Are you planning an event?

You need to be sure that any security services that you buy in are complying with the law. This means ensuring that individuals are properly licensed where necessary.

The events sector in the UK is worth £42.3 billion and most, although not all, events will require some professional security. Some or all of these security staff may require a licence issued by the Security Industry Authority (SIA).

The purpose of this guidance is to help you to identify the roles in your event that may require a security licence under the terms of the Private Security Industry Act 2001. There is also guidance on due diligence checks when buying security, and a resources section. Understanding what makes someone licensable is important, and will help you ensure you have the right person in the right role at the right time.

This is only intended as general guidance. It is not a substitute for the complete definition of licensable activity within the Private Security Industry Act 2001, and for the avoidance of doubt should be read in conjunction with the Act. It is also not possible to give definitive guidance as to who is licensable in all circumstances because it will always depend on the specific circumstances of the case. It does not remove the need for those concerned to consider the implications of the Act for particular events or premises, and to seek appropriate independent legal advice.
2. The Security Industry Authority

Who are we?

The Security Industry Authority (SIA) is the organisation responsible for regulating the private security industry. We are an independent body reporting to the Home Secretary, under the terms of the Private Security Industry Act 2001. Our remit covers the United Kingdom.

We have two main duties. One is the compulsory licensing of individuals undertaking designated activities within the private security industry; the other is to manage the voluntary Approved Contractor Scheme, which measures private security suppliers against independently assessed criteria.

Whilst it may be appealing to buy cut price security, the possible consequences of doing so are considerable. Low quality security provision can raise the risk to the public by being unable to deal appropriately with incidents, screening and vetting checks may be inadequate, customer service may be poor, and ultimately your reputation may be damaged. Past reporting in the media shows that it is often the buyer that makes the headlines, not the security contractor. Well informed buyers of security can reduce the likelihood of this occurring by conducting strong tender processes, due diligence checks, and detailed pre event planning.

The Private Security Industry Act 2001 outlines a system for the statutory regulation of the private security industry. This section is designed to provide an overview of the Act so you can make informed choices in your procurement.

Whether or not a licence is required is determined by the role that is performed and the activity that is undertaken. A full description can be found at Section 3 and Schedule 2 of the Private Security Industry Act 2001.

3.1 Who should have a licence?

There are two types of SIA licence:

**Front line licence**

A *front line licence* is required if undertaking licensable activity, other than key holding activities (this also covers undertaking non-front line activity).

A front line licence is in the form of a credit card-sized plastic card that must be worn, subject to the licence conditions.

**Non-front line licence**

A *non-front line licence* is required for those who manage, supervise and/or employ individuals who engage in licensable activity, as long as front line activity is not carried out — this includes directors* or partners.

A non-front line licence is issued in the form of a letter that also covers key holding activities.


If you have a non-front line licence you do not need to get another one if you are involved in another area of non-front line licensable activity (for example: if you are a director of a firm supplying close protection operatives but you also supply security guards, you will not need to get two licences).

For a list of licensable roles please refer to Appendix 1.
3.2 Licensable activities – manned guarding

Manned guarding activity includes any of the following:

**Guarding premises** against unauthorised access or occupation, against outbreaks of disorder or against damage;

**Guarding property** against destruction or damage, against being stolen or against being otherwise dishonestly taken or obtained;

**Guarding one or more individuals** against assault or against injuries that might be suffered in consequence of the unlawful conduct of others.

All of the above includes providing a physical presence, or carrying out any form of patrol or surveillance, so as to deter or otherwise discourage it from happening or to provide information, if it happens, about what has happened.
Manned guarding can be broken down into five different types of security activity each of which have their own corresponding licence issued by the SIA. For a full definition please refer to the Act:

<table>
<thead>
<tr>
<th>Security guarding</th>
<th>guarding premises or property against damage, theft, unauthorised access, or outbreaks of disorder;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Door supervision</td>
<td>guarding licensed premises (e.g. pubs, bars and clubs) and events or property against damage, theft, unauthorised access, or outbreaks of disorder;</td>
</tr>
<tr>
<td></td>
<td>See Appendix 4 for definitions of licenced premises</td>
</tr>
<tr>
<td>Close protection</td>
<td>guarding individuals against assault or injuries;</td>
</tr>
<tr>
<td>Cash and valuables in transit</td>
<td>guarding property against being damaged or stolen by the use of specially manufactured vehicles that have secure transportation as their primary function;</td>
</tr>
<tr>
<td>Public space surveillance (CCTV)</td>
<td>guarding premises, property or people by the use of CCTV equipment to monitor the activities of a member of the public or identify a particular person;</td>
</tr>
<tr>
<td>Key holding</td>
<td>Keeping (or controlling access to) keys for security purposes;</td>
</tr>
<tr>
<td>Vehicle immobilisers [in Northern Ireland only]</td>
<td>Immobilising (including by attaching a wheel clamp), restricting or removing vehicles, where a charge will be imposed as a condition of release.</td>
</tr>
</tbody>
</table>

In most circumstances, security operatives only require a licence if they are carrying out security activity in relation to a contract for services with a consumer. The exceptions are Door Supervisors and Vehicle Immobilisers, who (due to the increased risks associated with those sectors) are licensable even if their activity is carried out on an “in-house” basis.
3.3 SIA licence integration

Where we are satisfied that the training required for one role is sufficient for that individual to carry out licensable activity in another role a licence may be used for more than one licensable activity. The matrix at Appendix 2 shows for each licence the activity that is covered.

