



Home Office

**REGULATIONS TO IMPLEMENT
THE PRIVATE SECURITY INDUSTRY ACT 2001
IN RESPECT OF
MANNED GUARDS AND KEYHOLDERS**

ANALYSIS OF RESPONSES TO THE CONSULTATION EXERCISE

FEBRUARY 2005

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1. Introduction

- 1.1 On 29 November 2004, the Home Office (HO) published a partial regulatory impact assessment consultation paper seeking views on further proposals to regulate the private security industry. In particular, the paper sought comments on the proposed criteria for the granting of licences for manned guards and keyholders. For the purposes of the paper, ‘manned guarding’ includes numerous job activities: security guarding; cash and valuables in transit; close protection; and close circuit television for public surveillance.
- 1.2 The partial regulatory impact assessment consultation document was sent out to over 8,000 interested individuals and organisations which included private security providers/suppliers and purchasers, trade bodies, local authorities, the police, training providers, and everyone who had been in correspondence with the Home Office regarding manned guards and keyholders. The consultation document was also made available for download from the HO, Security Industry Authority (SIA) and British Security Industry Association (BSIA) websites.
- 1.3 During the 8 week consultation period, a combined total of 13,480 opened the document from the SIA and HO website. The Home Office also received individual requests for copies of the consultation document close to the deadline date for responses. These recipients were allowed some extra time beyond the deadline date to respond.
- 1.4 Both the SIA and the HO sent out electronic and postal reminders to all the interested parties of the consultation paper in order to encourage all those who wished to reply to the partial regulatory impact assessment to submit their feedback within the deadline date. A reminder of the deadline date for responses was also posted on the British Security Industry Association website.
- 1.5 Unfortunately, only 49 formal replies were received in total. Given the substantial difference in the number of people who saw the consultation document and those who provided responses, it has been assumed that many people chose not to reply to the consultation paper as they did not have any major concerns. A full list of the respondents to the consultation document can be found in the annex, excluding the 5 respondents who requested that their comments remain confidential.
- 1.6 Although 49 responses is a relatively small figure on which to analyse responses to the consultation document, many different thoughts were offered. As such, it is not possible to describe all those responses in detail. The objective is to reflect the major views that emerged, following the template of the suggested questions that were set out in the consultation document.

2. Executive Summary

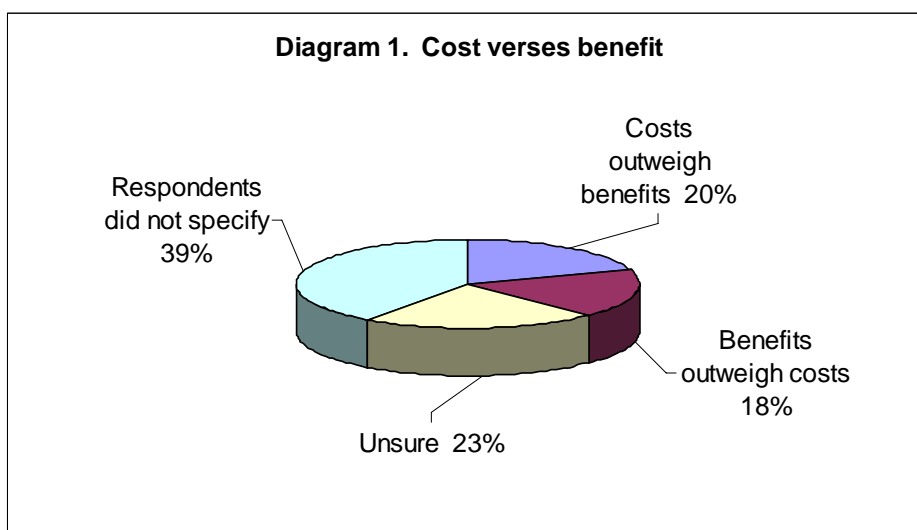
- .10 All respondents to the consultation paper accepted the importance of training for security guards, as a means by which standards across the whole of the industry could be improved. Of those who had concerns regarding the proposed training requirements, most respondents wanted a more inclusive training programme and some wanted greater recognition for training already undertaken.
- 2.2 An overwhelming 90% of respondents to the question gave their support for the application of criminality criteria. Respondents were keen to get rid of the criminal element within the security industry and in turn improve the image of the industry.
- .10 The majority of people supported the proposals regarding enforcement and sanctions. They believed that rigorous enforcement of the regulations and the application of sanctions would build confidence in the industry and would enable the SIA to fulfil the aims of the regulations.
- .11 The most prominent concern which arose from the responses to the consultation document was that of cost; training and licensing costs for the individual applicant and for supplier companies. However many people acknowledged that licensing is necessary for the industry and as such the costs should be viewed as an investment.
- .12 Although respondents recognised the advantages of licensing the security industry, many were concerned about meeting the regulations by the compliance date. Some people put forward the view that a longer and more flexible transition period was required in order to ease concerns about prosecution.
- .13 The majority of respondents believed that depending on whether the most fair and realistic criminality criteria are chosen, the effective implementation of licensing would go a long way to improve the standards of the security industry.

