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16 January 2023

Dear Mr Suter,

**Subject: Monitored Recommendations 7 and 8**

I thought it would be helpful to write to provide an update on progress, from the SIA's perspective, on our work on Monitored Recommendations 7 (MR7) and 8 (MR8).

The SIA submitted formal detailed proposals in relation to acceptance and implementation of both MR 7 and MR8 to the Home Office. The matter is now fully with the Home Office officials and ultimately Ministers for consideration and decision on whether to accept the proposals or not. We await to hear the outcome.

As we have indicated previously, as private security is a devolved matter, the SIA regulates the private security industry in Scotland and Northern Ireland on behalf of the governments in those nations. We have continued to keep those authorities updated as well.

### **The SIA's view and proposals**

The SIA's view is that there is clear evidence that both sets of our proposals:

- a. will improve public protection and public safety;
- b. have the broad support of private security operatives and businesses we have engaged with; and
- c. will not result in disproportionate regulatory burden with the sensible measures and controls proposed, including exemptions, exceptions, and thresholds.

We thought it would be helpful to make clear to you that in the proposals submitted to the Home Office the SIA have gone beyond the scope of MR7 and MR8's recommendations. The SIA's view is that:

1. individual SIA licensing for in-house security should be extended to both operators of CCTV/public surveillance and in-house security guards; and
2. the licensing of private security contractors and labour providers be introduced.

## **Extending in-house licensing**

In relation to the MR7, the SIA has proposed to the Home Office extending the scope of licensing to both individuals performing CCTV monitoring activities in-house and individuals performing security guarding (SG) activities in-house.

This goes further than MR7 on the basis that it is difficult to see why the same consistent public safety measures (vetting, training, and supervision) that are applied in SIA licensing are not required in these roles when they are performed in-house, particularly where individuals are carrying out these activities in venues with material public footfalls.

To ensure that such regulation is consistent, targeted, and proportionate, the SIA has proposed that certain categories of in-house security activity not be licensed. This would be done through exemptions where equivalent regulation already exists, and exclusions where it is not the policy intention to regulate that activity. For example, we have proposed

- Exemptions for prisons and other detention facilities and airside aviation security, mirroring existing individual Private Security Industry Act 2001 (PSIA) licensing exemptions.
- An exclusion for incidental activity. This mirrors the exclusion in the PSIA so that security activities which were a minor and/or very infrequent part of someone's job would not be licensable.

For clarity:

- the proposals do not extend to Key Holding, Cash and Valuables in Transit, and Close Protection activities;
- the SIA's statutory remit does not extend to security activities carried out by overseas CCTV services for UK-based venues.

## **Business Licensing**

The SIA has proposed the introduction of business licensing in response to MR8. This should in our view be a registration and baseline fit and proper test based on probity standards in the voluntary Approved Contractor Scheme, with appropriate additional competency standards/conditions founded in public protection. In the SIA's view, there is a strong case to support business licensing, based on objectives to improve legal compliance, reduce risks, and improve public safety.

Mandatory licensing would ensure this through SIA knowledge of the existence of organisations supplying or deploying licenced individuals, through checks, and through licensing conditions such as insisting additional training is provided beyond the SIA entry-level training, continuing employee/deployed vetting, and the provision of essential equipment.

The SIA proposals are that mandatory licensing should cover:

- a. organisations deploying SIA individual licence holders to provide regulated security services under a contract for services with another party; and
- b. businesses that supply SIA individual licence holders to another organisation for the fulfilment of a contract for the supply of regulated security services.

In the SIA's view, the benefits of business licensing can be achieved whilst ensuring the requirements are proportionate, do not unduly stifle small business growth, and are suitably targeted. The regulatory burden/impact is justified and mitigated by:

- tying the scope of business licensing to the existing individual licensing regime;
- alignment to the existing voluntary scheme baseline principles;
- replicating existing PSIA exemptions in business licensing; and
- the use of transition periods, an education first approach, and a robust, but proportionate, approach to enforcement.

### **Other actions**

We believe it is important that the SIA leads, acts, and uses all the tools available to it to ensure public protection. The SIA cannot rely on, or wait for, statutory changes to the licensing regime or new powers to further protect the public. We have already made significant changes to our approach since the attack at the Manchester Arena. By way of ease and assistance we enclose a summary of various changes and improvements made by the SIA. These include introducing new standards for baseline level training for individual security officers, introducing mandatory emergency First Aid training, and making mandatory ACT counter-terrorism learning. We have also increased our inspections and enforcement capacity working across the UK.

However, in our view, alongside the actions the SIA has made and is continuing to take, there is still a need for the changes to the statutory regime that we have proposed to the Home Office.

### **Volume 2 Recommendations**

Finally, as you know the second volume of the Inquiry findings contained two further recommendations for the SIA's attention. We have been asked to consider developing further training that all licenced security operatives should be required to take on providing a first response in trauma care to people who have been badly injured. I can assure you the SIA team leading on this swiftly turned its attention to considering these recommendations. They are carefully considering these, their impact and are working with the Home Office, private security, and Awarding Organisations, as well as the College of Policing to understand their work, to consider how best to respond to the new recommendations.

If you or your colleagues require any further detail or information, do not hesitate to contact me or Paul Fullwood, Director of Inspections and Enforcement at the SIA, who has been leading on all this work.