3.4 Exclusions

The Act also contains exclusions whereby an SIA licence would not be required. These are summarised below for presentational purposes and are produced in good faith. However, the wording in the Private Security Industry Act 2001 always overrides them.

**Exclusion 1**
Where an individual is only responsible for checking that individuals have paid for admission or have invitations to allow admission to an event.

**Exclusion 2**
Where an individual maintains order amongst a group of people and this is incidental to their role (and that role does not involve manned guarding activity) for example a school teacher accompanying children on an outing.

**Exclusion 3**
Where individuals do not undertake licensable activity but are faced with a sudden or unexpected situation e.g. a fight or going to the assistance of a colleague who is being attacked by members of the crowd. This exclusion will not apply if there is an expectation that an individual will respond to such incidents by, for example, its inclusion in their job description.

**Exclusion 4**
In house employees when carrying out duties in connection with their employer’s use of a certified sports ground or certified sports stand for purposes for which its safety certificate has effect. Employees of a visiting team to such premises are also exempt provided that the visiting team has a certified sports ground or stand.
3.5 Examples of licensable and non licensable activity

The table below provides some examples of typical event staff roles and activities and whether an SIA licence is required. This list is by no means exhaustive and it should always be remembered that it is not the job title that is important; it is the work, or activity, that an individual does that determines whether they need a licence.

<table>
<thead>
<tr>
<th>Licensable</th>
<th>Non Licensable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>– Requiring an SIA Licence</strong></td>
<td><strong>– No SIA Licence required</strong></td>
</tr>
<tr>
<td>Screening a person’s suitability to enter the event or venue e.g. individuals under the influence of alcohol or drugs or demonstrating anti social behaviour. This includes those who are searching bags to ensure that there is no unauthorised access or any damage to property or injury to others.</td>
<td>Customer care duties including directing patrons to refreshments, toilet and first aid facilities</td>
</tr>
<tr>
<td>Searching of persons and/or property to prevent items that are unauthorised or illegal from entering the premises e.g. cameras, alcohol, drugs or weapons.</td>
<td>Directing spectators to seating areas by checking tickets</td>
</tr>
<tr>
<td>Responding to incidents within crowds, queues or the audience to control behaviour which is antisocial, undesirable or likely to result in harm to others.</td>
<td>Providing safety advice and assistance to patrons as required</td>
</tr>
<tr>
<td>Ejecting individuals from a venue or event or designated area e.g. concert pit or backstage areas.</td>
<td>Ensuring gangways and exit/evacuation routes are kept clear for health &amp; safety purposes</td>
</tr>
<tr>
<td>Protecting a pitch, track or other identifiable area from spectators or others with the intention of preventing unauthorised access or damage.</td>
<td>Providing assistance in the carrying out of evacuation procedures in the event of danger to patrons, including liaising with representatives of the emergency services</td>
</tr>
<tr>
<td>Licensable</td>
<td>Non Licensable</td>
</tr>
<tr>
<td>------------</td>
<td>---------------</td>
</tr>
<tr>
<td><strong>– Requiring an SIA Licence</strong></td>
<td><strong>– No SIA Licence required</strong></td>
</tr>
<tr>
<td>Providing a security presence to prevent and detect crime within a designated area.</td>
<td>To be responsible for the health and safety and comfort of spectators within a designated area.</td>
</tr>
<tr>
<td>Guarding property and/or equipment in situ during the setup and breaking down of, for example, an event or exhibition.</td>
<td>Monitoring and maintaining the pedestrian flow at key locations e.g. entry and exit points.</td>
</tr>
<tr>
<td>Patrolling the perimeter of an event to prevent unauthorised entry being gained by individuals, through the climbing or breaching of any fences or barriers, or through being let in via an access point.</td>
<td>Providing guidance and direction to visitors arriving by car or on foot, including the management of roadway crossings to ensure the safe passage of visitors over the roads.</td>
</tr>
<tr>
<td>Working as a bodyguard protecting performers, corporate guests, clients, VIPs etc. under a contract for services.</td>
<td>Report to a supervisor or safety officer any damage or defect which is likely to pose a threat to spectator ‘health and safety’ e.g. a damaged seat or barrier.</td>
</tr>
<tr>
<td>Observational and reporting roles as part of or in support of guarding fall within paragraph 2(1) as a result of paragraph 2(3) of Schedule 2 of the Private Security Industry Act which includes as licensable activity providing a physical presence or any form of surveillance as to deter or otherwise discourage something from happening or to provide information if it happens about what has happened.</td>
<td>Volunteers (see section 5.)</td>
</tr>
</tbody>
</table>

1 If the purpose of searching of persons or bags is to ensure that no-one with prohibited items enters the premises, then this is an activity that falls within paragraph 2(1)(a) of Schedule 2 of the Private Security Industry Act as an activity that consists of “guarding premises against unauthorised access”.

