



Security Industry Authority

The SIA Journey – have we gone far enough? (21 May 2009) – Notes

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Introduction

Notes from the SIA Journey – have we gone far enough? held on the 21 May 2009

These summary notes reflect the collated views of those who attended the conference, a list of whom can be found in the appendix.

It is acknowledged that each delegate has a different view and does not necessarily agree with each point, however all views and suggestions have been recorded.

It is noted that the ideas and suggestions recorded do not represent agreements, nor do they represent the view of the SIA. The SIA may disagree or agree with the views and suggestions of the conference.

Summary of the Day

SIA Chair Baroness Ruth Henig opened the conference at Manchester Central. The day concentrated on our experience of regulation so far and how to take regulation of the industry forward. It also focussed on how we can learn from and work with the private security industry to raise standards and improve public safety.

The programme featured presentations from Dr Adam White, Research Associate at the University of Sheffield; Professor Peter D'Arcy, Foreign Advisor to the Minister of the Interior Sheik Saif, Abu Dhabi; and Graeme McCabe, Better Regulation Team, the Home Office; which are available on our website:

www.the-sia.org.uk/home/about_sia/conference.htm.

Seminars ran throughout the day on the 'Future and Standards of the Approved Contractor Scheme'; 'The SIA Strategy and Approach to Communication and Customer Services'; and 'The Future of the Private Security Industry – a Threat and Opportunity Assessment'. A delegate from each seminar gave feedback on their session to the conference in the afternoon.

Brian Simms led with feedback from the Future and Standards of the Approved Contractor Scheme. Their session found that the ACS had raised standards from both the companies' and the buyers' point of view. The group learnt that 150 companies have gone for Approved Contractor status with the past 12 months. The differentiation study, a study looking at the potential for differentiation with the Approved Contractor Scheme, was discussed in the session, as well as new requirements for the ACS: the best differentiation option; company licensing; public awareness; and the ideal number of companies for the scheme. It was felt in the session that the ACS had to continue to drive up standards in the longer term. In order to increase public and client awareness it was suggested that an ACS/buyers' forum would be beneficial, and that insurance companies could play a larger part. It was also thought that inspection teams needed to be more streetwise.

Richard Bailey presented the feedback from the SIA Strategy and Approach to Communication and Customer Services. The seminar was in two parts; the first focussed on what the SIA had done well in the last 6 months; and the second focussed on where the SIA could do better. It was thought that the SIA had made big steps in licence application processing times. The online status checker, website information and updates, and payment by direct debit were all cited as areas in which the SIA had done well. It was thought that the SIA had coped well with the spike in Security Guard renewals. The second part of the session was what the SIA could do better. It was thought that the contact centre, although dealing well with basic questions, was not capable of dealing with enquiries on complex issues and that there was no clear escalation process. A single reference number for enquiries was suggested that could be quoted on calling the contact centre. It was felt that there was a lack of response to ACS enquiries, and as such an e-response to ACS enquiries was suggested. It was also suggested that there should be more e-updates, containing more information than they do currently. The session thought that the quality and consistency of the licence card could be improved. It was suggested that the regulation of training providers in the industry needs to be improved by tightening the control on training standards. It was also suggested that the SIA engage more with end-users, i.e. buyers, companies and the public. It was also felt that there should be liaison with partners during the licensing process.

John Bates presented the feedback from the Future of the Private Security Industry a Threat and Opportunity Assessment. This session featured a presentation from Douglas Greenwell, Sales and Marketing Director at G4S and a presentation from Dawn Barry, Operations Director at Alsecure, both available to view on our website (as above).

Douglas Greenwell discussed the £18 billion facilities management market and £5 billion security market in the UK. Dawn Barry discussed the recruitment costs and administration costs small businesses face. The value and opportunity of 2012 and 2014 was discussed during the session. The Association of Chief Police Officers (ACPO) community safety and accreditation scheme was also discussed. Licence integration was discussed in terms of future licence renewals and how it could benefit the industry and the individual. The overall message was that the industry needs to be seen as progressive and professional and the SIA has a responsibility to help with that. There needs to be a proper understanding of what regulation has delivered – an awareness campaign was suggested as a means of doing this. The group identified the need to close the gap between the expectation of the industry and what the SIA can deliver as a regulator.

