





Contents

| Section 1. ACS assessor guide | | | |
|---------------------------------------|---|----|--|
| Section 2. Approved Contractor Scheme | | | |
| Section 3. Overall considerations | | | |
| Section - | 4. Criterion specific guidance | 14 | |
| Criterion | n 1 – Strategy | 15 | |
| 1.1.1 | The organisation has a clear approach to business that is acted on and communicated to all staff | 16 | |
| 1.1.2 | Key stakeholders are aware of the organisation's overall approach to business | 18 | |
| 1.1.3 | A plan for the business exists with an effective review schedule | 19 | |
| 1.2.1 | Critical success factors have been clearly identified and internal measures are in place to monitor | | |
| | progress towards achievement | 2 | |
| 1.2.2 | Goals, objectives and targets are clearly visible for all levels of the organisation | 23 | |
| 1.2.3 | Procedures have been defined to ensure conformance to working standards or codes of practice | 25 | |
| 1.3.1 | The management of internal and external communications is handled effectively | 28 | |
| 1.4.1 | There is a policy relating to corporate social responsibility and the environment which is communicated | 32 | |
| 1.4.2 | The organisation plans activities to promote and improve the reputation of the private security industry | | |
| | with the police, the local community and with customers | 35 | |
| | The organisation is involved in activities to promote and improve the awareness of counter-terrorist activities | 37 | |
| 1.5.1 | The organisation regularly reviews performance against success factors and performance indicators | 39 | |
| Criterion | n 2 – Service delivery | 4 | |
| 2.1.1 | Key service delivery processes have been identified and are understood by all | 42 | |
| 2.2.1 | There is a current and effective plan to ensure continuity of service delivery | 45 | |
| | The organisation meets its customers' requirements | 47 | |
| 2.3.2 | There is an awareness of the impact of service delivery on consumers at all levels of the organisation | 49 | |
| 2.3.3 | The management of contractual arrangements with the customer has been defined | 5 | |
| | Use of subcontractors is agreed with customers and subject to defined quality assurance procedures | 52 | |
| 2.4.2 | Effective customer and consumer performance indicators and service level agreements have been established | 54 | |
| 2.4.3 | Incident procedures are defined | 57 | |
| 2.4.4 | All procedures are regularly reviewed | 58 | |
| 2.4.5 | Effective procedures exist to ensure the attendance of staff on customer sites | 59 | |
| 2.5.1 | Plans for improvement to site-based activity exist, based on the review of actual performance | 6 | |
| 2.5.2 | Procedures for the implementation of changes are in place and used | 62 | |
| 2.6.1 | The organisation regularly reviews performance against service level agreements and/or key customer | | |
| | performance indicators | 63 | |
| Criterion | n 3 – Commercial relationship management | 65 | |
| | Effective purchasing procedures are implemented | 66 | |
| | The organisation works in partnership with its suppliers to improve performance | 69 | |
| | Professional advice is offered to customers on the best approach to meet their needs | 7 | |
| | The organisation implements an effective approach to responding to tenders/request for services | 72 | |
| | The organisation implements a process for obtaining new business | 73 | |
| | The organisation implements a process for customer site visits | 74 | |
| | The organisation implements a complaints procedure | 75 | |
| 3.4.1 | The organisation implements an approach to consumer contact | 77 | |
| 3.5.1 | The organisation regularly reviews performance against responses from customer opinion gathering | 79 | |
| Criterion | n 4 – Financial management | 8 | |
| | The organisation has the funding available to achieve its plan for the business | 82 | |
| | Clear and effective management of the payroll can be evidenced | 84 | |
| | The organisation has effective financial management procedures (i.e. there are sound fiscal controls in place) | 90 | |
| | A clear 'fit and proper' management structure with defined and understood authority levels is in place | 92 | |
| | • There is sufficient insurance to cover contractual requirements | 94 | |
| | The organisation conducts effective analysis of the market place in which it operates | 96 | |
| | The organisation regularly reviews performance against key financial indicators critical to the business | 98 | |

| Criterion | n 5 – Resource management | 100 |
|-----------|--|-----|
| 5.1.1 | Relevant versions of documents are available at the point of use | 101 |
| 5.1.2 | The organisation complies with legislation on the handling of and protection of data | 102 |
| 5.2.1 | Lease or ownership papers are appropriate to the business premises, providing administrative and any | |
| | operational centres that are fit for purpose | 105 |
| 5.2.2 | Control rooms/response rooms are designed, fitted and equipped in a manner appropriate to purpose | 108 |
| | Equipment owned is recorded, adequately maintained and appropriate for its purpose | 110 |
| | Service delivery to customers and safety for staff are improved by investment in technology | 111 |
| | The organisation regularly reviews the management of resources and data | 112 |
| | n 6 – People | 114 |
| 6.1.1 | There is an effective recruitment policy | 115 |
| | Staff records are maintained | 118 |
| | Terms and conditions of employment exist which are implemented and communicated | 120 |
| | A disciplinary and grievance procedure is in place which is implemented and communicated | 122 |
| | A policy exists covering Transfer of Undertakings which is implemented and communicated | 123 |
| | Roles and responsibilities are defined for all staff and communicated to them | 125 |
| | A defined policy related to equality and diversity exists which is implemented and communicated | 126 |
| | A process for obtaining staff opinions on the organisation, their job and conditions exists and is implemented | 128 |
| | | 120 |
| 0.2.1 | Staff training, development and improvement policies and procedures are in place, implemented and communicated | 130 |
| 622 | | 132 |
| | An induction pack/training including an introduction to policies and procedures exists | |
| | All staff are trained to the required standard | 134 |
| | Assignment-specific training/induction/information is given | 137 |
| | All staff have training plans and records | 138 |
| | A holiday entitlement policy is implemented and communicated | 139 |
| | A pensions policy exists which is implemented and communicated | 141 |
| | A health and safety policy and supporting procedures exist and are implemented | 143 |
| | An approach to the provision of welfare and benefits is in place | 145 |
| | A process for the appraisal of staff performance is in place | 147 |
| | Self learning and improvement is encouraged | 148 |
| | The organisation develops staff, especially those with leadership potential | 149 |
| | The organisation adheres to the current legislation on working hours | 150 |
| | The organisation complies with current legislation on staff wages | 152 |
| | The organisation regularly reviews performance against key staff performance indicators | 154 |
| 6.5.2 | The organisation regularly reviews performance against responses from staff opinion gathering | 156 |
| Criterion | n 7 - Leadership | 158 |
| 7.1.1 | Leaders can demonstrate, relevant to sector, knowledge of the legislative framework, working practices | |
| | and industry standards/codes of practice | 159 |
| 7.1.2 | Managers and directors responsible for processes and key personnel are involved in developing and | |
| | can demonstrate an understanding of procedures | 161 |
| 7.2.1 | Leaders consult stakeholders on their leadership skills and have personal development plans based on | |
| | the feedback | 163 |
| 7.3.1 | Leaders have developed a set of high values or code of ethics that are implemented throughout | |
| | the organisation | 165 |
| 7.4.1 | Leaders are involved in improvement activity, encouraging staff participation where appropriate | 167 |
| | Leaders recognise individual and team efforts | 168 |
| | Leaders with overall responsibility for the success of the organisation review results/performance against | |
| | critical areas of the business and drive continuous improvement | 169 |
| Section | 5: Glossary | 171 |
| SCCLIOIT | J. 0103341 y | 171 |

1. ACS assessor guide

It is important for both our integrity and the effectiveness of our Approved Contractor Scheme (ACS) that the ACS standard is uniformly understood by the assessing bodies and that the assessment, subsequent report and recommendations are applied consistently. This assessor guide has been designed to provide information to assessors and to clarify any potential areas where inconsistent application may occur.

This document should be used in conjunction with the Security Industry Authority (SIA) ACS standard (see 'Get approved') and ACS self-assessment workbook. An applicant guide to the ACS self-assessment workbook (the self-assessment workbook guide) has also been produced to assist applicants with the requirements of the ACS standard and the assessment.

This guide provides the guidance on conducting an assessment against the ACS standard. It is to be used in conjunction with any training material developed and issued as part of the ACS assessor development programme, and other guidance. It is not intended to be a substitute for training, nor does it cover every situation that could arise during an assessment.

It is not expected that the assessor would be familiar with all of these aspects to enable an in-depth examination. It must be remembered that it is the responsibility of the applicant organisation to provide a truthful assessment of their performance and the assessor's role is one of verification. As such, the assessor should plan to ask targeted questions to elicit information about the applicant's approaches. Assessors should familiarise themselves with the key points of some of the legislative requirements.

The best place to find government services and information is on the Gov.UK website (www.gov. uk/), for example, tools and guidance for businesses (www.gov.uk/browse/business), employing people including pay, contracts and hiring (www.gov.uk/browse/employing-people), working, jobs and pensions including holidays, pensions, tax and minimum wage (www.gov.uk/browse/working). The Gov.UK website provides a trusted source of information relevant to many of the legislative requirements within the ACS standard.

Changes to either the ACS standard or the ACS selfassessment workbook may result in the reissue of this guide.

The approach taken by us in the design of the ACS, the ACS assessment process, and guidance on preparing for assessments, are explained in section 2 – Approved Contractor Scheme. Information to assist assessors in the consistent interpretation of the ACS standard is contained in section 3 – Overall Considerations and section 4 – Criterion Specific Guidance of this guide.

Section 3 – Overall Considerations clarifies the key considerations that should be taken into account by all assessors when conducting an assessment, whilst section 4 – Criterion Specific Guidance, takes the assessor through each of the seven criteria in more detail giving guidance as to the extent of evidence required to attain the required level of achievement.

A glossary of terms and additional assessment guidelines are contained in section 5.

The notes contained in this document are not exhaustive and we will be continually adding the lessons learnt from the ongoing ACS assessment process into all assessor material.

2. Approved Contractor Scheme

The ACS was introduced under the PSIA 2001, in February 2006. It provides a means for regulated businesses to determine the effectiveness of their strategy development and implementation. It aims to encourage businesses in the industry to improve their standards by creating a framework for developing, promoting and spreading best practice. It is not a check list or a compliance standard. It is non-prescriptive and can be applied by any organisation, regardless of size or sector.

The ACS has been reviewed a number of times over the past years, incorporating new ideas and thinking, legislative and regulatory requirements and adapting to the changing economic, societal and political environment. The latest being reflected in the 2019 self-assessment workbook.

We can all think of security businesses that we would recognise as being good. They may operate in different environments, with different stakeholder constituencies, and come in all shapes and sizes, but what they share is a common mindset that is based on a number of attributes and ways of working that separate them from other businesses.

The basis for the development of the ACS criteria is built on a number of fundamental principles that outline the basis for achieving sustainable success in a SIA regulated organisation. They can be used as the basis to describe the attributes of a good healthy organisational culture, and they also serve as a common language for aspiring leaders.

Each of the principles is important in its own right but maximum benefit is achieved when an organisation integrates them all into its culture.

Adding value for stakeholders

Approved contractors consistently add value for stakeholders by understanding, anticipating and fulfilling needs, expectations and opportunities. They help improve performance standards in the industry and help the industry develop new opportunities

Timely change management (TCM)

Approved contractors demonstrate a process of continuous renewal of an organisation's direction, structure, and capabilities to meet the changing needs of external and internal customers. Timely change management (TCM) is the proactive, prompt and sustained implementation of change.

Building organisational capability

Approved contractors enhance their capabilities by taking a holistic approach to managing change within and beyond the organisational boundaries.

Investment in resource and improvement

Approved contractors focus on how they know that its processes are delivering the desired outcomes, has sufficient resources to sustain its business, measures, understands and improves its achievements in relation to all stakeholders, and adopts a continual improvement policy.

Succeeding through trained and competent people

Approved contractors value their people and create a culture of openness for the achievement of both organisational and personal goals. With other approved contractors, they form a security industry centre of knowledge and expertise which enables and encourages effective industry development and investment. It aims to make the security industry a career of choice.

Leading with vision, knowledge and integrity

Approved contractors have leaders who shape the future and make it happen, acting as role models for its values and ethics. Relationships are founded on mutual trust and respect.

Relevant to the needs of society

Approved contractors have a positive impact on the wider public around them by taking account of its economic, social and environmental impacts in the way it operates – maximising the benefits and minimising the downsides. They strengthen the extended police family by encouraging and supporting further engagement of the private security industry.

Sustaining positive results

Approved contractors achieve sustained positive results that meet both the short and long term needs of all their stakeholders, within the context of their operating environment.

The ACS assessment process has been developed around the assessment approach, RADAR, used by the European Foundation for Quality Management (EFQM). RADAR, which stands for 'Results', 'Approach', 'Deployment', 'Assessment' and 'Review', and has strong similarities to Deming's cycle: Plan; Do; Check; Act, which sits at the heart of ISO9001 audits.

This approach asks organisations to:

 Determine the results it wishes to achieve as part of its approach to planning for the business. These results cover the performance of the organisation both financially and operationally. They also include the perception of its stakeholders.

- Plan and develop a set of **approaches** that will deliver the required results both now and the future.
- Deploy these approaches in such a way as to ensure that they are fully implemented.
- Assess and review the approaches by monitoring and analysis of the results achieved, clarifying ongoing learning, and prioritising, planning and implementing improvements.

RADAR matrices segmented into a series of attributes

Analysis of Enablers

| Elements | Attributes | Guidance | |
|---------------------------|-------------|---|--|
| Approaches | Sound | The approaches have a clear rationale, based on the relevant stakeholders needs, and are process based. | |
| | Integrated | The approaches support strategy and are linked to other relevant approaches. | |
| Deployment | Implemented | The approaches are implemented in relevant areas, in a timely manner. | |
| | Structured | The execution is structured and enables flexibility and organisation agility. | |
| Assessment and refinement | Measurement | The effectiveness and efficiency of the approaches and their deployment are appropriately measured. | |
| | Learning | Learning is used to generate opportunities for improvement. | |
| | Improvement | Outputs from measurement and learning are used to evaluate, prioritise and implement improvements. | |

Analysis of Results

| Elements | Attributes | Guidance | |
|-------------------------|---------------------|--|--|
| Relevance and usability | Scope and relevance | A coherent set of results, including key results, are identified that demonstrate the performance of the organisation in terms of strategy, objectives and the need and expectations of the relevant stakeholders. | |
| | Integrity | Results are timely, reliable and accurate. | |
| | Segmentation | Results are appropriately segmented to provide meaningful insights. | |
| Performance | Trends | Positive trends or sustained good performance over at least 12 months. | |
| | Targets | Relevant targets are set and consistently achieved for key results, in line with the strategic goals. | |
| | Comparisons | Relevant external comparisons are made and are favourable for the key results, in line with strategic goals. | |
| | Confidence | There is confidence that performance levels will be sustained into the future, based on established cause and effect relationships. | |

Although the ACS self-assessment workbook is divided into seven criteria, there is a great deal of overlap between all of them. You should not view each of the criteria, or indeed the sub-criteria and indicators, within each criterion, separately. Many of the criteria, sub-criteria and indicators have links with others and it is your responsibility to ensure that the links are followed during the assessment process.

You need to have a flexible and pragmatic approach in conducting an assessment within the requirements of our assessment process. The ACS standard (see 'Get Approved') is looking for an overall picture of how well an applicant organisation is run and business is conducted (the holistic approach). It may be that you need to explain and explore the relationships between the criteria, sub-criteria and indicators with the applicant organisation in order to fully understand what the applicant organisation has achieved in relation to the ACS standard.

There is no right or wrong way of meeting the ACS standard and the focus of the assessment should be on identifying whether the organisation has achieved its desired outcomes rather than the method used to get there. However you need to ensure that the methods used are relevant to the size of the organisation and sector in which it operates. The ACS standard is designed to improve

the way in which the private security industry operates, and therefore there must be consideration of the methods employed to ensure that all SIA approved contractors are ethical in their dealings and do not incorporate any of the bad practices often associated with the industry.

The feedback given to the applicant by you needs to provide added value and enable improvement.

2.1. The ACS assessment process

The ACS assessment process is based on self-assessment, verified by an assessment by one of our approved assessing bodies. It is the responsibility of the applicant organisation to ensure they have accurately represented themselves in their ACS self-assessment by completing the interactive self-assessment workbook and to demonstrate such to you. Your role is to verify this through discussions with employees, customers and where possible, additional stakeholders such as consumers, the police and the general community.

The self-assessment is designed to help organisations determine whether they meet the ACS standard prior to making a formal application to us, when they will be required to pay an application fee and, on approval, a registration fee. The registration fee is then payable each year to maintain approval.

The applicant will self-assess themselves and complete the interactive self-assessment workbook to determine if they meet the ACS requirements. If this show they are achieving at least the mimimum requirement (the required achievement level is met, the organisation can submit an application to us.

The ACS assessment process is shown diagrammatically in Figure 1.

The following notes relate to the numbered boxes in Figure 1. These are included to provide additional information on the activities to be conducted by the assessing body and/or you and to answer any questions about the assessment process. Any additional questions should be submitted to us.

- 1. Where issues have arisen during our initial eligibility and fit and proper checks, the assessing body will be informed of specific areas we want you cover during the assessment and in the final report. These could include the licence status of individuals or specific areas of customer complaints. This is not expected to be applicable to the majority of applicants.
- The assessing body and/or you will use the applicant's self-assessment and any other additional information obtained from the applicant organisation to plan the visit.
 - The additional information could include the number of employees, number of branches, coverage, number and location of customers.
- 3. You will develop an assessment plan based on the information contained within the self-assessment and any applicant-specific instructions obtained from us. You should use the assessment planning guidelines provided when developing the plan. Although the self-assessment completed by the applicant, is a useful tool in the planning of the assessment, it is important to note that you should not plan to work through the self-assessment indicator by indicator, but should identify multiple areas that can be covered within planned discussions and interviews.
- 4. The assessment plan should be agreed with the applicant organisation. It is likely that this will not be a separate activity but will be an integral part of step three. Once agreed, a copy of the visit plan should be sent to us, and the applicant at least three working days prior to the assessment taking place.

5. Conduct the assessment according to the agreed plan. This enables you to relate evidence verified through discussion back to the self-assessment. It is recommended that your assessment notes are updated after each interview to ensure you capture all relevant information. At the end of the assessment you should be in a position to determine, from the evidence presented, if the applicant organisation has achieved the required achievement level. Section – 3 Overall Considerations explains some of the additional factors you should take into account when determining the achievement level or where the applicant has exceeded this.

There may be occasions where it becomes apparent before the end of the assessment that the applicant is unlikely to meet the required achievement level. You should discuss this immediately with the applicant and agree whether to continue the assessment. Whilst there may be benefits to the applicant to continue with the planned visit, the assessor should be sensitive to any cost implications.

If, during the assessment, you identify issues, such as illegal working practices, that fall outside of the scope of the ACS but would have an adverse effect on the reputation of our scheme, you should continue with the assessment as planned but advise the business, and tell us.We may investigate further and/oruse the information to inform our decisions (e.g. in relation to ACS approval conditions) and/or refer on to other authorities.

At assessment:

 You should look at the business's overall policies, procedures and practices, but when testing, we would normally expect sampling to draw on activity that falls within the scope of the assessment.

For example: where a business supplies both security and cleaning services, we would not expect you to arrange to interview cleaners, but we would expect you to sample staff who have a role in both areas (e.g. senior staff, receptionist, finance officer, trainer) as well as those with dedicated security roles.

 It is possible that you will determine that a business is able to meet the ACS standard because of the limited scope e.g. applied/ approved for security guarding only, but also delivers door supervision and acts as a labour provider.

However, where its identified that unlawful practices are evident in other areas of the business, whilst you may not be able to raise an improvement need against any of the SAW indicators (because they fall out of scope of the assessment), this cannot be ignored and should be reported.

In addition, or as an alternative you could raise an improvement need under criterion 7.3. E.g. where it can be demonstrated [through illegal practices] that leaders do not maintain an ethical business culture

6. You will conduct a closing meeting with the director/s and other members of the management team as determined by the applicant. At this meeting you will discuss the findings of the assessment, and your proposed recommendation to us. You and the applicant should agree the performance level of the organisation and, as applicable, any improvement options, that is, actions to be considered in order to enhance performance required, or any improvements needed to meet ACS requirements, that is, effective action needed in order to meet the ACS standard.

In all cases where improvement needs are identified, you should discuss an action plan with the applicant and agree a suitable revisit date. (Note: for new applicants, where the nature or number of improvement needs is such that it is not realistic for the applicant to satisfactorily address these within the initial six-month period, then a revisit should not be booked.

For approved contractors, where the nature or number of improvement needs is such that the ACS sanctions framework applies, then a revisit should not be booked. Further details can be found in specific assessing body guidance on improvement needs. The applicant organisation should be reminded at this stage that we will make the final decision with regard to the ACS approval.

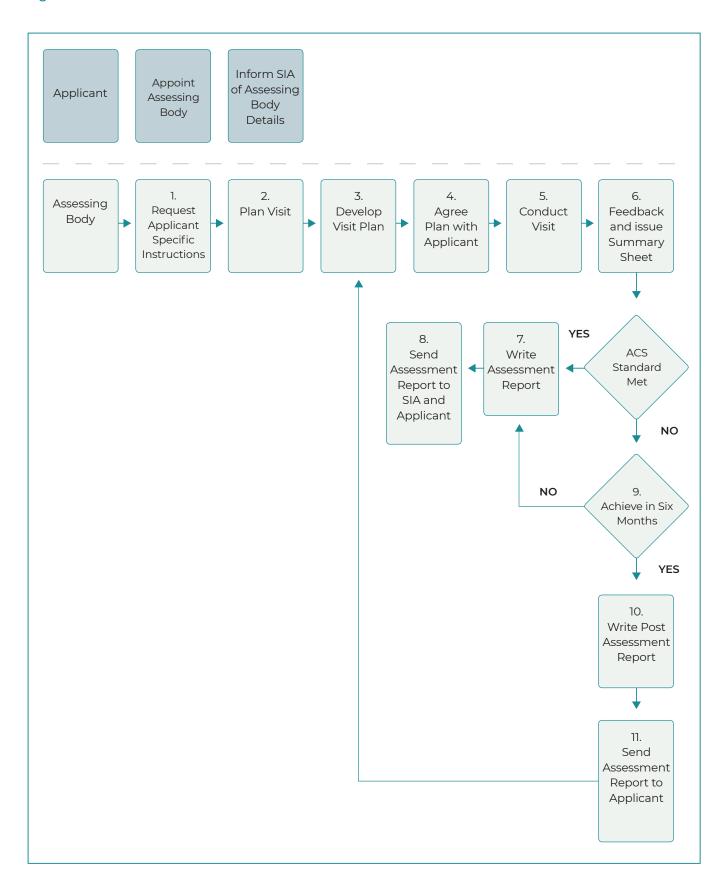
 Following the assessment, you will write a summary sheet and assessment report, or where applicable (for approved contractors) an assessment short report, and input assessment scores onto the interactive self-

- assessment workbook. Guidance on how to complete the report can be found in a separate guidance note.
- 8. You will submit a copy of the assessment report and a recommendation for approval, or non-approval, to us and the applicant within seven working days. We will make our decision based on the report, the recommendation, our eligibility requirements, and fit and proper conditions.
- Please refer to the improvement need guidance for full guidance on what to do in the event of improvement needs being identified during an assessment.

Where a revisit is required to evidence improvements made or any agreed remedial action, you should follow steps three through nine of the assessment process. During the revisit you have the option to assess any criteria. You may also visit additional sites if applicable and/or appropriate.

Note: Applicants have the right to appeal any decision made either by you, if agreement cannot be reached at the end of the assessment, or by us.

Figure 1 – ACS Initial Assessment Process



3. Overall considerations

There are a number of key considerations to be taken into account when conducting an assessment.

3.1. Organisation

Whilst it is essential that the required level of achievement against the ACS standard is met, the size of the applicant organisation is an important factor in determining the type and scope of evidence you would expect to see.

It would be unreasonable, for example, to expect a small applicant organisation to have the same level of formality in the way it approaches business as a larger applicant organisation with regional/branch offices and a large number of remote workers. Whilst it is not possible to give you specific details of what particular types of organisations should present, this guide is intended to offer some advice. Except where specified, procedures do not have to be written down but organisations must ensure that they are used and manage any changes.

Smaller applicant organisations should have in place the requirements of the ACS standard in a manner reasonable for their size. Even this may vary depending on the number of staff, decision makers etc. You could expect that the more staff and decision makers within an organisation, the more formal and documented the approaches would need to be in order to ensure greater consistency of application. The more formal and documented the approaches, the greater the test of deployment needs to be during the assessment.

However this does not mean that level of deployment should not be tested in small organisations. It is possible for small applicant organisations to assume that everyone must know the procedures and as a result fail to put into place the level of detail required to ensure clarity and consistency.

The development of approaches would be more systematic in larger organisations with special departments having unique responsibility for certain areas, especially in the largest organisations within the industry. In smaller organisations everything is likely to be done by one or two people. A more formal approach to some areas would be found in those organisations, regardless of size, that have ISO9001 certification.

Communication

Methods employed to communicate with employees and other stakeholders should be in keeping with the ease with which the organisation can reach each group.

Communication, to staff, for example, through multiple levels, across multi regions and/or branches and on wide spread client sites would be expected to be more structured and managed to ensure that a consistent message is received by all.

Geographically dispersed customers would also require different communication approaches than local customers. It would, therefore, be expected that larger applicant organisations would have more formal communication methods in place to ensure that all relevant stakeholders, particularly staff, are informed as appropriate.

Technology

Smaller applicant organisations are less likely to invest in technological solutions to manage the business, frequently using paper-based procedures and systems. This is perfectly acceptable provided that the resulting records are maintained in an accurate and timely manner and allow the applicant organisation to meet the requirements of the ACS standard.

Purchasing

When assessing applicant organisations that outsource functions, such as screening and vetting, or control room, and that are likely to make repeat large purchases, you should see more detailed and robust supplier management processes in place, with the applicant organisation working closely with the supplier.

Small applicant organisations are less likely to have formal supplier relationships. However, there is no reason why a smaller applicant organisation should not work with any supplier to improve the service obtained or service delivery to their clients.

Ongoing improvement

In addition to the size of the applicant organisation, the length of time trading will also have an impact on the type of evidence provided. Newer applicant organisations will have less developed approaches, not yet reviewed with improvements identified and implemented. It is important, however, to

ensure that these applicant organisations can demonstrate that they have considered and developed approaches to handle an improvement cycle. Mature applicant organisations should be able to demonstrate better developed approaches and methods as a result of multiple improvement cycles.

3.2. Current standards

The ACS self-assessment workbook guide has been cross referenced with ISO9001 to assist both the applicant and you to identify where they are appropriate.

Smaller applicant organisations and those applicant organisations that are relatively new to the security industry are less likely to have certification to ISO9001than larger and more mature applicant organisations.

Where an applicant organisation is UKAS ISO9001 registered and/or can demonstrate, through other certification that they are compliant to the relevant British standards, then the sampling levels may be reduced. However, the assessor should review recent audit reports and undertake some limited checks to give confidence that this approach is safe.

It is feasible that you will conduct a combined assessment/audit against the ACS standard, ISO9001 and/or the relevant British standard. This is acceptable provided that all aspects are covered in the assessment and the integrity of any of the standards is not compromised.

SIA approved contractors are expected to work to the British standard codes of practice relevant to their sector(s). Since these are codes of practice and not requirements standards you must be flexible in their interpretation of how conformance to the codes is demonstrated. It is anticipated that some detail in the codes of practice will not be appropriate to every organisation. Any deviation from the recommendations in an applicable code of

practice should be justified by the organisation. In such cases, if you and the organisation are not in full agreement then we will arbitrate. If the organisation holds a certificate of conformance, for example, product certification from a UKAS accredited certification body, to the relevant codes of practice, then only the requirements specified in the self-assessment workbook should be assessed.

Note: in some cases, there are differences between the definitions of security activities described in the British standards codes of practice and the regulated activities defined by the SIA. You should be careful to ensure that you understand exactly what regulated activity is being undertaken, before assuming which British standard is relevant.

Figure 2 – Security Industry Codes of Practice/ Working Standards identifies the codes of practice that are relevant to each activity (sector) for which ACS approval is available. Organisations seeking approval for a particular activity (sector) must work to the code(s) of practice listed.

The licence management service includes additional standards and requirements that apply when SIA approved contractors are approved to use or considering using the licence management service. These standards do not apply to SIA approved contractors not using the licence management service.

3.3. Approaches

As discussed in section 3.1 – Organisation, the approaches used will vary depending on the size and maturity of the applicant organisation. It is important that you, whatever the approach, are satisfied that they are appropriate and contribute to the desired outcome. In order to deliver the desired outcome approaches have to be fully implemented. It is here that you must plan to talk to as many staff, customers and possibly consumers as is necessary, in order to test.

Figure 2 – Security Industry Codes of Practice/Working Standards

| BS10800 | Provision of Security Services. Code of practice | As required by the sector specific standard |
|----------|--|--|
| BS7858 | Screening of individuals working in a secure environment – Code of practice | All activities regulated by the SIA |
| BS7958 | Closed circuit television (CCTV) – Management and operation – Code of practice | Public space surveillance (CCTV) |
| BS7499 | Provision of static guarding security services – Code of practice | Security guarding |
| BS7960 | Door supervision – Code of practice | Door supervision |
| BS7872 | Manned Security Services – Cash and valuables in transit services (collection and delivery) – Code of Practice | Cash & valuables in transit |
| BS7984-1 | Keyholding and response services – General recommendations for keyholding and response services | Keyholding and security guarding |
| BS7984-2 | Keyholding and response services – Lone worker response services | Keyholding and security guarding |
| BS7984-3 | Keyholding and response services. Provision of mobile security services - Code of practice | Keyholding and security guarding |
| BS8507-1 | Code of practice for close protection services – services within the United Kingdom | Close protection |
| BS8517-1 | Security Dogs – Code of practice for the use of general purpose security dogs | Security guarding |
| BS8584 | Vacant property protection services – Code of practice | Security guarding/keyholding |
| BS8593 | Code of practice for the deployment and use of Body Worn Video (BWV) | Security guarding/public space surveillance (CCTV) |
| n/a | BPA Code of Practice * | Vehicle immobilisation |
| n/a | SIA Code of Connection | Licence management service |
| n/a | SIA Licence Management Manual | Licence management service |
| | | |

^{*}Vehicle Immobilisers operating in Northern Ireland should work to the British Parking Association Code of Practice for control and enforcement of parking on private land and unregulated public car parks or equivalent. If new British standard codes of practice are published that detail further good practice in relation to an activity (sector) regulated by us, then we will expect SIA approved contractors to conform to these codes of practice within six months of their publication.

3.4. Evidence

The form and shape of the evidence presented should be determined by the impact and risk of the section being assessed and should be appropriate to the size and maturity of the applicant organisation as discussed in section 3.1 Organisation. You are looking for sufficient evidence to assure yourself that the applicant organisation is meeting the requirements outlined in the individual boxes within the ACS self-assessment.

3.5. Discussion Groups

An effective way of ensuring that the evidence presented is valid and well deployed would be through discussions and questioning of stakeholders.

You may conduct focus groups and/or individual discussions with staff to test deployment and understanding. The staff selected to participate in these discussions should be chosen, where possible, by you and should cover a full range of roles.

