

The problems with the GLC Regulations were mainly that:

- They were far too specific – with the result that the detailed technical requirements were often out of date and frequently inappropriate to a particular situation.
- The expertise and resources available to individual licensing authorities varied enormously – consequently regulations were inconsistent between authorities and enforcement was extremely variable.
- This meant that the regulations were not always understood or respected by the entertainment industry with the consequent threat to safety that this implies.
- Unnecessary expense was frequently incurred because of local variations which could not be readily resolved given the absence of any central resource to resolve matters of interpretation or dispute. This particularly affected touring productions and transfers between venues.
- The regulations were often too narrowly concerned with the safety of the public, and ignored risks to staff and performers.
- The regulations were based upon a mandatory approach that frequently totally ignored the concept of assessment of risk.

Let me tell you a brief story about John, our local fire inspector. We had a weight-operated release held in the 'on' position by a tracker wire. This served to turn off the gas boiler in emergency. It used to jam regularly – that is, on every inspection by the theatre surveyor, the insurers, during the fire brigade annual survey and with the gas board – and would probably do so in a fire as well. The problem was the tracker wire was thin and stiff and the brass pulleys had very shallow grooves so the wire used to jump off the pulleys and jam in their mounts. But the installation complied with BS 483 or some such number. My chap decided to change the system for a robust nylon string on deep groove pulleys as used in hospitals and everything worked wonderfully. Until John arrived – "I cannot permit that string. Boiler release mechanisms must use a metal wire." Why? This works. "No – the string might melt in a fire." And? "The rule is quite clear." "But the gas would be turned off if the string melts – don't you see it fails

safe?" Now John was no fool, so he let the string remain!

There were regular problems with the GLC's Technical Regulations, which were usually ameliorated by the exercise of discretion by the enforcer. But discretion – risk assessment – implies understanding and a readiness to accept responsibility. And that's the problem. Many enforcement officers lack specific training and rely on excessive prescription to cover their ignorance and thus avoid the possibility of criticism for a wrong decision. And some are even judged by their number of successful prosecutions.

The acceptance of responsibility also implies the competence to make decisions. This entails an understanding of the actual intention behind a safety recommendation rather than just concentrating on the form of words. Back to my friend John, the fire inspector!

Risk assessment is an excellent tool but it needs to be based on knowledge. And risk assessment involves making choices. These choices involve the concept of reasonableness and the acceptance of responsibility. The concept means accepting that different people will come up with differing resolutions to safety issues; the concept of responsibility also implies the possibility even of (honest) error. Absolute safety is a chimaera – or perhaps rather a siren luring mankind to madness. The only way to ensure that no one can die in a theatre is to close all theatres. But staying at home is much more dangerous.

The Technical Standards come from a collaboration between enforcers and the industry who have each recognised that the one has an imperfect understanding of the other's problems and are prepared to learn from the other. The Technical Standards provide the guidance that is appropriate to the needs of the entertainment industry, guidance that remains flexible enough for performance

*Following a review of the way British Standard 7905 on Lifting Equipment was prepared and examples of its content by two of the committee members, there is an explanation of the Model Conditions for Places of Entertainment by the Chair of the ABTT Safety Committee and by an experienced theatre consultant.*

Risk assessment enables solutions which are:

- *Necessary*
- *Proportionate*
- *Efficient*

Solutions should be:

- *Certain*
- *Consistent*
- *Clear*

Collaboration – agreement, not enforcement.

Goal-setting – not prescription.