Q&A Session

1. What steps are planned to raise public awareness of licensing in Northern Ireland? And are there any plans for the SIA team to come back to Northern Ireland following the recent workshops held over there? (Cameron Mitchell, Risk Management Solutions Global LLP)

Good communication is about the right message at the right time, and the communication will ramp up as we get closer to the offence date. Adverts started to run in Northern Ireland to coincide with the open for business date, and will continue to do so up until the offence date in December to let people know what they need to do to comply with the law. Publicity will be primarily aimed at the people who need to be regulated. Increasing public awareness is part of the communication programme, media interviews are taking place to increase public awareness and various groups will be targeted at the right time. We have also established contacts in Northern Ireland for hands on help.

2. Are you disappointed with the lack of feedback on in-house? (Brian Simms, Security Management Today)

There was no substantial evidence of a risk in not licensing in-house given to us throughout the comprehensive study. From a personal point of view, yes, it was disappointing. The industry did not respond in the way that was expected. We try to engage as much as possible with our stakeholders; we can only encourage the industry to work closely with us in three years time when we review the issue. No risk to the public was identified because it was found that in-house security teams train and carry out criminality checks on their staff. No further evidence was found or presented to the SIA.

3. What form of end-user engagement/communication do you carry out at a high level? (Dan Hooton, Prudential)

Formal consultations and impact assessments are available for all to respond to. Surveys such as the Approved Contractor Scheme review are aimed at end-users. We also engage with end-users to modify behaviour via compliance, for example employment of licensed individuals, and encouraging the use of ACS companies. We need to work on what more we (both the SIA and the end-user) can do. But how far do we go? And how much of the licensing fee can be spent on marketing campaigns?

4. In the current economic climate clients are struggling with costs so pushing forward regulation and higher standards costs money, is this really what we should be doing right now? (Cathy Ridguard, Sodexo)

We need to understand the need of individuals and the industry and have agreed standards to make sure the licence fee is a price worth paying. It is about licence cost versus value for money.

5. As an organisation providing training to individuals and businesses with interest in the security industry, I am disturbed to hear the volume of training providers that are not following the legal procedures for training of security personnel and simply 'signing off' qualifications. (Carl Mannion, Director of NEET Futures CIC)

Any evidence of this should be forwarded to the SIA, the relevant awarding body or the qualifications regulators. The SIA co-ordinate and publish the level of training malpractice allegations on the website, this is updated every quarter, and can be found on the training pages of our website, http://www.the-sia.org.uk/home/training/training_issues.htm.

Whilst there is a view from some sections of the industry that malpractice is endemic, the qualifications regulator states that there is no more malpractice in the security sector that

there is in any other industry. The data we have collected, which forms a definitive summary of all intelligence relating to training malpractice, supports this view.

6. The Awarding Bodies do not have the power to maintain the integrity of programmes since only the examinations form part of the courses that can be assessed and verified externally.

What does the SIA intend to do in order to improve matters for legitimate training organisations who simply cannot complete a 1-day training course as many training providers offer? (Carl Mannion, Director of NEET Futures CIC)

There is an issue about how we can best assure the quality of the training input. We are currently researching the quality of training so that we have an objective evidence base and can assess whether or not there is a problem. We will be sharing our research with awarding bodies with a view to see if we need to provide support to centres to increase the quality of training. We have already agreed to tighten the requirement on tutors, and to ensure that they have relevant occupational experience as well as a teaching qualification and, where applicable, a qualifications in how to train Conflict Management.

Offering licence-linked training in one day, assuming that there are no legitimate exemptions involved, is training malpractice. These cases should be reported directly to the SIA or, if known, to the relevant awarding body. When we receive an allegation of training malpractice, we work with the awarding body concerned to make sure that the allegation is investigated fully. We also ensure that we are informed of the action that is taken against any training provider that is not following the rules.

7. Will there be any provision for ‘undercover’ investigations from SIA enforcement officials? (Carl Mannion, Director of NEET Futures CIC)

Not for training malpractice. The investigation and regulation of qualifications falls within the remit of the qualifications regulators such as OfQual and SQA.

Investigations into malpractice in the assessment of qualifications is usually undertaken by the relevant awarding body in the first instance. This very often takes the form of an unannounced visit, which is a very effective way of detecting malpractice.