Applicant organisations should ensure that you have access to all staff:

as a minimum the number of staff included should be the square root of the total number of licensable staff or effective number of personnel, whichever is the greatest, and encompass the different licensable sectors being assessed. For organisations with less than 5 staff, then all staff should be interviewed. For organisations with more than 900 staff, then a minimum of 30 staff should be interviewed. Ensure staff from a variety of different shifts are visited and interviewed, where possible.

Note: where we refer to staff above, this includes any individual deployed by the business, regardless of their employment status;

- a cross section of levels of authority within the applicant organisation – quite often management have a different view of the way in which an organisation is run to that of staff. It is important to obtain a balanced view by selecting interviewees from all levels of management, supervisors, shift/site leaders and staff;
- a cross section of head office and remote workers – when testing deployment it is important to ensure that those furthest from the core of the business are aware of appropriate information. When selecting interviewees it is important to include staff who work on remote sites and/or who do shift work.

You are required to contact customers and/or suppliers to verify evidence presented. Whilst it is required for any selection to be made by you, this should be done with the full consent of the applicant organisation, which should make the necessary arrangements.

Whenever interviews and discussions are conducted, you should ensure that all information is given in confidence and any sensitive evidence is presented to the applicant organisation anonymously.

You should be aware of the sensitive nature of all discussions and interviews and conduct them appropriately.

3.6. Attitude

Whilst not a direct part of the ACS standard you should pay attention to the attitude of the applicant organisation. You should be looking at the way in which the applicant organisation prepares for the assessment and the openness in discussing potential areas for improvement. The applicant organisation should co-operate fully with you and not be covertly unhelpful. For example, an applicant organisation may ensure that selected interviewees are unavailable for interview when required.

Applicant organisations should demonstrate a willingness to participate constructively in the discussions around scoring and improvement planning. You should also be looking for evidence of a commitment to improvement within the whole of the organisation.

The attitude demonstrated to you should be used to influence the decision to recommend ACS approval (or not) if the applicant organisation is borderline for ACS approval.

4. Criterion specific guidance

The following section examines any special requirements or considerations for each of the seven criteria that make up the ACS standard. These should be reviewed and used in conjunction with the points raised in Section 3 – Overall considerations.

The seven criteria are:



1. Strategy

An SIA approved contractor has clear strategic direction enabling it to deliver value to all stakeholders.



2. Service delivery

An SIA approved contractor has robust processes in place that ensure service delivery to its customers and stakeholders.



3. Commercial relationship management

An SIA approved contractor promotes robust and transparent commercial relationships with its customers, consumers and suppliers, founded on mutual trust and respect.



4. Financial management

An SIA approved contractor is financially viable with sufficient resources to meet its current and future obligations.



5. Resources

An SIA approved contractor has sufficient technical resources to sustain its business, meeting the relevant industry standards.



6. People

An SIA approved contractor develops and implements plans to ensure its people are suitably trained, developed and cared for.



7. Leadership

An SIA approved contractor has effective leadership.

You may wish to refer to ISO9001 and relevant British standards for additional information.

Specific references have been given for websites that will provide information for you on the statutory requirements which form the minimum achievable ACS standard in some of the indicators.

Criterion 1: Strategy



An SIA approved contractor has clear strategic direction enabling it to deliver value to all stakeholders.

Note:

Examples of the types of evidence you may consider sufficient to meet the ACS standard are given wherever possible. As verification visits are conducted, additional examples will be added. This also applies to the examples of good practice contained in this section. Should you have difficulty in determining whether evidence presented meets the ACS standard, you should contact us.

This criterion is composed of five sub-criteria

The SIA approved contractor can demonstrate that it...

- 1.1 has a coherent plan and approach to business
- 1.2 has clear mechanisms for improving the standard of service delivery
- 1.3 handles internal and external communications effectively
- 1.4 actively manages the impact of its services on society and the environment
- 1.5 measures and improves on performance against key indicators

1.1.1

The organisation has a clear approach to business that is acted on and communicated to all staff

This indicator links to:

- 7.3.1 Leaders have developed a set of high values or code of ethics that are implemented throughout the organisation.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation can describe its overall approach to business including its role, purpose or mission and values.
- 2. The approach to business supports delivery of service to the customer.
- 3. The approach to business and its importance, including clearly defining what is expected of staff is:
 - · explained to staff when they join the organisation;
 - · communicated in the appropriate format to staff on an ongoing basis.
- 4. The approach to business focuses on meeting the needs of customers, consumers and the wider public.
- 5. Plans to maintain and develop the business are in line with the approach to business

IMPROVEMENT LEVEL 1

The approach to business clearly addresses the needs of other key stakeholders.

Staff understanding of the approach to business is monitored through checks during service delivery.

Please see the Glossary for a definition of the terms 'approach', 'mission' and 'values'.

CLARIFICATION

An approved contractor should be clear about why it exists and what it stands for (its approach to business).

Some applicant organisations, may meet this requirement with formal, documented mission and values statements but a less formal approach, particularly in smaller organisations, may also be appropriate. If the leaders of the organisation can explain verbally the approach to business, then assessors can validate this by checking with staff and customers.

Where formal statements are created these should be displayed within the company and at remote sites. Understanding of the approach to business will be tested with staff and with other stakeholders.

The organisation should be able to demonstrate that it has considered:

- the purpose of the business (the role purpose or mission);
- the manner in which they wish to conduct their business (principles, codes and values);
- how they ensure that all employees understand the link between their role and the organisation's approach to business;
- how the values relate to the manner in which they conduct themselves.

Where the applicant organisation forms part of a larger organisation whose main business is not within the private security industry, the overall mission and/or values may be the one used. In this case, the applicant organisation should be able to demonstrate the application of the overall mission and values within their sectors.

The key to the achievement level is an understanding of what is important to the business, what it believes in and what is therefore expected of staff. The needs of other stakeholders should be recognised.

Ref: ISO9001

EXAMPLES

Examples could include:

Mission, vision and values statement used throughout the company and covered at induction.

Mission and values are linked to/referenced in company documentation, website and procedures.

Please see the Glossary for a definition of the terms 'approach', 'mission' and 'values'.

1.1.2

Key stakeholders are aware of the organisation's overall approach to business

REQUIRED ACHIEVEMENT LEVEL

- Suppliers, subcontractors, existing and potential customers are always made aware of the role, purpose or mission and values of the organisation during the negotiation and acquisition of new business.
- 2. Customers are asked to comment on how well the organisation's approach to business is applied, for example, as part of a customer satisfaction survey.

IMPROVEMENT LEVEL 1

Other stakeholders such as consumers, police and other authorities are made aware of the organisation's overall approach to business.

IMPROVEMENT LEVEL 2

There is ongoing communication of the approach to business to all stakeholders such as consumers, police, other authorities and the wider public.

Other stakeholders are asked to comment on how well the approach to business is applied by the organisation and by its staff.

Please see the Glossary for a definition of the terms 'mission', 'values' 'stakeholder', 'consumer', 'customer' and 'subcontractor'.

CLARIFICATION

The approach to business, including the role, purpose or mission and values, needs to be communicated to the customer, at a minimum during the negotiations stage when acquiring new business. With all sizes of organisation it is acceptable for this to be verbally communicated as part of the discussions. This can be validated during interviews with selected customers.

Ongoing reference to this approach to business can be verified during regular customer discussions, especially in the area of checking how well the organisation is performing in relation to its approach helps to bring it to life.

Some sectors will find some challenge in getting evidence of consumer contact, although that does not necessarily mean that they should not do so.

Ref: ISO9001

EXAMPLES

- Including approach to business in tender and supplier documentation.
- Including approach to business in website, sales and marketing material.
- Covering approach to business in feedback gathering mechanisms.

1.1.3

A plan for the business exists with an effective review schedule

This indicator links to:

- 4.4.1 The organisation regularly reviews performance against key financial indicators critical to the business.
- 6.5.1 The organisation regularly reviews performance against key staff performance indicators.

REQUIRED ACHIEVEMENT LEVEL

- 1. A plan for the business exists that:
 - is aligned and is consistent with the organisation's approach to business:
 - · reflects the needs and expectations of customer and staff;
 - is based on the financial needs of the organisation and the needs of customers:
 - · is relevant to the services being provided;
 - reflects recent changes within the industry, for example, buyer behaviour;
 - · reflects recent changes to relevant legislation;
 - · is reviewed annually (unless driven by exceptional events).
- 2. All staff are made aware of relevant aspects of the business plan, for example, the needs of customers, recent changes to legislation that impact on the organisation's approach to business.

IMPROVEMENT LEVEL 1

The plan for the business incorporates analysis of performance against internal measures, for example, key performance measures and critical success factors, and includes targets for the coming period.

The organisation schedules reviews of performance against the plan for the business.

IMPROVEMENT LEVEL 2

The plan for the business is based on:

- · the needs and expectations of all stakeholders;
- information gained from learning activities, analysis of competitor information, benchmarking exercises, and social, environmental and legal issues.

Please see the Glossary for a definition of the terms 'analysis', 'approach', 'benchmarking', 'critical success factors', 'measures and indicators' and 'performance'.

CLARIFICATION

The plan for the business should cover the financial needs of the organisation and the requirements of customers and staff. The approach to business should be evident throughout the plans. The implementation of recent changes within the industry or planned changes to legislation should be included.

Organisations may plan one or two years in advance whilst others may do their planning on a rolling six monthly basis. The ACS does not have a specific requirement on timings. The requirement is that planning for future developments in the business takes place and that plans are reviewed and adjusted when necessary.

Any plans, documented or not, should be monitored for progress and any changes required to ensure the continuity of the business, highlighted.

Applicant organisations should be moving towards planning for the business using analysis and understanding of information gathered from internal performance and external information. In an organisation where security services form part of the organisation, a discreet plan for the business may not be appropriate. However specific plans and targets that link to the higher organisational plans would be expected.

EXAMPLES

- Identification of all stakeholders, for example, customers, staff, suppliers, members of the public and the local community.
- · Collection and use internal performance indicators.
- Participation in committees and groups from the security industry and other associations.
- · Use of information learned at these activities

Plans could include such things such as:

- · budget planning;
- $\boldsymbol{\cdot}$ planning for events such as licensing;
- · planned recruitments to meet changes in the market place;
- · use of technology to improve service delivery.

GOOD PRACTICE

Regular review of the business plan. All staff are made aware of relevant key aspects of the business plan.

1.2.1

Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement

This indicator links to:

- · 1.1.3 A plan for the business exists with an effective review schedule.
- 1.2.2 Goals, objectives and targets are clearly visible for all levels of the organisation.
- 3.5.1 The organisation regularly reviews performance against responses from customer opinion gathering.
- 4.4.1 The organisation regularly reviews performance against key financial indicators critical to the business.
- 6.5.1 The organisation regularly reviews performance against key staff performance indicators.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement

REQUIRED ACHIEVEMENT LEVEL

- Demonstrable critical success factors which reflect the organisation's goals and targets have been identified and recorded. These could cover, for example:
 - · customer satisfaction;
 - · contract performance, for example, response times, customer contact;
 - staff retention:
 - · staff training and development;
 - · effective leadership;
 - · effective financial and management systems;
 - · access to adequate financial and human resources;
 - · health and safety arrangements.
- 2. Internal key performance measures include:
 - · financial measures;
 - · customer service levels;
 - · staff measures, for example, sickness, disciplinary.

Where applicable: measures include annual performance targets of:

- 99% of licence applications must be correctly completed when submitted to the SIA;
- 99% of licence applications must pass internal SIA quality checking of ID and photograph checks.
- 3. Review of performance against critical success factors happens on a regular basis.
- 4. All measures have targets and are reviewed by appropriate members of staff.
- 5. Measures are amended/updated based on organisation performance.

IMPROVEMENT LEVEL 1

Progress towards achievement of targets is monitored through an internal balanced scorecard or other valid mechanism.

The scorecard or other mechanism includes key measures, for example:

- · financial;
- · customer;
- · business processes;
- learning/growth;
- · past performance.

Please see the **Glossary** for a definition of the terms 'critical success factors', 'key', 'performance', 'management system' and 'measures and indicators'.

CLARIFICATION

Critical success factors (CSFs) are those things an organisation must address in order to achieve its overall aims, for example, purpose or mission. It is not a requirement of the ACS standard that these critical success factors are documented. However it is important that the leaders of the organisation are able to articulate what is important to their business.

Many organisations concentrate on financial CSFs and supporting measures along with performance indicators against specific contracts. Good practice would be to have a CSF and supporting measures that would also relate to staff and leadership as well as financial and customer measures.

Where applicable (i.e. for licence management): performance should be to meet the two specific KPIs. This is not required to be documented if the company can demonstrate that they are meeting them.

Ref: ISO9001

EXAMPLES

CSFs often start with the phrase 'We must have...' for example: We must have:

- · satisfied clients and customers;
- · a range of products and services to meet market needs;
- · effective leadership;
- · highly effective and motivated people;
- · a culture of continuous improvement;
- · effective financial and management systems;
- · access to adequate financial and human resources;
- · strong alliances with selected business partners;
- $\boldsymbol{\cdot}$ sound health and safety and environmental operations;
- · profitable contract wins;
- · effective processes and procedures.

GOOD PRACTICE

Critical success factors are documented, with linked targets and benchmarks and are reviewed monthly by the senior management team.

1.2.2

Goals, objectives and targets are clearly visible for all levels of the organisation

This indicator links to:

- · 1.1.3 A plan for the business exists with an effective review schedule.
- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- 4.4.1 The organisation regularly reviews performance against key financial indicators critical to the business.
- 6.5.1 The organisation regularly reviews performance against key staff performance indicators.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Goals, objectives and performance targets are set at a high level within the organisation.
- 2. Goals, objectives and targets cover the financial, service delivery and staffing aspects of the organisation.
- 3. Staff are aware of the goals, objectives and targets that affect their area of service delivery.
- 4. Goals, objectives and targets are discussed with individuals.
- 5. There is a link between the goals, objectives and targets of individual staff and the organisation's overall objectives.
- 6. Staff are aware of how their individual goals and objectives are linked to the organisation's overall objectives.

IMPROVEMENT LEVEL 1

Goals, objectives and targets can be traced down through the organisation.

They are developed through discussions with the staff responsible for their achievement.

There is a clear link with the role, purpose or mission and plans to maintain and/ or develop the business.

Please see the Glossary for a definition of the term 'goals'.

CLARIFICATION

The key aspect of this indicator is the flow down from overall aims, through critical success factors and measures to specific goals, objectives and performance targets throughout the organisation. Whilst mission and critical success factors are not required to be documented, the challenge for any organisation is to ensure that individual or team goals and objectives are understood and achieved.

The prioritisation of the goals and objectives is not important to ACS approval, providing that there is a balance/range of goals and objectives that include such things as quality of service, staff considerations and the linkage with overall aims etc. and that this can be demonstrated.

Goal setting within a smaller organisation will be less formal, however it should still exist. It may be targeted more around the service delivery aspect of the business, but all staff should know and understand the goals and objectives of both the organisation in general and the customer contracts they work on. Individuals should understand how their individual performance contributes to the organisation's overall goals/objectives.

Ref: ISO9001

EXAMPLES

Different parts of the organisation would have different goals, objectives and targets but they would all link into the overall goals and objectives of the organisation.

For example:

- a person who looks after the payment of wages would have objectives and targets around accuracy of the wages and payment on time:
- a frontline member of staff would have objectives and targets relating to the achievement of customer requirements, as laid out in assignment instructions.

GOOD PRACTICE

Company goals are included in assignment instructions. Goals are covered as part of the appraisal process.

1.2.3

Procedures have been defined to ensure conformance to working standards or codes of practice

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation is committed to delivering a quality service to its customers that is based on established high standards or a British standard code of practice (where relevant).
 - The organisation has up to date copies of relevant industry standards it is working to.
 - Staff understand the standards or codes of practice that are relevant to them and understand that they must deliver to these standards.
 - · Working standards are implemented throughout the organisation.
- 2. Where a British standard code of practice exists for a particular industry sector (as determined by the SIA), organisations seeking approval for the sector should aim to conform to their guidelines.
- 3. Any deviation from the recommendations of a particular code of practice should be justified as not affecting service delivery, public safety and/or the integrity of the ACS.
- 4. Where applicable: The working standards include the SIA:
 - · Code of Connection;
 - · Licence Management Manual.
- 5. The organisation has a process for checking that it is working in compliance with the relevant standards, for example, through a checklist or other form of internal audit and/or external audit.
- 6. Where applicable: this activity includes audits to demonstrate adherence to licence management eligibility criteria and conditions.

IMPROVEMENT LEVEL 1

The organisation holds full UKAS accredited certification for British standards within sector scope of the ACS assessment.

IMPROVEMENT LEVEL 2

The organisation can demonstrate that it participates constructively in the development of private security industry code(s) of practice.

Please see the Glossary for a definition of the term 'code of practice'.

CLARIFICATION

This indicator requires a commitment to a British standards code of practice, where relevant to do so. Vehicle immobilisers operating in Northern Ireland should work to the British Parking Association code of practice for control and enforcement of parking (or equivalent).

Commitment to working to the codes of practice should be confirmed with both staff and customers.

British standard codes of practice take the form of guidance and recommendations only and should not be quoted as if they are a specification. An organisation may deviate from the code(s) of practice where they can justify to the assessor and/or SIA that any deviation does not affect service delivery, public safety and/or the integrity of the ACS.

Licence Management

For those using the licence management service, most contact with us will be through our portal, so there should be little need for any emails to be sent to us that contain personal information about licensees/licence applicants. However, where the business sends emails externally to us that contain personal or sensitive information, emails should be encrypted (to Advanced Encryption Standard 256) and/or password protected. Encryption is not required internally by the organisations approved to use our licence management service because access is controlled by other measures, for example, password protected e-mail accounts and access controls.

Level 1:

Full UKAS accredited certification for British Standards means product certification (as defined by ISO17065) for each British standard code of practice. This will be in the form of a separate product certificate for each code of practice or in the form of a passport scheme approval certificate where a requirement of the passport scheme includes British standard product certification. This does not include ISO9001 certification that covers the security sector British standard codes of practice.

Level 2:

Evidence demonstrating that the contractor participates constructively in the development of private security industry codes of practice will vary according to the size and type of organisation. For some organisations, this may include membership of relevant committees such as the British Standard Institution's development committees, the SIA's standards groups, or other standards development groups. For smaller organisations, this might include contributing to workshops or consultation activities relating to standards development. Tangible evidence should be available to support, such as records of comments on proposals or drafts, invites to formal consultation as an industry expert, attendance at consultative events, meeting minutes.

An organisation could make use of BSI standard development portal https://standardsdevelopment.bsigroup.com to stay up to date with the progress of standards that affect them and the security industry, and make active contributions in the development of industry-shaping standards e.g. by commenting on standards when they are circulated as a draft for public comment.

EXAMPLES

- A check list to ensure that assignment instructions are being followed.
- Checks by internal quality groups against ISO9001 and the relevant British standards.
- $\cdot\;$ External audits against ISO9001 and the relevant British standards.
- Checks conducted by Local Authorities on incident logs signing in books etc.
- Audit to demonstrate adherence to licence management service eligibility criteria and conditions.

Level 2:

Organisations demonstrating that they fulfill this requirement could share some of their practices with smaller organisations or non-approved contractors.

The relevant standards can be found listed in Figure 2.

Ref: ISO9001

GOOD PRACTICE

An internal audit programme implemented by independent internal auditors (staff do not audit their own).

- · Mystery shopping.
- Spot check.
- · Covert observation.

Gain UKAS accredited product certification for the British standards within sector scope of the ACS assessment.

1.3.1

The management of internal and external communications is handled effectively

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation has identified the communication needs of its customers and staff in terms of:
 - · the type of information that needs to be communicated;
 - · when information needs to be communicated;
 - · how information is communicated.
- 2. Key service information relevant to all areas of the business is delivered in an effective and timely manner to staff and other stakeholders and is:
 - · accurate and up to date;
 - · subject to version control;
 - · available when needed;
 - regularly reviewed to ensure it remains relevant, accurate and up to date.
- 3. The organisation complies with relevant legislation and regulations regarding the management and publishing of information.
- 4. No inaccurate, false or misleading claims are made about the organisation or its work.
- 5. Planned communication takes place between the organisation, its customers and staff.
- 6. Procedures to manage all adverse publicity include:
 - · a designated spokesperson;
 - · authorised levels of sign-off on comments.

IMPROVEMENT LEVEL 1

Any feedback received on the way the organisation communicates is reviewed and improvements made in future communication.

Procedures to manage adverse publicity about either the organisation or events within the sector include:

- · keeping of records of any responses made;
- involving customers (where they are affected) in the planning of responses.

IMPROVEMENT LEVEL 2

The organisation has identified the communication needs of other stakeholders such as consumers, Police, other authorities and the wider public.

This information is used to develop and implement plans to communicate with these stakeholders.

The organisation checks the awareness and understanding of stakeholders to ensure the effectiveness of its communication.

CLARIFICATION

The handling of information is a broad subject and however it is handled the applicant organisations should ensure that it:

- covers key service delivery information such as customer contractual requirements, the aims and purpose of service provision, financial information about a contract and so on:
- is accurate and up to date with some form of document control see indicator 5.1.1;
- · is available to the right people;
- · is available when needed;
- \cdot is managed and controlled in line with legislation see indicator 5.1.2.

The information produced should be regularly reviewed to ensure it is still relevant and wherever possible the amount of information in circulation should be reduced.

The provision and management of information may be a manual process within smaller applicant organisations. It is important to verify how the above points can be demonstrated.

The key to the ACS standard is that communication to customers and staff is thought through in terms of identifying what type of information needs to be communicated, when it needs to be communicated and how it is communicated to the different audiences. This should be validated with staff and other stakeholders.

It should not be assumed because an organisation has few staff that communication is easily undertaken or understood.

Communication within a smaller organisation can, by the nature of the organisation, be less dependent on written forms and is more on verbal communication. Where communication methods are less formal there is a greater risk that communication may be overlooked, ineffective or that the needs of the stakeholders are assumed and not identified.

Due to the nature of larger applicant organisations there should be a more formal and rigorous approach to communication. In some of the largest organisations there may be a department with the responsibility of ensuring communication needs are met. Communication is likely to be on different levels dependant on the recipient, especially where customers are also based on multiple sites. The provision of information in larger companies is usually computer based. One of the key issues tends to be that too much information is produced, leading to information overload and a high possibility that critical information is overlooked.

Understanding communication needs is the process of actually identifying what customers, staff and other stakeholders want in the way of communication rather than providing a level of communication that you think is appropriate. Communication needs can vary from customer to customer and from staff member to staff member. The organisation should be striving to meet all of these needs. This does not always mean doing more. In some cases it could be a case of doing less but differently.

Some sectors are particularly susceptible to bad publicity, for example vehicle immobilisers and door supervisors, although no sector is immune. Applicant organisations need to be aware of this and have given thought to how they mitigate the impact of any bad publicity on their business, customers and staff.

CLARIFICATION (continued)

Care must be taken to ensure that no false or misleading claims are made with respect to memberships, certifications, approvals, accreditations, and/or affiliation on promotional material, including websites. Similarly, inaccurate claims of previous experience, history, or clients presenting a distorted impression of the company's ability to deliver must be avoided.

Licence management service users: a requirement is to notify us of any security breach: a security breach is where systems, passwords or machines are compromised, for example, passwords/accounts being used by unauthorised persons, operators leaving licensing screens open and accessible for long periods of time when others could freely access, findings from penetration testing that reveal system compromise. Reporting of breaches to the SIA should include:

- a confirmed breach that relates to any aspect of the licensing activity/ processes;
- other significant security incidents, for example, where there is a significant compromise to the business's overall system/s, that is, not restricted just to licence processing activity, that could compromise the integrity of the SIA licensing system.

Licence management service users: we grant the approved contractor permission to use the licence management strapline: 'The SIA and approved businesses working together to license the private security industry'. The strapline may be incorporated in full on any office stationery, marketing materials, tender documentation, vehicles and plant. The SIA shall be entitled to instruct the approved contractor to remove the licence management strapline if, at its absolute discretion, it considers that continued use is prejudicial to the good name and reputation of the SIA.

Ref: ISO9001

EXAMPLES

- How communication takes place especially for mobile staff and other stakeholders.
- · Using top down, bottom up and horizontal communication channels.
- $\boldsymbol{\cdot}$ Evaluating the success of communications, that is, are people aware?
- Understanding the different needs of stakeholders in terms of communication and how these are addressed.
- · Assignment instructions.
- · Prior risk assessments being available before a contract renewal visit.
- Results against service level agreements being available prior to a customer visit.
- · Licence renewal information.
- · Contract profitability.
- Actions taken following feedback from customers, consumers and other interested parties.

Information could include providing timely information on former staff to potential recruiters for screening and vetting purposes.

1.3 An SIA approved contractor handles internal and external communications effectively

GOOD PRACTICE

- · A dedicated gatekeeper keeps tabs on all external communications.
- · Remote staff can safely and securely access a company intranet site.
- · Company extranet for customers/stakeholders.
- · Chat rooms for staff.
- · Company newsletters sent out with pay.
- · Staff notice boards.
- Effective use of social media such as Facebook and Twitter to promote business and communicate with stakeholders.
- · Policy on staff use of social media to protect organisational reputation.

1.4 The SIA approved contractor actively manages the impact of its services on society and the environment

1.4.1

There is a policy relating to corporate social responsibility and the environment, which is communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation has a policy relating to corporate social responsibility and the environment which:
 - outlines the organisation's positive stance on environmental and social issues;
 - · directly addresses protection of the public;
 - · is communicated to all staff and customers.
- 2. The organisation is aware of its responsibilities to society and takes a positive stance to ensure ownership.
- 3. The organisation is aware of its impact on the environment and is taking steps where appropriate, to reduce this impact.
- 4. Staff are aware of their responsibilities and act accordingly.
- 5. Steps have been taken to make customers aware of the organisation's positive stance on its responsibilities to society and the environment.
- 6. Performance against the policy is monitored.

IMPROVEMENT LEVEL 1

The corporate social responsibility policy covers a wide spectrum of activity.

The organisation works in compliance with ISO14001.

IMPROVEMENT LEVEL 2

The organisation holds certification to UKAS ISO14001 in Environmental Management accreditation.

Please see the Glossary for a definition of the term 'corporate social responsibility'.

1.4 The SIA approved contractor actively manages the impact of its services on society and the environment

CLARIFICATION

The ACS standard does not require the applicant organisation to have a written corporate social responsibility policy.

The applicant organisation should be aware that all individuals and organisations have a responsibility to society, both the local community and the environment.

Taking steps to make customers aware of your position on corporate social responsibility could include a comment or statement on the organisation's website or in promotional literature. In a small organisation, it could simply be reference to corporate social responsibility in client discussions.

Any actions taken to reduce the impact of service delivery on the environment need to be appropriate to the sector. For example, CVIT vehicles are not designed to be environmentally friendly, however there are actions that could be taken around maintenance and emission testing that could have an impact. However, in some other sectors mobile patrols could be done using more environmentally friendly modes of transport such as scooters instead of cars, or electric vehicles. There should also be an awareness of what recycling is possible within their type of business. The whole organisation should be aware of the activities of the organisation and their responsibility to participate.

EXAMPLES

- Awareness throughout the organisation of the role it plays in 'keeping people safe'. For example, door supervisors removing weapons from individuals and handing them over to the Police, or raising awareness of the risks when in crowded places.
- Consideration of activities the organisation could be doing, however small, to reduce the impact of their work on the environment and community at large, such as:
- · safe disposal of batteries, computers, etc.;
- · recycling of paperwork;
- · recycling printer cartridges;
- · old computers given to the community;
- · recycling of uniforms;
- · use of alternate types of transport;
- · safer driving initiatives;
- · reductions in utility usage, for example, electricity;
- · conformance to ISO14001;
- involvement in customer initiatives, for example, can recycling, cigarette butt-end recycling;
- $\cdot\,$ donating old (unbranded) uniforms.

1.4 The SIA approved contractor actively manages the impact of its services on society and the environment

GOOD PRACTICE

A written policy might help demonstrate the organisation's commitments to corporate social responsibility. Publicising this to all staff and customers would be a further enhancement.

The policy could include:

- · ethical purchasing, for example, local purchasing;
- · local recruitment;
- waste transfer notes to confirm correct disposal. Tracking devices to monitor the speed of vehicles, or speed limiters;
- · effective route planning to reduce impact on environment;
- · development of a public transport policy;
- · purchasing fair trade tea and coffee;
- · ISO14001 in Environmental Management.

1.4.2

The organisation plans activities to promote and improve the reputation of the private security industry with the Police, the local community and with customers

This indicator links to:

•1.4.3 The organisation is involved in activities to promote and improve the awareness of counter-terrorist activities.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation is aware of how it may impact the reputation of the private security industry.
- 2. The organisation takes opportunities to enhance the reputation of the private security industry when appropriate.
- 3. Appropriate contact with the Police is maintained.
- 4. Actions that may enhance the reputation of the private security industry are planned and linked to local activities and to customer initiatives where appropriate.

IMPROVEMENT LEVEL 1

The organisation:

- Actively works with relevant organisations to promote protection of the public within the local community, for example, through awareness-raising or training on:
 - counter terrorism;
 - child exploitation;
 - human trafficking.
- Encourages recruitment by promoting a positive image of the private security industry through their actions.

IMPROVEMENT LEVEL 2

The organisation has been recognised by relevant organisations, for example, the Police, the local community or customers, as a leader in developing the reputation of the private security industry.

CLARIFICATION

The reputation of the private security industry within the local communities and with customers is often damaged by a small number of individuals and companies. The focus of this indicator is around applicant organisations taking positive action to improve/change this reputation. All action should be appropriate to the size and nature of the applicant organisation. Everyone within the organisation should recognise their responsibilities with respect to corporate social responsibility, and be able to articulate the impact their work has on the local community and environment.

Most security organisations will come into contact with the Police at some point – for example in response to incidents. The reputation of the industry may be influenced by Police perceptions, and development and maintenance of appropriate relationships will be beneficial. Opportunities include counter-terrorism initiatives.

Organisations must ensure that the appropriate level of contact is maintained. For example larger companies may sit on the National Police Chiefs' Council (NPCC) consultation groups. Smaller organisations may have more reactive relationships but could try to build links via local community safety groups or beat officers.

Door supervision companies may wish to liaise with their local Police licensing officer. Some companies have built links through attendance at police seminars or are approved Police Community Safety Accreditation Scheme partners.

EXAMPLES

- · Presenting a professional image when dealing with customers.
- · Belonging to local enterprise groups.
- · Behaviour when in contact with local community.
- · Sponsoring local sports teams.
- Participating in/supporting local activities.
- · Talks in local schools about the role of security industry.
- · Promotion of regulation and its positive impact.

- A planned approach to corporate social responsibility to ensure that activities fit with the organisations overall aims and objectives.
- $\boldsymbol{\cdot}$ Active member of town centre groups aimed at reducing crime.
- Open days to encourage local people to appreciate the role and potential impact of the organisation.
- $\cdot \;$ Recruitment of people with special needs.
- · Free security services offered to local events.
- Creation of a cross-organisation working group to consider 'what do we do?', 'what can we do?' and 'how do we achieve it?' with regard to corporate social responsibility.
- Stray and nuisance dogs reported to the Police out-of-hours are bought to the company offices and kennelled overnight in a purpose built area containing multiple kennels. The dogs are then collected the following morning by the local dog wardens.