2 Examples of such roles include (but are not limited to) patrolling the venue, observing from fixed positions or monitoring CCTV footage.
4. Multi role staff

It is worth considering if licensed staff could be used for more than one activity, such as being part of a quick response team when no longer required to undertake searches of people and property at the entrance to an event. If licensed staff are able to carry out more than one role, it may reduce the number of SIA licensed staff required, whilst not compromising the safety of the event.
5. Volunteers

Many events across the UK rely on volunteers to help deliver an event safely and provide a positive customer experience. The value of volunteers is recognised by the SIA but for the purposes of the Private Security Industry Act 2001 there needs to be clear demarcation between volunteers and contracted in security and clarity regarding the criteria for both.

Only those individuals employed, or contracted in, to carry out licensable activities are covered by the legislation. Volunteers, by virtue of not being employed or contracted in are not considered to be employees and therefore are not licensable under the Private Security Industry Act 2001 (unless in relation to vehicle immobilising – refer to the Private Security Industry Act 2001).

However, volunteers working as manned guards at events must provide their services for free and receive no financial benefit, payment in kind or a reward for their services to be defined as a volunteer.

The principles on what constitutes a payment in kind or reward are in line with those set out by HM Revenue & Customs. HM Revenue & Customs identifies a payment in kind or benefit as whether it is subject to either PAYE (tax) or National Insurance contributions.

The list provided on the HM Revenue & Customs website is comprehensive, but not prescriptive, and if in doubt, individuals or organisations should seek independent legal advice.

http://www.hmrc.gov.uk/employers/ebik/ebik2/table-of-contents.htm
The following examples provide an indication as to how some common occurrences are likely to be treated:

The payment of out of pocket expenses (e.g. travelling to and from the event) would not be considered a payment in kind.

The payment of a donation made direct to a charitable organisation would not be considered as a payment in kind as long as no part of this payment is then passed on to the individual.

The provision of a meal or meal vouchers during the working day is acceptable. However, provision of vouchers to be exchanged for, ‘lunch at the Ritz’ for example could be considered a reward.

The ability to view the event while working (directly before, during or after a shift) would not be considered a reward, however preferential treatment or discounted rates for premium tickets (e.g. Men’s Final on the Centre Court at Wimbledon, or a Cup Final match) could.

Tickets provided to an individual for use by themselves (whilst not working), their family or any associate could be viewed as a reward.

The provision of uniform or appropriate equipment for the job would not be considered payment in kind or a reward, nor would certain other items of clothing such as a motif tie. However, the provision of official merchandise e.g. CDs or DVDs could be.
6. Approved Contractor Scheme

The SIA’s Approved Contractor Scheme is a voluntary scheme that businesses providing security services can apply to join. Security suppliers must meet 87 different performance indicators which are based upon widely recognised business improvement models (including ISO9001:2000 and European Foundation for Quality Management Excellence Model). The scheme also draws upon Investors in People and includes relevant British Standards. Companies who hold Approved Contractor status are independently assessed each year to ensure they continue to meet the required standard. As such the ACS stands out as having especially comprehensive good practice criteria. A list of the SIA’s ACS companies can be found on the Register of Approved Contractors (ROAC) on our website. You may wish to consider requiring your security provider to be an SIA Approved Contractor.
7. Pre-event planning

As with other aspects of your event, pre-event planning will help clarify the security requirements such as numbers of staff and type of security e.g. CCTV operators, door supervisors, or security guards needed for your event. It will also help you to identify a security provider to deliver these services.

For many events in the UK a licence will be required in order to supply alcohol and provide entertainment at the event. Legislative requirements are different throughout Scotland, Northern Ireland and England and Wales so it is important to check with police forces and local authorities what permissions you require. The Private Security Industry Act 2001 has a clear definition of what constitutes a “licensed premises” throughout the UK and the definitions can be found at appendix 4.

For event organisers it is key to understand what areas of your event are licensed premises. Is it only certain sections such as bars or is it the entire field, street, or building where the event is taking place? Usually the “licensable area” is clarified on a plan supplied with any licensing application. For the purposes of SIA licensing security staff deployed in relation to this “licensable area” will require Door Supervisor licences at times when the premises is open to the public and alcohol is available for consumption or regulated entertainment is taking place.

Early engagement with Local Authorities and Police will help establish what, if any, areas of your event require permissions under alcohol/entertainment licensing regimes across the UK which in turn will affect the number of security staff you may require. Similarly Environmental Health, Fire and Rescue Services, or Health and Safety teams may have requirements that inadvertently necessitate security services such as perimeter patrols or restricting access to certain parts of a site.