8. The ACS scheme as we know means a company that are vetted to a lot higher standard and at the cost to those companies. I have heard a lot of discussion about under-cutting in relation to services provided and rogue elements. To professionalize the industry, why can't the ACS scheme be introduced as a minimum standard? (Mark Shepherd, Norfolk Police)

Because the ACS is voluntary, the ACS standard is not designed as a minimum standard; its requirements are pitched at a more challenging level covering all aspects of business activity and with a focus on continuous improvement. To impose such requirements on all security providers might be seen as adding a significant regulatory burden on businesses and would also make it more difficult for the SIA to update and enhance the ACS standard. The SIA will keep under review the potential compulsory licensing of businesses, using a more basic standard than ACS, and a public consultation about such an approach in the vehicle immobiliser sector is currently underway (www.the-sia.org.uk/home/about_sia/news/nr_090430.htm).

9. The cost of licensing is considered against ‘in-house’ implementation – why was this not considered for private security industry? (Dirk Wilson, Sector Security Services Ltd)

The financial impact of introducing licensing to the in-house sector was one of many factors considered under better regulation principles. Any financial burden must be measured against the added value that regulation will bring to ensure it is proportionate and beneficial;

in this case in respect of public protection. The cost of licensing the contract industry was not considered in the Regulatory Impact Assessment as each sector of the industry was brought within the SIA regulatory remit.

10. It is stated that 'in-house' licensing cannot be justified as there is 'minimal risk' from 'in-house' staff. What was the risk from private security companies? (Dirk Wilson, Sector Security Services Ltd)

The risk association with not licensing in-house being minimal is based on the same assessment factors as contract companies. Prior to regulation it was understood that contract companies did not generally undertake criminality checks or adequately train their employees, leading to Parliament believing there was a sufficient risk to public protection through a poorly trained criminal element within the industry (that self-regulation had failed to address) that should be addressed by compulsory regulation. Our research into the in-house sector found that the majority of in-house employers did undertake criminality checks and provided adequate, tailored, training for their staff, so reducing the risk previously identified in the contract sector, and removing any need to introduce compulsory regulation at this time.

11. When will the ACS move to include British Standards rather than presently exclude them? (Dirk Wilson, Sector Security Services Ltd)

As of the 1 April 2009, approved contractors must conform to the relevant British Standard Codes of Practice. Any deviation from the guidelines and recommendations in these codes of practice must be justified.

12. As quality of training provision came up several times, the SIA divorces themselves from regulating the trainers, perhaps they should change the approach on views on this matter, which appears to be what we want from our regulator? (Dean Toney, University of Plymouth)

Training quality and malpractice are taken very seriously. All allegations are investigated. We can only investigate what you tell us and we can't go on hearsay, we need to know the details. We do not regulate training providers but they do impact on our credibility. We facilitate passing of information and chase qualification regulators and awarding bodies. The more information we are given the more we can hold them to account.

David Greer, Skills for Security – this is a difficult area as it is not the responsibility of the SIA to regulate training. We work to set qualifications but we have run three separate consultation processes with industry online which have shown no consistent evidence of training malpractice.

13. Does the SIA consider that any changes of Government in the near future may have a significant influence on the future of regulation? If so, what kind of changes can we expect? (Brian Sims, Security Management Today)

As a regulator responsible to the government of the day we are bound to abide by their approach to regulation. We cannot speculate on the detailed changes a new Government may wish to introduce through legislation. David Arculus (former Chair of the Government's Better Regulation Task Force) has published a report for the Conservative Party setting out proposals for a regulatory framework which can be found at <http://www.epfltd.org/images/Arculus%20Report.pdf>

14. Given that many senior industry figures initially suggest that 200 approved companies of better quality would be the way forward, where is the differentiator for clients now that over 600 companies are on the list? (Brian Sims, Security Management Today)

The aim of the ACS is to raise standards to help protect the public; more contractors choosing to meet ACS requirements clearly contributes towards this aim. The SIA has recently conducted a study into the potential for differentiation within ACS and the recommendations from this study will be published on the SIA website shortly.

15. Why is regulating investigation being delayed? (Tony Imossi, Association of British Investigators)

We acknowledge that it is taking longer than anticipated to introduce licensing for private investigations and precognition agents, and this has caused frustration and uncertainty for some within the industry. During the past eighteen months, the development of PI/PA regulation has been rescheduled by other regulatory issues that Ministers determined had a higher priority, including the Right to Work issues. Since then, Ministers have agreed that the licensing of private investigators should be one of the SIA's main priorities, along with the Business Licensing Scheme and the licensing of Enforcement Agents (bailiffs).