1.4.3

The organisation is involved in activities to promote and improve the awareness of counter- terrorist activities

This indicator links to:

• 1.4.2 The organisation plans activities to promote and improve the reputation of the private security industry with the Police, the local community and with customers.

REQUIRED ACHIEVEMENT LEVEL

- 1. Staff are aware of:
 - · the current level of threat from terrorism faced by the UK;
 - · what the current threat level means;
 - · where to find information about changes to the threat level.
- 2. The organisation is aware of how it may promote and improve the awareness of counter-terrorist activities and has taken some initiatives in this area.

IMPROVEMENT LEVEL 1

Actions to promote and improve the awareness of counter-terrorist activities are planned and linked to local activities and to customer initiatives where appropriate.

IMPROVEMENT LEVEL 2

The organisation actively works with relevant organisations to promote and improve the awareness of counter-terrorist activities.

IMPROVEMENT LEVEL 3

The organisation has been recognised by relevant organisations, for example, the police, the local community or customers, as a leader in promoting and improving the awareness of counter-terrorist activities.

CLARIFICATION

In today's society the threat from terrorism remains real. There should be an awareness within the organisation of the current level of threat from terrorism faced by the UK at any given time and what it means. Likewise, there should be an awareness of how to promote anti-terrorism activities.

The focus of this indicator is around applicant organisations taking positive action to improve awareness amongst its staff, and as far as possible extending this to include its customers, other stakeholders, and the local community.

Awareness, needs to reflect the current threat level and be refreshed as and when this changes.

Where a contractor has introduced counter-terrorist initiatives or has developed specific responses to deploy in certain circumstances, these should be reflected in the Als.

As with all ACS requirements, the way in which an organisation evidences this indicator will vary, as will the extent of its activity.

More information is available from Security Service MI5 website

EXAMPLES

Minimum activities:

- staff should understand that they have a role in relation to counterterrorism:
- counter-terrorism information should be provided at induction, and refreshed as necessary, to reflect the latest advice from key agencies such as GOV.UK, National Counter Terrorism Security Office (NaCTSO) and the Centre for the Protection of National Infrastructure (CPNI www.cpni.gov.uk/), as well as from local initiatives:
- staff should have a basic understanding of some of the basic concepts/campaigns, such as:
 - awareness e-learning (www.gov.uk/government/organisations/ national-counter-terrorism-security-office);
 - the National Police Chiefs' Council/Counter Terrorism Policing 'run tell hide' campaign (www.npcc.police.uk/ NPCCBusinessAreas/WeaponAttacksStaySafe.aspx);
 - the British Transport Police 'See it, Say it, Sorted' (www.btp.police. uk/police-forces/british-transport-police/areas/campaigns/see-it-say-it-sorted/);
- staff could be provided with access to the Citizens Aid app which gives practical advice;
- businesses could consider improving practices in line with the latest guidance such as that from NaCTSO – Crowded Places Guidance (www.gov.uk/government/publications/crowded-places-guidance) and consider the activities from the menu of tactical options on P6/7 of the National Police Chiefs' Council document (www.gov.uk/ government/publications/national-stakeholder-menu-of-tacticaloptions);
- businesses could consider additional controls to minimise the likelihood of existing staff becoming a security concern (www.cpni. gov.uk/reducing-insider-risk);
- businesses could be signed up to receive the National Counter Terrorism Protective Security Threat Advisory messages from CSSC, and share this with staff (www.thecssc.com/security-and-safety-messages/);
- businesses should know where to seek advice from counterterrorism security advisers (CTSAs). CTSAs work with businesses and the community to identify and assess sites that may be vulnerable to terrorist or extremist attack;
- $\boldsymbol{\cdot}$ attending specialist training and awareness days;
- read publications on the NaCTSO website and distribute them amongst staff.

More information is available from www.gov.uk/government/ organisations/national-counter-terrorism – security-office

1.5.1

The organisation regularly reviews performance against success factors and performance indicators

This indicator links to:

- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- •1.2.2 Goals, objectives and targets and clearly visible for all levels of the organisation.
- •1.4.1 There is a policy relating to corporate social responsibility and the environment, which is communicated.
- •1.4.2 The organisation plans activities to promote and improve the reputation of the private security industry with the Police, the local community and with customers.
- 1.4.3 The organisation is involved in activities to promote and improve the awareness of counter-terrorist activities.
- · 2.1.1 Key service delivery processes have been identified and are understood by all.
- 4.4.1 The organisation regularly reviews performance against key financial indicators critical to the business.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- Performance against the organisation's goals, objectives and critical success factors, for example, customer satisfaction, contract performance and performance indicators (including health and safety) is regularly reviewed.
- 2. Measures cover all key aspects of business processes relating to meeting the needs of customers, consumers and the wider public.
- 3. Reasons for shortfalls in performance are understood.
- 4. Some results show positive trends and/or sustained good performance, for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement.

Please see the **Glossary** for a definition of the terms 'critical success factors' and 'measures and indicators'.

CLARIFICATION

Applicant organisations should consider measuring some of the activities conducted in indicators 1.4.1 and 1.4.2.

All organisations should have clearly defined health and safety measures for the services they supply. Smaller organisations may have health and safety measures at assignment instruction level. All organisations should have measurable success factors for these measures and should evaluate the impact of these during reviews of their performance.

EXAMPLES

Measuring activities related to the organisation's goals, objectives and critical success factors could include:

- · customer satisfaction;
- contract performance, for example, response times, customer contact;
- · staff retention;
- · staff training and development;
- · effective leadership;
- · effective financial and management systems;
- · access to adequate financial and human resources;
- $\boldsymbol{\cdot}$ health and safety arrangements.

Measuring activities relating to meeting the needs of customers, consumers and the public could include:

- $\cdot \ \ \text{emissions from transport;}$
- · utility consumption;
- · waste streams, for example, paper, printer cartridges, batteries, glass;
- · use of new and recycled materials;
- · accidents and near misses;
- · media interest;
- · contribution to local economic development;
- $\boldsymbol{\cdot}$ relationships with relevant authorities, local media, local community;
- ethical behaviour, for example, poaching contracts from other security providers;
- $\boldsymbol{\cdot}$ $\,$ impact on local economies, for example, reduction in crime levels;
- nuisance and harm from the organisation's operation, for example, speed of response to audible alarms in residential areas.

In addition, awards and membership of health and safety bodies may provide an indication of the extent of an organisation's commitment to the environment, society at large, and protecting the public.

Criterion 2: Service delivery



An SIA approved contractor has robust processes in place that ensure service delivery to its customers and stakeholders

Note:

- Examples of the types of evidence you may consider sufficient to meet the ACS standard are given wherever possible. As verification visits are conducted, additional examples will be added. This also applies to the examples of good practice contained in this section. Should you have difficulty in determining whether evidence meets the ACS standard, you should contact us.
- 2. Subcontractors referred to in 2.4.1 refers to companies that are subcontracted to deliver security services on behalf of the applicant.

This criterion is composed of six sub-criteria

The SIA approved contractor can demonstrate that it:

- 2.1 has in place effective service delivery processes;
- 2.2 has a plan to ensure continuity of service delivery;
- 2.3 identifies and responds appropriately to what customers require of a security service;
- 2.4 monitors and manages service delivery to both customers and consumers in a consistent manner;
- 2.5 monitors internal processes, taking appropriate action to make improvements, when necessary;
- 2.6 measures and improves performance against key customer and consumer indicators.

2.1.1

Key service delivery processes have been identified and are understood by all

This indicator links with:

- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- •1.3.1 The management of internal and external communications is handled effectively
- 1.5.1 The organisation regularly reviews performance against success factors and performance indicators.
- 7.1.2 Managers and directors responsible for processes and key personnel are involved in developing and can demonstrate an understanding of procedures.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Key processes for the delivery of services to customers:
 - have been identified and are documented in training manuals or in individual procedures;
 - · are reliably followed;
 - · have standards of performance which can be assessed for compliance.
- 2. All key service delivery processes:
 - have an identified and available responsible manager, director or people with significant control;
 - · have an escalation procedure;
 - · have related measures of performance that are monitored;
 - are reviewed to ensure continuing relevance to the organisation's strategy and objectives, and to customers;
 - · are regularly tested outside routine site visits and inspections to:
 - ensure continuing effectiveness in the delivery of excellent customer service;
 - identify areas for improvement.

IMPROVEMENT LEVEL 1

All process measures have performance targets.

The impact of performance in key service delivery processes is understood by all interacting with the organisation.

Improvement actions resulting from tests of the key service delivery processes are created with deadlines for their implementation.

Please see the **Glossary** for a definition of the terms 'inspection', 'key', 'key processes', 'measures and indicators', 'service delivery', 'strategy' and 'process'.

CLARIFICATION

All applicant organisations should have defined the processes required to deliver services to all customers. These processes can be defined at a number of levels forming a quality management system such as that required by ISO9001. At their lowest level the processes would take the form of assignment instructions, which inform the staff how to deliver to a specific client or site. This would be the minimum requirement for approval against the ACS standard. All processes required to deliver services should have associated standards of operation with performance targets and should be regularly tested to ensure that standards are being achieved. The approach to testing can range from a contractual arrangement with an external supplier or mystery shopper to an internally developed and delivered testing regime. It is up to the applicant organisation in consultation with its customers to determine what approach best fits its needs.

Smaller organisations are likely to have processes defined at the level of assignment instructions and there should be some level of documentation around these processes. The scope should cover the full range of processes used to manage service delivery. The level of detail required in the documentation would be in relation to the size of the applicant organisation. However, there should be clear, accurate and up to date assignment instructions in place for all contracts. Verbal communication only is not acceptable for assignment instructions.

Documentation for key internal processes should be sufficient to ensure that processes can be understood and carried out by someone new to the job with the minimum of input. Although informal, there should be some methodology in place that allows for issues and improvements to be raised.

Within larger organisations, formal documentation, usually in the form of a quality management system, should be in place even if the applicant organisation is not ISO9001 accredited. This should cover internal procedures as well as those affecting service delivery. The level of detail within the quality management system should be appropriate to the size of the organisation.

Formal processes should be in place to ensure that issues and improvements are handled at an appropriate level within the applicant organisation. If it is possible to make local changes to procedures, that is, at individual customer sites, then evidence must be presented on how this is controlled.

Evidence that processes are being followed should be presented to the assessor who should confirm that they are implemented where relevant within the applicant organisation and that they are used at all times.

Ref: ISO9001

2.1 The SIA approved contractor has in place effective service delivery processes

EXAMPLES

Your key service delivery processes must be tested and these tests must be outside routine site inspections. For example, if you provide security services, you must test the effectiveness of that security service.

Other examples include:

- processes key to the success of the business are understood by management;
- · third party penetration testing.

- Key processes are formally managed, with owners, targets, benchmarking and review.
- Changes to processes are made as a result of incidents and complaints.
- Resource a dedicated performance manager to oversee key service delivery.

2.2.1

There is a current and effective plan to ensure continuity of service delivery

This indicator links with:

•1.2.3 Procedures have been defined to ensure conformance to working standards or codes of practice.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation has identified the key aspects of the business that are critical to its operation.
- 2. Plans for business continuity cover identified critical aspects, for example:
 - · periods of labour shortages;
 - · incident and crisis management in all aspects of service delivery;
 - · IT systems and technology;
 - · customers not paying on time.
- 3. The plans are:
 - · relevant to the business;
 - · reviewed periodically to ensure continued effectiveness;
 - · tested against some of the highest risk scenarios.
- 4. The plans also contain:
 - · details of actions to be taken;
 - · named responsible people.

IMPROVEMENT LEVEL 1

The plans for business continuity are tested regularly for effectiveness.

Actions resulting from tests of the plans for business continuity are created with deadlines for their implementation.

IMPROVEMENT LEVEL 2

The organisation works in compliance with a business continuity best practice system, such as BS EN ISO 22301.

The organisation can demonstrate that it effectively contributes to business continuity best practice.

Please see the ${f Glossary}$ for a definition of the terms 'key', 'service delivery' and 'process'.

CLARIFICATION

The ACS standard is looking at how the applicant organisation manages incidents and crises within the business. This is looking at the internal procedures rather than the handling of incidents at a customer site, which is addressed in another indicator.

The scope of the continuity plan, sometimes known as a disaster recovery plan, will be dependent on the ability to recover after an incident or crisis. There must be some evidence that the plans have been reviewed, periodically, and that the organisation has identified the critical operational aspects of the business.

The extent to which the continuity plans are tested will vary dependent on the size of applicant organisation. Larger organisations may have a continuity plan, covering the full scope of the business, with a rigorous testing schedule that is implemented.

Note that sectors, such as Keyholding, would consider all call-outs as incidents and it is important that the organisation understands the difference between these call-out activities and business continuity incidents.

Ref: ISO9001

Level 2:

Evidence demonstrating that the contractor contributes to business continuity best practice will vary according to the size and type of organisation. For some organisations, this may include involvement in networking groups, and/or other business resilience groups. Tangible evidence should be available to support, such as records of attendance, meeting minutes, presentations delivered.

EXAMPLES

- How would the contractor manage after a fire/flood/snowstorm at your premises, or how would you access/travel to work?
- What provision has the contractor made for loss of data due to systems failure?
- · Identification of alternative offices?
- · How does the contractor store key files and equipment?
- How does the contractor plan for the impact of Private Security Industry Act 2001 licensing/renewals and their ability to cover all contracts without a fall in standards?
- How would the contractor continue to pay staff if there was a breakdown in payroll systems and procedures?
- How would the contractor respond to threats against the organisation and customer sites.

- Become familiar with your customers' contingency plans to ensure compatibility.
- Design alternative manual procedures and test them for effectiveness.
- $\boldsymbol{\cdot}$ $\,$ Key management insurance to cover loss of key management.
- All contingency plans are regularly tested and reviewed. The organisation works in compliance with a business continuity best practice system, such as BS EN ISO 22301.

2.3.1

The organisation meets its customers' requirements

This indicator links to:

- 2.4.2 Effective customer and consumer performance indicators and service level agreements have been established.
- 3.5.1 The organisation regularly reviews performance against responses from customer opinion gathering.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation identifies customers' new requirements through discussion.
- 2. The organisation contacts or meets with its customers to:
 - · establish the purpose, aims and objectives for the service provided;
 - · clarify requirements following a complaint;
 - · discuss ongoing security requirements to ensure currency;
 - discuss changes to existing requirements, to further mitigate threats and risks to their assets.
- 3. All staff at a customer site are fully aware of that customer's requirements, and levels of awareness are monitored.

Please see the Glossary for a definition of the term 'organisation'.

CLARIFICATION

The ACS standard requires that applicant organisations meet regularly with the customer to discuss their ongoing requirements and any potential changes. The organisation should provide evidence of a pro-active approach in influencing and anticipating customer requirements, these meetings should be documented in some way. The frequency of these meetings is solely dependent on the needs of the customer and it is possible that the applicant may only meet with the customer once a year. In some sectors, such as vehicle immobilisers, it may be possible that the customer does not require frequent meetings. Evidence must be presented to support this.

Information obtained from the customer should be sought that provides clarity of risks and threats to customer assets. An approved contractor will need to know the customers policy and strategy to mitigate the risks and threats. If one doesn't exist then they should work with the client and agree an appropriate approach and security solutions. **Note:** risk and threat assessment in this context is different to a site health and safety risk assessment.

Discussions should take place with customers on a regular basis, whatever the size of the applicant organisation. Evidence should be presented as to how these discussions are managed and controlled, including frequency. If these meetings are not documented then evidence must be presented on how key information is fed back into the organisation and resulting actions are carried forward.

Staff should be fully aware of customer requirements at the sites worked.

Ref: ISO9001

EXAMPLES

Risk and threats assessment may include:

- Incidence of crime: what are the risks (actual and perceived)? Assess the type, scale and pattern of incidents that have occurred in the last 12 months.
- Environment and buildings: where are the customers' vulnerable points? For example, access and egress points and other high risk security areas. Assessment considers the environmental and building factors that contribute to the customer's security.
- Security measures: what level of security is required to counteract those risks effectively? Assess the effectiveness of the security measure.
- Policy and strategy document: the risk and threat assessment will highlight specific areas that will need to be included in the customer's policy and strategy document. These are specific to each business, for example, terrorism, conventional crime (theft), singleissue, for example, extremists.

Use of Police crime maps, for example, via websites such as: www.crimestatistics.co.uk/postcode $\,$

Assignment instructions reflect customer requirements and may include:

- · review/amended from, acknowledgement form;
- · company details and procedures;
- · operational duties;
- standard instructions for security officers;
- · prime objectives of security officer;
- · health and safety and evaluation procedures;
- · emergency procedures;
- general items, for example, service defect reporting; customer care guidelines.

- The development of security contracts consider the risk and threat assessment.
- Assignment instructions are developed in conjunction with the customer and signed off by the customer.
- · Assignment instructions include added value for the customer.
- Photographic details of customer sites are included within assignment instructions.
- Customers are provided with a dedicated account manager who engages with the customer to review any change in requirements weekly.

2.3.2

There is an awareness of the impact of service delivery on consumers at all levels of the organisation

REQUIRED ACHIEVEMENT LEVEL

- 1. The impact of service delivery on consumers is discussed:
 - when there has been a complaint or adverse publicity concerning the sector:
 - · at a senior management level at regular intervals.
- 2. All staff are trained in and understand:
 - · the impact of service delivery on consumers;
 - · their role in protecting the public (where appropriate);
 - · how this interfaces with the police and with other authorities.
- 3. The role of protecting the public, and its importance, is discussed throughout the organisation and forms part of discussions with the customer.

IMPROVEMENT LEVEL 1

Awareness of the impact of service delivery is monitored throughout the organisation.

Please see the Glossary for a definition of the terms 'consumer', 'organisation' and 'service delivery'.

CLARIFICATION

All applicant organisations, at senior management level, should discuss the impact of their services on consumers and the wider public. For some sectors the impact on consumers may be limited, for example, CVIT where interaction with the public may be minimal. In other sectors, such as door supervision and vehicle immobilisation, interaction with the consumer is a significant part of the role.

However, all sectors have an impact on consumers and the wider public and this should be recognised by the senior management team. For example within CVIT, the impact on consumers is less obvious as the role is more about maintaining strict service standards/procedures to ensure the public are not put at risk. Provided that this can be evidenced, this would be acceptable. Similarly, within the keyholding sector the consumer is rarely seen or contacted. However the presence of an alarm would be considered to have an impact on the local community and as such should be considered.

The vehicle immobilisation sector views the first-line consumer as a wrong-doer as they are parking illegally. However due consideration must be given to the manner in which the service is delivered. Staff should receive training on their role in protecting the public, and its importance, and how their role interfaces with the Police and where appropriate, other authorities.

There must be very clear and testable reasons for this indicator to be considered not applicable by any applicant organisation.

EXAMPLES

- Including impact of service delivery on consumers in assignment instructions and risk assessments.
- · Staff briefings in counter terrorism awareness.
- Briefings from local Police, trading standards, Proof of Age Scheme (PASS), Crimestoppers, Local Licensing Authority, UKBA etc.
- Internal training module on protection of the public, also covered at induction.
- Statement on website or promotional material about approach to protection of the public.

- Within the CVIT sector; a dedicated unit which works closely with the Police and other agencies to identify and prevent criminal activity in relation to CVIT operations. This highlights the impact of the service on the public and other stakeholders such as the Police and local authorities.
- Impact on consumer is covered in customer meetings and feedback questionnaires.
- Customer service training for door supervisors and vehicle immobilisers.
- Staff receive training on the impact of service delivery upon consumers.

2.3.3

The management of contractual arrangements with the customer has been defined

This indicator links to:

• 2.3.1 The organisation meets its customers' requirements.

REQUIRED ACHIEVEMENT LEVEL

- 1. All contractual arrangements with customers include:
 - · negotiation of the terms and conditions of supply;
 - · written contracts, signed by both parties (customer and organisation).*

*Or refusal or failure to sign can be evidenced, or some other means of evidencing agreements can be provided, such as a purchase order number, or payment being made.

- 2. Contractual arrangements are adhered to.
- 3. Contracts are monitored for review and renewal periods.

CLARIFICATION

Formal written contracts should be put in place and signed off by both the customer and the organisation. In some sectors there is a tendency for customers not to issue or sign a contract for fear that this will tie them into service provision. This should not be accepted. If a customer or contractor does not sign, a refusal to sign should be evidenced.

All contracts should be reviewed regularly.

Applicant organisations should ensure that the content of the contract with their customer is relevant to the services delivered and consideration has been given to risks and liabilities.

Contract arrangements may differ between micro, small, medium and large companies. For example, micro companies may have a quotation with attached terms and conditions and rely on guidance websites for advice, whereas a large company could have a commercial department including qualified solicitors responsible for creating, reviewing and negotiating contract terms.

Ref: ISO9001

EXAMPLES

- · Signed contract or terms and conditions of supply.
- Letter to customers requesting a signature on a contract plus follow up letters where contracts not signed.

- Where CCTV is operated, the contract with the customer contains
 the objectives of the scheme, clearly indicating both valid and
 excluded uses. It has a written policy statement that identifies the
 owner of the scheme and contact details and steps have been put
 in place to clearly distinguish between licensable and non-licensable
 CCTV activities.
- Sign-off sheet on the front of contracts and/or date stamp contract review dates.

2.4.1

Use of subcontractors is agreed with customers and subject to defined quality assurance procedures

This indicator links to:

- · 6.1.2 Staff records are maintained.
- · 3.1.1 Effective purchasing procedures are implemented.
- 3.1.2 The organisation work in partnership with its suppliers to improve performance.

REQUIRED ACHIEVEMENT LEVEL

- 1. The use of subcontractors is agreed with the customer before their deployment.
- 2. The customer has the opportunity to ask, using valid justification, that the subcontractor(s) is (are) removed from any particular assignment.
- Subcontracted:
 - individuals are required to hold a valid SIA licence (which the organisation verifies by checking the SIA website);
 - organisations used to deliver a security service are SIA approved contractors (exceptions apply – please see the definition of 'subcontractor').
- 4. All subcontracted individuals are vetted and screened.
- 5. All subcontractors sign a confidentiality agreement.
- 6. All subcontractors are given contract terms and conditions of engagement and the provision of equipment is agreed and documented in the contract.
- 7. All subcontractor organisations used to deliver a security service are SIA approved contractors.
- 8. Subcontractors are not permitted to subcontract further to non-ACS businesses without SIA approval and the approval of the customer to whom the organisation is supplying the service.
- 9. All subcontractors are paid on an invoice only basis and within contractually agreed timeframes.
- 10. Where appropriate, subcontractors are audited, including on-site visits.
- 11. Performance measures are used to monitor subcontractors.
- 12. Feedback is obtained from customers relating to subcontractors' performance and fed back to subcontractors to identify areas of improvement.

Please see the ${\bf Glossary}$ for a definition of the term 'subcontractor'.

CLARIFICATION

Note that reference should also be made to:

• 3.1.1, and 3.1.2 (about improving supplier performance, which includes labour providers, subcontractors and other suppliers).

The term 'subcontractors' in this section does not apply to staff obtained through an agency.

Some applicant organisations do not use subcontractors in the provision of services to customers. These applicant organisations should indicate that this indicator is not applicable. This will be tested as part of the review of staff records and discussions with staff.

Approved contractors can only subcontract provision of a security service (for which they are approved) to other approved contractors. This does not apply in cases where a subcontractor solely supplies labour – 'subcontracted labour'. Such organisations are not required to be approved and may in some cases not be eligible for ACS. This exception covers self-employed individuals and agencies supplying temporary staff whose licensable activities are directed and monitored by the approved contractor. If in doubt about an agency, then check what the contract requires – if it specifies provision of a security service then the agency must be approved, but if it specifies supply of labour and nothing more then approval is not required.

Subcontractors are not permitted to subcontract further to non ACS businesses without SIA approval and the approval of the customer to whom the organisation is supplying the service.

Direct supervision in this context is taken to mean that the security company delivering the security service has full responsibility for the induction, training, direction, monitoring of performance, welfare etc. of the subcontracted operative. Supervision may be provided in person, for example, by daily or weekly supervisory visits, or remotely, for example, by telephone, email, text, as appropriate.

Ref: ISO9001

EXAMPLES

• Customers are made aware through letters, response to tender etc. that the service may be subcontracted.

- The organisation restricts tender exercises to ACS companies only, for licensable contracts.
- Customers are notified of any use of a subcontractor and given the right of refusal to accept the service.

2.4.2

Effective customer and consumer performance indicators and service level agreements have been established

This indicator links to:

- 2.3.1 The organisation meets its customers' requirements.
- 3.2.1 Professional advice is offered to customers on the best approach to meet their needs
- 3.4.1 The organisation implements an approach to consumer contact.
- 2.6.1 The organisation regularly reviews performance against service level agreements and/or key customer performance indicators.

REQUIRED ACHIEVEMENT LEVEL

- All customer contracts and/or terms and conditions of supply have an agreed service level agreement with performance indicators that include the effectiveness of service in mitigating threats and risks to customer assets.
- 2. Performance targets are agreed and reviewed regularly with the customer.
- 3. Performance against the indicators is reviewed regularly.
- 4. Where targets are not met, action-plans are developed together with the customer, including timescales for improvement.

IMPROVEMENT LEVEL 1

Service level agreements with customers include some consumer indicators. These relate to users impacted by service delivery.

Performance against these indicators is regularly reviewed internally.

IMPROVEMENT LEVEL 2

There are additional consumer measures in place. These relate to the:

- · general public;
- · the police;
- · other authorities.

These are regularly reviewed with the customer.

All consumer performance indicators have targets aimed at improving the results.

Where targets are not met, action plans are developed with agreed completion timescales.

Please see the Glossary for a definition of the terms 'consumer', 'performance' and 'service level agreement'.

CLARIFICATION

All customer contracts should have associated agreed levels of service that are relevant to the size and complexity of the contract. Service level agreements should include and consider the purpose, aim and objectives of the service. Plans to ensure improvements in service delivery should exist where there are areas of poor performance or where targets have been raised to meet new and more demanding customer, legislative or other requirements.

Where applicant organisations can demonstrate good performance, the organisation should ensure some means are in place that will sustain that level of performance. The requirement of consumer measures is over the achievement level although applicant organisations are encouraged to consider putting such measures in place.

Once the security requirements have been finalised, the next step is to decide how best to specify them in the tender and contract documents. For example, input or output specifications:

- Output (may simply be security service should ensure no thefts of or from vehicles).
 - this is the output requirement from the service and since the security company takes the risk it must also be accompanied by allowing the security company the freedom to choose how to satisfy the requirements. For example, staffing levels, CCTV. This will have a knock-on effect on the cost of the service, which may turn out to be high as the security company is required to bear the insurance costs.
- Input (might phrase the requirement as: the security service must provide two staff at all times to monitor the six CCTV cameras to detect intrusion within one minute and provide two staff to be available within three minutes).
 - this will almost certainly yield a less expensive contract but, because the security company has limited flexibility to modify the cover, the customer must bear the consequences if this strategy does not prevent theft from a car park.

Ref: ISO9001

EXAMPLES

· Performance against targets reviewed during site visits.

Assignment instructions include:

- · purpose the reason for which something is done;
- · aim The desired outcome;
- \cdot objectives Something that you plan to do or achieve;
- · appearance of security officers;
- · timekeeping;
- · general attitude and cooperation;
- · efficiency of duties;
- · supervisory visits;
- · daily occurrence book;
- · patrols;
- · management response;
- · documentation and accounts.

- There is intensive monitoring of new contracts to establish level of performance and ensure customer expectations are met, say for example three months.
- Consumers given the option of putting their exit passes in either a box that says 'below average', 'good' or 'very good' to indicate satisfaction levels.

2.4.3

Incident procedures are defined

This indicator links to:

· 2.4.4 All procedures are regularly reviewed.

REQUIRED ACHIEVEMENT LEVEL

- 1. Incident procedures:
 - · have been developed by the organisation;
 - that relate to customer sites have been developed in collaboration with and agreed with the customer;
 - · are followed on every occasion.
- 2. All appropriate staff are aware of the incident procedures.

IMPROVEMENT LEVEL 1

Incident procedures are tested annually by management and lessons learned are documented and used to improve processes.

CLARIFICATION

This indicator is examining how the applicant organisation handles, collates and analyses things that happen that are outside the day to day running of a customer contract. This differs from indicator 2.2.1 in that this relates solely to incidents concerning or happening during the delivery of the service, rather than the contingency planning required to maintain the business.

The incident procedures should be developed in collaboration with the customer. Staff need to have an understanding of how and what incidents should be escalated when required.

Note: in the keyholding sector, all activities may be recorded as incidents.

In some cases, customers may be reluctant for contractors to report and record incidents on the basis that too many incidents may impact their business and/or reputation. This is particularly relevant in the door supervision sector where serious or numerous incidents might impact the venue licence, or insurance. The contractor should be able to demonstrate how it ensures that incident procedures are followed at all times, and that staff are not discouraged from reporting by customers.

Ref: ISO9001

EXAMPLES

· Outcomes of incidents are shared with stakeholders.

- · Procedures are reviewed after each incident.
- Incident procedures are categorised according to impact/risk, for example, using a traffic light system. Response is tailored accordingly.
- Introduction of a Suspicious Incident Report form for CVIT crew members to complete. Analysis identifies trends, hot spots etc.
- · Incident procedures are tested.

2.4.4

All procedures are regularly reviewed

- •1.5.1 The organisation regularly reviews performance against success factors and performance indicators.
- 2.5.1 Plans for improvement to site-based activity exist, based on the review of actual performance.
- 3.5.1 The organisation regularly reviews performance against responses from customer opinion gathering.
- 7.1.2 Leaders are involved in the development and implementation of relevant policies and procedures.

REQUIRED ACHIEVEMENT LEVEL

- 1. All service delivery and associated procedures are reviewed:
 - · on a regular basis;
 - by the manager, director or people with significant control responsible;
 - to ensure ongoing relevance and effectiveness in delivering satisfaction and improving performance;
 - after a customer complaint has been received or an incident has highlighted an improvement opportunity.
- 2. There are processes in place that enable issues and improvements to be raised by users and against which improvement plans can be developed.
- 3. Improvements made to service delivery processes, as a result of review, can be identified and demonstrated by the organisation.

IMPROVEMENT LEVEL 1

There are processes in place that enable service delivery issues and improvements to be raised and reviewed outside of the review process.

IMPROVEMENT LEVEL 2

All of the organisations procedures are subject to regular review.

There are processes in place for all procedural issues and improvements to be raised and reviewed outside of the review process.

Please see the Glossary for a definition of the terms 'performance' and 'organisation'.

CLARIFICATION

Procedures relating to service delivery should be reviewed regularly to ensure ongoing relevance to the requirements and their effectiveness in delivering satisfactory and improving performance.

Ref: ISO9001

EXAMPLES

 How the organisation questions the ongoing validity and relevance of its procedures, particularly at the start, renewal and end of a contract.

- · All procedures are reviewed at least annually.
- · Staff feedback is gathered on effectiveness of procedures.
- Any improvements made as a result of a review are documented for any lessons learned.

2.4.5

Effective procedures exist to ensure the attendance of staff on customer sites

REQUIRED ACHIEVEMENT LEVEL

- 1. All staff working at a customer site/venue are required to register their arrival and departure from each site/venue.
- 2. Attendance records at every site/venue are kept to ensure that procedures are followed.
- 3. Attendance records are reviewed by management on a routine basis.
- 4. Staff are aware of the importance of adhering to these procedures.
- 5. Procedures are in place to deal with staff non-attendance at customer sites.
- 6. Specific procedures are defined for ensuring lone workers check in regularly.