The Security Industry Authority can provide advice on the SIA licence(s) that operatives may require for the circumstances outlined above. Early engagement with your regional SIA interventions officer can allow them time to offer support and advice on job roles, security suppliers and supply chain, due diligence and contractual arrangements. Contact us in the early stages of planning your event for guidance on the Private Security Industry Act 2001 to understand how it may affect your security requirements.
Consider as well if your event is aimed at children or the vulnerable whether any enhanced screening and vetting checks are required. If vulnerable groups with a specific non-visible condition (e.g. Tourettes, Aspergers or autism) will be attending the event, brief security staff in good time. They will need to be able to recognise the broad signs of the condition in question, and should be advised to work with any accompanying support workers.

Discussions with the appropriate agencies prior to your event will allow you to make informed decisions about the security services you need and the process required for obtaining the necessary permits or licences. This liaison may be done through one to one meetings or via Safety Advisory Groups.

Using risk assessments and table top exercises to run through your event from initial preparation of the site through to its conclusion will clarify how the different security operatives on site will be utilised both in a business as usual capacity or emergency situation.

The counter terrorism (CT) training associated with Projects GRIFFIN and ARGOS delivered by the National Counter Terrorism Office (NaCTSO) has been replaced by online and other training products under the new national CT initiative ACT – Action Counters Terrorism. SIA Approved Contractors are required to ensure that their staff are appropriately trained regarding CT awareness. If you are contracting with a non ACS business, consider checking what percentage of security staff deployed to your event have attended CT awareness training.

Contingency planning, or stress testing, your event through hypothetical scenarios will further illustrate how security operatives may be used should an emergency situation arise. Pre-planning responses to incidents such as terrorism, serious crime, natural disaster, medical emergency, missing persons, equipment failure, loss of communications will identify security needs. Consider whether your security staff require specialist skills or knowledge and whether if an emergency does arise will you be relying on stewards or volunteers to back fill security roles.

For most events it is unlikely there will be the opportunity to have a “live” contingency exercise to train security staff so pre-planning will ensure there are sufficient numbers, clearly defined roles and responsibilities, and procedures in place.

Once a clear understanding has been developed of security needs we recommend that every member of staff is provided with a clear job description. This should detail the activities to be undertaken as part of the role, and the purpose for which activities are being undertaken. It is also suggested that the licensable status of the individual and the location of where the work is to be undertaken are included.
For larger events only very few companies in the UK will be able to supply security operatives solely from a pool of its own employees. A process of subcontracting or use of labour providers is often used to fulfil the numbers of security operatives that has been agreed.

Sub-contracting is the process whereby the responsibility for delivering the customer contract is transferred to another party and is fulfilled on behalf of the company who initially won the contract. With labour provision the responsibility for delivering the customer contract remains with the company who won the contract but they rely on third parties to supplement their staff numbers to deliver the contract.

Both practices may be acceptable providing there is transparency for the client and suitable due diligence checks in place to ensure the individuals deployed to an event are correctly licensed for the role they are undertaking.

It is important as a buyer of security services that you are clear regarding your expectations of security companies in relation to subcontracting and labour provision. For example, can your chosen security provider subcontract to another company; do you need to be notified if it does; is one company supplying stewards and another supplying security operatives; if labour providers are being used, who is responsible for screening and vetting checks of the operatives supplied; who is going to manage the staff on the day of your event including any self-employed staff; and who is liable if unlicensed staff, or staff with no right to work, are discovered working at your event? For the avoidance of doubt the terms and conditions of any contract or agreement in writing should clearly state the roles, responsibilities and liabilities between your security provider, any subcontractors, labour providers, and you as the client.
9. Counter Terrorism

The UK has seen a number of terrorist attacks at crowded public places. The National Counter Terrorism Security Office (NaCTSO) have produced a number of publications to offer guidance to event organisers and security staff regarding protective security to prevent future attacks. The most recent publications can be found on the NaCTSO website.

NaCTSO’s Action Counters Terrorism (ACT) programme of training and awareness-raising events and products aim to increase public and security industry awareness of how best to reduce and respond to the most likely types of terrorist activities. The aim of ACT is to:

• Help understand the threat from terrorism to the UK
• Guide individuals on what to do if they find themselves involved in a terrorist incident or event that leads up to a planned attack
• Enable people to recognise and report suspicious activity

As part of the risk assessment for any event, the guidance offered by NaCTSO publications should be considered and applied appropriately. All SIA Approved Contractors must demonstrate the measures they have introduced to improve staff awareness of the threat from terrorism. Consider whether as part of your event planning you require all security staff, or those deployed in key areas, to have undertaken counter terrorism awareness training.
The choice of your security provider can have a significant impact upon the success of your event.

Not every event requires a lengthy tender process but there are some general good practice enquiries that can be made of potential security providers. This list is not exhaustive and some points will not be relevant to all events but due diligence prior to entering into an agreement with any supplier will help safeguard your business from financial and reputational risk.

10. Choosing a security provider

The choice of your security provider can have a significant impact upon the success of your event.

Not every event requires a lengthy tender process but there are some general good practice enquiries that can be made of potential security providers. This list is not exhaustive and some points will not be relevant to all events but due diligence prior to entering into an agreement with any supplier will help safeguard your business from financial and reputational risk.