16. At the renewal stage of the licensing process, are there any plans to introduce competence training assessment? If so, will this include an increase to the renewal fee? (Blaine Bradbury, Printworks)

We have been considering how best to assure ourselves that operatives' skills remain up to date whilst at the same time recognising that any extra training we require could represent a major burden to industry. We have decided upon an approach in conjunction with industry that we feel balances our ability to regulate to prevent harm to the public, with the needs of the sector.

Every three to five years we update our competency specification. This will dictate what content will need to go in the licence-linked qualifications, and is our statement of the basic knowledge and skills that an operative needs to work in the sector. We will in future use the outcome of this exercise to see if the skills required have changed. This could happen as a result of changes in industry practice, technology or the emergence of new risks that means the basic training required to get a licence needs to be different.

Where we identify that the skills need for an industry has changed, we will consider the need to set a requirement for 'top-up' training at the point of licence renewal. We will only exercise this option where we feel that any skills gap identified are significant and critical. In addition, our proposals will be subject to an Impact Assessment, meaning that the Home Office will run a separate consultation to make sure we are not putting unfair burden on the individual and industry.

We have just renewed our core competency specification, and the only area where we feel major change has been identified is in the Door Supervisors specification. We are currently working with the Home Office so that an Impact Assessment can take place. We will be releasing details of this shortly.

17. In relation to the EU proposed Directive on services, is investigation in the private sector part of the security industry? (Tony Imossi, Association of British Investigators)

The private security sector is excluded from the Services Directive under Article 2(2)(k). In agreement with Business, Enterprise and Regulatory Reform (BERR) and the Home Office, all of the services regulated by the SIA are included in this exclusion. Please note that the individuals we licence already fall within the remit of the Mutual Recognition of Professional Qualifications Directive which we implemented in 2007. Guidance on the implementation of

this Directive is available on our website:

www.the-sia.org.uk/home/about_sia/legislation/eu_law.htm.

18. Would the SIA be willing to ask the Home Office about creating a specific offence for clients knowingly using contracted unlicensed staff? Landlords risk losing their licence if they use unlicensed door supervisors, how about some threat against factory owners etc? (Justin Bentley, IPSA)

A client knowingly using contracted licensing staff is already exposed to criminal liability through existing legislation. It is an offence for a person to aid, abet, counsel or procure the commission of an offence and such a person can be tried and punished as a principal offender (the Accessories and Abettors Act 1861, s.8 for indictable offences and the Magistrates' Courts Act 1980, s. 44(1) for summary offences). When tackling security contractors providing unlicensed staff, one of our standard approaches is to engage with their customers and where necessary point out the customer's liability for being a party to an offence of the supply of unlicensed operatives or operating without a licence. We have not yet found it necessary to prosecute a customer but it remains an option. There is therefore no need to ask for a specific offence to be created. As part of the considerations for introducing compulsory business licensing for contract security suppliers, we will consider whether an offence of contracting with an unlicensed business should be an offence. The same principles however, of being a party to an offence will still apply.

Appendix: List of Attendees

Company	Name
Abu Dhabi Police	Peter D'Arcy
Advance Monitoring Solution	Tony Cockcroft
Advance Security	Richard Bailey
Advance Security	Chris Palmer
Aegis Security Services	Lee Paintin
Aegis Security Services	Karl Schofield
Akita Security Services Ltd	Charlotte Williams
Akita Security Services Ltd	Philip Williams
Alamo Security Services Ltd	Dennis Horwood
Alamo Security Services Ltd	John Mountain
Alsecure	Dawn Barry
AM Support Services	Adrian Cresswell
AM Support Services	Steven Wyatt
Association of British Investigators	Tony Imossi
Association of Security Consultants	Simon Cooper
Bank of England	Don Randall
Beacon Security	Matthew Robinson
Beacon Security	Natalie Robinson
Brinks Ltd	Philip Steele
British Beer and Pub Association	Lee Le Clercq
British Parking Association	Patrick Troy
BRITSEC Security Services Ltd	Gary Lewis
BRITSEC Security Services Ltd	Gary McPartland
BSI Management Services	John Lee

Company	Name
BSIA	John Bates
BSIA	Tim Thomas
CCTV Data Compliance Inspect	Ian Johnson
CJL Managements	David Little
Clear Solutions	John O'Malley
Compass Group	Michael Bullock
Corps Security	Sam Croft
Corps Security	Joanna Gillespie
EDI	Cheryl Elleray
Europa Facilities Services Ltd	Ian Pugh
Europa Facilities Services Ltd	Debbie Wright
Eyes Security Ltd	Ian Longstaff
Faceofm UK Ltd	David Wallace
First Legal Support	Andrew Drewary
G4S	Robert Thompson
G4S	Douglas Greenwell
G4S	Jeff Ley
G4S	Keith Roberts
G4S Security Services	Bill Gray
Godolphin	John Creek
Government Office for the North West	Gail Porter
Guarding UK ltd	Peter Rees
Home Office	John Cairncross
Home Office - Strategic Centre	Graeme McCabe
HZL	Alan Prescott