IMPROVEMENT LEVEL 1

Targets are set and routinely monitored for attendance at customer sites.

Technology is used effectively to alert the security business to the whereabouts of staff, for example, lone workers, field staff, and monitor their safety.

CLARIFICATION

Applicant organisations from the keyholding sector who attend customer sites in response to an incident rather than attending either full time or on a regular basis, should examine and demonstrate, how they are aware that incidents are responded to in a timely manner.

(Note the reference to 'incidents' in 2.4.3 for key holding and response activities)

Customer sites include anywhere the applicant organisation provides the service. This includes:

- · CVIT sector all collection points;
- · door supervision sector all venues;
- · vehicle immobilisers all parking areas covered.

Organisations should have procedures in place to confirm that staff are where they should be and to deal with non-attendance at customer sites. This is for two reasons:

- · to ensure the safety of staff by knowing their location;
- to assure the customer that their requirements are being met; attendance records can confirm that a presence on site, or venue, is being maintained.

EXAMPLES

- · Log book on site.
- · Phone calls.
- · Timesheet kept by staff and submitted at the end of the week.
- · Escalation process for missed check-calls.

- · Use of GPS for tracking vehicle systems.
- · Use of automated booking and check-call systems.
- Visitors' logs are kept at all sites for management/supervisors' visits. Targets are set and routinely monitored for attendance at customer sites.
- Mobile phone patrol tracker system which enables the control centre and operations management to remotely monitor site patrols in real time.
- Specific procedures are defined for ensuring lone workers check-in regularly.

2.5 An SIA approved contractor monitors internal processes, taking appropriate action to make improvements, where necessary

2.5.1

Plans for improvement to site-based activity exist, based on the review of actual performance

This indicator links to:

- \cdot 2.4.4 All procedures are regularly reviewed.
- 2.6.1 The organisation regularly reviews performance against service level agreements and/or key customer performance indicators.

REQUIRED ACHIEVEMENT LEVEL

- Improvement plans are developed in response to a review of performance against agreed service levels.
- 2. Improvement activity is coordinated and prioritised.
- 3. All plans have owners, dates for delivery and expected improvement targets.
- 4. Improvement plans are reviewed at a local level.

IMPROVEMENT LEVEL 1

Prioritised improvement plans are produced as a result of the review of performance.

Regular reviews of all plans for improvement are conducted by the appropriate level of management to ensure delivery of improvement.

Please see the Glossary for a definition of the term 'performance'.

CLARIFICATION

This indicator pulls together the Plan, Do, Check, Act, cycle for service delivery processes. Other indicators examined the need for understanding the customer requirements, having the processes and procedures in place to deliver against agreed levels of performance. This indicator requires the linkage of improvement activity with a review of results against agreed service levels.

Improvement plans do not have to be formal plans. However an organisation needs to demonstrate to an assessor:

- · why improvements are being made;
- · what is expected from the improvement;
- $\boldsymbol{\cdot}$ $\,$ evidence of some review to establish that the improvement worked.

One of the best ways to be able to demonstrate this to an assessor would be to maintain some form of written record.

Ref: ISO9001

EXAMPLES

- Improvements to processes relating to specific contracts are made.
 These are reviewed and if relevant, implemented company wide.
- The review of processes as part of regular customer meetings with changes being made as required.

GOOD PRACTICE

 Specific improvement projects are established with a project owner; for example a licensing coordinator manages licence renewals. 2.5 An SIA approved contractor monitors internal processes, taking appropriate action to make improvements, where necessary

2.5.2

Procedures for the implementation of changes are in place and used

REQUIRED ACHIEVEMENT LEVEL

- 1. Changes are implemented according to procedures, which include:
 - · communicating the change to the relevant staff;
 - training, where appropriate, taking place prior to the change being implemented;
 - · maintenance of document version control;
 - · monitoring progress of change to ensure delivery of improvement.

IMPROVEMENT LEVEL 1

The procedures to implement change are clear and designed to maximise the effectiveness of the change.

These include:

- · reviewing the introduction of technology to improve procedures;
- conducting pilots or other means of controlling the implementation of change;
- · communicating the change to all appropriate stakeholders;
- reviewing how the change was managed to identify improvements to the procedures.

These procedures are used for all implemented changes.

CLARIFICATION

Where processes have been changed the applicant organisation must be able to evidence that they have managed the change in a way appropriate to the size, impact and importance of the change. This would involve taking consideration of the elements listed in the ACS self-assessment workbook.

Ref: ISO9001

EXAMPLES

Refers to maintaining document version control as part of the procedures for the implementation of change. This links with section 5.1.1 which asks the organisation to assess how well version control in general is managed.

2.6 An SIA approved contractor measures and improves performance against key customer and consumer indicators

2.6.1

The organisation regularly reviews performance against service level agreements and/or key customer performance indicators

This indicator links to:

- 2.3.3 The management of contractual arrangements with the customer has been defined and implemented.
- 2.4.1 Use of subcontractors is agreed with customers and subject to defined quality assurance procedures.
- 2.4.2 Effective customer and consumer performance indicators and service level agreements have been established.
- · 2.4.4 All procedures are regularly reviewed.
- 2.5.1 Plans for improvement to site-based activity exist
- 2.5.2 Procedures for the implementation of changes are in place and used
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- On a contract by contract basis service delivery is reviewed against key customer performance measures that include the suitability of the security solution.
- Measures cover all key aspects of the services provided to customers to demonstrate how well the organisation and staff deliver to customer requirements.
- Reasons for actual and perceived shortfalls in performance are understood
- 4. Some results show positive trends and/or sustained good performance for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Performance against service level agreements and key customer performance indicators is regularly reviewed.

Measures cover all key aspects of the services provided to customers.

The results show positive trends and/or sustained good performance for the period of time the measure has been in place.

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

Action plans are in place where performance falls below target.

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement.

Please see the **Glossary** for a definition of the terms 'key', 'key performance indicator', 'performance' and 'service level agreement'.

2.6 An SIA approved contractor measures and improves performance against key customer and consumer indicators

CLARIFICATION

This is a results indicator where the applicant organisation can provide quantitative measures relating to service delivery. Measures should be in place to demonstrate how well the organisation and staff deliver to customer requirements.

Without quantitative measures in place the applicant organisation cannot demonstrate positive trends and/or sustained good performance or improvements in performance.

An aim of this indicator is to enable the approved contractor to inform the customer whether the contracted service is sufficient to mitigate threats and risks to the customer's assets. Measures (key customer performance indicators) should include security outputs, for example:

- if the purpose of the contract it to keep track of stock, maintain security and avoid staff theft by restricting access to stock and using CCTV, then number of thefts should be measured. Should the service meet agreed arrangements but fail to address the frequency of thefts, then the approved contractor should make representation to the customer:
- for a contract to provide door supervision: if the purpose of the
 contract is to reduce the number of violent incidents, then the
 frequency of these incidents should be measured. It could be that
 the contract is for one door supervisor and the performance of the
 door supervisor is acceptable but it is not having the desired results,
 that is, to reduce the number of incidents to an acceptable level. It
 could be that more than one door supervisor is required to achieve
 the intended aim of the contract. Should the service meet agreed
 arrangements but fail to address the frequency of violent incidents,
 then the approved contractor should make representation to
 the customer.

However, there may be instances where the approved contractor may not have access to this data or the customer fails to engage in a manner that enables the inclusion of these types of measures. In this instance the approved contractor should be able to evidence this and evidence will be accepted as justification to deviate from the required achievement level.

Ref: ISO9001

EXAMPLES

- · Performance indicators within a service level agreement.
- · Compliments and complaints.
- · Duration of relationship.
- · Customer retention.
- · New and lost business.
- · Effective recommendation.

Criterion 3: **Commercial relationship** management



An SIA approved contractor promotes robust and transparent commercial relationships with its customers, consumers and suppliers, founded on mutual trust and respect.

Note:

 Examples of the types of evidence you may consider sufficient to meet the ACS standard are given wherever possible.

This criterion is composed of five sub-criteria

The SIA approved contractor can demonstrate that it:

- 3.1 implements responsible trading practices in its procurement of goods and services;
- 3.2 offers professional advice to its to customers and potential customers on appropriate services;
- 3.3 manages customer relationships in a professional manner;
- 3.4 manages consumer relationships in a professional manner;
- 3.5 measures and improves customer perceptions of its organisation, its people and its services.

3.1.1

Effective purchasing procedures are implemented

This indicator links to:

 2.4.1 Use of subcontractors is agreed with customers and subject to defined quality assurance procedures

REQUIRED ACHIEVEMENT LEVEL

- 1. Purchasing is conducted in accordance with procedures that:
 - clearly define specifications/requirements for all purchases that impact the quality of service delivery, and which are appropriate for the size/type of purchase being made;
 - · specifies who can make or authorise these purchases;
 - · is understood by all relevant staff.

Preferred suppliers

- 2. Purchases of items that impact service delivery are only made from preferred suppliers.
- 3. Preferred suppliers have been selected based on a demonstrated ability to meet all quality, cost and service requirements.
- 4. The list of preferred suppliers is actively maintained and updated on a regular basis, based upon a review of supplier performance, which includes staff feedback.

Consultants

- 5. Where the organisation is using a consultant to support the management of the organisation's ACS application and approval, additional checks are in place to ensure the consultant's suitability, including:
 - · positive feedback on the consultant's track record and references;
 - · knowledge of the private security industry;
 - reviewing the consultant's continuous professional development and how s/he keeps up to date with the industry.

IMPROVEMENT LEVEL 1

Purchasing is conducted in accordance with a policy that identifies the organisation's clear intention to address environmental, social and ethical issues.

Preferred suppliers are selected on the basis that their approach to business and policies are consistent with the organisation's. For example:

- · child labour;
- · forced labour;
- · health and safety;
- · discrimination;
- · freedom of association;
- · fair pay for staff;
- · anti-corruption;
- · environmental impact;
- · working hours.

IMPROVEMENT LEVEL 2

Suppliers are audited against the organisation's ethical purchasing policy.

Please see the Glossary for a definition of the terms 'knowledge' and 'supplier'.

CLARIFICATION

Purchasing procedures should be in place and be appropriate to both the size and impact of the purchase. However it is the items purchased that impact on the quality of security service that are important to the ACS standard. There should be selection criteria for suppliers based on quality/value rather than pure cost. (This applies equally to services purchased such as management consultancy, the supply of labour from agencies or from other security businesses, and the use of subcontractors.) Applicant organisations should be able to demonstrate that purchases represent value for money.

Where outsourced services are provided, it must be evidenced that the applicant organisation has maintained accountability for the application of standards and procedures, for example, for outsourced security screening and vetting, the standard specified should be BS7858 or equivalent. Where a service is subcontracted, the applicant/ACS business must carry out, and be able to demonstrate, due diligence to ensure required standards are met, even where the service is subcontracted to another approved contractor. If labour is sourced from an approved contractor, the contractor cannot assume that those individuals have been screened to the relevant standard, and so the contractor should satisfy itself that the individuals supplied are suitable.

Where labour is bought in, due diligence should also include compliance with all the relevant tax and national insurance legislation concerning people they deploy supply. Refer to 4.2.1.

There should be processes in place to ensure the effective monitoring of supplier performance, although the level of application should be appropriate to usage. For example, it would be expected that the monitoring of any outsourced supplier (such as a subcontractor) is more closely monitored than that of a stationery supplier. Equally the purchase of management consultancy should be reviewed to ensure that deliverables have been identified and realised. There should also be clear procedures in place for the handling of supplier issues and poor performance. Again this should be relevant to the size and impact of the product supplied.

Note: approved contractors that are subsidiaries within a group structure, may share services (such as human resources, screening, payroll) with other subsidiaries or the parent organisation within the same group. In this scenario, there should be clear contracts or service level agreements that set out the nature of the service, the obligations and accountabilities etc.

Larger applicant organisations may use national suppliers and would therefore need to have more structured reviews of supplier performance than smaller applicant organisations. It is likely that there are more levels of approval based on value of purchase, understanding and application.

The relationship between smaller applicant organisations and their suppliers is likely to be more informal, with:

- · more local relationships being developed;
- · selection processes being less rigorous.

Approval levels within smaller organisations are more likely to be less complex, often at a single level. However there should still be evidence that approval has taken place.

Decisions relating to the selection of suppliers are often made on a convenience basis in smaller organisations. In these circumstances there should be evidence of processes to reach that decision rather than a formal purchasing policy. Some small companies only need to make one-off purchases, such as on an ad hoc basis for repairs, service and breakages and therefore the selection procedures may reflect this. Whatever the approach to the selection of suppliers, it should be applied on all occasions.

Ref: ISO9001

EXAMPLES

- · Outsourcing of specific tasks such as screening.
- Selection criteria could include staying with the supplier known to the organisation who has historically delivered the product and the service required, to the specified standard.
- When purchasing office technology, consideration is given to product energy rating and efficiency and selection made on this basis rather than cost.

3.1.2

The organisation works in partnership with its suppliers to improve performance

REQUIRED ACHIEVEMENT LEVEL

- 1. Performance requirements, that is, specifications delivery requirements, are determined and agreed with suppliers.
- 2. Discussions take place to review suppliers' performance against the agreed requirements.
- 3. Suppliers are given feedback on their performance.
- 4. Suppliers are paid within the contractually agreed timescales.

IMPROVEMENT LEVEL 1

Regular meetings are conducted with key suppliers to review performance against targets.

Where performance is below standard, actions for improvement, including timescales, are agreed.

IMPROVEMENT LEVEL 2

Actions arising from review meetings are documented with defined actions and timescales for resolution.

The organisation works with suppliers to improve performance.

All levels of the organisation are given the opportunity to work with suppliers and customers to improve processes.

Please see the ${\it Glossary}$ for a definition of the term 'partnership', 'performance' and 'supplier'.

CLARIFICATION

The applicant organisation must be clear as to its requirements from any supplier including labour providers/subcontractors. This can be as simple as agreeing delivery within a set time frame or having something constructed to specifications. Provided that these are appropriate for the size and nature of the request then they would be applicable to achieve the required level. The level of discussion with the suppliers including labour providers/ subcontractors to review their performance should be in line with the size and nature of the goods supplied.

Where an organisation has outsourced its control room, then the provider of that facility is considered to be a supplier. The organisation should receive daily reports on the performance of the outsourced control room against agreed standards.

Note: approved contractors that are subsidiaries within a group structure, may share services (such as human resources, screening, payroll) with other subsidiaries or the parent organisation within the same group. In this scenario, there should be clear contracts or service level agreements and there should still be a review of performance.

Ref: ISO9001

EXAMPLES

Applicant organisations should be encouraged to build a relationship with their suppliers and work together to improve performance where necessary. An example of this would be to work with a recruitment agency to ensure that the advertising and sifting process is adequate to reduce the number of unsuitable job applicants.

Where organisations do not have the expertise to select suppliers effectively, for example, consultants, independent advice should be sought from a relevant body, for example, Chamber of Commerce.

- CVIT companies work closely with vehicle manufacturers to ensure vehicles are fit for purpose.
- Some companies might work with IT suppliers to ensure packages are specifically tailored to meet their specific needs.
- DS companies have worked with uniform suppliers to develop arm bands to hold the SIA licence.
- Consultants are given a clear brief as to what they are expected to deliver, including time-targeted outcomes.

3.2 An SIA approved contractor offers professional advice to its to customers and potential customers on appropriate services

3.2.1

Professional advice is offered to customers on the best approach to meet their needs

This indicator links to:

 3.5.1 The organisation regularly reviews performance against responses from customer opinion gathering.

REQUIRED ACHIEVEMENT LEVEL

- Discussions are held with potential customers on how best to meet their needs.
- 2. These discussions are conducted by appropriate, competent personnel to ensure the right advice is given.
- 3. When a customer specifies a level of security that is not appropriate, then the customer is told of the implications.

IMPROVEMENT LEVEL 1

Discussions are held with existing customers when contracts are due for renewal to ensure the service offered is still the most appropriate.

All discussions focus on

- · ensuring the advice is relevant to customer needs;
- · developing the service offered to the customer.

Improvements to the process for offering advice are made, based on customer feedback, where appropriate

IMPROVEMENT LEVEL 2

Any changes to the recommendations made are explained and documented.

Customers are encouraged to review their security requirements regularly. The business offers appropriate assistance to do this.

The organisation highlights defects in the customer's security arrangements to them.

Please see the Glossary for a definition of the terms 'approach' and 'supplier'.

CLARIFICATION

It is possible that for a specific reason, usually financial, the customer does not accept the proposals. The applicant organisation should have procedures in place to ensure that the advice and any proposed changes are recorded and supplied to the customer. This is of particular importance in terms of meeting service delivery requirements, staff member safety, and public safety.

The organisation should also be aware of and encourage advising the customer on such things as the introduction of technology both in support areas and those areas linked to service delivery. Advice to customers should only be provided by personnel who are sufficiently experienced to do so.

Ref: ISO9001

3.2 An SIA approved contractor offers professional advice to its to customers and potential customers on appropriate services

3.2.2

The organisation implements an effective approach to responding to tenders/request for services

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a process in place to respond to requests for service.
- 2. The process includes:
 - undertaking pre-contract site visits and risk assessment/s, which where appropriate, take account of any TUPE requirements;
 - · understanding the customer requirements;
 - · demonstrating a fit and proper management.
- 3. Selected people are responsible for the tendering process.
- 4. Lessons learned from all bids are fed back into the process in the form of improvements.
- 5. There is a process in place to respond to short notice requirements of existing and new/potential customers.

IMPROVEMENT LEVEL 1

A feasibility study is conducted prior to the commencement of a contract which evaluates environmental/technical challenges and considerations.

IMPROVEMENT LEVEL 2

ACS benchmarking and other relevant data is used to support tender submissions and requests to supply services.

Please see the Glossary for a definition of the terms 'approach' and 'benchmarking'.

CLARIFICATION

The assessor will expect to see company and other information to hand and utilised as part of the tender process. There should be evidence of how discussions with prospective and new customers concerning requirements and risk assessments are fed into tenders and contracts respectively.

It is possible in the vehicle immobilisation sector that there is no tendering process, especially where there is no fee paid for patrolling the site or there is a lack of competition in the area.

Within larger organisations it is possible that the tendering process is conducted by a special group of people based on strategic decisions made as part of the business planning process. Smaller organisations should have an approach to preparing tenders that minimises the effort involved in putting one together and takes account of the lessons learned from previous successful and unsuccessful tenders. It is expected that this would involve the use of templates etc. which can be traced for amendments, demonstrating how lessons learnt are fed back into the process.

The review of successful and unsuccessful tenders should be evidenced, and how the lessons learned are fed back as improvements to the process explored. The response to tender/request for service should be founded on compliance with employment obligations.

Ref: ISO9001

3.2 An SIA approved contractor offers professional advice to its to customers and potential customers on appropriate services

3.2.3

The organisation implements a process for obtaining new business

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a well-defined process for obtaining new business which is:
 - · based around ethical behaviour and integrity;
 - · clearly linked to the approach to business of the organisation;
 - · consistent with the plans for the business.

In canvassing and tendering for business, the organisation highlights the benefits to the customer and to public safety, of using SIA approved contractors.

IMPROVEMENT LEVEL 1

The company makes use of networking at industry events, local business forums and/or sector specific groups, for example, to obtain new business.

IMPROVEMENT LEVEL 2

The approved contractor's online profile is monitored to ensure that it reflects the organisation's sales proposition in the tender process.

CLARIFICATION

There should be an approach in place for obtaining new business that is planned, with the type of customer being identified as part of the planning process. The approach should then be developed in a way appropriate to the target audience, based around ethical behaviour and integrity.

Within smaller organisations obtaining new business may be more opportunistic but the assessor should still see evidence of a planned and targeted customer base to ensure that service delivery can be attained. It is possible that the strategy of the organisation is not to go out and seek new customers/sectors. All that may be in evidence is a process for extending contracts with existing customers. This should be tested through the review of the plan for the business. There should be a process for how the organisation intends to achieve its stated aim.

Ref: ISO9001

GOOD PRACTICE

- Networking, especially with other agencies, for example, working with local crime reduction groups, or local business groups.
- · Being on approved supplier lists.
- Exploiting potential with customers who have additional or future security needs, for example, identifying new construction sites, following up with tenant customers.
- Developing links with local traders offering them a discount to create a win-win situation.
- Care must be taken to ensure that no false or misleading claims are made with respect to memberships, certifications, approvals, accreditations, and/or affiliation on promotional material, including websites. Similarly, inaccurate claims of previous experience, history, or clients presenting a distorted impression of the company's ability to deliver must be avoided.

3.3.1

The organisation implements a process for customer site visits

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a process with supporting procedures for site visits to all customers, which details:
 - · the frequency of visits;
 - · the method of confirming the visits have taken place.
- 2. Customer site visits are conducted regularly and have a clear purpose.

IMPROVEMENT LEVEL 1

Every customer has a pre-designated owner who is responsible and accountable for the successful management of that account.

Senior management regularly visit customer sites and there is a method of confirming the visits have taken place.

Please see the Glossary for a definition of the term 'supervisor'.

CLARIFICATION

Where multiple sites are covered then the ACS standard requires that a supervisor is responsible for making ongoing visits to the sites within the scope of their responsibility. The regularity of the visits should be determined by customer requirements.

Within some sectors, for example, vehicle immobilisers and CVIT, it is appropriate for site visits to be conducted as part of the initial visit at the start of a contract. Further site visits are made only at the request of the customer. Where organisations feel that this is appropriate to their organisation, they must provide evidence to the assessor to justify this approach.

In certain circumstances, such as within the vehicle immobilisation sector, there may be a large number of customer sites involved, however, it is not acceptable that any site is not visited.

The purpose of any site visit should be clearly defined.

3.3.2

The organisation implements a complaints procedure

REQUIRED ACHIEVEMENT LEVEL

- 1. All complaints are:
 - · recorded;
 - · handled robustly and objectively;
 - · analysed to look for patterns.
- Complaints are responded to within target times or deviations are justified.
- 3. Where relevant, all those who complain receive an individual response to their complaint.
- 4. Information on complaints is reviewed by the leaders of the organisation and improvements are implemented.

IMPROVEMENT LEVEL 1

Consumer complaints are separated from customer complaints.

Efforts are made to ensure all complaints are resolved to the satisfaction of the customer and, where relevant, the consumer.

Information on complaints received and their resolution is made available on request to external stakeholders.

IMPROVEMENT LEVEL 2

The company has used ISO10002 during the development of its complaints handling procedures.

Information on complaints received and their resolution, for example, including lessons learnt, is made publicly available, for example, on the organisation's website, in brochures and newsletters.

Complaints are recorded and analysed (including comparing good and poor performance) to look for patterns.

CLARIFICATION

The contractor should be able to define what they consider to be a complaint, for example, is it any level of dissatisfaction? Can it be oral? Does it have to be formally submitted?

Complaints from both customers and consumers should be recorded effectively. The manner in which the records are kept should be appropriate to the size of the applicant organisation. It is not necessary to have a computer-based system to record complaints. Whatever method is used, manual or automated, it should facilitate easy analysis of the type and nature of the complaints. Any patterns or trends should be monitored and reviewed.

The organisation should be able to provide examples of complaints, including details of what action has been taken and how processes have changed as a result. Unless complaints are always handled by the highest level of authority, there should always be procedures in place for escalating the non-resolution of complaints.

People should be able to make a complaint in a way that is appropriate, for example, by telephone, in person, in writing, via the website, via the customer, via email. There should be time targets for response, and the organisation should monitor this. Complainants should be followed up to ascertain whether they were satisfied with the way the complaint was handled and whether they are satisfied with outcome.

Ref: ISO9001

GOOD PRACTICE

- · The complaints process is widely publicised.
- The company has used ISO10002 during the development of its complaints handling procedures.

3.4.1

The organisation implements an approach to consumer contact

This indicator links to:

- 2.4.2 Effective customer and consumer performance indicators and service level agreements have been established.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Front line staff are given instructions on how to deal effectively with the consumer.
- 2. The organisation is aware of consumer opinion through the number of commendations or complaints, including items of positive or negative feedback it receives via its customers.
- The organisation gathers other information, in addition to commendations or complaints (including examples of positive or negative feedback), from its customers regarding the consumer's view of them.

IMPROVEMENT LEVEL 1

The organisation invites feedback directly from the consumer.

All staff are given ongoing instructions on the correct way to deal effectively with the consumer.

Staff compliance with instructions is monitored.

IMPROVEMENT LEVEL 2

Consumer opinion of the organisation is valued.

The organisation actively gathers information from a number of sources regarding the consumer's view of them.

The organisation actively communicates with the consumer to promote a positive image of itself and the sector/s in which it operates.

Please see the Glossary for a definition of the terms 'approach' and 'consumer'.

CLARIFICATION

Consumer feedback is generally received via the customer as part of the complaints procedures as indicated in indicator 3.3.2.

SIA licence training, especially for door supervisors and vehicle immobilisation, includes a section on dealing with the consumer, which is more relevant to indicator 2.3.2. Some sectors, such as CVIT, may not deal with consumers at the point of service delivery and internal training focuses on making staff more diligent and more aware of the threats that exist on an everyday basis. This would be considered as an approach to the management of consumer contact.

Within the CVIT sector, guards do not want to interact with the public, due to the nature of their business. Any complaints received generally relate to specific incidents such as car and vehicle accidents. These should still be recorded and analysed for patterns. Vehicle immobilisation companies, due to the nature of the business, are more likely to receive complaints directly from the consumer. Vehicle immobilisers would have contact with consumers on a regular basis and there should be instructions given as to how to handle consumers and the feedback gained.

Most of the sectors will have no planned contact with consumers to solicit opinions about the service they deliver. Complaints may be received by consumers or consumer representatives. This includes, for example, complaints that come via the SIA, Citizens Advice Bureau. Consumer feedback may be sought in a pro-active manner (for example, through use of the Well Driven? contact point, company website www.welldriven.org).

GOOD PRACTICE

- An applicant organisation analyses separately the complaints received from consumers and takes specific action to address any issues.
- · Proactively seek consumer feedback.
- Organisations may be able to exploit existing customer surveys to include feedback on security.
- Complaints from consumer representatives are managed as part of the organisation's complaints process.

3.5 An SIA approved contractor measures and improves customer perceptions of its organisation, its people and its services

3.5.1

The organisation regularly reviews performance against responses from customer opinion gathering

This indicator links to:

- •1.2.1 Key stakeholders are aware of the organisation's overall approach to business.
- 2.3.1 The organisation meets its customers' requirements.
- · 2.4.4 All procedures are regularly reviewed.
- 3.2.1 Professional advice is offered to customers on the best approach to meet their needs.
- 3.3.2 A complaints procedure is in place and implemented.
- · 3.4.1 An approach to consumer contact is implemented.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Customer opinions are regularly obtained and reviewed on a customer by customer basis.
- Reasons for actual and perceived shortfalls in performance are understood.
- 3. Customer opinion has improved following changes made as a result of feedback.
- 4. Some results show positive trends and/or sustained good performance for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Performance against customer perception measures is regularly reviewed. Measures cover all aspects of the services provided to customers.

Reasons for shortfalls in performance are understood.

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

The results of external comparisons are used for promoting learning and improvement.

Please see the Glossary for a definition of the terms 'measures and indicators' and 'performance'.

3.5 An SIA approved contractor measures and improves customer perceptions of its organisation, its people and its services

CLARIFICATION

Opinion gathering to deliver quantitative measures does not have to be a formal annual quality questionnaire; it can be as simple as a series of set questions to be discussed with all customers, with the results being consolidated into percentages or numbers for the organisation.

Some organisations will have sophisticated systems for doing this, whereas other organisations may gather information on an informal basis.

Organisations should be able to provide examples of feedback from customers, including an indication of how the organisation has responded, and any action taken as a result.

Ref: ISO9001

EXAMPLES

- · Capability and behaviour of staff.
- · Value for money.
- · Reliability.
- · Responsiveness.
- · Flexibility.
- · Communication.
- · Accessibility.
- · Intention to renew contract.
- · Willingness to recommend.

Criterion 4: Financial management



An SIA approved contractor is financially viable with sufficient resources to meet its current and future obligations.

Note:

- There are elements within this criterion which cover the financial processes
 of a business and the legislative requirements of running a payroll system.
 Assessors are not expected to be familiar with all of these aspects to enable
 an in-depth examination. It is the responsibility of the applicant organisation
 to provide a truthful assessment of their performance and the assessor's
 role is one of verification. As such the assessor should plan to ask targeted
 questions to elicit information about the applicant's approaches.
- 2. The assessor should familiarise themselves with the key points of some of the legislative requirements. The Gov.UK website (www.gov.uk/) is a trusted source of information relevant to many of the legislative requirements within the ACS standard.

This criterion is composed of four sub-criteria

The SIA approved contractor can demonstrate that it:

- 4.1 has sufficient and suitable financial resources to manage its financial obligations;
- $4.2\ uses$ robust processes to manage finances and associated risks;
- 4.3 understands the market place and has financial plans to meet or change its strategic direction;
- 4.4 measures and improves performance against key financial indicators.

4.1 An SIA approved contractor has sufficient and suitable financial resources to manage its financial obligations

4.1.1

The organisation has the funding available to achieve its plan for the business

This indicator links to:

- •1.1.1 The organisation has a clear approach to business that is acted on and communicated to all staff.
- 1.1.3 A plan for the business exists with an effective review schedule.

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a clear link between the financial plans for the business and related activity such as marketing, service delivery and business improvement.
- There are no outstanding county court judgments or Scottish Decrees against the organisation or its directors, or people with significant control.
- 3. Where required, the organisation submits annual accounts and a confirmation statement to Companies House within the specified time limits.
- 4. The organisation has financial forecasts/projections for all aspects of the business.
- 5. There is clear information about how the organisations finances are managed.
- The organisation is aware of its credit rating and understands how this has been generated. This is commensurate with its plans for the business.
- 7. The organisation maintains a recording system identifying and verifying all income streams.

IMPROVEMENT LEVEL 1

The organisation proactively makes its staff aware of relevant financial aspects, including the financial performance of the organisation.

IMPROVEMENT LEVEL 2

The organisation enters into an open book approach with customers in relation to its finances.

The organisation promotes access to accounts by independently making these readily accessible to the public.

The organisation has its accounts and financial statements audited by an independent certified public accountant (where appropriate to the size and structure of the organisation).

4.1 An SIA approved contractor has sufficient and suitable financial resources to manage its financial obligations

CLARIFICATION

It is not expected that an assessor would examine the accounts in detail. The purpose of this indicator is to ensure that the applicant organisation is able to demonstrate that it has been operating within the statutory requirements. Where an organisation is registrable for VAT, the organisation should evidence that it is VAT registered and that VAT payments have been made to the HMRC as and when they were due for at least 12 months.

In larger organisations the assessor may wish to speak to the finance director for this information.

Applicant organisations must demonstrate that they have the funding to meet their business plan and commitments. The assessor will not be required to examine the financial arrangements in detail. The applicant organisation should be able to satisfy the assessor that financial arrangements are in place.

Companies should be able to confirm income streams, profitable and non-profitable contracts, overhead analysis, loans and overdraft arrangements, factoring, shareholders, investments, budgets and forecasts.

