

Licensed Premises — The Second Strand

INTERNAL · a bigger, better-defined list than the H&S one, and two products already built

Two of the three things you asked for are built and can be sold next week. The third is a regulated qualification you cannot award yourself, but the delivery constraint you remembered has gone away.

1. The market, and why it is better than the H&S list

Measure	Number
Premises licences in England and Wales (Home Office, 31 March 2024)	224,100
...licensed for on-premises consumption (69%)	154,629
...off-licences	59,800

- **Every one of them needs a DPS holding a personal licence.** No exceptions.
- **Every one has staff who sell alcohol and must be trained**, and who commit the offence personally if they get it wrong.
- **Hospitality staff churn is enormous.** That makes training a repeat purchase rather than a one-off, which the H&S packs are not.
- **The list is public.** Licensing authorities publish premises licence registers. You do not have to buy or guess this data, and it comes with the premises name, the address and often the licence holder.

That last point matters more than it looks. Sourcing the list was the binding constraint on the whole H&S plan. Here it is a published register.

2. What you can award, and what you cannot

Product	Regulated?	Position
Underage sales prevention	NO	Your own product. Due diligence training and evidence, not a qualification. Sell it today. BUILT, 10 documents
Drugs awareness for licensed premises	NO	Your own product. Same position. Sell it today. BUILT, 8 documents
APLH — Level 2 Award for Personal Licence Holders	YES	Ofqual regulated. Awarding bodies include Highfield Qualifications, BIIAB and Laser Awards. Requires an approved centre and an invigilated exam. You cannot award it yourself

The bit you had wrong, and it is good news

You said you did not think the APLH exam could be done online because it has to be invigilated. **It does have to be invigilated, but REMOTE invigilation is now widely offered.** Candidates sit it at home on a webcam. Providers advertise online course plus remote exam as a single package.

So the whole strand can be delivered without anybody travelling anywhere, which is exactly the model you wanted. Market pricing runs around £70 for the online course and about £75 for remote invigilation, with bundled retail typically well above that.

3. What is built and sellable next week

Ref	Underage Sales Prevention (UAS)
UAS-00	Implementation guide — the law and the defence
UAS-01	Age verification policy (Challenge 25)
UAS-02	Staff training pack, 25 minutes, delivered in house
UAS-03	Staff knowledge test, 14 questions (answer key separate, never published)
UAS-04	Refusals register
UAS-05	Till prompts, signage schedule and proxy sale controls
UAS-06	Authorisation to sell alcohol and staff declaration
UAS-07	Due diligence audit and test purchase readiness, 16 checks
UAS-08	Four staff briefings with attendance sheets

Ref	Drugs Awareness for Licensed Premises (DAP)
DAP-00	Implementation guide — MDA s.8 and the licensing objectives
DAP-01	Drugs policy, including physical and environmental measures
DAP-02	Staff training pack, 30 minutes
DAP-03	Staff knowledge test, 12 questions (answer key separate)
DAP-04	Incident and seizure register, plus recorded toilet checks
DAP-05	Search and refusal of entry policy — consent based
DAP-06	Three staff briefings with attendance sheets

4. The hook, and it is stronger than the H&S one

Licensing Act 2003 s.146 makes selling alcohol to a child an offence. The fine is at level 5, which for offences committed on or after 12 March 2015 is **unlimited**. s.147A, persistently selling — three unlawful sales on the same premises in three consecutive months — carries a fine of up to **£20,000**, a closure notice, and the court may **suspend the alcohol part of the premises licence for up to three months**.

And the whole product follows from one sentence: **s.146 gives a due diligence defence, and that defence is only ever as good as the evidence behind it. A policy nobody was trained on, a refusals register nobody completed, and staff who never signed anything will not sustain it.**

Three months without an alcohol licence closes most pubs permanently. That is a more immediate and better understood threat than an HSE fine, and every licensee already knows it.

5. Pricing

Product	Price	Note
Underage sales pack, unlimited staff	£79	Your own. 100% margin
Drugs awareness pack, unlimited staff	£79	Your own. 100% margin
Both packs	£129	Saves them £29
Verified staff certificate	£10 per head	RECURRING. Staff churn drives repeat purchase every year
APLH course plus remote exam, resold	£169	Cost around £110, so £59 margin. Get a reseller rate before quoting

6. What it earns

Column	Buyers per 1,000	Gross	Cost of goods	NET	Average order
CAUTIOUS	4.8	£639	£74	£565	£133
BASE	12.0	£1,598	£185	£1,414	£133
STRONG	19.8	£2,637	£305	£2,332	£133

Sends per month	CAUTIOUS	BASE	STRONG
2,000	£13,571	£33,926	£55,979
4,000	£27,141	£67,853	£111,957
8,000	£54,282	£135,706	£223,914

Average order is £133 against £262 on the H&S strand, because the products are cheaper. But the list is 224,100, it is published rather than assembled, and the certificate line recurs every year on staff churn. Runway at 4,000 a month is 4.7 years on premises licences alone.

7. Running it as a separate string

- Separate sending domain from the H&S strand and from phwltd.com. Three domains, three reputations, and a problem on one never touches the others.
- Separate inbox and separate filing folders, so the reply counting stays honest.
- Completely different message. Do not mention plant, yards or PUWER to a pub.
- Different segments within it too: pubs and bars, restaurants, hotels, nightclubs, convenience stores, off-licences, supermarkets, sports and social clubs. The drugs pack sells hard to late-night venues and barely at all to a village shop.
- Build the list from published licensing registers, authority by authority. Start with Derby, Derbyshire and Staffordshire so the first customers are local enough to visit if it goes well.

8. To be selling next week

1. Export the two packs to PDF and set a payment link for each, plus one for the £129 pair. Half a day.
2. Write one landing page per pack. The fear line at the top, what is in it, the price, the button.

3. Pull the premises register for three local authorities. That is a few thousand names with addresses.
4. Write the email. Lead with the three-month suspension, not with the documents.
5. Send 500 in the first week. Measure the reply rate and the buy rate properly, in the folders.
6. Get a reseller quote for APLH with remote invigilation while the first campaign runs. Do not advertise it until you have a price you can actually deliver at.

The two unregulated packs are the whole of next week's work. APLH is a fortnight behind because it depends on somebody else's pricing.