Company	Name
Information Commissioner's Office	Judith Jones
International Professional Security Association	Justin Bentley
Interserve security	Alan Whiteley
Investigators Sector Group	Alan Marr
IPSA	Dennis Ricketts
ISS	Nick Holden
Izon Ltd	Paul Cameron
Izon Ltd	Charles Miller
JS Facilities Group	Derek Palmer
JS Facilities Group	Jon Schofield
Key Facilities Management	Simon Coward
Kingfisher Security	Ashwin Sanjenbam
Knightsbridge Guarding Ltd	Stacey Hall
Knightsbridge Guarding Ltd	Terry Hanley
LACORS	Mark Du Val
Lincolnshire Police Force	Peter Davies
Lloyds Register Quality Assurance	Mike Richards
London Met University Business School	Allison Wylde
Lynceus	Stephen Beels
Lynceus	Joanne Regan
Maclellan International	Richard Atkinson
Manchester City Council	Fraser Swift
Mayflower Control Ltd	David Lovell
Merseyside Police	Steve McNorton
Mitie	Kevin Tyrell

Company	Name
National Security Inspectorate	Kay Aitkin
Neet Futures CIC	Carl Mannion
NOCN	David Hutchinson
Norfolk Police	Mark Shepherd
Northern Security Ltd	Paul Herran
Northern Security Ltd	Paul Hopper
Oldham Council	Janice Leech
Oldham Council	Martyn Scholes
Phoenix CP/G4S Risk Management	Stuart Gilks
Professional Security Magazine	Mark Rowe
Protogenia Business	Gabrielle Chavasse
Prudential plc	Dan Hooton
RDS Training	Sharon Porter
Risk Management Solutions Global LLP	Cameron Mitchell
Rollright Facilities	Christian Taylor
Sanctuary Security Services	Nick Gully
Sector Security Services Ltd	Dirk Wilson
Sector Security Services Ltd	Nilam Karia
SecuriGroup	Russell Kerr
Security Management Today	Brian Sims
Shercurity	Claire Sandbrock
Shercurity	Alan Smith
Shield Security Service Ltd	Terry Vincent
SIA	Liz Ashley
SIA	Amy Balchin

Company	Name
SIA	Simi Bath
SIA	Siana Bretherton
SIA	Robert Buxton
SIA	Robin Dahlberg
SIA	Andy Drane
SIA	Robert Dye
SIA	Peter Dyke
SIA	Amelia Fitzsimmons
SIA	Lucy Hartley
SIA	Imogen Hayat
SIA	Ruth Henig
SIA	Alex Hood
SIA	Bill Matthews
SIA	Stephen McCormick
SIA	John Montague
SIA	Jackie Munn
SIA	Brendan O'Friel
SIA	David Porter
SIA	Jane Ratford
SIA	Linda Sharpe
SIA	Andrew Shephard
SIA	Nick Smith
SIA	Roger Everson
SIA	Ryan Taylor
SIA	Bruce Warman

Company	Name
SIALimited	Mick Boulton
Skills for Security	David Greer
Sodexo Ltd	Stephen Giles
Sodexo Ltd	Kathy Ridgard
SSIAB	Geoff Tate
Strathclyde Police	Brian Connely
Tag Guard Systems	Nick Evans
Thales	Tony Aston
The New Jerusalem End Time Ministries	Rev. John Al-Davies Jnr
The Printworks	Blaine Bradbury
The Security Institute	Di Thomas
The Shield Guarding Company Ltd	Nigel Jameson
The Shield Guarding Company Ltd	Greg North
TSS Total Security Services Ltd	Ross Jardine
UK Security Facilities Ltd	Tony Clarke
Unipart Security Solutions	Andrew Hayes
Unite the Union	Ian Tonks
University of Lincoln	Alan Blackham
University of Plymouth	Dean Toney
University of Sheffield	Adam White
VSG	Bill Muskin
Walford and North Shropshire College	Martin Powell
Wetherspoons	Mark McGinty
Wilson James	Colin Beaver
Wilson James	Stuart Lowden