

Officer comments

Supervision of entrances (Paragraphs 1.1.2)

The mandatory conditions attached to premises licences reads as follows: -

Mandatory Condition: door supervision

1. Where a premises licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, each such individual must be licensed by the Security Industry Authority.
2. But nothing in subsection 1. requires such a condition to be imposed-
 - a) In respect of premises within paragraph 8(3)(a) of Schedule 2 to the Private Security Industry Act 2001 (c12) (premises with premises licences authorising plays or films), or
 - b) In respect of premises in relation to –
 - I. Any occasion mentioned in paragraph 8(3)(b) or (c) of that Schedule (premises being used exclusively by club with club premises certificate, under a temporary event notice authorising films or under a gaming licence, or
 - II. Any occasion within paragraph 8(3)(d) of that Schedule (occasions prescribed by regulations under that Act.

For the purposes of this section, “security activity” means an activity to which paragraph 2(1)(a) of that Schedule applies, and paragraph 8(5) of that Schedule (interpretation of references to and occasion) applies as it applies in relation to paragraph 8 of that Schedule

There is therefore no mandatory requirement for racecourses to provide door supervisors under the Licensing Act 2003.

However I think it's fair to cross-reference licences on a case-by-case basis to ensure there is no duplication. We can add wording to this effect.

Risk Assessment (Paragraphs 9.1)

There are numerous use of the word ‘operator’ in this section, which I would have thought already addressed this. However, for clarity, we could simply substitute the words ‘new applicants’ for ‘operators’ at the top of page 16.