Yours sincerely,



Michelle Russell  
Chief Executive

## **SIA Summary of Additional Actions - November 2022**

### Training

- In 2021 and 2022 new licence linked qualifications were introduced for Doors Supervisors, Security Guards and Close Protection licences. The new training must be completed before an application for a licence can be made to the SIA. The steering group for the development of the updated qualifications included senior counter terrorism policing.
- The content for the qualifications includes new counter terror content, developed in partnership with NaCTSO and CPNI, about IEDs, suspicious conduct, hostile reconnaissance and understanding the security actions that can deter or disrupt it. It also includes clarity about the role security operatives play during a terror attack such as knowing venue plans and procedures, making decisions based on dynamic risk assessment and how to report an incident to emergency services. The content considers lessons shared by CPNI and seeks to give an awareness of emergency services response time. It also covers evacuation/ invacuating, which are lessons learnt from the 2017 London Bridge attack.
- The training includes mandatory Emergency First Aid at Work training, ACT e-learning and additional ACT security specific modules, all of which are subject to a formal examination.
- All Security Guard and Door Supervision licence holders seeking to renew a licence from October 2021 have needed to take additional “Top up” training which includes the requirement for the ACT modules. Close Protection operatives wanting to renew have needed to take this from October 2022.
- Each licence holder is written to on the anniversary of receipt of their licence with a reminder to take the on-line ACT e-learning again.
- The new requirements have not led to a reduction in people entering the industry. There have been changes to the usual timing of renewals, but both renewals and new application levels have remained overall healthy – as of November 2022, there were a record number of 455,883 licences on the public register, held by 402,499 individuals.
- A new more robust assessment regime now exists for this training. This includes video recording of all assessments at the end of a qualification to prevent malpractice and fraud and protect the integrity of the quality of training as these can now be tested and assured more easily.
- The responsibility for quality monitoring of qualifications belongs to the recognised Awarding Organisations and OfQual. We have however supplemented quality monitoring with a new programme of SIA unannounced visits to training providers. Over 80 of these have been completed this year so far. These visits have identified improvements quality assurance for the awarding organisations (who lead on this) to implement. The learning is also being disseminated more widely in webinars to help promote best practice.
- We have worked with police partners to develop, trial and deliver a bespoke counter terror training package for industry. This was used to develop and deliver the ACT product tailored for the security industry.

## ACS Standards

- Various improvements have been made to strengthen and provide assurance on the voluntary ACS scheme including:
  - Several changes made to strengthen the standards. These changes were designed to strengthen indicators in all aspects including terror threat awareness:
    - all staff to be aware of the current threat level and know where to find information about threat levels
    - businesses to promote and improve awareness of counter-terrorism activities as well as being involved in local initiatives designed to support terror threat awareness
    - improving the overall quality of services provided including strengthening indicators to deal with proper identification, risk mitigation, service continuity and resilience plans to deal with a range of incidents including crisis management
    - ensuring the impact of the service delivered is discussed with the provider and they understand their role in protecting the public
    - a more effective approach to responding to tenders/requests for service that include undertaking a pre-contract site visit and risk assessment to ensure the subsequent service provided is fit for purpose
    - re-iteration that the approved contractor scheme is interlinked with the British Standards including BS7960 and BS7499, that have both been strengthened in the areas of site inspection/surveys of clients premises and assignment instructions
  - a new approach to focussed assessments of external ACS assessors by the SIA has launched. This ensures better quality and tests competence in the assessment process they carry out to approved contractors on the SIA's behalf. This launched in September 2022 and has been well received by assessors;
  - reviewing the sampling regime and introduction of a new 'service delivery' assessment (designed to ensure 70% of assessor time is 'on site') approach to auditing;
  - more robust annual audit for all Certification Bodies contracted to deliver assessment services. Lowest performing Certification Body received a 'deep dive' audit and detailed action plan to improve performance;
  - a new programme of SIA assurance visits to approved contractors in addition to their annual assessment to provide additional testing, assurance and compliance to the standard. These started October 2022.
- We have, since the Manchester Arena bombing, also organised for all Approved Contractors to have access to presentations from CTSA that include advice on counter terror work.

## Enforcement and Inspection

- Additional funding and resource made available in April 2022 has increased the SIA's field inspection capacity across the UK. Our capacity and reach has increased so far this year by 52% resulting in inspections of 457 sites and 503 suppliers at the end of October.
- An additional increase of 50% in resources in the criminal and financial investigations against individuals and businesses who cause the greatest harm has resulted in an increase of 64% in the number of investigation cases.
- We supported and funded - the development of the ACT e-learning security specific top up module, and our NaCTSO secondee has continued to work with CPNI and law enforcement to provide input in the development of security sector related counter terrorism (CT) Guidance. The secondee sits on the NaCTSO Sites and Zones boards as part of the PALS programme, and is a member of the West End Security Group Protect and Prepare Board. We continue to link in directly with CTSA's across the UK providing support in liaising with the security sector. We worked with CPNI in the development of the Security Control Room Users course and ensure all CT related guidance, products and advice from them reaches the security industry via SIA Comms channels.
- Relationships have been developed with CT Policing units including the National CT Intelligence Board, National CT SIO Board and the CT Nominal Management network. This ensures, via an overarching Information Sharing Agreement, that vital intelligence and details of high-risk individuals and threats can be shared quickly, legally and directed to the appropriate agency.
- We have continued to roll out "Operation Sentry" – exercises with other law enforcement agencies aimed at exercising licensed security operatives and venues in the event of a major terrorist attack on their venue or surrounding area, utilising live role play scenarios – acid, marauding knife attacks, invacuations. The most recent one was attended by 120 restaurants and bars in the City of London, along with security and operation managers from security businesses in the area, senior members of security businesses through to self-employed licence holders, taking part.

## **November 2022**