The organisation must meet their debts as and when they fall due. If not, this indicates that the company is insolvent and falls below ACS requirements. These instances may be mitigated where the organisation makes use of formal (contract) third party guarantees. In this case, it is reasonable to expect the applicant business to provide evidence of that guarantee.

It is important that purchasers can be reasonably satisfied that an approved contractor is a stable and healthy organisation financially. Companies will need to demonstrate that finances are recorded, identifiable and legitimate.

Approved contractors will need to be aware of their organisational credit rating. A poor credit rating may not necessarily be a problem in itself, provided that the organisation can justify the rating and demonstrate that it is taking steps to remedy poor creditworthiness. An approved contractor must supply all documents to Companies House, as required of it by law, on time.

Level 2:

In promoting access to its accounts, the organisation should go beyond relying on companies house records and ensure these are readily accessible to the public, such as by publishing full accounts on its public engagement platforms.

4.1 An SIA approved contractor has sufficient and suitable financial resources to manage its financial obligations

EXAMPLES

- · Business bank accounts.
- · Invoices.
- · Receipts.
- · Payroll to cross reference with bank accounts.
- · Credit ratings.
- · Management/KPI reviews/meeting minutes.
- · Value of contracts/% of profits.
- · Tenders.
- · CSF comparison from previous years.
- Consider businesses using contracts as a loss leader, ok for larger businesses but not practical for small/micro business.
- · Third party guarantees.
- · Factoring agreements.
- · Loans.

Level 1:

- The organisation updates staff on financial performance through staff newsletters or briefings.
- Further information on Good practice in annual reports can be found at: https://www.nao.org.uk/wp-content/uploads/2019/05/Goodpractice-in-annual-reports-2107-2018.pdf

Level 2:

- $\boldsymbol{\cdot}$ The organisation publishes full accounts clearly on its website.
- The accounts clearly set out Where the organisation spends its money, explanation of budgets, comprehensive overview of key financial indicators, analysis of financial statements, detailed analysis of financial performance, analysis of sources of income.

4.2.1

Clear and effective management of the payroll can be evidenced

This indicator links to:

- 6.1.3 Terms and conditions of employment exist which are implemented and communicated.
- 6.4.2 The organisation complies with current legislation on staff wages.

REQUIRED ACHIEVEMENT LEVEL

The organisation complies with all the relevant tax and national insurance legislation concerning people they deploy.

This requires complying with all of the HMRC guidance, including operating real time information correctly and on time.

All the organisation's people must be employees unless the organisation can evidence otherwise. For exceptions see 'People not on the payroll' points 10 and 11 below.

- 1. Payroll is managed to legislative standards.
- 2. Tax codes are checked and correctly applied in a timely manner and in compliance with HMRC guidance.
- 3. Staff are paid through a PAYE compliant system.
- 4. People who are subject to PAYE receive full employment rights of an employee.
- 5. Month-end and year-end procedures are run within deadlines.
- 6. There is a direct link between the hours worked and the wages paid:
 - this also applies where staff are paid by others, for example, a factoring company, an umbrella payroll company, an agency, or subcontractor;
 - · organisations do not make unlawful deductions from staff pay.
- 7. Payments to staff are made on time within the contractual payment cycle.
 - where payments are made to labour providers/agencies (who then pay individuals), the business should undertake due diligence to ensure individuals are paid within an agreed period.
- 8. All queries relating to payroll are handled effectively and lessons learned are fed back to improve procedures.
- 9. There is clear information for staff on their pay, deductions and the payroll system in use.

People not on the payroll

- 10. Approved contractors show due diligence in determining or identifying the correct employment status based on actual practice, and that this is reflected in the completion of the CEST tool for each role.
- 11. Where individuals are determined to be self-employed (using the CEST tool), Approved contractors must demonstrate that the agency legislation doesn't apply. Otherwise, the operatives will be agency workers and all remuneration received for services provided will be subject to PAYE/National Insurance. Further information in respect of the agency legislation applying can be found here, and when it doesn't apply: here.

IMPROVEMENT LEVEL 1

Staff are paid through an automated payroll system.

IMPROVEMENT LEVEL 2

Electronic pay slips are offered to staff.

There is a structured salary scheme for all staff, which promotes fair and consistent pay to security operatives, and avoids differences in pay arising from specific customer contract negotiations.

The organisation makes efforts to ensure that differences in salary are determined by an objective assessment of roles, responsibilities and performance, that is, linked to the internal structure of the organisation, and not dictated by customer contracts.

Please see the Glossary for a definition of the term 'labour provider'.

CLARIFICATION

Where applicants buy in labour from other organisations (such as other security companies, or agencies) to enable them to deliver their contracts, the applicant must carry our sufficient due diligence to be able to demonstrate that the standard is being met throughout the supply chain (All of the requirements that apply to employees, also apply to those sourced from other organisations.). This is likely to require some form of supply chain audit including periodic on-site sampling or testing.

Applicants should also refer to the requirements of 3.1.1. Requirements around purchasing and preferred suppliers applies.

Similarly where applicants sub-contract all or part of their services to other organisations, then they should carry out sufficient due diligence to provide confidence that the sub-contractor is operating to the ACS standard. Even where the sub-contractor is an approved contractor, some due diligence would be required, although this may be more limited, depending on the risk.

Applicants companies should also refer to the requirements of 2.4.1.

All applicant organisations must evidence that they adhere to all relevant legal requirements such as PAYE, National Insurance etc.

The assessor will track a selection of staff through the payroll system to ensure that the requirement is met. Any deductions from pay must be clear to staff

It is the responsibility of an approved contractor to correctly determine the employment status of all its workers.

When defining a role as either employed or self-employed, approved contractors must comply with all relevant HMRC guidance, including:

- Income Tax (Earnings and Pensions) Act 2003 (ITEPA).

According to HMRC, individual security operatives (who do not employ others) are not bona fide subcontractors taking commercial responsibilities if supplying only their own labour. Such operatives, no matter how short or temporary the contract, are usually operating under the direction supervision and control of the approved contractor and should be included for PAYE.

CLARIFICATION (continued)

Approved contractors will need to show the due diligence they have taken in determining the correct employment status of their operatives by looking at the whole working arrangements, including what happens in practise. This must be reflected in the completion of the CEST tool for each role.

People who are subject to PAYE must receive full employment rights of an employee and could include sole traders not on the payroll but engaged via a payroll company but subject to PAYE. Should the organisation act as an intermediary, then those subject to PAYE should receive full employment rights.

More information can be obtained online from www.gov.uk/guidance/check-employment-status-for-tax and check employment status for tax. If still unsure, the organisation should contact its local HMRC status inspector for guidance.

Some insurers offer policies that cover organisations for the liabilities of HRMC compliance inspections and the costs of defending against them, however these are not a requirement of the ACS standard.

Deductions

Where the business offers other services or benefits to staff and/or has arrangements, such as for a charge for the hire of uniform, they may make a charge to staff, and this may appear as a deduction on their pay slip. How the business does this is for the business to decide, but the business must ensure that staff fully understand what this means to them. This should be part of their agreed contract/terms and conditions, and should be fully documented (both the agreement and the way it appears on the pay slip). The business must be able to evidence this.

Note: Before deductions from pay are made it, should be benchmarked against national minimum wage rates. If an employee has paid for certain things related to their job out of their wages, the employer should deduct these payments to determine if the actual pay rate is above/below the national minimum wage. It makes no difference whether or not the employee has agreed to the deduction. In any event; pay after these deductions should/must not fall below the National Minimum Wage.

These payments/deductions are:

- payments for the employer's own use or benefit for example, if the employee has paid for travel between work sites;
- payments for things the employee needs for the job but are not refunded for – such as tools, uniform or equipment, training;
- benefits such as medical insurance/loss of earnings insurance/life assurance

All other payments made out of the employee's wages, such as tax and National Insurance, and certain accommodation expenses where applicable should be included in the employers' calculations when determining the national minimum wage has been paid.

EXAMPLES

Example (charge for SIA licence)

 Security Industry Authority – Specific workers must by law hold a licence. It is the worker's responsibility to ensure they obtain the licence, and their responsibility to pay the fee. If the employer pays the fee and then seeks repayment from the worker, national minimum wage pay will not be reduced (regardless of whether the charge is made by either a payment or a deduction).

EXAMPLES (continued)

Explanation for qualification charges

- A charge for something, such as a qualification, which is required as a pre-requisite for obtaining employment, does not reduce national minimum wage pay.
- However, if the requirement is imposed by the employer and arises from the employment itself, then any charge passed on to the worker would be considered an expense (NMWM11100), and would reduce national minimum wage pay.

Further information can be found at: www.gov.uk/hmrc-internal-manuals/national-minimum-wage-manual/nmwm11230

Deduction for uniforms

- As a condition of employment an employer may require workers to wear specific uniforms. If the employer requires the worker to purchase specific items, such as overalls, then any deductions made from pay or payments made to the employer in respect of those items will always reduce national minimum wage pay.
- If an employer provides a uniform, any charge the employer makes for ordinary wear and tear to that uniform will reduce the worker's national minimum wage pay

Further information can be found at: www.gov.uk/hmrc-internal-manuals/national-minimum-wage-manual/nmwm11220

Use of payroll companies

The following lists due diligence that contractors should carry out when engaging a payroll company.

There are two likely scenarios:

- 1. ABC Ltd outsources its payroll function to DEF Ltd but ABC continues to be the employer. In which case obtain:
 - name, address, PAYE reference & VAT number for DEF Ltd along with number of employees on outsourced payroll;
 - · director or controlling individual of DEF...name, address etc.;
 - the circumstances giving rise to ABC engaging DEF;
 - details of checks ABC has conducted to ensure that DEF is a bona fide business;
 - · references sought?;
 - · what industry experience does DEF have?;
 - \cdot is there a contract for payroll provision?;
 - status treatment of workers with DEF employed or self-employed?;
 - · details of DEF's fee structure;
 - what exactly does ABC pay for? How is money transferred? What is the frequency?;
 - copy invoice from DEF ensuring VAT number and bank account details are shown;

EXAMPLES (continued)

- · copy pay slips;
- checks by ABC Ltd that DEF Ltd is making correct returns to HMRC and that employee's tax and National Insurance Contributions etc. are remitted correctly;
- consequences if due diligence is not conducted responsibility for non-compliance by DEF can be transferred to ABC under s687 ITEPA 2003.
- 2. ABC Ltd outsources its payroll and transfers its workers to DEF Ltd who now becomes the employer. In which case obtain the same as 1. in addition to the following:
 - were the workers transferred under Transfer of Undertakings Protection of Employment (TUPE)?;
 - · documentation;
 - which business interviews, hires and fires workers. Who do the workers contact if sick or for any other HR matter?;
 - · who do the workers believe is the employer?;
 - · copy pay slips who is shown as the employer?;
 - what to check for when reviewing pay slips, for example, does PAYE reference match the name of the company?

In short, you are seeking to establish who in reality is the employer, so be subtle about this line of enquiry.

Employment Rights Act 1999 s8 provides employees with entitlement to a pay slip which must show:

- 1. employee's earnings before and after any deductions;
- 2. the amount of any deductions that may change each time employee is paid, for example, tax and National Insurance;
- 3. employers must also explain any deductions fixed in amount, for example, repayment of a season ticket loan. They can choose to do this either on a pay slip, or in a separate written statement.

There is no legal requirement to show the name of the employer and PAYE reference. However, an approved contractor should be able to satisfactory explain why they have omitted such information.

GOOD PRACTICE

- $\cdot\,\,$ The payroll system can be manually operated.
- Maintenance and accuracy of an automated system is easier to achieve.
- All staff are aware how their pay is determined and receive written information which shows gross pay, deductions/adjustments and net pay.
- · Use of electronic pay slips and automated pay runs.

4.2.2

The organisation has effective financial management procedures, i.e., there are sound fiscal controls in place

REQUIRED ACHIEVEMENT LEVEL

- 1. Financial resources and liabilities are managed and controlled through, for example:
 - · audited or certified annual accounts;
 - · sales ledger or automated financial package;
 - · purchase ledger or automated financial package;
 - · cash flow and expenses;
 - risk management including contingency arrangements such as advanced or staged payments, or utilising the services of a factoring company;
 - · asset management.
- 2. These processes ensure the use of financial resources to support the plan for the business.

IMPROVEMENT LEVEL 1

Financial plans are reviewed regularly to ensure relevance and viability, and include areas for cost savings.

Performance indicators are in place and are regularly reviewed.

IMPROVEMENT LEVEL 2

The organisation makes regular use of available financial benchmarking and other relevant data to analyse its financial performance.

Please see the Glossary for a definition of the terms 'analysis' and 'benchmarking'.

CLARIFICATION

An organisation, of any size, will need to demonstrate sound fiscal control, including providing evidence of the management of the financial aspects of all customer contracts, including the costs associated with each of those contacts, such as wages.

The procedures need not be documented but the applicant organisation should be able to evidence that the procedures are understood and that there is cover within the organisation to maintain accurate and rigorous control in all circumstances.

Whatever method has been adopted the processes surrounding financial management must be rigorous and cover all aspects of the business. Financial planning, whilst being conducted on a smaller scale, should still be part of the financial management processes with control of cash flow and investments.

An approved contractor will need to demonstrate that it has understood what risks it is exposed to and how it has attempted to minimise exposure to those risks, as well as how it plans to deal with unexpected events that could affect it financially, for example, the sudden loss of a major contract, or a jump in interest rates.

EXAMPLES

The management of the financial aspects of a smaller applicant organisation is likely to be under the sole responsibility of the managing director/owner and may not be computer based. It is likely, within larger applicant organisations, that financial management is conducted via computer based systems with documented procedures.

Examples could include:

- · authorised signatories;
- · financial limits;
- · contingency planning;
- · use of factoring companies;
- · written payment policies;
- · early payment discounting;
- · credit checking suppliers and customers.

GOOD PRACTICE

- Companies will have frequent reviews of their financial position, sometimes as often as daily.
- · Profit schemes.
- $\boldsymbol{\cdot}$ $\,$ Independent financial and tax advice.

4.2.3

A clear 'fit and proper' management structure with defined and understood authority levels is in place

REQUIRED ACHIEVEMENT LEVEL

REQUIRED ACHIEVEMENT LEVEL

- All directors, partners, people with significant control or any sole trader must:
 - · hold the appropriate SIA licence(s);
 - · not be an un-discharged bankrupt;
 - not be a person to whom a moratorium period under a debt relief order relates;
 - not be a person subject to a bankruptcy restriction order or debt restriction order;
 - not be subject to disqualification under the Company Directors
 Disqualification Act 1986 or the Company Directors Disqualification
 (Northern Ireland) Order 2002 as amended;
 - not be a sole trader, director, partner or person with significant control
 of any business or firm providing security industry services that
 was placed in liquidation, administration or receivership within the
 previous 12 months, unless they have taken adequate steps to satisfy
 the SIA that they are fit and proper to the circumstances of their case.
- 2. The accountability and responsibilities of each director, partner or people with significant control are clear.
- 3. Limited companies meet statutory requirements and file necessary changes to Companies House within the specified time period.
- 4. There is a clearly defined and communicated management structure, including any links to parent organisation, subsidiaries, groups and franchises.

IMPROVEMENT LEVEL 1

All authority levels are clear.

Staff knowledge of the management structure is checked as part of staff feedback mechanisms.

Where relevant, customers' knowledge of the management structure is checked as part of customer feedback mechanisms.

Links to subsidiaries/parent companies and group structures are explained in the organisation's promotional literature/website.

IMPROVEMENT LEVEL 2

Representatives of the business are named on the company website and promotional material (where relevant).

Authority levels have been defined and are understood as required to ensure the smooth running of the organisation.

Please see the ${\bf Glossary}$ for a definition of the term 'people with significant control'.

4.2 An SIA approved contractor uses robust processes to manage finances and associated risks

CLARIFICATION

One of the key elements within this indicator is the need to ensure that the ownership and/or shareholding can be traced and verified. This has a strong link with the requirement for SIA licences for directors, owners and people with significant control and its associated checks, for example, bankruptcy.

All statutory directors, owners and people with significant control should hold the appropriate SIA licences and this should be verified at each verification. Refer to the SIA website for further guidance: www.gov.uk/government/organisations/security-industry-authority.

There is likely to be just one level of sign-off for financial matters within smaller applicant organisations. This should be clearly understood and applied throughout the organisation. Financial processes may appear to be more complex with a greater number of levels of authority within a larger applicant organisation. The number of levels should be appropriate to size, and responsibilities for approval etc. should be clearly understood throughout the applicant organisation. Authority levels may be down to cost centre level in the very large applicant organisations.

Directors of security companies who have previously gone into liquidation, administration or receivership within the last 12 months may not operate as directors of approved contractors. This also applies to partners, and persons with significant control (where they fall under the definition of a director or shadow director). (ref Ministerial Direction)

Ref: ISO9001

EXAMPLES

 Authorised personnel for signing of expense claims; purchase orders etc

GOOD PRACTICE

 Published company structure showing management levels and staff. 4.2 An SIA approved contractor uses robust processes to manage finances and associated risks

4.2.4

There is sufficient insurance to cover contractual requirements

This indicator links to:

· 6.1.2 Staff records are maintained.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation has contractual insurance that:
 - · covers the annual value of the contracts;
 - · is appropriate in content and value.
- 2. The company ensures all hazardous activities undertaken are disclosed to, and agreed by, insurance underwriters.
- 3. The organisation also has the correct insurance cover, appropriate to its size and operations:
 - · £5 million for public liability.
 - · £5 million for employers' liability.
- 4. The business's insurance costs are not passed onto staff.

Subcontractors

5. Where subcontractors do not have their own insurance, they are covered under the organisation's.

IMPROVEMENT LEVEL 1

The organisation is insured for over and above the minimum of £5 million for both public and employers' liability insurance.

Insurance cover is effectively reviewed and adjusted as necessary, by identifying the limitations of the organisation's insurance cover and undertaking suitable actions to mitigate, reduce or transfer resultant risks.

CLARIFICATION

An organisation should not pass the cost of business insurance onto its staff, that is, making deductions from pay, salary exchange arrangements etc.

For example:

- health/medical/life/loss of earning insurances are offered as benefits in kind, in exchange for a deduction from pay;
- · companies insure against costs of unplanned absence by employees.

The applicant organisation should identify what their insurance covers and how it is relevant and sufficient for their business. For the required achievement level this should be as a minimum, the insurance required for them to operate as a business – legally and for the customer contracts they have. These costs should be borne by the business and not passed onto staff.

Exceptions to this might include any other type of insurance such as health/ medical/life/loss of earning/unplanned absence/cover for self-employed individuals/liabilities of HMRC compliance inspections and the costs of defending against them etc., insurances that are offered as benefits to staff over and above the minimum business requirement as above. In these circumstances, the business may make a charge to staff but staff must fully understand what this means and have a choice to be able to opt in or out, and the business must be able to evidence this.

Organisations should be able to demonstrate how changes to their size, nature of business etc. have been reflected in their annual renewal. Where organisations undertake activities such as security at events on an occasional or seasonal basis, they need to ensure that their insurers are fully aware of the extent and nature of these activities.

Reference should be made to the relevant British standard, where applicable, for appropriate levels of insurance for the sector.

Organisations must be able to demonstrate that they have disclosed any hazardous activities to insurers/underwriters.

Not all the items listed will apply to every organisation. However, where they are relevant to the organisation, it must be able to demonstrate that it has the appropriate level of cover.

Subcontractors must be covered under the organisation's own insurance cover where they do not have their own.

GOOD PRACTICE

· The business offers critical illness cover to all staff.

4.3 An SIA approved contractor understands the market place and has financial plans to meet or change its strategic direction

4.3.1

The organisation conducts effective analysis of the market place in which it operates

This indicator links to:

· 1.1.3 A plan for the business exists with an effective review schedule.

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation is aware of and understands developments in the market place in which it operates.
- 2. The organisation uses this information to:
 - · plan;
 - · make financial decisions.

IMPROVEMENT LEVEL 1

The organisation:

- · actively gathers and uses information about its market;
- · understands and monitors its direct competitors.

IMPROVEMENT LEVEL 2

The organisation actively gathers and uses information about the market it may want to enter in the future.

IMPROVEMENT LEVEL 3

The organisation makes use of SIA ACS benchmark scores and other available benchmarking information, to compare its performance and to inform marketing activity.

Please see the Glossary for a definition of the terms 'analysis' and 'benchmarking'.

CLARIFICATION

The scope of this indicator will vary dependent on the geographical area covered by the applicant organisation. If the customer base is regionally based then an understanding of regional needs and developments is required. Should the customer base be national, a broader understanding would be required. The applicant organisation should be able to demonstrate that any intelligence gathered is used to inform actions and planning.

Larger organisations may have a specialist commercial team within the applicant organisation.

4.3 An SIA approved contractor understands the market place and has financial plans to meet or change its strategic direction

EXAMPLES

- · New legislation.
- · Licensing requirements.
- · Competitor activity.

Level 3:

- Contractors can use the benchmarking data provided by the SIA that compares the scores of all standard route approved contractors.
- Contractors can also choose to use proprietary products such as the Plimsoll analysis (https://www.plimsoll.co.uk) which compares data from companies around the world, and draws its information from accounts filed at Companies House, and identifies trends in company performance.

GOOD PRACTICE

 Organisations promote the benefits of their approval as part of their marketing activities. 4.4 An SIA approved contractor measures and improves performance against key financial indicators

4.4.1

The organisation regularly reviews performance against key financial indicators critical to the business

This indicator links to:

- · 1.1.3 A plan for the business exists with an effective review schedule.
- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- •1.2.2 Goals, objectives and targets are clearly visible for all levels of the organisation.
- 1.5.1 The organisation regularly reviews performance against success factors and performance indicators.
- 4.1.1 The organisation has the funding available to achieve its plan for the business.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Performance against key outcomes is regularly reviewed.
- Measures cover all key aspects of business processes relating to financial resources.
- 3. Reasons for shortfalls in performance are understood.
- 4. Some results show positive trends and/or sustained good performance for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement.

Please see the **Glossary** for a definition of the terms 'key', 'measures and indicators' and 'performance'

CLARIFICATION

This indicator focuses on how the applicant organisation knows that its processes are delivering the desired financial outcomes. For example, how effective are these processes? Are processes achieving what the organisation wants them to achieve? How successful is the organisation?

The applicant business should draw on its financial plans for the business and the forecasts and targets that are part of that plan. The processes and procedures in place to achieve the plans for the business should have measures and be reviewed to check that they are working effectively to achieve the plans for the business.

Organisations should be able to provide examples of actual financial results or outcomes achieved against their own targets and against industry benchmarks.

Some analysis of trends over time should also be carried out.

EXAMPLES

Financial outcomes such as:

- · turnover;
- · profit;
- · net profit;
- · loss;
- · balance sheet;
- · sales:
- · meeting of budgets;
- · cash flow;
- · costs;
- · depreciation.

Other measures that may be appropriate could be:

- $\cdot\,\,$ payment of invoices against payment timeframes;
- · improved credit ratings;
- · profit against forecast;
- $\boldsymbol{\cdot}\$ less and more profitable contracts;
- · turnover against forecast;
- · debtor days;
- · contract value;
- · number of contracts against business plan;
- · assets and overheads;
- increasing/decreasing; loss leaders (ok for larger businesses but not practical for small/micro business);
- · loans reducing/increasing;
- · cost of travel and other business expenses;
- factoring costs;
- contingency funds, for example, major contract loss; cash flow; investments.

GOOD PRACTICE

Use of charts and graphs to illustrate performance against targets.
 Publication and sharing of information to all staff and customers.
 Publicity around key successes.

Criterion 5: Resource management



An SIA approved contractor has sufficient technical resources to sustain its business and meet the relevant industry standards.

Note:

- There are elements within this criterion which cover the legislative requirements of conducting a business. It is not expected that you would be familiar with all of these aspects to enable an in-depth examination. It must be remembered that it is the responsibility of the applicant organisation to provide a truthful assessment of their performance and your role is one of verification. As such you should plan to ask targeted questions to elicit information about the applicants' approaches.
- You should familiarise yourself with the key points of some of the legislative requirements. The Gov.UK website (www.gov.uk/) is a trusted source of information relevant to many of the legislative requirements within the ACS standard.

This criterion is composed of three sub-criteria

The SIA approved contractor can demonstrate that it:

- 5.1 uses effective management information systems for all aspects of its business:
- 5.2 has sufficient and suitable premises, procedures and equipment to conduct business effectively;
- $5.3\,$ measures and improves performance in the management of resources.

5.1.1

Relevant versions of documents are available at the point of use

REQUIRED ACHIEVEMENT LEVEL

- 1. Document version control is applied to all service delivery documents.
- 2. The most up-to-date versions of applicable documents are available at the point of use.

IMPROVEMENT LEVEL 1

Document version control is applied effectively to all key documents.

IMPROVEMENT LEVEL 2

Staff have the opportunity to suggest improvements to document handling.

5.1.2

The organisation complies with legislation on the handling of and protection of data

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation complies with the relevant laws on data protection and security in all aspects of the business.
 - Including notification to the Information Commissioner where required.
- 2. The organisation conducts a risk assessment against the relevant data protection legislation and high-risk areas have additional controls.
- 3. All records are handled and stored in a way that is consistent with legal requirements for handling personnel data.
- 4. Procedures are implemented for the maintenance of all service delivery data and information, personnel and financial records in compliance with current legal requirements.
- 5. All staff are made aware of their individual responsibilities for data protection and security compliance.
- 6. All staff receive training outlining their individual and organisational responsibilities for data protection compliance.
 - · Refresher training is conducted where appropriate.
- 7. There are procedures in place to monitor staff awareness of their own and the organisation's responsibilities for data protection.
- 8. Where applicable: the organisation:
 - complies with its obligations under data protection legislation in respect of all personal data it processes on behalf of the licence applicant;
 - ensures it obtains any necessary consents from the licence applicant, in relation to its use of the licence applicant data and acts within the bounds of that consent.
- 9. Where applicable: the organisation retains a copy of all identity documents used to verify the SIA licence applicant's identity, in the format specified by the SIA and to the security standard specified in the licence management manual for seven years, following a licence applicant leaving the approved contractor's business.
- 10. Where applicable: an information security policy exists, which is consistent with the SIA code of connection. The organisation notifies the SIA upon becoming aware of any security incident/breach of security, including, but not limited to, an actual, potential or attempted breach, or threat to, their information security policy, where it relates to SIA licensing.

IMPROVEMENT LEVEL 1

Compliance with the data protection legislation is audited with ICO guidance or through a recognised compliance assessment.

CLARIFICATION

Information referred to in this section relates to all the information held by an organisation including that held on personal computers. The section is looking to determine how well the organisation manages records and information.

The applicant organisation will need to comply with the requirements of the General Data Protection Regulation (GDPR). Information is available from the Information Commissioner's Office, here: ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/

There are statutory requirements for the keeping of personnel records and financial records – www.gov.uk/paye-for-employers/keeping-records is a useful link for information pertaining to the statutory requirements. Applicant organisations may wish to refer to the current British standard relating to information security.

The applicant organisation needs to be aware of the requirements of the Data Protection Act 2018 and to have implemented them – www.gov.uk and www.ico.gov.uk provide a useful guide to the GDPR seven key principles (rules) for data protection and other relevant information such as training requirements.

Where applicable:

Licence management service users are required to notify us of any security breach. A security breach is where systems, passwords or machines are compromised, for example, passwords/accounts being used by unauthorised persons, operators leaving licensing screens open and accessible for long periods of time when others could freely access, findings from penetration testing that reveal system compromise. Reporting of breaches to the SIA should include:

- a confirmed breach that relates to any aspect of the licensing activity/ processes;
- other significant security incidents, for example, where there is a significant compromise to the business's overall system(s) (that is, not restricted just to licence processing activity), that could compromise the integrity of the SIA licensing system.

The organisation should investigate any breach and take action to prevent recurrence.

The SIA remains of the view that both the SIA and licence management businesses would be treated as data controllers in respect of all personal data managed through the portal, and that each organisation would have its own obligations under the Data Protection Act.

By using the portal, licence management businesses are:

- (a) carrying out a business process for their own purposes, for example, managing licence applications so that their staff/contractors can work for them;
- (b) using the data for their own purposes, that is, to manage the contractor/ employment relationship they have with the licence applicants. On this basis, licence management businesses cannot be considered a data processor.

Ref: ISO9001

EXAMPLES

Organisation publishes guidelines for staff on what information is retained by the company and what information may be released by staff.

A business is required to obtain consent from the individual to process their personal information for the purposes of making licence applications. This is already an obligation under DPA. A business is required to demonstrate that it has obtained that consent – this necessarily means that there should be some form of documentary evidence. Most businesses currently obtain this type of consent through the recruitment process (for new staff), and job application form, however the business's DPA statements may need to be amended to include the purpose of licence processing. Businesses that have developed their own internal systems/forms for use as part of the licence renewal process may need to amend their forms to incorporate the relevant consents. A business may wish to take its own legal advice on DPA.

GOOD PRACTICE

- All staff receive training outlining their individual and organisational responsibilities for data protection compliance.
- A free audit by the ICO is requested and completed to confirm data protection obligations are being met.

Important things to consider:

- · what are the organisation's procedures for backing-up information?;
- · are records stored securely?;
- what is kept in relation to financial records? For example, accounts, invoices, expenses.

5.2 An SIA approved contractor has sufficient and suitable premises, procedures and equipment to conduct business effectively

5.2.1

Lease or ownership papers are appropriate to the business premises, providing administrative and any operational centres that are fit for purpose

REQUIRED ACHIEVEMENT LEVEL

- 1. The work environment is fit for the business purpose and is secure. This could include:
 - · remote or home working;
 - · leased or rented business premises;
 - · virtual office space.
- 2. The business is conducted through either an owned, leased or rented premises and/or through a contracted virtual office service, as consistent with the business plan.
- 3. The organisation's correspondence and any promotional material complies with company law and legal traceability.
- 4. Where appropriate, the physical working environment has been assessed for the business needs and is properly managed. Factors to consider include:
 - · adequate lighting and sanitary facilities;
 - · workstation assessments;
 - · adequate storage and waste disposal;
 - · heating and ventilation;
 - · restroom;
 - · fire and emergency equipment;
 - · general cleaning and housekeeping.
- Where applicable: the work environment of administration offices and/ or operational centres has been assessed and is effectively managed to process SIA licence applications. That is, the ability to process SIA licence applications, including uploading documents.

IMPROVEMENT LEVEL 1

Feedback is sought from staff regarding the suitability of the working environment and any improvements made by the organisation.

Please see the ${\it Glossary}$ for a definition of the terms 'virtual office space' and 'virtual office service'.

5.2 An SIA approved contractor has sufficient and suitable premises, procedures and equipment to conduct business effectively

CLARIFICATION

The assessor will be looking for how the ownership of the premises is managed. For example:

- if the property is on lease what is the time left on the lease and what preparation has been conducted for the end of the lease?;
- if the property is rented what planning is in place for the loss of the property.

The size and location of all premises should be applicable for the size and nature of the business. All organisations are required to have administrative offices that are fit for purpose. It is recognised that smaller organisations may not have separate premises from the owners home but the ACS standard requires that these are equipped and maintained such that records, including training records, all professional and business documents, files, certificates, correspondence, staff details etc. that are necessary to the proper conduct of business transactions, are securely kept.