- Has the company experience of providing security to events similar to yours?
- Can the company provide references from other events that you can contact to verify this?
- Is the company insured to undertake the security services it is proposing to provide to you?
- Does the company have public liability insurance?
- Do the company have business premises? Can you visit the company at this address?
- Do you require an SIA Approved Contractor for your event?
- If so is the company claiming to be an SIA Approved Contractor for the security services you require at your event?
Check the SIA's register of Approved Contractors to ensure the accreditation is up to date.

Can the company provide assignment instructions, health and safety policies for staff, contingency plans, staff training, equipment, and continuity of service plans for your event?

Can the company provide a staff list for all roles they are supplying at your event?

Can the company provide evidence of their due diligence procedures in relation to Private Security Industry Act 2001, VAT and PAYE compliance, national minimum wage, and right to work checks?

Can the company supply a VAT number?
• This number can be verified by contacting HMRC on 03000 538254 before you enter into any agreements as well as making regular checks of all VAT registration numbers afterwards.

Can the company supply a PAYE number?

Will the company be subcontracting any parts of the contract or using labour providers? If so consider HMRC guidance on the use of labour provision can be found at https://www.gov.uk/government/publications/use-of-labour-providers/use-of-labour-providers-advice-on-due-diligence.
• Adding a clause in the contract requiring labour suppliers to show evidence of the VAT and PAYE returns filed and payments they’ve made to HMRC as well as screening and vetting checks undertaken on the staff being supplied to your event.
• Adding a clause in the contract requiring your authorisation of further sub-contracting before any of the supplies to be made are sub-contracted to a third party labour provider.
• Adding a clause in the contract preventing the use of offshore intermediaries.
Check the details of any subcontractors or labour providers that may be used against the register of approved contractors.

Do subcontractors or labour providers hold the necessary and adequate insurance policies?

Check with potential security providers and their preferred subcontractors/labour providers who is responsible for the screening and vetting of the individuals supplied and ensuring that individual has the correct SIA licence for the role they are undertaking.

What additional training (beyond that required to obtain an SIA licence) have your potential security supplier and subcontractors/labour providers given to the personnel being deployed to your event? Specifically, what counter terrorism awareness training have they had?

What are you being charged for the staff being supplied to your event? The Association of Labour Providers states any business charging less than the suggested hourly cost of supply may indicate unsustainable practices. The suggested rate as of April 2018 was £10.26 for those over the age of 25 and takes into account statutory wage payments only. You can find the latest rates on the Association of Labour Providers’ website here: http://labourproviders.org.uk/

Similarly what are the staff for your event going to be paid? Consider checking workers are actually paid their contractual rate, that it complies with the National Living Wage/National Minimum Wage and the latest rates have been used. As of April 2018 this is £7.83 for those over the age of 25. You can find the latest rates here: www.gov.uk/national-minimum-wage-rates.
Is a Business Credit Check appropriate to mitigate the risk to your event? For example have potential suppliers been associated with companies in the past that have gone into bankruptcy, are the decision makers for the company who they say they are, how long does it take the company to pay it’s invoices and how does this compares to industry average? A credit check may assist you in making an informed choice about suppliers.
Once you have chosen your security provider there are further due diligence measures you can undertake during the lifecycle of your event. These can be done either in partnership with your security provider or as a separate due diligence measure to show compliance with any conditions placed upon the licence for your event.

11.1 Before the event

- Obtain from your supplier a list of all individuals who will be deployed to your event. The list should include the following:
  
a) individual’s full name
  
b) date of birth
  
c) SIA licence number
  
d) role they are undertaking
  
e) Their employer if PAYE or the labour provider.
  
f) Ensure this list is updated regularly by your security provider with any changes.
  
g) Create an online business account at the SIA’s website and register for the online licence checker tool. You will be able to create a watchlist for your event for all staff that hold an SIA licence and will be able to check the validity of that licence. If you find any individuals with suspended, revoked, or expired SIA licences they cannot work in a security role but can still be deployed in a non-security role. Inform your security provider if you find individuals with expired, suspended, or revoked licences.

- Obtain from your security provider a list of any subcontractors or labour providers being used including full company name, address, contact telephone number, and company number.

- Talk to your security supplier and find out whether they will be using SIA licensed staff not previously known to them who will be arriving on the day of the event (e.g. recruited last minute through social media). Although this is not illegal, and is now reasonably common practice, to avoid the risk of fraudulent licences you should require...
‘turn ups’ to evidence their identity by producing a driving licence or other legitimate photographic ID. Monitor social media to see whether security providers are recruiting for your event via e.g. Facebook or Gumtree.

- Ensure you have a single point of contact for each subcontractor or labour provider should you need to contact them in an emergency.
- Inform VIPs, guests, or performers, of the licensing requirements for close protection operatives.
- Create job descriptions, assignment instructions, and briefings in advance where possible. Have these agreed with your security provider and any subcontractors/labour providers.
- Make sure your security provider is aware of all conditions on your premises licence, temporary event notice, or other licensing permission to ensure compliance with that licence.
- Consider bringing security staff onto site early to receive a comprehensive event familiarisation and counter terrorism (CT) briefing. There may be an additional cost, but it will be repaid many times over if an incident is prevented or injuries minimised due to an excellent security response.

