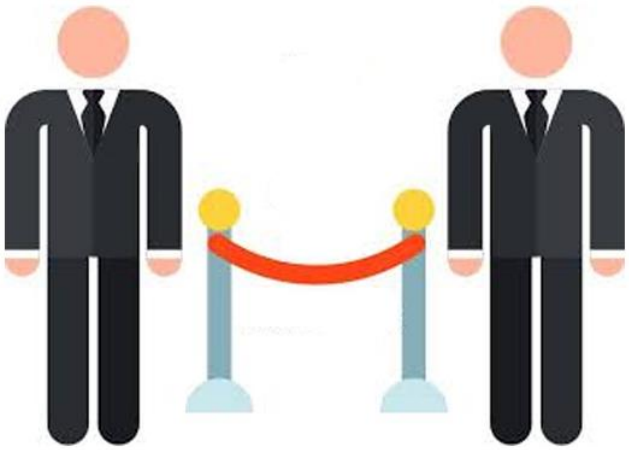
Besides the fact that the immediate presence of a security colleague is a significant inhibitor against attacks against security staff which would make the job safer and less stressful, a minimum of two trained staff members are needed to safely effect the physical intervention and restraint skills training they receive for their SIA Licence.

So, for all the reasons detailed above, I consider that to employ lone Door Supervisors is inherently, unacceptably unsafe. I'd also maintain that wherever Door Supervisors are required to be employed, there should always be a minimum of at least two.

In the light of the above, the SIA (supported by HSE) should move to ban the practice of only deploying a single Door Supervisor at any Licensed Premises.

Commercial considerations

The cost of hiring a Door Supervisor is about £14-£16 per hour.



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