The address for correspondence and promotional material should comply with the disclosure requirements as laid out in company law. See https://www.gov.uk/government/organisations/companies-house and https://www.gov.uk/government/publications/incorporation-and-names/incorporation-and-names. Should an organisation make use of a virtual office solely for the duration and/or purpose of the assessment, then a visit to the normal place of work, for example, the home of the proprietor, should be undertaken to sample the various policies, procedures and processes.

Where virtual offices are used, an organisation should demonstrate conformance with relevant indicators covering strategy (for the use of virtual offices), procurement, suppliers and performance (of suppliers), as well as others where due diligence is required, for example, relating to health and safety, welfare, information security, equipment, as if the premises are their own

Organisations using virtual offices should be mindful not to mislead the public or customers. For example, there is a balance between using a virtual office to present a professional image and promoting the business; the reality of the nature, size and scope of the business; the legal requirements of a registered company address.

Disclosure of company details

Regulations made under the Companies Act 2006 require a company to display its name at its registered office and other places of business, on business documents and on websites. The purpose of the regulations is that the legal identity of every company should be revealed to anyone who have, or may wish to have, dealings with it. The requirements are included in the 'Company, Limited Liability Partnership and Business (Names and Trading Disclosures) Regulations 2015 (SI2015/17).

The company must include its company name in characters legible to the naked eye at its registered office, the location where the company keeps its company records and all places of business, on all websites, all business letters and notices, all cheques, order forms, invoices, demands for payment and other business correspondence (whether paper or electronic). If any such office, location or place is shared by six or more companies, each such company must ensure either that its registered name is displayed for at least 15 continuous seconds at least once every three minutes, for example, on an electronic display, or that its registered name is available for inspection on a register by any visitor to that place.

CLARIFICATION (continued)

In addition, all websites, business letters and order forms must state the company's country of registration, its registered number and the address of the registered office. Further, all business letters must contain the names of either all or none of the directors.

If the company trades under a business name, the above requirements must still be met.

Stationery, websites and signs for the company must therefore be prepared in accordance with these rules.

Ref: ISO9001

EXAMPLES

Assessors will consider:

- · adequate lighting and sanitary facilities;
- · workstation assessments;
- · adequate storage and waste disposal;
- · heating and lighting;
- · restroom;
- · fire and emergency equipment;
- · general housekeeping.

GOOD PRACTICE

The organisation ensures that the work environment has a positive influence on motivation, satisfaction and performance of people in order to enhance the performance of the organisation. The organisation proactively gathers feedback from staff about their views on the suitability of the work environment, what improvements could be considered and the effectiveness of any improvements that are implemented.

5.2.2

Control rooms/response rooms are designed, fitted and equipped in a manner appropriate to purpose

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation has determined the design, construction, layout and equipment requirements for its control rooms/response rooms.
 - These requirements respond to the needs of staff using these facilities, for example, accessibility.
- 2. The level of design, construction, layout and equipment is directly related to risks associated with customer contracts.
- 3. The control rooms/response rooms are appropriately constructed to ensure physical security, safety and integrity, for the protection of staff and the safeguarding of customer records and property.
- 4. Where the control rooms/response rooms are outsourced, the organisation ensures that the control rooms/response rooms are fit for purpose.

IMPROVEMENT LEVEL 1

Improvements to design, construction, layout and equipment are implemented, for example:

- where new or amended contracts increase the risk to physical security, safety and integrity of staff and/or to customer records and property;
- · due to changes in staff and/or business growth/contraction.

IMPROVEMENT LEVEL 2

The control rooms/response rooms are designed in accordance with good ergonomic practice. For example, considerations could include:

- · architectural factors;
- · design and layout of individual work stations;
- · arrangement of monitors;
- · design of control panels;
- seating;
- · environmental factors.

Please see the Glossary for a definition of the terms 'control room' and 'response room'.

CLARIFICATION

The requirements for a control room in terms of the manned guarding, keyholding and CCTV sectors are clearly laid down in the relevant British standards. For other sectors, the specifications of a control room do not have to be so stringent.

Ref: ISO9001

EXAMPLES

For example, the control room for sectors such as door supervision and vehicle immobilisation could simply be an area within the head office where phone calls from operatives are taken. However, it must be fit for purpose and adequate to ensure the safety of staff in an emergency situation so that issues can be recorded and monitored. The organisation is responsible for ensuring a control room is fit for purpose even when it outsources the provision of a control room from a supplier.

Where the control rooms/response rooms are outsourced, the organisation must ensure that the control rooms/response rooms are fit for purpose.

5.2.3

Equipment owned is recorded, adequately maintained and appropriate for its purpose

REQUIRED ACHIEVEMENT LEVEL

- All equipment is appropriate for the purpose to which it has been allocated.
- 2. An inventory of equipment critical to service delivery is recorded and regular checks are conducted to ensure the records are complete and up to date.
- 3. All equipment critical to service delivery is maintained according to an up-to-date schedule.
- 4. Where applicable: equipment used for licence application processes meets requirements (where specified) and is fit for purpose.

IMPROVEMENT LEVEL 1

There is a comprehensive equipment register which covers all the equipment owned by the organisation.

Regular checks are conducted to ensure the register is complete and up to date.

CLARIFICATION

No matter the size of the applicant organisation, if there is any equipment used in the running of the business or in service delivery there must be a form of asset management in place. The applicant organisation must be able to demonstrate that the method used, be it a manual list or simply a folder of receipts, enables them to meet the requirements of the ACS standard in terms of control maintenance etc.

The more equipment owned and used by an applicant organisation, the more robust approach to control and management is required. It is not necessary that it is computer based but evidence should be presented to meet the requirements of the ACS standard in terms of control, maintenance etc.

Procedures should be in place to ensure that any customer property or equipment is subject to the same due care and attention required for their own equipment. Such equipment should be separately identified and kept fit for purpose.

Ref: ISO9001

EXAMPLES

- · Equipment registers.
- · Maintenance schedules.

GOOD PRACTICE

Review of results from maintenance tests to identify any common faults.

5.2.4

Service delivery to customers and safety for staff are improved by investment in technology

REQUIRED ACHIEVEMENT LEVEL

 The organisation proposes appropriate opportunities, with suppliers and/ or customers, in the use of technology to improve service delivery and safety standards, for example, the use of body-cams.

IMPROVEMENT LEVEL 1

The organisation evaluates new and emerging technology to further enhance service delivery to customers and/or staff safety.

Please see the Glossary for a definition of the term 'service delivery'.

CLARIFICATION

The implementation and use of technology may be limited by cost, and in its use at customer sites. The ACS standard requires that applicant organisations explore technological solutions, however simple, to improve service delivery and staff safety.

Where contractors identify new technologies, they should be able to demonstrate how they are being used to improve service delivery and/or staff safety. It is not sufficient for them to simply describe or demonstrate new technologies that appear to be a good idea, without some sort of analysis, testing and review.

The type and sophistication of the technology in use or proposed for use at a customer site should be in line with the size and resources available.

It would be expected that technological solutions would be more readily researched by the larger applicant organisations and be available to improve service delivery or to offer greater value for money within customer contracts.

EXAMPLES

- $\,\cdot\,$ GPS and mobile tracking technology; emergency buttons etc.
- Training is delivered to staff to ensure new technology is used effectively.

GOOD PRACTICE

- Pre-evaluation of technology prior to purchase to ensure requirements are met.
- A barcoding system to track issue and return of equipment to individuals.
- An electronic key tracking system, operated by the finger print of authorised users; it automatically records the ID of the user, key number, time and date withdrawn. If the key is not returned within a specific time it will automatically generate an alarm to inform management that the key has not been returned.

5.3 An SIA approved contractor measures and improves performance in the management of resources

5.3.1

The organisation regularly reviews the management of resources and data

This indicator links to:

- 5.1.1 Relevant versions of documents are available at the point of use.
- · 5.1.2 The organisation complies with legislation on the handling of and protection of data.
- 5.2.3 Equipment owned is recorded, adequately maintained and appropriate for its purpose.
- 6.1.3 Terms and conditions of employment exist which are implemented and communicated.
- 6.1.4 A disciplinary and grievance procedure is in place which is implemented and communicated.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Management of resources and data is regularly reviewed.
- 2. Monitoring covers all key aspects of resource use, for example, compliance with data protection laws, appropriateness of working environment to business needs, maintenance of equipment.
- 3. Reasons for inappropriate and/or incorrect use of resources are understood.
- 4. Some results show positive trends and/or sustained good performance for the period of time the monitoring has been in place.

IMPROVEMENT LEVEL 1

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement.

Please see the **Glossary** for a definition of the terms, 'measures and indicators', 'performance' and 'resource'.

5.3 An SIA approved contractor measures and improves performance in the management of resources

CLARIFICATION

This is a results indicator where the applicant organisation can provide quantitative measures relating to the management of resources. Measures should be in place to cover all aspects of resource use. Without quantitative measures in place the applicant organisation cannot demonstrate positive trends and/or sustained good performance or improvements in performance.

Resources may include:

- information systems (includes risk assessments, document storage, training and awareness in data protection, compliance with ICO guidance);
- premises (includes virtual, work station assessments carried out);
- · procedures, (for example, review of document control) and
- equipment, (for example, control/response centre provision, vehicles, radios, cameras, CCTV, office equipment, site equipment including microwaves, heaters).

EXAMPLES

- Compliance with data protection laws, including GDPR requirements.
- · The appropriateness of the working environment to business needs.
- · Maintenance of equipment in a state which is fit-for-purpose.
- · Equipment lists.
- · Maintenance schedule.
- · Software updates.
- · Equipment replacement timescales.
- · Breakdowns.
- · Data breaches.
- Incorrectly installed equipment or application (accidents, health and safety, etc.).
- · Complaints about defective equipment, staff/client feedback.
- Heating, lighting and ventilation (legislative requirements, for example, health and safety minimum temperature).
- Appropriate use of resources breakages, damages, repairs, service/ maintenance records. Vehicle trackers etc.
- Log mileage and fuel use for mobile officers and use monitoring information to review patrol routes and/ or driving behaviour.
 This can be used to develop targets, and/or inform efficiency savings and/or safety improvements.

Criterion 6: People



An SIA approved contractor develops and implements plans to ensure its people are suitably trained, developed and cared for.

General:

There is a requirement for all applicant organisations, regardless of the number of staff, to be compliant with:

- · legislation;
- · licensing requirements;
- · screening procedures.

One of the key aims of the ACS is to transform the private security industry and to make it a career of choice. The way in which organisations within the private security industry treat and provide for their staff will be a major factor in achieving this aim. Fear of reprisals when disagreeing with 'company line' is not acceptable and it is your role to ensure that this is not prevalent in any applicant organisation recommended for approval. This takes a high level of sensitivity and confidentiality on your behalf.

Not all human resource policies and procedures will be documented in every applicant organisation, especially small organisations. Where policies and procedures have a direct impact on staff, such as grievance, disciplinary and training, it would be expected that they were readily and easily available to all staff. Documented policies and procedures are the preferred way and should be encouraged. Staff should be aware of the human resource policies that impact them and you should check awareness.

Note

- There are elements within this criterion which cover the legislative requirements of conducting a business. It is not expected that the assessor would be familiar with all of these aspects to enable an in-depth examination. It must be remembered that it is the responsibility of the applicant organisation to provide a truthful assessment of their performance and your role is one of verification. As such you should plan to ask targeted questions to elicit information about the applicant's approaches.
- 2. You should familiarise yourself with the key points of some of the legislative requirements. The Gov.UK website (www.gov.uk/) is a trusted source of information relevant to many of the legislative requirements within the ACS standard.

This criterion is composed of five sub-criteria

The SIA approved contractor can demonstrate that it:

- 6.1 manages its people effectively;
- 6.2 deploys competent people;
- 6.3 appropriately supports its people;
- 6.4 complies with its legal obligations when employing people;
- 6.5 measures and improves staff performance and perceptions of the organisation.

There is an effective recruitment policy

REQUIRED ACHIEVEMENT LEVEL

 The organisation works to BS7858 or appropriate industry sector equivalent for screening individuals.

OR

- 2. The organisation can justify deviations, which are accepted by an insurer, for example, where operatives may be working covertly or are unable to account for gaps in employment, and retains the appropriate evidence of the insurer's decision.
- 3. Where they may be available, the organisation seeks relevant screening records from another approved contractor when re-screening.
 - The organisation assesses the risks of requesting, obtaining and using screening records from another approved contractor, and data protection legislation, prior to using those records.
- 4. Standard processes and procedures are followed:
 - the requirements for each role within the organisation are defined and include: experience, skills and qualifications;
 - · interviews for all potential recruits are conducted;
 - · interview notes are documented and retained for one year;
 - · recruitment records are maintained for all staff;
 - the organisation regularly checks the validity of SIA licences and the right to work in the UK.
- 5. Compliance:
 - Private Security Industry Act 2001 licensing requirements are adhered to:
 - the recruitment policy meets employment law and defines how screening of staff is carried out;
 - the organisation ensures that all work permit/visa conditions are complied with.
- 6. Where applicable: the organisation ensures all key staff processing licensing applications meet the key staff criteria and are security screened to BS7858.
- 7. Where applicable: the confirmation of identity and address includes verification of original documents required when submitting an application for an SIA licence.

The list of permitted documents is available here: www.gov.uk/government/organisations/security-industry-authority

IMPROVEMENT LEVEL 1

Defined job requirements are used to place an appropriately worded advertisement that takes into account relevant legal requirements.

Constructive feedback is provided to interview candidates who fail to obtain a role.

IMPROVEMENT LEVEL 2

Additional background checks with written responses covering ten years employment history (where appropriate) are completed within 16 weeks of employment commencing.

Re-vetting is conducted, where appropriate, prior to:

- · promotion;
- · transfer to high-risk site.

The organisation works with re-settlement and/or employment organisations to help the unemployed back into work.

IMPROVEMENT LEVEL 3

The organisation offers a guaranteed interview scheme to disabled candidates whose application meets the minimum criteria for the post.

The organisation holds Investors in People (or equivalent) accreditation.

The main focus of this indicator is the screening and vetting of staff to a high standard. Whilst there are a number of screening and vetting standards in existence any standard being used should meet the stringent requirements within BS7858, or the organisation must be able to justify deviations (and have these accepted by the insurer). The Gov.UK website provides a useful step by step guide for employing someone: www.gov.uk/employsomeone?step-by-step-nav=dc77c606-cc6b-49ac-9f40-b96959d02539.

Guidance on checking staff's right to work can be found at: www.gov.uk/government/collections/right-to-work-checks-employer-guidance.

There is a statutory requirement to maintain employment records and to ensure that all employment adverts are non-discriminatory. Further information on this can be found on: www.acas.org.uk/media/pdf/c/a/Acas_Personnel_data_record_keeping-accessible-version-July-2011.pdf

Licences must be checked regularly to ensure they are still valid. Work permits and visas must also be checked to ensure that staff are still eligible to work. The organisation must ensure that any visa conditions are complied with. For example many foreign students are limited to working a set number of hours. Some may not be eligible to work in a sector that is not in direct connection with their degree course.

Employers will be able to rely on an online right to work checking service to demonstrate compliance with illegal working legislation. The Home Office right to work checking service available on GOV.UK, gives employers access to up-to-date, real-time information about migrants' right to work, making it easier for individuals to prove their rights in the UK. The right to work checking service is secure and free to use: www.gov.uk/check-job-applicant-right-to-work.

Organisations should have a robust process for the management of licensing (including renewals) and the licence dispensation process. Controls should be in place, and records maintained to demonstrate:

- \cdot the level of LDNs issued does not exceed 15%;
- LDNs are correctly issued according to the published guidance (in particular the 10 week limit and that applications have reached the correct stage in the application process);
- Approved contractors authorised by us to deploy staff under a licence dispensation notice must ensure at all times that there is at least one relevant person within the business competent to issue a licence dispensation notice. That person must understand their obligations, follow our guidance on licence dispensation and refresh their knowledge and understanding at least every three years.

Ref: ISO9001

EXAMPLES

• The organisation considers the implications of legislation when placing job advertisements, for example, Equality Act 2010.

GOOD PRACTICE

 The company uses SIA licence management or licence assist services and pays for the operatives licence.

Staff records are maintained

This indicator links to:

• 4.2.4 There is sufficient insurance to cover contractual requirements.

REQUIRED ACHIEVEMENT LEVEL

- 1. Up to date staff records are maintained which contain:
 - · personal details such as name, address;
 - · bank details;
 - · PAYE information;
 - · vetting information where relevant for the role;
 - Private Security Industry Act 2001 licensing information where required, such as licence number, expiry date;
 - · details of licensing dispensation notices, where relevant;
 - complete employment history as obtained during the recruitment process (5 or 10 years, depending on the relevant vetting criteria of the organisation);
 - · training records;
 - · disciplinary and grievance information, where relevant.
- Licenses are regularly checked against the public register and a photographic record of the licence kept as evidence when deploying agency, subcontracted licenced persons.
- 3. Driving licences for staff using organisation vehicles and insurances for private vehicles are checked six-monthly with the DVLA and a data copy kept on file.

OR

- 4. A driving licence agency licence check system.
- 5. The requirements of BS7858 and data protection legislation on the maintenance and storage of recruitment records are adhered to.
- 6. The organisation follows HMRC guidance regarding due diligence record keeping for the use of labour providers and self-employed.

IMPROVEMENT LEVEL 1

Staff records contain up to date records of discussions about individual performance.

Please see the Glossary for a definition of the term 'labour provider'.

The manner in which staff records are maintained should be appropriate for the size of applicant organisation, that is, not necessarily computer based, but in all cases it should be secure and confidential.

The requirements of BS7858 or similar standards (as well as data protection legislation), as required in indicator 6.1.1 on the maintenance and storage of recruitment records, should be adhered to. In addition, records should include details of licence dispensation notices such as date of issue, expiry, SIA unique reference number, SIA acknowledgement letter, details of any licence appeals, visas and work permits.

Organisations should check licenses regularly against the public register and to maintain a copy of the website screenshot as part of due diligence. The organisation could also use the SIA watchlists to check licences. Details of driving licences for any staff using company vehicles should be regularly checked, and a record of these checks kept on file. Similarly insurance details for private vehicles used should be checked to ensure they are appropriately insured, for example, include first class business use. This statement will be n/a for those organisations which do not operate company vehicles.

HMRC have identified increasing problems in the security industry with fraud and unpaid taxes through the use of labour providers. It is good commercial practice for all businesses to carry out checks to establish the credibility and legitimacy of their suppliers. Approved contractors should seek to avoid involvement in supply chains where VAT and /or other taxes will go unpaid.

Details on due diligence for the use of labour providers can be found at:

www.hmrc.gov.uk/leaflets/labour-providers-due-diligence.pdf

Terms and conditions of employment exist which are implemented and communicated

This indicator links to:

· 4.2.1 Clear and effective management of the payroll can be evidenced.

REQUIRED ACHIEVEMENT LEVEL

- 1. Terms and conditions of employment have been defined for each role, stating:
 - · name of employer and staff;
 - · job title and/or job description;
 - · start date:
 - · details of pay and allowances;
 - · total number of hours and days required;
 - staff benefits statement (including, for example, pension, provision of uniform, holiday pay and entitlement) – people who are subject to PAYE receive full employment rights of an employee;
 - · details of notice and termination period;
 - · disciplinary, grievance and appeals procedures;
 - · place of work or notification that place of work varies;
 - · details of any probationary period;
 - · details of any provisional period subject to screening, if applicable;
 - · requirements to adhere to policies and procedures;
 - · details of any equipment supplied.
- 2. All staff are given a written copy of terms and conditions of employment within the time period set by legislation.
- 3. Changes to terms and conditions are discussed with staff prior to implementation.

IMPROVEMENT LEVEL 1

Terms and conditions are revised when changes to employment conditions are made.

IMPROVEMENT LEVEL 2

Terms and conditions are issued to all staff within four weeks of employment starting.

IMPROVEMENT LEVEL 3

Terms and conditions are issued to all staff before, or as, employment starts.

There is a statutory requirement for contracts of employment to be issued to all staff within eight weeks of starting. The ACS standard requires information, above the statutory requirement, to be included in the contract to take into account the nature of the industry.

It is acceptable that contracts are issued at end of 12/16 week screening probation, provided that the information that would be included in a contract is provided in writing to the staff member within eight weeks.

Further information can be obtain from: www.gov.uk/employment-contracts-and-conditions.

EXAMPLES

Benefits statement could include such things as:

- · pension;
- · provision of uniform;
- · holiday pay and entitlement.

A disciplinary and grievance procedure is in place which is implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. There are disciplinary and grievance procedures that:
 - · comply with the minimum legal requirements;
 - · are clearly written and easily understandable by all staff.
- 2. Staff are given copies of the procedures when they join the organisation.
- 3. The procedures are followed.

IMPROVEMENT LEVEL 1

Disciplinary and grievance procedures go beyond the minimum legal requirement.

For example, using independent conciliation as an alternative way of resolving disputes.

CLARIFICATION

There is a statutory requirement for all organisations to provide to all staff a copy of a company specific disciplinary procedure that meets minimum requirements. This procedure should be followed when necessary.

The ACS standard is looking for applicant organisations to provide a grievance procedure, that is, a procedure that enables staff to formally raise issues with the way in which they were treated by the organisation, which is known by all staff and is followed when necessary.

This requirement helps to provide organisations with the ability to dictate their own procedures rather than use the default statutory procedure.

Organisations should be able to demonstrate that policies and procedures are effectively implemented, communicated and understood at all levels.

GOOD PRACTICE

Acas provide additional information on good practice in the contents of a disciplinary and grievance procedure, should the organisation require additional assistance in the creation of a procedure. The Acas code of practice on disciplinary and grievance procedures gives practical guidance for handling these issues in the workplace: www.acas.org.uk/index.aspx?articleid=2174

A policy exists covering Transfer of Undertakings which is implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation is aware of its obligations under TUPE and there are procedures in place to manage a Transfer of Undertakings.
- 2. The organisation co-operates fully in the exchange of information required for a smooth transfer.
- 3. TUPE information is exchanged in a timely fashion.
- 4. The organisation can demonstrate how both inward and outward transfers could be handled effectively.
- 5. The procedures ensure:
 - · assessment of the training needs of the staff;
 - · induction into the organisation;
 - · provision of required training within reasonable specified timeframes;
 - full screening or re-screening of staff where prior screening information is not complete;
 - · right to work checks are carried out as part of re-screening;
 - the procedures contain details of how the staff will be integrated into the organisation where practicable.
- 6. All staff files are assessed to ensure full compatibility with existing staff records.
- 7. Staff transferred into the business under TUPE are offered tailored information and support to help them settle in.

Smaller organisations may not have a procedure in place to deal with the event of TUPE. They should demonstrate what is required if they are in a process where TUPE applies.

Larger applicant organisations may or may not have a Transfer of Undertakings policy dependent on their strategy. Where there is no strategy, key personal should be aware of the legal requirements that apply.

The TUPE regulations apply:

- (a) when a business or undertaking, or part of one, is transferred to a new employer; or
- (b) when a service provision change takes place, for example, where a contractor takes on a contract to provide a service for a client from another contractor.

Directors are expected to be aware of the existence of TUPE for the two conditions that apply above. Where there is a strategy for expansion then a policy to follow TUPE should exist. If there is clear evidence that there are no plans to expand and this can be demonstrated then N/a can be applied to this indicator. Approved contractor's must cooperate fully with each other in the exchange of TUPE information and must exchange information in a timely fashion.

Further information can be obtained from: www.gov.uk/transfers-takeovers.

GOOD PRACTICE

The organisation may wish to monitor TUPE staff more closely during the initial period of their employment, to ensure a seamless transition. For example, some companies use a different appraisal process initially to ensure any concerns or issues are picked up in a timely manner. Other companies file TUPE staff records in different coloured files to distinguish them from existing staff and to enable more effective monitoring.

Roles and responsibilities are defined for all staff and communicated to them

REQUIRED ACHIEVEMENT LEVEL

- 1. Roles and responsibilities:
 - · have been defined for all staff (licensed and unlicensed);
 - are reviewed regularly to ensure and maintain relevance to the business;
 - · have been communicated to and are understood by all staff;
 - · are understood throughout the whole organisation.
- 2. There are procedures in place to monitor ongoing awareness of roles and responsibilities.

CLARIFICATION

SIA licensing should be taken into account when defining roles and responsibilities of all staff. In particular the boundaries of their roles must be clear in order to prevent them inadvertently moving into licensable activities, for example, security guards working near licensed premises or at events, security guards who operate CCTV that could include PSS CCTV, people not usually working in licensable roles such as cleaners or receptionists who regularly have to cover for a licensable person.

Similarly, we are aware that some contractors choose to licence individuals even though they may not be carrying out licensable activity, for example, in-house, or may not be carrying out activity in a particular sector, for example, a security guard who happens to work in a control room is not necessarily licensable in the PSS CCTV sector, and may only require an SG licence. The assessor should be careful to question the nature and purpose of activities in order to satisfy themselves of the correct type of licence, or where a licence may not be required.

In smaller applicant organisations there may be fewer defined roles with responsibilities assigned to few people or in some case one individual. Within larger organisations roles and responsibilities should be very clearly defined, especially where there may be specific roles and responsibilities for each customer site or where staff move between sites.

Everyone in the applicant organisation should understand their own role and responsibilities and how they fit into the organisations structure.

For companies providing security to events – refer to www.gov.uk/government/organisations/security-industry-authority for the most up to date guidance.

A defined policy related to equality and diversity exists which is implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. There is an organisation-specific equality and diversity policy that:
 - · complies with the minimum legal requirements;
 - · is clearly written and easily understandable by all staff.
- 2. Staff are given access to a copy of the procedure when they join the organisation.
- 3. The policy is followed.

IMPROVEMENT LEVEL 1

The defined equality and diversity policy goes beyond the minimum statutory legal requirement.

The organisation actively manages its equality and diversity policy and acts appropriately when staff are found to be working outside of it.

IMPROVEMENT LEVEL 2

The organisation monitors equality and diversity fairly to help ensure that its recruitment policies are non-discriminatory.

The organisation can demonstrate its commitment to improving diversity and equality within its business.

IMPROVEMENT LEVEL 3

The organisation can demonstrate its commitment to improving diversity and equality within the security industry.

CLARIFICATION

Diversity is a generic term for all legislation relating to any form of discrimination on the grounds of such things as: race; gender; age; sexual orientation; disability.gender reassignment; pregnancy and maternity; religion or belief;It is more than equal opportunities as it requires positive action. All organisations are required to demonstrate they understand and comply with the legislation. It is possible that there may not be a specific equality and diversity policy or procedure, but a collection of policies such as equal opportunities, harassment, etc. that together promote diversity.

Organisations should be able to demonstrate that people are treated fairly, and that policies and procedures are effectively implemented, communicated and understood at all levels

Level 1:

Taking measures to stop discrimination happening - Introduce an equality policy.

The starting point for an organisation or business, whether large or small, to promote fairness at work is an equality policy. It can refer to and interact with other policies – for example, discipline, and bullying and harassment.

Please see the Glossary for a definition of the term 'diversity'.

CLARIFICATION (continued)

When developing an equality policy, an employer should consult with employees and their representatives, if there are any. Any existing consultation and/or negotiating arrangements with employees or their representatives should be followed.

As well as talking to employees, an employer could at this stage also conduct an equality impact assessment (EIA) to try to pick up on any issues ahead of drawing up the policy and its action plan.

A policy should include, for example:

- the organisation's commitment to provide equality for all its staff and job applicants and that pledge should stem from the head of the organisation such as the boardroom, chairman or chief executive
- its aim to encourage, value and manage diversity in the workforce
- its goal to attain a diverse workforce which is representative of the areas it is drawn from and the customers it serves
- that the organisation will seek to provide a workplace where all employees can give their best, where discrimination, bullying, harassment and victimisation will not be tolerated, and decisions are based on merit (apart from limited exceptions allowed

Level 3:

The applicant should do more than simply having relevant polices, and/or targets (where for example equality and diversity is no more than a boxticking exercise to fulfil artificial recruitment quotas), but can show that its approach has led to improved business performance.

Applicants demonstrate commitment to improving equality and diversity within the security industry when they make it a driver in their supply chain requirements.

The applicant may run or involve itself in relevant networking activity such as gender balance networks, or women in security groups, or offer, promote or partner relevant apprentiship schemes for young people across the industry.

Applicants may contribute to or involve themselves in initiatives, or have been nominated for awards such as the National Diversity Awards, https://nationaldiversityawards.co.uk/about-us/

under the Equality Act).

- that breaches of the policy will be regarded as misconduct, and dealt with through the organisation's disciplinary procedure.

Acas has developed a sample equality policy which employers can adapt to their own needs and can be found at www.acas.org.uk/templates

EXAMPLES

Information of employers' responsibilities: equality monitoring can be found on: www.gov.uk/employers-responsibilities-equality-monitoring. Acas provide an example of an equality policy template: www.acas.org.uk/media/word/7/r/Equality-policy-template.doc and an equality and diversity monitoring form template: www.acas.org.uk/media/word/c/9/Equality-and-diversity-monitoring-form-template.doc. Additional information on preventing discrimination can be obtained on: www.gov.uk/employer-preventing-discrimination should the organisation require additional assistance in the creation of a procedure.

Please see the ${\hbox{\bf Glossary}}$ for a definition of the term 'diversity'.

A process for obtaining staff opinions on the organisation, their job and conditions exists and is implemented

REQUIRED ACHIEVEMENT LEVEL

- 1. Individuals have the opportunity to express their opinion on the way in which the organisation is run, their job and conditions.
- 2. Opinions gathered are recorded.
- 3. Issues raised are acted upon where appropriate and this action is communicated to staff.
- 4. The organisation monitors its progress in improving the satisfaction of its staff.

IMPROVEMENT LEVEL 1

All staff are asked their opinions about the organisation on a regular basis. Key performance measures exist and are monitored.

Improvement plans are in place and some are implemented.

IMPROVEMENT LEVEL 2

Key performance measures exist with targets, and are monitored.

Plans for improvement are developed and implemented, based on results achieved.

Please see the Glossary for a definition of the term 'performance'.

There is a requirement within the ACS that all applicant organisations take steps to gather the opinions of their staff on the way in which the organisation is run. This would be an opportunity to establish such things as understanding of the approach to business, level and effectiveness of communication, understanding of roles and responsibilities. The approach to opinion gathering should be appropriate to the size of the applicant organisation. For example it would not be expected that an applicant organisation with 10 staff members conducts a formal opinion gathering exercise, where it would be considered the best approach in an applicant organisation of 500 staff members.

There are a number of options that would suit organisations in between, for example the organisation may have set questions to be discussed with all staff as part of general discussions, with the results being consolidated, into percentages or numbers, for the organisation. Joining and exit interviews are another way to obtain staff opinions.

With larger applicant organisations with a more formal approach to gathering the opinions for their staff, the data could then be segmented for more targeted action planning.

Organisations should be able to provide examples of feedback from staff, including an indication of how the organisation has responded, and any action taken as a result.

EXAMPLES

- · Appraisals.
- · Suggestion box.
- · Open door management policy.
- · Staff forums/chat rooms.
- · Staff surveys/questionnaires.

GOOD PRACTICE

- $\boldsymbol{\cdot}$ The opportunity to provide feedback anonymously.
- Publicise outcomes to staff in timely manner, along with reasons where action may not be possible.