11.2 During the event

- On the day of the event before it opens to the public check the watchlist you created of the staff being supplied to you. Notify the security provider of any individuals who are no longer licensed.
- Instigate secondary photograph identity checks for SIA licensed security staff not previously known to the security provider (as discussed in the previous section ‘Before the event’).
- Ensure signing in sheets are completed for all staff.
- Check that the number of staff your supplier is contracted to provide is actually the number on site.
- Ensure briefings are undertaken so that those who are not SIA licensed are aware of the limitations of their role. Note if possible briefing times, who delivered this, and who was present.
- Report any unlicensed staff to your security provider, the police and the SIA.
11.3 After the event

- Debrief with your security provider to review the event and successes and areas to improve upon.

- If necessary debrief with the local authority and police either through safety advisory groups or one to one meetings about the successes and areas to work for your event if you are considering holding it again.

- Retain signing in sheets and compare the staff on duty to the staff list you were given prior to the event. For any changes in personnel you were not made aware of check their details on the SIA’s public licensing register.

- Advise the SIA of any issues in relation to company. You can contact your local SIA regional investigators if you’ve had prior contact with them regarding an event. Otherwise, see the details on page 26 (“Reporting unlicensed operatives or unlawful behaviour”).
12. Enforcement

Under the 2001 Act there are a number of criminal offences, including for working in a licensable security role without a licence or supplying unlicensed security staff. Further details regarding the offences and associated penalties can be found at the SIA website.

For buyers of security there are linked offences through other legislation. This is because consumers represent an important link in the chain of criminality – without customers being willing to flout the rules and accept the supply of unlicensed security operatives, there would be no market for them in the first place.

Increasingly, SIA regional teams are engaging with event owners, police and Safety Advisory Groups before an event. One benefit is to help owners and security providers exercise due diligence by them setting up SIA business accounts and putting security staff through licence watch lists. At larger festivals, or where intelligence gives rise to concern, SIA regional investigators attend in person and work with event organisers to check that security staff on the ground are correctly licensed. From 2018, this will include deploying portable equipment with investigators that will identify fraudulent SIA licenses and other identification documents.

Interested parties should seek their own independent legal advice on this matter if they are concerned about their individual liabilities.
I3. Reporting unlicensed operatives or unlawful behaviour

If you see or hear about someone in the private security industry committing a crime, we want to know about it. That’s not just someone working without a licence or in breach of our licensing conditions; it can be any crime they have committed which might have an effect on their licensable status. Information can be reported through our website at: https://www.sia.homeoffice.gov.uk/Pages/enforcement-reporting.aspx and you can report illegal activity anonymously by calling Crimestoppers on 0800 555 111.
14. Resources

Security Industry Authority (SIA):
https://www.sia.homeoffice.gov.uk

National Counter Terrorism Security Office (NaCTSO):

HM Revenue and Customs (HMRC):
https://www.gov.uk/government/organisations/hm-revenue-customs

Association of Labour Providers (ALP):
http://labourproviders.org.uk/

Centre for the Protection of National Infrastructure (CPNI):
https://www.cpni.gov.uk/

Home Office Immigration Enforcement (HOIE):
https://www.gov.uk/government/organisations/immigration-enforcement

Institute of Licensing (IoL):
https://instituteoflicensing.org/

Health and Safety Executive (HSE):
http://www.hse.gov.uk/

The Purple Guide (to Health, Safety and Welfare at Music and Other Events):
https://www.thepurpleguide.co.uk/

Please be aware that the Purple Guide, which is produced by the Events Industry Forum, requires an annual subscription for access.
Appendix 1: Table of licensable roles.

https://www.sia.homeoffice.gov.uk/Pages/licensing-roles.aspx

Licensable Roles

The following list shows the roles that are licensable. If a role you undertake is shown below then you will need a licence if you also undertake a licensable activity. These role definitions are an interpretation for presentational purposes and are produced in good faith. However, the wording in the Private Security Industry Act 2001 always overrides them.

There are two types of SIA licence:

- A **front line** licence is required if undertaking licensable activity, other than key holding activities (this also covers undertaking non-front line activity). A front line licence is in the form of a credit card-sized plastic card that must be worn, subject to the licence conditions.

- A **non-front line** licence is required for those who manage, supervise and/or employ individuals who engage in licensable activity, as long as front line activity is not carried out – this includes directors* or partners. A non-front line licence is issued in the form of a letter that also covers key holding activities.