6.2.1

Staff training, development and improvement policy and procedures are in place, implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a training, development and improvement policy with supporting procedures in place that covers:
 - · organisation-specific training;
 - · assignment-specific training;
 - industry-specific training, for example, cyber-security, counterterrorism, child exploitation, trafficking;
 - training required for an SIA licence and ensures that all staff undertake any training specified by the SIA within a reasonable time period as stipulated by the SIA.
- 2. The training, development and improvement policy:
 - · applies to all staff;
 - · is fully implemented.
- 3. There are procedures in place to monitor the extent of policy implementation and staff awareness.
- 4. Where applicable: All key staff undertake any training specified by the SIA, within a reasonable time period as stipulated by the SIA.

IMPROVEMENT LEVEL 1

The training, development and improvement policy and procedures are regularly reviewed for relevance and completeness.

Managers and supervisors are supportive of releasing front line licensable staff for required training.

All internal and external trainers are suitably qualified.

IMPROVEMENT LEVEL 2

The organisation sets aside a specific budget for the training and development of front line licensable staff.

Customers and/or other stakeholders are consulted on the content of training.

The ACS standard requires applicant organisations to have procedures in place to ensure that all staff have the relevant training to obtain an SIA licence and to provide additional and ongoing training to these staff to maintain and improve their effectiveness in their role.

Approved contractors authorised by us to deploy staff under a licence dispensation notice must ensure at all times that there is at least one relevant person within the business competent to issue a licence dispensation notice. That person must understand their obligations, follow our guidance on licence dispensation and refresh their knowledge and understanding at least every three years.

All relevant staff, including those not licensable, should be aware of this commitment to continue their professional development.

Where applicable: the applicant organisation should ensure the staff have read and understood and work to the licence management partnership agreement, including the code of connection, and the licence management manual.

GOOD PRACTICE

- Local police officers and/or other stakeholders participate in the training and induction of new staff.
- Staff receive a passport style training record. Each element of training received is entered into the passport as a constant record of competence and skill base. Staff can scan it using a QR code which then links directly to training portal on company website.

6.2.2

An induction pack/ training including an introduction to policies and procedures exists

This indicator links to:

- · 6.1.1 There is an effective recruitment policy.
- 6.1.5 A policy exists covering Transfer of Undertakings which is implemented and communicated.

REQUIRED ACHIEVEMENT LEVEL

- 1. An induction pack is given to all staff on the day they start working for the organisation.
- 2. The induction pack covers:
 - · Information for licensable staff:
 - adherence to terms and conditions of licence or LDN:
 - the wearing or carrying of correct identification;
 - the requirement to report new criminal convictions and cautions.
 - · the organisation's guidelines on:
 - disciplinary and grievance procedure;
 - incident reporting;
 - uniform;
 - personal appearance;
 - health and safety;
 - equality and diversity;
 - general conduct expected;
 - drugs and alcohol policy;
 - confidentiality;
 - requirements for data protection and security;
 - management structure.

IMPROVEMENT LEVEL 1

The induction pack also covers the organisation's guidelines on:

- key organisation contacts;
- · the right to union representation.

IMPROVEMENT LEVEL 2

All staff are given face to face induction training. The additional information/training covers:

- · the history of the organisation;
- \cdot the approach to business of the organisation;
- · feedback mechanisms for both staff and customers;
- · an overview of the customer base.

Understanding of induction material is checked and confirmed with the individual.

IMPROVEMENT LEVEL 3

All levels of staff are made aware of the opportunity to pursue relevant recognised qualifications, for example, NVQ, Management.

Senior management are personally involved in the induction process.

The presentation and layout of an induction pack is not a key feature although it would be expected that a larger applicant organisation would have a more standard brochure style or online approach. It is essential however that the key items listed in the ACS standard are included in the pack.

Where organisations tend to focus on individual's training needs, the following link provides useful information: www.security-institute.org

EXAMPLES

Acas provide useful information on 'What should be on your induction programme for new recruits?' (www.acas.org.uk/index.aspx?articleid=5714).

GOOD PRACTICE

It would be considered good practice if the information is provided in such a manner as to be easily used as a reference source for staff.

- Some organisations have developed e-learning induction and refresher packages for staff.
- Regular performance review or monitoring, post induction to reinforce key issues.
- Inclusion of information on the SIA, licensing, the ACS standard and licensing dispensation.
- Simulation facilities, for example, a control room, a bank counter, for new staff to develop new skills in a safe environment.
- The organisation issues an induction workbook that is completed over a three-month period to ensure understanding of key policies and procedures.

6.2.3

All staff are trained to the required standard

REQUIRED ACHIEVEMENT LEVEL

- 1. All staff are given adequate role-specific training, including on the:
 - · procedures of the organisation;
 - · use of any equipment required to carry-out the role.
- 2. **Staff in supervisory positions** are given specific training (or, where relevant, mentoring) relating to the skills required for leadership, for example:
 - · the role of a supervisor;
 - · team behaviour;
 - · leadership;
 - · decision making;
 - · problem solving;
 - · communication skills;
 - performance review;
 - · time management;
 - · customer service.
- 3. Staff who require an SIA licence:
 - have received and passed additional job training, as defined by the relevant training specifications;
 - undergo a skills assessment on joining the organisation to identify their competence level and immediate training needs;
 - · are given training on subject-specific modules.
- 4. All training is documented.
- 5. The effectiveness of any training is assessed.

IMPROVEMENT LEVEL 1

Organisational training needs are effectively assessed as part of an annual appraisal.

Supervisors:

- receive specific training in additional topics that would improve and enhance their leadership skills;
- $\boldsymbol{\cdot}$ have their training needs monitored, reviewed and recorded;
- · have undertaken recognised training and qualifications.

The organisation tests **front line licensable staff's** knowledge of the relevant licence-linked training at least annually.

IMPROVEMENT LEVEL 2

The organisation has a leadership development programme or equivalent, to bring talent through the ranks.

Provision is made for mentors to support **supervisors** in their leadership role.

All relevant managers have undertaken:

- licence-linked training (or equivalent) in at least one sector;
- · a recognised security management qualification.

IMPROVEMENT LEVEL 3

Front line licensable staff are consulted on the availability and content of training programmes.

Feedback from staff is used to plan and implement improvements to training.

The organisation contributes to the development of the core competencies and standards for the licensable sectors within which it operates.

CLARIFICATION

All front line staff are to have undergone training to obtain the relevant SIA licence, followed by additional basic job training on the procedures of the organisation. Where there is no training requirement for licensing purposes, for example, non-front line licence holders or keyholders, then there is still a requirement to provide role-specific training. This is supported by, where relevant, subject specific and equipment training such as first aid, firefighting etc.

By 'licence-linked training' here, we mean the minimum qualification needed to achieve the competency requirement of the appropriate SIA licence. It is important that the basic competence of all staff is tested before deployment. In some cases, licence-linked training may be many years old and staff may have done no refresher training. Likewise, new licence holders may have recently completed the training, but not yet implemented it in a real environment.

This indicator may be particularly relevant for staff working as security guards with a door supervisor licence.

Testing of competence and skills assessment may take place through targeted questioning, such as scenario posing at interview, and/or completion of a questionnaire at recruitment, and/or completion of a test or exam before deployment, for example, completing an incident report.

Information on the specifications for licence-linked training can be found here: www.gov.uk/guidance/check-what-training-you-need-to-get-an-sia-licence. These can be used by organisations to help design the appropriate method of testing.

For staff who are used infrequently, for example, casual or events staff, a more flexible approach can be adopted, for example, through risk assessment by event or deployment.

The effectiveness of any training should be assessed. Training need not necessarily be attendance on a specific training course. Mentoring and specific guidance in good leadership practice may be considered as well.

EXAMPLES

For people who only provide keyholding services, there is no licensing training requirement, therefore the organisation should ensure that relevant training is provided in order to ensure competency.

Licensed door supervisors and close protection officers who are employed in a security guarding role, should receive as a minimum, training equivalent to that required for the SIA security guarding licence.

Consideration should also be given to licensable staff who may benefit from the physical intervention training module, such as retail security staff in particular, as well staff holding close protection licences to perform work as door supervisors.

Training needs analysis or competency based analysis drives future training requirements and plans.

GOOD PRACTICE

- A specific licence-linked refresher training module which can be used by new starters and existing staff.
- Online refresher training package, which staff can work through in their own time.
- Managers complete licence linked qualifications or recognised security management qualifications, such as:
- Degree/Foundation degree in Security Management, Risk Management, Crowd Management, Terrorism;
- Diploma in Security Management, Certificate in Security Management, NVQ in Security Operations/Management.
- Information on security management qualifications can be found at the Security Institute: www.security-institute.org

Subjects of interest for training may include:

- · health and safety at work;
- · protection of premises and property.

6.2.4

Assignment-specific training/induction/ information is given

REQUIRED ACHIEVEMENT LEVEL

- 1. Assignment-specific training/induction/information is given verbally and is supported by documented assignment instructions.
- 2. Staff are supervised:
 - $\boldsymbol{\cdot}$ for the duration of their on-assignment induction at a new location;
 - over a number of shifts (where the assignment is undertaken as shift work).

IMPROVEMENT LEVEL 1

Staff are tested on their knowledge of their assignment instructions.

Assignment specific training/induction/information is validated by the organisation, for example, on monthly/quarterly welfare visits.

IMPROVEMENT LEVEL 2

Staff have the opportunity to give feedback on the quality and relevance of their assignment-specific training/induction information.

CLARIFICATION

Assignment instructions refers to any instructions given to a staff member in order for them to be able to carry out their role on a given customer contract.

There may be some sectors such as CVIT where it is not possible to keep new staff under supervision. The applicant organisation should have procedures in place to ensure that, in such cases, the assignment is within the capabilities of the new staff and provision is made to discuss issues and concerns at the end of every day.

EXAMPLES

The CVIT sector have safe systems of work, which all operatives are expected to abide by in all situations.

6.2.5

All staff have training plans and records

REQUIRED ACHIEVEMENT LEVEL

- 1. All staff have training records that show:
 - · programme of study completed;
 - · dates when training was conducted;
 - · details of the training provider and/or trainers involved;
 - · certificate expiry dates.
- 2. The currency of training is monitored to identify when training needs to be renewed.
- 3. Records of all personal development needs and training undertaken are maintained.

IMPROVEMENT LEVEL 1

Where appropriate, staff have professional/vocational training plans that show:

- · details of planned training;
- · planned completion date;
- a named person who is responsible for ensuring the training takes place.

IMPROVEMENT LEVEL 2

Training plans and records are regularly reviewed with staff to ensure they are accurate and up to date.

CLARIFICATION

The training required to obtain an SIA licence would be considered as professional and vocational training for the purpose of this indicator.

If a staff member is already licensed when employment starts, it is possible that the full training records may not be known. The applicant organisation should be aware of when the licence and any required retraining is due for renewal.

Ref: ISO9001

GOOD PRACTICE

- Organisations deploying close protection staff should maintain records of first aid certificates and monitor the need for renewal.
- Record should also be kept of all training undertaken and professional development needs of staff.

6.3.1

A holiday entitlement policy is implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a holiday policy that entitles all staff to the statutory minimum.
- 2. Staff who join within the holiday year, or who work part-time, are entitled to the same holiday entitlement pro-rata.
- 3. Statutory definitions are used to calculate pro-rata payments.
- 4. Staff are encouraged to use their full entitlement.
- 5. The organisation considers requests for flexible working fairly.

IMPROVEMENT LEVEL 1

Staff who work on public holidays that, would normally form part of their annual leave entitlement, are entitled to extra paid leave or enhanced pay.

IMPROVEMENT LEVEL 2

Leave entitlement is monitored and staff are told of their remaining entitlement.

A policy that enables staff to carry over their leave entitlement exists and is communicated to staff.

The organisation has a special leave policy.

IMPROVEMENT LEVEL 3

Holiday entitlement exceeds the statutory minimum by at least five days $\ensuremath{\mathsf{OR}}$

The organisation has in place a holiday accruement policy for long service.

A holiday entitlement policy entitling staff to the statutory minimum is a statutory requirement. The ACS standard requires the applicant organisation to encourage staff to take their full entitlement.

When we refer to rolled-up holiday pay – we mean instances where a company is paying one or more employees an amount for holiday pay in the hourly rate (and/or at pay points other than when holiday is taken) instead of holiday pay being paid for the time when annual leave is taken.

We consider this practice to fall below the ACS standard (6.3.1) as it does not encourage employees to take their full entitlement. Moreover, it is not legal. The SIA has sought independent legal advice on the issue of rolled-up holiday pay, which has confirmed that our position is correct.

Should the ACS assessors observe a SIA approved contractor deploying this practice, an improvement need must be raised. If a current employment contract still includes rolled-up pay, it needs to be re-negotiated.

We are aware that the above is not universally understood and some believe rolled-up holiday pay can be legitimately used. It cannot. We are also aware that businesses may find this inconvenient or difficult, but that does not change our position.

Where employers may find it difficult to work out what holiday pay someone is entitled to, particularly if they work variable hours and/or only occasionally, and may challenge the assessor's findings, the assessor may wish to direct the contractor to the following websites:

- www.gov.uk/holiday-entitlement-rights/holiday-pay-the-basics
- · m.acas.org.uk/media/pdf/r/c/Acas-guide-Holidays-and-holiday-pay.pdf

Note: there are references in both the self-assessment workbook – re: conformance with legislation on pay (4.2.1) and re: contracts of employment including details on pay and allowances (6.1.3), and the self-assessment workbook guide – under 4.2.1, 4.2.2, 6.1.3, 6.3.1, 6.4.2 which includes further reference to holiday pay and point contractors/assessors to relevant guidance.

GOOD PRACTICE

- Staff are given a duty roster three to six months in advance to help staff maintain a work life balance.
- Holiday entitlement exceeds the statutory minimum by at least five days
- Additional holiday allowance on an incremental basis according to a defined period of service that encourages and rewards long service.

6.3.2

A pensions policy exists which is implemented and communicated

REQUIRED ACHIEVEMENT LEVEL

1. The organisation offers a workplace pension scheme and the scheme meets minimum standards so is not effected by automatic enrolment (as defined by in the Pensions Act 2008).

OR

- 2. The organisation has worked out if it must provide a pension scheme under the Pensions Act 2008.
- 3. The organisation understands and has fulfilled its duties under the Pensions Act 2008, that is, what they need to do if they need to put staff into a pension scheme or what they need to do if they don't need to put staff into a pension scheme.
- 4. Where there is a requirement to put staff into a pension scheme, the organisation:
 - has chosen a pension scheme (which is suitable for the organisation and its staff) that is set up for automatic enrolment. The pension scheme has been independently reviewed or regulated by the Financial Conduct Authority;
 - has written to all its staff individually to explain how automatic enrolment applies to them;
 - has declared its compliance to the Pensions Regulator telling them how it has met its other duties.
- 5. The organisation fulfils its ongoing duties that include:
 - assessing any new staff it takes on to see if they meet the age and earnings criteria to be put into a pension scheme;
 - monitoring the ages and earnings of its staff every time it pays them to see if they need to be put into a pension scheme;
 - paying at least the minimum contribution levels into the pension scheme;
 - $\boldsymbol{\cdot}$ dealing with requests to join and leave the pension scheme;
 - · keeping accurate records of what it has done.
- 6. Re-enrolment is reviewed every three years.
- 7. The organisation encourages its staff to:
 - seek advice relating to how membership of the pension scheme correlates with the level of state pension;
 - · plan for their retirement;
 - · protect themselves against pension scams.
- 8. The organisation actively communicates with its staff about changes to the state pension, which may affect them.

IMPROVEMENT LEVEL 1

All eligible staff are enrolled into workplace pension schemes with less than 10% opting out.

The organisation facilitates the availability of expert advice/trusted websites relating to pension arrangements that include:

- · guidance on retirement advice and options;
- · how staff can protect themselves against pension scams.

IMPROVEMENT LEVEL 2

There is a workplace pension scheme in place to which the employer contributes, **matching** staff contributions, and is open to all staff.

IMPROVEMENT LEVEL 3

The employer contributions to a pension scheme exceed staff contributions.

CLARIFICATION

The ACS standard requires organisations to take some responsibility for ensuring their staff are aware of the risks of not providing for their retirement. We recognise that many employers will already have pension provision for their workers, and that this will often match or exceed the minimum requirements contained in the duties. In these cases, such employers may just need to check that the minimum requirements are covered in their existing processes.

The employer must make arrangements so that the terms and conditions of the personal pension scheme being used for automatic enrolment, reenrolment or enrolment are given to the jobholder. Whilst in practice the provider may issue the terms and conditions, it remains the employer's responsibility under the law to make arrangements for this to happen.

Further information on the statutory requirements relating to the provision of pensions, including auto-enrolment, can be found at www.gov.uk/workplacepensions

The Pensions Advisory Service www.pensionsadvisoryservice.org.uk/ or the regulator www.thepensionsregulator.gov.uk both provide free and impartial advice, including lots of information about auto-enrolment.

A workplace pension scheme must be a qualifying pension scheme to meet the requirements of automatic enrolment. It must also meet the minimum levels of contributions or allow benefits to build up at least at a minimum rate.

Qualifying schemes may be either defined benefit schemes or defined contribution (money purchase) schemes. A defined contribution pension is where you build up a pot of money that you can use to provide an income in retirement. The income you might get from a defined contribution scheme depends on factors including the amount you pay in, the fund's investment performance and the choices you make at retirement.

Level 1

At least 90% of eligible staff should be enrolled into, and not opt out of, a workplace pension scheme/s,

Level 2

To meet the Level 2 requirement, a workplace pension scheme must be made available to all staff, including those not eligible for auto-enrollment, e.g. part-timers or zero-hour employees, and the employer contributions must match those of the employee.

GOOD PRACTICE

- Some organisations invite a financial or pensions advisor to offer help to staff.
- Annual reminders sent out with wage slips can be a useful reminder for staff to reconsider their pension provision.

A health and safety policy and supporting procedures exist and are implemented

This indicator links to:

• 5.2.1 Lease or ownership papers are appropriate to the business premises, providing administrative and any operational centres that are fit for purpose.

REQUIRED ACHIEVEMENT LEVEL

- 1. There is a health and safety policy which:
 - · meets minimum legal requirements;
 - is available at all locations where the organisation's staff are working.
- 2. All staff are given health and safety training as part of their induction when joining the organisation and on a regular basis.
- 3. Procedures are in place:
 - · to confirm the safety of staff whilst working at a customer site;
 - · for dealing with workplace violence/violent incidents.
- 4. Lessons learned from the review of incidents lead to improvements in practice.

IMPROVEMENT LEVEL 1

There is a health and safety policy in place that:

- · goes beyond minimum legal requirements;
- · is fully implemented with supporting procedures.

Performance reporting goes beyond minimum legal requirements.

Performance against all health and safety measures is frequently monitored and reviewed.

IMPROVEMENT LEVEL 2

Additional health and safety awareness courses are regularly undertaken by all staff.

IMPROVEMENT LEVEL 2

The health and safety policy is recognised as best practice within the industry (by organisations such as the Health and Safety Executive, ROSPA, British Safety Council).

The organisation is a member of an appropriate recognised scheme, for example:

- · Safe Contractor;
- · RoSPA;
- · British Safety Council.

CLARIFICATION

Applicant organisations regardless of the size are required to have a health and safety policy that meets minimum legal requirements. There is a statutory requirement for all organisations with five or more staff to have a health and safety policy and supporting procedures to ensure the safety of staff at work. Organisations with <5 employees still require a policy, and that, except for the need for it to be written, it should meet all other legal requirements. For additional information go to: www.hse.gov.uk/simple-health-safety/index.htm.

The ACS standard requires organisations to consider the risks to staff at customer sites. At customer sites, staff need to be trained in line with the customer's health and safety policy and procedures.

Risk assessments should be regularly reviewed. Staff carrying out risk assessments should be appropriately trained. Organisations should particularly consider lone worker policy and practice.

Particular attention should be given where there are virtual offices or where staff work from home, to ensure that staff are not put at risk.

Security staff can be seen as targets and may be subject to verbal and physical abuse. Approved contractors must ensure there are specific procedures in place to deal with workplace violence.

The Health and Safety at Work Act places general duties on you to do what is reasonably practicable to ensure health and safety. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble. However, you do not need to take action if it would be grossly disproportionate to the level of risk, and the health, safety and welfare of your employees at work.

The Management of Health and Safety at Work Regulations 1999 (the Management Regulations) require organisations to assess and control risks to protect your employees.

Improvement Level 1

Level 1, recognises organisations that take additional action to further safeguard health and safety at work.

Other regulations supporting the HSW Act set out more detailed legal duties for specific activities or industries. The Health and Safety Executive (HSE) has produced publications to help you understand what these mean in practice.

HSE 'The health and safety toolbox: How to control risks at work' is a useful quide: https://www.hse.gov.uk/toolbox/index.htm

- Accreditation to the Safe contractor scheme which ensures correct advice and training is given to all staff along with other requirements such as conducting relevant risk assessments.
- Risk assessments are ideally point of use documents and should be readily available for staff to refer to at their place of work.
- Each staff member completes an annual health and safety questionnaire.
- $\boldsymbol{\cdot}$ Organisations might use scoring mechanisms to prioritise risks.
- For further information, refer to organisations like, HSE, ROSPA, and British Safety Council. Days lost due to incidents are monitored.

An approach to the provision of welfare and benefits is in place

REQUIRED ACHIEVEMENT LEVEL

- 1. The welfare and benefits offered by the organisation meet the legal requirements.
- 2. Appropriate uniforms are supplied and the organisation maintains and replaces when necessary.
- 3. Necessary Personal Protective Equipment (PPE) is provided free of charge.
- 4. All staff:
 - · are made aware of the welfare and other benefits package;
 - all staff have regular contact with a supervisor or manager who can address any welfare concerns.

Licence Management

- 5. Where applicable: the organisation does not:
 - mandate that any individual must consent to the approved contractor acting on their behalf using licence management service;
 - charge any individual an administration fee for submitting their application on their behalf using the licence management service, unless otherwise agreed with the SIA by way of an exceptional circumstance request.
- 6. Where applicable: processing SIA licence applications via the licence management service. This includes the organisation electronically capturing and submitting a suitable passport-style photograph in accordance with the SIA's website.

IMPROVEMENT LEVEL 1

The welfare and benefits offered by the organisation exceed the legal requirements and include at least two of the following:

- · critical illness cover;
- · compassionate leave arrangements;
- $\boldsymbol{\cdot}$ payment of training required to obtain an SIA licence;
- · days spent on the training required for an SIA licence are paid;
- · payment of the SIA licence application fee.

IMPROVEMENT LEVEL 2

The welfare and benefits package also includes all of the following:

- · personal accident cover;
- · sufficient legal cover;
- · counselling service from trained professionals after suffering trauma.

Please see the Glossary for a definition of the term 'approach'.

CLARIFICATION

The welfare of staff and the benefits provided by employers is key to making the security industry a career of choice and to the retention of staff. The welfare arrangements and the benefits provided should be comparable in range to competitors in both the industry and the local market place.

Regardless of the size of applicant organisation, the working conditions should encourage recruitment into the industry and loyalty from staff.

Further information on Personal Protective Equipment (PPE) can be found at: www.hse.gov.uk/pubns/indg174.pdf

Licence Management requirements:

At initial assessment it may not be possible for requirement five and six to be fully assessed because the business does not have access to the SIA portal. However, the business must be able to demonstrate how it intends to obtain and upload a photo of the correct size and requirement (as per the LM Manual) for an individual. Some businesses may use smart phones, others may use cameras, and some may request the individual to provide a hard copy photo for this purpose. These are all acceptable providing business has determined its policy and process, and can upload these including any resizing necessary.

EXAMPLES

The examples given are not definitive. Other examples of welfare and benefits should be considered.

- Some organisations might offer bonuses to recognise effective performance. However, organisations need to ensure that the process is fair and transparent.
- Some organisations transport staff paid at the minimum wage to and from work.
- Some organisations provide free accommodation to staff undertaking significant travel to work as distant sites.
- Additional support offered on the business premises for staff who do not have English as their first language.
- Confidential employee assistance programmes operated by external agencies can provide free support to individuals on a wide range of issues.

A process for the appraisal of staff performance is in place

This indicator links to:

- 6.3.6 Self learning and improvement is encouraged.
- 7.4.2 Leaders recognise individual and team efforts.

REQUIRED ACHIEVEMENT LEVEL

- 1. Training and development needs are agreed and implemented.
- 2. All staff have at least an annual discussion with a supervisor or manager about their performance:
 - which is based on the views of their immediate supervisor or manager, and these views are supported by appropriate evidence;
 - · which is two-way and is based on more than a simple tick-list;
 - · which is documented.

IMPROVEMENT LEVEL 1

The discussions contain positive feedback and are based on input from the customer/s and colleagues.

IMPROVEMENT LEVEL 2

Interim discussions are held at least six-monthly with an immediate supervisor or manager.

Please see the Glossary for a definition of the term 'performance'.

CLARIFICATION

The term 'appraisal' does not necessarily mean a formal appraisal system. However all staff should have a personal discussion, at least annually, with their supervisor or manager about their performance. The discussion should be specifically about performance and the staff should be made aware of the purpose.

It should also be fair, two-way and focus not only on past performance but also on future needs to improve performance. The format of the discussion should be appropriate to the size of the applicant organisation and the needs of the staff. It should not be based solely on a tick-box site review, for example, against assignment instructions.

It is important that any such discussions are documented in some way to clarify and ensure complete understanding of the discussion and avoid any potential dispute.

GOOD PRACTICE

All discussions would be documented and signed by the manager and the staff member. Previous discussions would be used to form the basis of the current discussion so that actions can be confirmed as being completed and improvements recognised.

There should be a clear link between an individual's objectives and the wider aims and objectives of the organisation. This may simply be an understanding of the overall direction of the organisation and the impact of their role, for example their performance might influence whether or not a contract is renewed or extended.

Self learning and improvement is encouraged

This indicator links to:

 6.3.5 A process for the appraisal of staff performance is in place and is implemented.

REQUIRED ACHIEVEMENT LEVEL

- 1. Staff are encouraged to undertake:
 - · relevant/specialist training;
 - recognised formal qualifications in their chosen relevant disciplines based on national occupational standards;
 - · learning and development outside their chosen relevant disciplines.
- 2. Requests from staff are supported where possible.
- 3. Staff are aware of the opportunities available to them.
- 4. Assistance with learning activities is offered.

IMPROVEMENT LEVEL 1

The organisation provides paid time off for all job-related training.

The organisation funds the membership of relevant professional bodies and professional certification fees.

CLARIFICATION

The main focus of this indicator is the need to improve the skills and competencies within the industry. Applicant organisations should demonstrate how they encourage all staff to undertake additional/specialist training and the achievement of formal qualifications.

Where organisations tend to focus on individuals training needs, the following link provide useful information:

www.security-institute.org

- · Access to e-learning.
- Building links with local training providers, and exploring potential funding opportunities. Paid time off for learning.
- The organisation funds the membership of relevant professional bodies and professional certification fees such as membership of the Security Institute, Institute of Risk Management, Chartered Security Professional Status, CIPD, ILM, IPSA, ASIS, Institute of Directors, EPIC (Ex-Police in Industry and Commerce) etc.

The organisation develops staff, especially those with leadership potential

REQUIRED ACHIEVEMENT LEVEL

- 1. There are procedures in place to assist in the development of staff.
- 2. Staff who want to develop or who demonstrate leadership potential are identified.

IMPROVEMENT LEVEL 1

Staff with leadership potential and who want to develop are identified and given opportunities to learn about the business from a variety of positions and/or through mentoring.

IMPROVEMENT LEVEL 2

The company has an implemented succession plan that is reviewed annually.

Staff with leadership potential are mentored and developed by the senior management team.

Please see the Glossary for a definition of the term 'leader'.

CLARIFICATION

This may be achieved on an informal basis or, in the case of some larger organisations, on a more formal basis. However informal the procedures must address the ACS standard requirements. Informal procedures will be tested through discussions with employees.

The existence of procedures does not necessarily mean that employees wish to take opportunities presented to them. The applicant organisation should demonstrate that participation would be encouraged if an employee shows the desire.

It is possible that smaller organisations feel they do not have the opportunity to implement such developmental procedures as they cannot support more positions of responsibility. Such organisations should recognise the needs of the employees, and make such provision as is possible recognising that the employee may leave once additional skills and competencies have been developed.

- · Succession planning.
- · Peer training.
- · Mentors.
- · Publicising internal promotions and successes.
- · Project work and/or secondments.
- · Multi-skilling for staff with potential.

6.4.1

The organisation adheres to the current legislation on working hours

REQUIRED ACHIEVEMENT LEVEL

- 1. The organisation works within the legal requirements on staff working hours.
- 2. Staff are not put under pressure to opt-out of the restrictions before the employment contract is signed.
- 3. Shift patterns and the number of hours worked are appropriate, to protect the health and safety and ensure the effectiveness of staff.
- 4. Discussions take place where appropriate, with customers to encourage shift patterns with shorter hours.

IMPROVEMENT LEVEL 1

The organisation has implemented a policy to limit excess working hours for those undertaking regulated activity, that aids staff health and wellbeing.

IMPROVEMENT LEVEL 2

All operatives work no more than 48 hours per week.

CLARIFICATION

There is a statutory requirement to work in accordance with the Working Time Directive. There should be regular review of shift patterns, and regular risk assessments to ensure safe practice, and routine monitoring of hours worked for each individual, including work undertaken for other employers, e.g. as second jobs.

Most workers do not have to work more than 48 hours per week on average. If a worker agrees to work beyond the 48-hour limit, they must put it in writing. This is known as an opt-out agreement.

There is no obligation on a worker to sign an opt-out agreement and they should not suffer any detriment if they choose not to do so.

Workers have the right to cancel an opt-out agreement by giving their employer a period of notice. This notice must be at least seven days, although a longer notice period may be set by the employer. If there is a longer notice period this must be clearly stated as a term of the opt-out agreement and cannot be longer than three months.

Work-life balance is the equilibrium between an individual's priorities at work and their priorities in other aspects of life. With good work-life balance, work/home conflict is minimised so that the demands of work do not prevent a person from gaining satisfaction from their life outside work, while aspects of their personal life do not spill over to exert a negative impact on their work.

Level 1

There should be tangible evidence to demonstrate the organisation's approach, including how they have determined their policy, and the benefits it has brought to individuals and to the business. This might include arrangements for overtime, cover, and shift patterns.

Further information is available at: www.gov.uk/maximum-weekly-working-hours

EXAMPLES

- · Discussions with staff.
- · Staff and PAYE records.

GOOD PRACTICE

Proactive education of customers on the benefits of reduced working hours, for example, contracts delivered by more staff on less hours but at an enhanced hourly rate.

6.4.2

The organisation complies with current legislation on staff wages

This indicator links to:

- 4.2.1 Clear and effective management of the payroll can be evidenced.
- 6.1.3 Terms and conditions of employment exist which are implemented and communicated.

REQUIRED ACHIEVEMENT LEVEL

- 1. The national minimum and real living wage rates are adhered to or exceeded, for basic take home pay.
- 2. Any overtime payments are paid over and above basic take home pay.
- 3. Wage calculations should not include other items like holiday pay and transport costs.

IMPROVEMENT LEVEL 1

Staff are paid equitably throughout the organisation according to their job role and responsibilities.

IMPROVEMENT LEVEL 2

The company benchmarks its wage rate for front line staff against comparable sectors/firms.

Financial records demonstrate transparency on how overheads are built into the charge rate and how wage rates and payment are structured.