<table>
<thead>
<tr>
<th>Role</th>
<th>Licence type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sole traders, contractors, directors of companies and partners of firms who perform designated licensable activities themselves for the purposes of or in connection with any contract to supply services to the consumer.</td>
<td>Front line</td>
</tr>
<tr>
<td>Employees of sole traders, companies or firms who perform the designated activities themselves for the purposes of or in connection with any contract to supply services to the consumer.</td>
<td>Front line</td>
</tr>
<tr>
<td>Employees, directors of companies and partners of firms that perform designated duties themselves under instructions given by the consumer they are contracted to supply the services to.</td>
<td>Front line</td>
</tr>
<tr>
<td>Any person who manages or supervises employees of a security provider where such employees perform designated activities for the purposes of or in connection with any contract to a consumer (see note below).</td>
<td>Non-front line</td>
</tr>
<tr>
<td>Any person who manages and supervises agency workers who are instructed to carry out designated activities (see note below)</td>
<td>Non-front line</td>
</tr>
<tr>
<td>Directors or partners of a company/firm when any other of the directors, partners or employees of that company/firm perform licensable conduct as described in (a) to (e) above.</td>
<td>Non-front line</td>
</tr>
<tr>
<td>Any person that employs door supervisors or vehicle immobilisers.</td>
<td>Non-front line</td>
</tr>
<tr>
<td>Any person (whether an employee, or the director of a company, or the partner of a firm) that performs door supervision or vehicle immobilisation.</td>
<td>Front line</td>
</tr>
<tr>
<td>Persons who are employed to manage or supervise door supervisors or vehicle immobilisers.</td>
<td>Non-front line</td>
</tr>
</tbody>
</table>

Note that all these roles are in relation to contracts for the supply of services. These are the ‘contract’ roles.
<table>
<thead>
<tr>
<th>Role</th>
<th>Licence type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any person performing licensable vehicle immobilisation activity and charging a release fee. This includes landowners, their staff and volunteers.</td>
<td>Front line</td>
</tr>
</tbody>
</table>

Note:

- If you act as a manager or supervisor of an individual where that individual is required to carry out designated licensable activities for the purposes of or in connection with a contract for the supply of services then you will require a licence even if you are an employee of the customer of the services.

- If you merely give directions to a licensable individual on the customer's behalf, you are not considered a manager or supervisor of that person. In addition, if you are engaged by the firm providing the security services, to give directions only, you are not required to be licensed.
Appendix 2: Licence integration matrix.

https://www.sia.homeoffice.gov.uk/Pages/licensing-integration.aspx

**Licensing Integration**

In some cases, we are satisfied that the licensing criteria to be met for one licensable activity are sufficient to allow a licensed individual to carry out other licensable activities. The matrix below shows where a licence may be used to cover more than one activity.

<table>
<thead>
<tr>
<th>Licence Held</th>
<th>CViT</th>
<th>CP</th>
<th>DS</th>
<th>CCTV-1</th>
<th>SG</th>
<th>CCTV-2</th>
<th>VI</th>
<th>KH</th>
<th>Non-front line (all sectors)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Front line door supervisor licence (DS)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Front line close protection licence (CP)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Front line cash &amp; valuables in transit licence (CViT)</td>
<td>✔</td>
<td></td>
<td></td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Front line public space surveillance (CCTV) licence</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Front line security licence (SG)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Front line vehicle immobiliser licence (VI)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Key holder licence (KH)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>Non-front line licence in any sector</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Key**

- DS – Door Supervision
- CP – Close Protection
- CViT – Cash and Valuables in Transit
- CCTV – Public Space Surveillance (CCTV)
- SG – Security Guarding
- VI – Vehicle Immobilising
- KH – Key Holding

**Notes**

- CCTV-1 Undertaken to monitor the activities of a member of the public in a public or private place or to identify a particular person.
- CCTV-2 Only to identify a trespasser or to protect property.
Appendix 3: Licensing flowchart.

Manned guarding flowchart

The flowchart on the following page gives an indication of which licence you need. Please note that the flowchart should be used as a guide only and is not a substitute for the Act. To avoid any element of doubt, read the Private Security Industry Act 2001, Section 3 and Schedule 2 (as amended).

Note 1

None of the five ‘manned guarding’ licences is required. However, you should ensure that your activity does not fall within one of the other types of licensable activity i.e. key holding or vehicle immobilisation, as on page 6.

Note 2

Please see the section about licensed premises on page 34.

Note 3

As this activity is undertaken in relation to property and not in relation to licensed premises (as defined under the Private Security Industry Act 2001), the additional controls under Schedule 2 of the Act would not apply even if performed on licensed premises.

Note 4

As this activity is undertaken in relation to persons and not in relation to licensed premises (as defined under the Private Security Industry Act 2001) the additional controls under Schedule 2 of the Act would not apply even if performed on licensed premises.
1. Are you undertaking the work as a volunteer, receiving no payment in kind or a reward for services rendered?

   **YES**

2. Does your job include any of the following?
   a) The guarding of premises against unauthorised access or occupation, against outbreaks of disorder or against damage. (Referred to as guarding premises in this flow chart)
   b) The guarding of property against destruction or damage, against being stolen or against being otherwise dishonestly taken or obtained. (Referred to as guarding property in this flow chart)
   c) The guarding of one or more individuals against assault or against injuries that might be suffered in consequence of the unlawful conduct of others. (Referred to as guarding individuals in this flow chart)

   Guarding premises against unauthorised access includes being wholly or partly responsible for determining the suitability for admission to the premises of persons applying for admission.