IMPROVEMENT LEVEL 3

The organisation pays all staff at least the real living wage for the area in which they live and work.

CLARIFICATION

The ACS standard requires organisations to pay the real living wage rates excluding overtime payments. Wage calculations/payments should not include other items like holiday pay, transport and accommodation costs.

See clarification given under 4.2.1 for additional information regarding deductions from pay and adherence to national minimum wage rates.

More information is available at: www.gov.uk/national-minimum-wage

EXAMPLES

The Equalities Act 2010 addresses issues over equal pay for the same job.

Example (charge for SIA licence)

 Security Industry Authority – Specific workers must by law hold a licence. It is the worker's responsibility to ensure they obtain the licence, and their responsibility to pay the fee. If the employer pays the fee and then seeks repayment from the worker, national minimum wage pay will not be reduced (regardless of whether the charge is made by either a payment or a deduction).

Explanation for qualification charges

 A charge for something, such as a qualification, which is required as a pre-requisite for obtaining employment does not reduce national minimum wage pay.

however, if the requirement is imposed by the employer and arises from the employment itself then any charge passed on to the worker would be considered an expense (NMWM11100), and would reduce national minimum wage pay.

Further information can be found at: www.gov.uk/hmrc-internal-manuals/national-minimum-wage-manual/nmwm11230

Deduction for uniforms

- As a condition of employment an employer may require workers to wear specific uniforms. If the employer requires the worker to purchase specific items, such as overalls, then any deductions made from pay or payments made to the employer in respect of those items will always reduce national minimum wage pay.
- If an employer provides a uniform, any charge the employer makes for ordinary wear and tear to that uniform will reduce the worker's national minimum wage pay.

Further information can be found at: www.gov.uk/hmrc-internal-manuals/national-minimum-wage-manual/nmwm11220

6.5.1

The organisation regularly reviews performance against key staff performance indicators

This indicator links to:

- · 1.1.3 A plan for the business exists with an effective review schedule.
- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- •1.2.2 Goals, objectives and targets are clearly visible for all levels of the organisation.
- 6.2.3 All staff are trained to the required standard.
- 6.3.5 A process for the appraisal of staff performance is in place and is implemented.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Staff performance measures relate to performance in service delivery, for example, levels of training and development, competency requirements.
- 2. They are reviewed as and when discussions about performance take place with the customer.
- Additional measures cover all key aspects of staff activity, for example, staff turnover and retention, recruitment trends, appraisals being conducted on time.
- 4. Reasons for shortfalls in performance are understood.
- 5. Some results show positive trends and/or sustained good performance for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Measures covering all aspects of staff activity are regularly reviewed.

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 2

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement.

Please see the Glossary for a definition of the terms 'key', 'key performance indicator' and 'measures and indicators'.

CLARIFICATION

This indicator is asking an organisation to demonstrate that they measure, review and improve the way in which they manage their staff. It is looking for organisations to monitor and measure items that appear throughout this Criterion 6: People.

EXAMPLES

- · Levels of training and development.
- · Involvement in improvements.
- · Competency requirements.
- · Success rates of training and development to meet objectives.
- · Recognition of individuals and teams.
- Use of benefits.
- · Absenteeism and sickness levels.
- · Recruitment trends.
- · Staff turnover.
- · Accuracy of personnel administration.
- · Communication effectiveness.
- · Training evaluation.
- · Appraisals conducted on time.
- · Check calls.
- · Punctuality.

6.5.2

The organisation regularly reviews performance against responses from staff opinion gathering

This indicator links to:

- 6.1.8 A process for obtaining staff opinions on the organisation, their job and conditions exists and is implemented.
- 6.2.3 All staff are trained to the required standard.
- 6.3.5 A process for the appraisal of staff performance is in place and is implemented.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Staff opinions are regularly obtained and reviewed.
- 2. Reasons for actual and perceived shortfalls in performance are understood.
- 3. Appropriate actions have been taken on some issues raised by staff.
- 4. Some results show positive trends and/or sustained good performance for the period of time the measure has been in place.

IMPROVEMENT LEVEL 1

Performance against more formal staff perception measures is regularly reviewed.

Measures cover all aspects of staff activity.

Reasons for shortfalls in performance are understood.

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

All measures have targets. These are either met or the reasons for shortfalls in performance are understood and are being addressed.

Action plans are in place where performance falls below target.

IMPROVEMENT LEVEL 3

Comparisons of performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting learning and improvement. $% \label{eq:comparison} % \label{eq:comparison} %$

CLARIFICATION

Opinion gathering to deliver quantitative measures does not have to be a formal annual quality questionnaire; it can be as simple as a series of set questions to be discussed with all customers, with the results being consolidated, into percentages or numbers, for the organisation.

Some organisations will have sophisticated systems for doing this, whereas other organisations may gather information on an informal basis.

Organisations should be able to provide examples of feedback from customers, including an indication of how the organisation has responded, and any action taken as a result.

EXAMPLES

- · Communication.
- · Equal opportunities.
- · Leadership.
- · Involvement.
- · Recognition.
- · Training and development.
- · Employment conditions.
- · Health and safety conditions.
- · Job security.
- · Pay and benefits.
- · Working environment.
- $\boldsymbol{\cdot}$ The organisation's role in the community and society.
- · The organisation's environmental views and activities.

- Regular quarterly employee engagement meetings to gather feedback from staff and ideas for improvement.
- Q&A notice board where staff can post questions and directors answer them.

Criterion 7: Leadership



An SIA approved contractor has effective leadership.

This criterion is composed of five sub-criteria

The SIA approved contractor can demonstrate that:

- 7.1 the leaders have the knowledge and ability to lead a security company;
- 7.2 the leaders review and continuously improve the effectiveness of their leadership skills;
- 7.3 the leaders maintain an ethical business culture;
- 7.4 the leaders develop and implement an effective system for recognising and rewarding excellence;
- 7.5 it measures and improves performance of the organisation.

7.1.1

Leaders can demonstrate, relevant to sector, knowledge of the legislative framework, working practices and industry standards/codes of practice

REQUIRED ACHIEVEMENT LEVEL

- 1. Leaders:
 - have an appropriate knowledge of the legislative framework, common law, working practice and industry standards/codes of practice for their sector and role within the organisation;
 - · can apply this knowledge to their organisation.

IMPROVEMENT LEVEL 1

Leaders actively seek information or advice to ensure they are working to the most current and up to date legislation, working practice and industry standards and/or codes of practice for the sector.

IMPROVEMENT LEVEL 2

Senior leaders of the organisation have a recognised qualification in a discipline relevant to their role.

IMPROVEMENT LEVEL 3

Senior leaders of the organisation are involved in the review and update of working practices and industry standards/code of practice for their sector.

Please see the ${\it Glossary}$ for a definition of the terms 'code of practice', 'knowledge' and 'leader'.

CLARIFICATION

The leaders of the applicant organisation should have an outline knowledge, at a minimum, of the legislative framework, common law, working practice and industry standards/codes of practice. It is acceptable for applicant organisations to outsource the procurement of this information to specialist organisations. This is delegation not abdication and the leaders have a duty to ensure they understand and apply the requirements where necessary.

Level 3:

Evidence demonstrating that leaders are involved in the review and update of working practices and industry standards for their sector, will vary according to the size and type of organisation. For some organisations, this may include membership of relevant committees such as the British Standard Institution's development committees, the SIA's strategy and standards groups, or other standards development groups. For smaller organisations, this might include contributing to workshops or consultation activities relating to standards development. Tangible evidence should be available to support, such as records of comments on proposals or drafts, invites to formal consultation as an industry expert, attendance at consultative events, meeting minutes.

Ref: ISO9001

EXAMPLES

The senior leaders of the organisation have a recognised qualification in a discipline relevant to their role, for example:

- degree/foundation degree in Security Management, Crowd Management, Terrorism, Risk Management, Policing;
- $\boldsymbol{\cdot}$ certificate or Diploma in Security Management;
- · finance or HR qualification;
- · MBA or Business Management qualification;
- $\cdot\,$ NVQ/BTEC in discipline relevant to business, for example, customer service, security;
- qualifications achieved during service with Armed Forces and/or Police.

GOOD PRACTICE

Leaders use various sources of information such as the Department for Business, Innovation and Skills (BIS), the Institute of Leadership & Management, and British Standards Institution updates etc. to keep abreast of current and future developments in their sectors. Leaders demonstrate a commitment to achieving and maintaining the ACS standard, for example, sharing good practices at forums, hosting training.

7.1.2

Managers and directors responsible for processes and key personnel are involved in developing and can demonstrate an understanding of procedures

This indicator links to:

• 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. All managers and directors or people with significant control responsible for processes and key personnel:
 - · understand all of the procedures within their sphere of responsibility;
 - · ensure they are fully implemented.
- 2. Leaders continue to be involved in the development and implementation of the organisation's policies and procedures to ensure they:
 - · are regularly reviewed;
 - · remain relevant to the business;
 - · are effectively implemented.
- 3. Leaders are involved in the review of key performance results.
- 4. Leaders review results and raise and implement any action plans within their own area of responsibility.

IMPROVEMENT LEVEL 1

All managers and directors or people with significant control responsible for processes and key personnel:

- understand the links between the procedures and how they work together to deliver the plans for the business;
- actively ensure they are fully implemented in a manner reflecting the organisations values.

Please see the Glossary for a definition of the terms 'key', 'leader' and 'performance'.

CLARIFICATION

Leaders should understand what should be and what is happening within their organisation. Where the two differ there should be evidence that action is being taken to ensure correct procedures are implemented.

This indicator is closing the loop by requiring the leaders to review performance results and to take action where appropriate to improve performance.

There is a clear link in this indicator to the Plan, Do, Check, Act (PDCA) cycle. The ACS standard is looking for leader involvement in the development of the policies and procedures that form the basis of the way the company operates. Leaders are then expected to act on an issue or complaint not only to respond to the complaint but also by looking at and amending what, in the policies and procedures, contributed to the issue or complaint. The leaders also need to ensure that the amendments are implemented.

Ref: ISO9001

EXAMPLES

- Leaders review performance regularly against targets. Shortfalls are addressed.
- · Improvements in performance are recognised by leaders.
- · Changes to procedures after an incident.
- · Changes to procedures following any audit/assessment.
- Development of policies and procedures following changes in law.
- · Communication of importance of adhering to procedures.
- $\boldsymbol{\cdot}$ Development of back up and safety procedures.

- Leaders in the regular review of the policies and procedures to ensure that they continue to be relevant to the business and compliant to legislation.
- Leaders ensure that emergency and contingency procedures are regularly tested.
- · Leaders participate in company training and induction.
- · Leaders take ownership of specific procedures and/or processes.
- Leaders have several management tiers where potential/ actual improvements to procedures are generated, resulting in review of actual performance. For example, directors/senior management meetings.
- Leaders are directly involved in actions to address shortfalls in performance.
- · Key information is cascaded to every level of the organisation.

7.2 An SIA approved contractor's leaders review and continuously improve the effectiveness of their leadership skills

7.2.1

Leaders consult stakeholders on their leadership skills and have personal development plans based on the feedback

This indicator links to:

- 1.3.1 The management of internal and external communications is handled effectively.
- 3.3.2 A complaints procedure is in place and implemented.
- 3.4.1 An approach to consumer contact is implemented.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Leaders regularly seek feedback from customers and staff on their strengths and areas for development in the area of leadership.
- 2. A process for obtaining feedback from customers and staff is followed, which sets out:
 - · how feedback is obtained;
 - how feedback is acted upon to drive improvements in management style.
- 3. The areas for improvement are noted and actions are taken to improve behaviour.

IMPROVEMENT LEVEL 1

Improvement plans exist to address development opportunities for improving management style.

Improvement plans detail specific actions to be taken within agreed timescales.

IMPROVEMENT LEVEL 2

All leaders also regularly seek feedback on their leadership strengths and areas for development from other stakeholders, such as consumers, Police and other authorities.

The feedback is reviewed and improvement plans are created to address the areas for development.

Improvement plans are monitored for progress.

Please see the Glossary for a definition of the term 'leader'.

7.2 An SIA approved contractor's leaders review and continuously improve the effectiveness of their leadership skills

CLARIFICATION

Obtaining feedback on leadership style is likely to be conducted on an informal basis rather than through a mechanism such as 360 degree feedback. In some organisations feedback from staff on leadership skills within may be undertaken on a more formal basis.

Whichever approach is used, it must be applied to all leaders within the organisation and sought from all staff.

There must be evidence that feedback from employees is obtained, how it is obtained, and how it is acted upon to drive improvements in behaviour and management style.

There may be a few examples where feedback from customers has been received, however applicant organisations should consider making a request for this type of feedback part of discussions with clients on an annual basis.

EXAMPLES

Leaders could have an open door policy within their organisation.

- Leadership is addressed specifically within staff and customer feedback mechanisms.
- Other feedback from customers is gathered through means such as the tendering process, contract review, and informal discussions.
- Feedback is used for leader's personal development plans. CEO's have personal development plans.

Leaders have developed a set of high values or code of ethics that are implemented throughout the organisation

REQUIRED ACHIEVEMENT LEVEL

- 1. Leaders have developed a set of values or a code of ethics that are underpinned by:
 - confidential reporting of issues, non-compliance with procedures, service delivery failures and legislation, regulation and policy infringements;
 - · intolerance of bullying and harassment of staff;
 - · respectful treatment of staff;
 - · ethical dealings with customers and consumers;
 - · where applicable: anti-fraud and bribery policies.
- 2. The set of values or code of ethics are known by all staff and are implemented throughout the organisation.
- 3. Procedures are in place to take action against individuals who do not work within the values or code of ethics.

IMPROVEMENT LEVEL 1

Staff agree that leaders act as role models for the values or code of ethics.

IMPROVEMENT LEVEL 2

Leaders take an effective role in promoting a set of values or code of ethics within the industry.

Please see the Glossary for a definition of the terms 'leader' and 'values'.

CLARIFICATION

The key point within this indicator is how the organisation ensures the implementation of the values or code of ethics throughout the organisation. It is easy to develop values and a code of ethics but it is harder to ensure that they are adhered to throughout the organisation. The organisation should ensure compliance and take action where non-compliance is identified.

EXAMPLES

Leaders proactively monitor the implementation of the company's values:

- · recognising when individuals behave according to values;
- taking disciplinary action when individuals do not behave according to values;
- · fear-free internal whistle blowing procedures;
- communicating the values/or code of ethics to all staff and customers.

- Staff are asked for their feedback on how well leaders act as role models as part of the review of leadership skills.
- Staff are assessed against company values as part of the appraisal process.

7.4 An SIA approved contractor's leaders develop and implement an effective system for recognising and rewarding excellence

7.4.1

Leaders are involved in improvement activity, encouraging staff participation where appropriate

This indicator links to:

- 4.2.3 A clear 'fit and proper' management structure with defined and understood authority levels is in place.
- 6.2.2 An induction pack/training including an introduction to policies and procedures exists
- 6.2.4 Assignment-specific training/induction/information is given.
- 6.3.5 A process for the appraisal of staff performance is in place and is implemented.
- 7.5.1 Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement.

REQUIRED ACHIEVEMENT LEVEL

- 1. Leaders are routinely involved in improvement activity, encouraging appropriate staff participation, through suggestions, ideas and active involvement in the service delivery improvement process.
- 2. There are examples of such improvements that have included, where relevant, both leaders and staff.

IMPROVEMENT LEVEL 1

Leaders' involvement delivers added value to the improvement achieved and is enhanced by active and appropriate staff participation in the process.

IMPROVEMENT LEVEL 2

Leaders can evidence that lessons learnt during any improvement activity and achieved through staff participation are communicated across the organisation as appropriate.

Please see the Glossary for a definition of the term 'leader'.

CLARIFICATION

Leaders are required to be actively involved in any improvement activity within the applicant organisation. Evidence of where leaders have been involved in improving service delivery, either to a particular customer or to the organisation as a whole, should be available.

EXAMPLES

- Being open to and acting on staff/customer suggestions and feedback.
- Use of daily conference calls so that management gains an overview of any concerns/issues and to aid planning for the next working day.

- · Staff suggestion box.
- · Improvement suggestions are rewarded with bonus/gifts etc.
- Leaders are involved in external improvement activity such as work with emergency planning, community safety and Police work.
- $\boldsymbol{\cdot}$ Setting up information and consultation working groups.

7.4 An SIA approved contractor's leaders develop and implement an effective system for recognising and rewarding excellence

7.4.2

Leaders recognise individual and team efforts

This indicator links to:

 6.3.5 A process for the appraisal of staff performance is in place and is implemented.

REQUIRED ACHIEVEMENT LEVEL

- 1. There are processes in place to recognise individual and team efforts.
- 2. There are examples of recognition of individual and team efforts.
- 3. Leaders actively ensure that the processes are fully implemented.

IMPROVEMENT LEVEL 1

Leaders publicise staff recognition within the organisation and to external stakeholders.

Please see the Glossary for a definition of the term 'leader'.

CLARIFICATION

Staff participation in improvement activity helps both in the development of the individual and adding interest to the role. In addition, staff participation helps to add a practical application to any proposed improvements.

Evidence of where staff have been involved in improving service delivery, either to a particular customer or to the organisation as a whole, should be available.

EXAMPLES

- · Being open to and acting on staff suggestions and feedback.
- 'Campfire meetings' between front line guards and supervisors/ managers ensuring that managers stay in touch and front line officers have a face-to-face opportunity to input ideas or concerns.
- Buddy system in place for all staff, such that if there is an incident and one officer cannot get through to the control room, they contact their buddy at another site. This also works for general welfare and support.

- · Staff suggestion box.
- $\boldsymbol{\cdot}$ $\,$ Improvement suggestions are rewarded with bonus/gifts etc.
- Leaders are involved in external improvement activity such as work with emergency planning, community safety and Police work.
- Leaders actively seek advice from senior members of staff with regards to problems they have encountered, how they have solved this problems and how their experience can be used for improvement within the organisation.
- Appointment of training champions and best practice sharing sessions to ensure new initiatives are effectively publicised.

7.5.1

Leaders with overall responsibility for the success of the organisation review results/performance against critical areas of the business and drive continuous improvement

This indicator links to:

- •1.1.1 The organisation has a clear approach to business that is acted on and communicated to all staff.
- •1.2.1 Critical success factors have been clearly identified and internal measures are in place to monitor progress towards achievement.
- 1.2.2 Goals, objectives and targets are clearly visible for all levels of the organisation.
- •1.5.1 The organisation regularly reviews performance against success factors and performance indicators.
- · 2.1.1 Key service delivery processes have been identified and are understood by all.
- 2.6.1 The organisation regularly reviews performance against service level agreements and/or key customer performance indicators.
- 3.4.1 The organisation implements an approach to consumer contact.
- 3.5.1 The organisation regularly reviews performance against response from customer opinion gathering.
- 4.4.1 The organisation regularly reviews performance against key financial indicators critical to the business.
- 5.3.1 The organisation regularly reviews the management of resources and data.
- 6.2.3 All staff are trained to the required standard.
- 6.3.5 A process for the appraisal of staff performance is in place and is implemented.
- 6.5.1 The organisation regularly reviews performance against key staff performance indicators.
- 6.5.2 The organisation regularly reviews performance against responses from staff opinion gathering.
- 7.1.2 Managers and directors understand procedures.
- 7.2.1 Leaders consult stakeholders on their leadership skills and have personal development plans based on the feedback.
- 7.4.1 Leaders are involved in improvement activity, encouraging staff participation where appropriate.

REQUIRED ACHIEVEMENT LEVEL

- Leaders review performance measures and outcomes (via a balanced scorecard or similar). As a minimum, this includes all criteria measures, and relates to the organisation's critical success factors, for example, service delivery, customer satisfaction, contract performance, and internal key performance indicators, for example, supplier performance, financial measures, customer service levels, resource/data management, leadership.
- 2. Outputs from the balanced scorecard (or similar) are used to inform strategic approach and organisation improvement.
- Action plans are in place where performance falls below target, or where arrangements are no longer suitable to effectively mitigate threats and risks to customer assets.

IMPROVEMENT LEVEL 1

Improved performance has taken place in the areas targeted for improvement.

IMPROVEMENT LEVEL 2

Comparisons of overall organisation performance are made with relevant organisations inside and/or outside of the security industry.

The organisation's performance compares favourably.

External comparisons are relevant for promoting continuous improvement.

Please see the Glossary for a definition of the terms 'critical success factors', 'leader' and 'measures and indicators'.

CLARIFICATION

This indicator is clarifying one of the main roles of the leaders and placing responsibility onto them to drive the business forward. It requires the organisation to have an effective arrangement to monitor performance across those areas, identified by the organisation, and used as part of the organisation's strategy. The factual approach to decision making will ensure that all decisions are made using the most effective means possible, thereby ensuring a greater level of improvement across the organisation.

Continuous improvement is an ongoing, long-term approach to improve processes, products and services.

Real success of an improvement initiative comes when continuous improvement becomes business as usual. As this is an ongoing and constantly evolving process, it is important to keep re-visiting the changes you have made to see if they can be improved further or if there are any factors that might have an impact on the changes you have made in the long-term.

Gaining an overview of all business processes is an important one, as is reducing costs and increasing efficiency, but also:

- · improving quality;
- · increasing productivity;
- · reducing risks;
- · increasing profitability.

Without quantitative measures in place, the applicant organisation cannot demonstrate positive trends and/or sustained good performance or improvements in performance.

Ref: ISO9001

EXAMPLES

- · Returns on investment.
- · Service quality.
- $\cdot\;$ Saving time (amount of time to supply a service).
- · Customer experience.
- Safety.
- · Performance indicators within a service level agreement.
- · Compliments and complaints.
- · Duration of relationship.
- · Customer retention.
- · New and lost business.
- · Effective recommendation.
- Market share.
- · Success rates on tenders.
- · Contract retention.
- · Customer visits, for example, percentage of planned visits achieved.
- · Customer complaints, for example, speed of resolution.
- Level of customer satisfaction, for example, from surveys, what level is achieved against target?
- · Percentage of licensable staff with an SIA licence.

Glossary

Analysis

The examination of facts and data to provide a basis for effective decisions and actions.

Approach

The methods used by a provider of security services to manage and deliver their business. When considering approaches organisations should also consider the appropriateness of the method and the effectiveness of their use.

Balanced scorecard (or Balance score card)

A strategic performance measurement model. Its objective is to translate an organisation's mission and vision into actual (operational) actions (strategic planning).

Benchmarking

Comparing your performance with that of another company, not necessarily from the Private Security Industry, to see how well you are doing as an organisation.

Business stakeholders

These are the people who provide funding to the organisation; the people who the management team ultimately report to. In companies, this could be the owners, shareholders or investors.

Code of practice

A code of practice should formally exist where an organisation does not work to ISO9001:2015 or the relevant British standard. It should detail how the activities within the organisation should be conducted and to what standard. Internal procedures would not normally be considered a code of practice.

Consistency

The quality, state or fact of being consistent in the application of the ACS standard through the assessment process.

Consumer

Any person in society at large who has contact with a provider of security services in the course of delivery of a service to the customer.

Control room

A secure area where: assistance, information, advice can be obtained in routine or emergency situations; employees can be monitored; required recording can be affected.

Core competence

A well performed internal activity or capability that is central to the organisations competitiveness, profitability or efficiency.

Corporate social responsibility

Taking in to account the ethical, social and environmental impacts of the organisation's activities and taking complementary action to address those impacts where appropriate, using the organisation's own resources and expertise.

Critical success factors

Outcomes that an organisation needs to achieve in order to attain its overall aims purpose or mission. They usually relate to all aspects of the business, such as financial, employees, customers etc., and have performance indicators that can be monitored supporting their achievement.

Culture

The specific collection of values and norms that are shared by people and groups in an organisation that control the way they interact with each other and with stakeholders outside the organisation.

Customer

The person or organisation that contracts with the security provider for the delivery of security services.

Diversity

The extent to which the people within the organisation recognise, appreciate and utilise, the characteristics that make an individual unique. Diversity can relate to age, race, ethnicity, gender, beliefs, physical abilities and sexual orientation.

Deployment

The extent to which an approach is applied in addressing the requirements of the standard. Deployment measures whether the standards are actually being applied in the workplace across all of the sites and work units in the organisation.

Effective

It asks the question 'how well does a process or measure addresses its intended purpose? Determining effectiveness requires the evaluation of how well a need is met by the approach taken and its deployment, or by the measure used.

Equal opportunity

The practice of ensuring that all people receive fair and equal treatment regardless of gender, age, race, nationality, religion, disability or sexual orientation.

Good practice

Superior approaches, polices, processes or methods that lead to exceptional achievement against the business strategy.

Goals

A future condition or performance level that one intends to attain. Goals can be both short-term and long-term. Goals are ends that guide actions. Quantitative goals, or targets, include a numerical point or range.

Head office

The term used to describe the main operational base for the company. For very small organisations this may be a room within the owner's home. However, whatever is used or where ever the head office is based, it must be fit for the purpose it is serving.

Improvement need

Area(s) where action is necessary in order to meet the requirements of the ACS standard.

Improvement option

Area(s) where there remains scope for further improvement to business outcomes, or where without further action there is a risk of falling below the ACS standard.

Inspection

The careful examination and scrutiny against predetermined, rigid requirements.

Integration

The harmonisation of plans, processes, information, resource decisions, actions, results and analysis to support key organisational goals, that is, getting things to work together effectively.

Key

The major and most important elements or factors, those that are critical to achieving intended outcomes. The essential elements for pursuing or monitoring a desired outcome.

Key performance indicator

A key performance indicator (KPI) is a measurable value that demonstrates how effectively a company is achieving key business objectives. Organisations use key performance indicators at multiple levels to evaluate their success at reaching targets.

Key processes

The processes that are of most importance for delivering the strategy and driving the value chain of the organisation.

Knowledge

Knowledge is the expertise and skills acquired by a person through experience and education, involving theoretical and/or practical understanding of a subject. While data are raw facts, and information is data with context and perspective, knowledge is information with guidance/ability for action.

Labour provider

For ACS purposes, where businesses are providing designated security industry services:

- a labour provider is a supplier of labour;
- labour is defined as a single individual or more than one individual;
- labour provision is about the supply of one or more individual/s (to an ACS business) to enable it (the ACS business) to deliver a customer contract. There may be intermediaries that are also labour providers in the chain;
- a labour provider can be another security business (sole trader or limited company), or another type of organisation such as an employment business or recruitment agency;
- a labour provider does not have the responsibility for delivering the end customer contract – that is the responsibility of the ACS company that has the contract with the customer.

Example:

ABC Security have a contract with a festival to supply security over the summer. ABC require additional security operatives. They contract with a labour agency who agree to supply them with door supervisors. The labour agency are a labour provider because they only supply individuals and are not responsible for the delivery of the end-customer contract. Responsibility for the customer contract remains with ABC.

ABC Security must operate to BS7858 (as above). The onus would be on ACS to ensure that the individuals supplied by the labour agency are properly screened and vetted.

Leader

Any person in the organisation that has responsibility for, or influences other people within the organisation.

Management system

The framework of processes, related performance/result indictors and process management and improvement systems used to ensure that the organisation can fulfil its mission and vision.

Measures and indicators

Numerical information that quantifies input, output and performance dimensions of processes, services and the overall organisation (outcomes).

Mission

A mission describes the purpose of the organisation. A mission statement answers the question 'what is it that the organisation would like to achieve?'.

Organisation

A company, sole trader, or other body that has or may apply for the approved contractor scheme.

Organisational learning

New knowledge and skills acquired through evaluation, study, experience and innovation. Organisational learning is achieved through research, evaluation and improvement cycles, employee and customer ideas and input, best practice sharing and benchmarking. To be effective, learning should be embodied in the way the organisation operates.

Partnership

A durable working relationship between the organisation and partners, creating and sharing added value for both parties. Partnerships can be formed, for example, with suppliers, educational bodies or customers. Strategic partnerships support the strategic objectives of the organisation in a particular way.

People

All individuals employed/deployed by the organisation (full time, part-time, self-employed individuals, agency workers, volunteers) including leaders at all levels.

People with significant control

Companies, LLPs and SEs need to keep a register of people with significant control (PSC register) from 6 April 2016.

A PSC is anyone in a company, LLP or SE who meets one or more of the conditions listed in the legislation. This is someone who:

- · owns more than 25% of the company's shares;
- · holds more than 25% of the company's voting rights;
- holds the right to appoint or remove the majority of directors;
- has the right to, or actually exercises significant influence or control;
- holds the right to exercise or actually exercises significant control over a trust or company that meets one of the first four conditions.

Perception

The opinion stakeholders have of the organisation

Performance

Output results and their outcomes obtained from processes, services that permit evaluation and comparison relative to goals, standards, past results and other organisations. It can be expressed in non-financial and financial terms.

Policy

An over-arching statement that determines how an organisation will handle an aspect of its business. A policy will have a number of processes and procedures supporting the implementation.

Process

The method by which inputs are converted to outputs.

Procedure

Individual instruction that explains to an individual how to do their job. Assignment instructions are procedures for how to deliver the service to a particular customer.

Purchasing procedure

A procedure an organisation has in place to procure/ purchase goods and services such as; stationery, equipment etc.

PSIA

Private Security Industry Act 2001.

Resource

Resource in order to support strategy and policies and the effective operation of service delivery processes.

Response room

See Control/response room.

Service delivery

The process of delivering to the customer the requirements as outlined in a contract or terms and conditions of supply.

Service level agreement

Contract between a service provider and a customer. It details the nature, quality, and scope of the service to be provided.

Site

A particular location where security services are delivered for example a nightclub, shop, factory, gatehouse, hospital etc.

Stakeholder

Person or organisation with a vested interest in the outcome of any activity, for example, procedure, process, business etc.

Strategy

A high-level plan describing the tactics by which an organisation intends to achieve its mission and vision, that are subsequently translated into aligned strategic goals and objectives reflecting what the organisation has to do.

Subcontractor

A subcontractor can be:

- a self-employed individual (sole trader) responsible for delivering the customer contract on behalf of the ACS company;
- a limited company (including companies with only a sole director and no employees) responsible for delivering the customer contract on behalf of the ACS company;
- another type of business that is contracted to provide service delivery on behalf of the applicant/ACS business.

Agency staff, labour providers or individuals provided as labour, (see definition of labour provider) are not considered to be subcontractors.

An ACS company can only subcontract work to another ACS company.

There are some exceptions to this requirement, including:

- self-employed operatives that are under direct supervision of the main contractor;
- directly supervised labour, where the individual is under direct supervision of the main contractor;
- subcontractors not providing designated security services;
- by special arrangement with SIA (subject to application and agreement under our exceptional circumstances policy for subcontracting). This may include selfemployed individuals (sole trader or limited company) engaged as subcontractors and responsible for delivering the customer contract on behalf of the ACS company.

Supervisor

A person with responsibility for other employees.

Supplier

Includes labour providers and subcontractors.

Values

Sometimes called a code of ethics. A values statement explains the principles by which the organisation will conduct its business, treat its employees and customers.

Virtual office service

This is an organisation providing a local legal business address (and sometimes communication, such as a telephone answering service).

Virtual office space

Otherwise known as a business centre, which provides an office and/or meeting rooms. A virtual office space might also offer a virtual office service.

Vision

Description of what the organisation is attempting to achieve in the long-term future. It is intended to serve as a clear guide for choosing current and future courses of action and, along with the mission, it is the basis for strategies and polices.

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