   Guarding against something happening includes providing a physical presence, or carrying out any form of patrol or surveillance, to deter or otherwise discourage it from happening; or to provide information, if it happens, about what has happened.

3. Is the activity exempt from licensing? (see note 2)

   **YES**

4. Does your job include guarding property and involve the secure transportation of that property in vehicles specially manufactured or adapted so as to have secure transportation as their primary function?

   **YES**

   You need a **Cash & Valuables in Transit** licence if your services are supplied for the purposes of, or in connection with, any contract to a consumer. (see note 4)

5. Does your job include guarding individuals?

   **YES**

   You need a **Close Protection** licence but only if your services are supplied for the purposes of, or in connection with, any contract to a consumer. (see note 5)

6. Does your job include guarding premises or guarding property (other than the activity described in box 4) in relation to licensed premises open to members of the public at times when alcohol is being supplied for consumption, or regulated entertainment is being provided, on the premises? (see note 3 for what is meant by licensed premises).

   **YES**

   You need a **Door Supervisor** licence if you are performing this activity on behalf of yourself or your employer or your services are supplied for the purposes of, or in connection with, any contract to a consumer.

   If your activity is limited to the use of CCTV equipment, you do not need a Door Supervisor licence but you may need one of the other licences.

   If you have a Close Protection licence, then you are already licensed as a Door Supervisor.

7. Other than for the purposes of identifying a trespasser or protecting property, does your job include using CCTV equipment to monitor the activities of any person in any place (including in relation to licensed premises) or to identify a particular person? This includes the recording of images.

   **YES**

   You need a **Public Space Surveillance (CCTV)** licence but only if your services are supplied for the purposes of, or in connection with, any contract to a consumer.

   You need a Security Guard licence but only if your services are supplied for the purposes of, or in connection with, any contract to a consumer.

   If your activity is limited to the use of CCTV equipment, and you hold a Public Space Surveillance (CCTV) licence, then you do not need a separate Security Guard licence.

   If you have a Close Protection licence or a Door Supervisor licence, then you are already licensed as a Security Guard.
Appendix 4: Definitions of licensed premises.

https://www.sia.homeoffice.gov.uk/Pages/licensing-licensed-premises.aspx

Definition of ‘Licensed Premises’

For the purpose of the Private Security Industry Act 2001 the definition of ‘licensed premises’ is:

- premises in respect of which a premises licence or temporary event notice has effect under the Licensing Act 2003 to authorise the supply of alcohol (within the meaning of section 14 of that Act) for consumption on the premises;
- premises in respect of which a premises licence or temporary event notice has effect under that Act to authorise the provision of regulated entertainment;
- premises in respect of which a licence of a prescribed description under any prescribed local statutory provision is for the time being in force;
- any premises within the meaning given to “licensed premises” in section 147(1) of the Licensing (Scotland) Act 2005;
- premises comprised in a place or class of place for the time being specified by resolution under section 9(5)(b) of the Civic Government (Scotland) Act 1982 (resolution specifying place or class of place falling to be licensed if to be used as place of public entertainment);
- premises comprised in a place where an activity for the time being designated under section 44(1) of the 1982 Act (additional activities for which a licence is required) is carried on provided that, in the case of an activity designated under paragraph (a) of that section, the requisite resolution under section 9 of that Act has been obtained;
- premises in respect of which a licence, or an occasional licence, under the Licensing (Northern Ireland) Order 1996 is in force;
- any place in respect of which an entertainments licence within the meaning of Schedule 1 to the Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1985 is in force.
Premises are not licensed premises...

- if there is in force in respect of the premises a premises licence which authorises regulated entertainment within paragraph 2(1)(a) or (b) of Schedule 1 to the Licensing Act 2003 (plays and films)

- in relation to any occasion on which the premises are being used
  - exclusively for the purposes of a club which holds a club premises certificate in respect of the premises, or
  - for regulated entertainment of the kind mentioned in paragraph 2(1)(a) of Schedule 1 to the Licensing Act 2003 (plays and films), in circumstances where that use is a permitted temporary activity by virtue of Part 5 of the 2003 Act;

- in relation to any occasion on which a casino premises licence or a bingo premises licence is in force in respect of the premises under the Gambling Act 2005, and the premises are being used wholly or mainly for the purposes for which such a licence is required

- for Scotland, in relation to any occasion on which a licence is in force in respect of the premises under the Theatres Act 1968 or the Cinemas Act 1985, and the premises are being used wholly or mainly for the purposes for which the licence is required

- in relation to any occasion on which the premises are being used exclusively for the purposes of a registered club within the meaning of the Registration of Clubs (Northern Ireland) Order 1996

- in relation to any occasion on which a bingo club licence within the meaning of the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985 is in force in respect of the premises, and the premises are being used wholly or mainly for the purposes for which the licence is required.