3. List of the suggested questions for response

- 1) Cost versus benefits – what are your viewpoints?
- 2) What are your views about the Training for Security Guards?
- 3) What are your thoughts about the Keyholder sector?
- 4) If you manage/supervise a business, what effects do you think this regulation will have on it?
- 5) Do the regulations place any unnecessary burdens on business?
- 6) What are your opinions on the criminality criteria options?
- 7) What are your views on the licence implementation schedule?
- 8) What are your thoughts about the enforcement and sanctions?
- 9) Do you think the regulations will impact negatively on ethnic minorities?
- 10) Do you have any concerns over the competition issues identified within the assessment?
- 11) Do the regulations strike the right balance?
- 12) Do the regulations adequately protect the public?
- 13) Are there any other observations you would like to express?

4. Summary of responses

4.1 Views on cost versus benefit



- 40 out of 49 respondents (82%) provided their views on the costs and benefits of the regulations in respect of manned guards and keyholders.

Diagram 1

- 20% of respondents felt that the costs would outweigh the benefits.
- 18% of people believed that the benefits would outweigh the costs.
- 23% of people felt unsure and suggested they were unable to make an accurate cost versus benefit analysis at this stage as the benefits are long-term and difficult to specify.
- 39% of respondents did not specify whether they thought the costs would outweigh the benefits, or vice versa.

4.1.1 Cost of the SIA licence

Of the total people who commented on this issue, 30% of people expressed concerns regarding the cost of the licence application for the individual applicant and also for supplier companies that chose to pay on behalf of their staff. These respondents highlighted that the costs included a substantial one-off cost for individual applicants which would be particularly burdensome for existing security staff on low wages, and claims they would involve huge administration costs for supplier companies who managed the licence applications for their employees.

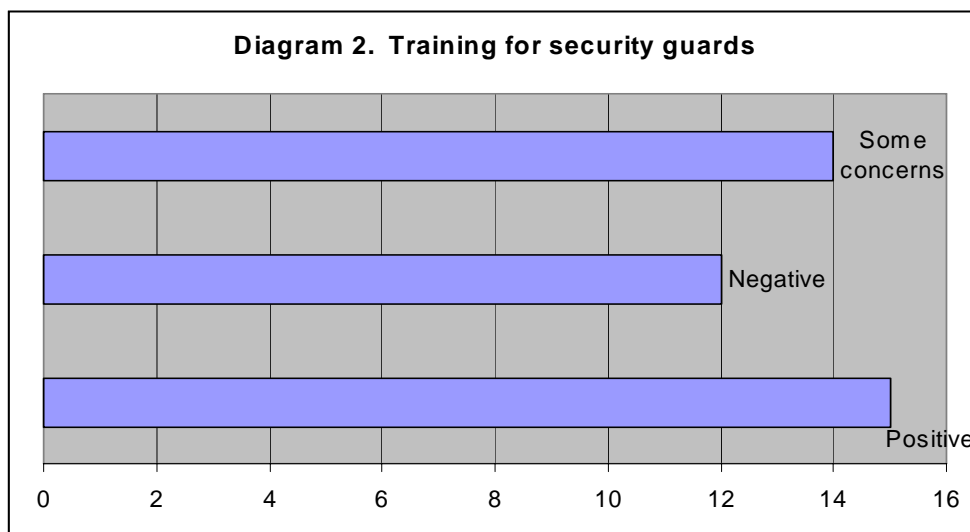
4.1.2 Transfer of cost to purchaser

In addition, 23% of people suggested that transferring some of the costs to the purchaser of security services would be difficult as the higher cost to the purchaser would appear much earlier than they saw any clear benefits. As an industry heavily focused on costs, some respondents feared that purchasers would seek contracts with other supplier companies, develop in-house security, or manage without.

.10.1 Benefits outweigh costs

18% of respondents gave unequivocally positive comments, believing that the industry as a whole would benefit from a more stable workforce, highly skilled individuals, and that in the long-term reputable firms would be able to recoup the initial costs of licensing.

4.2 Training for security guards



- 41 out of 49 people (84%) provided a response to the issue of training for security officers.
- Of the 41 respondents, 15 people (37%) gave a generally positive response.
- 12 people (29%) offered negative comments.
- 14 people (34%) expressed some concerns regarding the proposed training requirements for security guards.
- **All accepted the importance of training for security guards.**

4.2.1 Of those who made positive comments regarding the mandatory training for security guards, most respondents expressed support for training as they felt that it would benefit the security industry by uniformly increasing the skill levels of security guards, thus enhancing confidence in the industry.

4.2.2 The respondents who made negative observations did so because they felt that the training requirements were too basic and deficient in aspects such as search techniques, first aid, fire safety, and continuation training. Many of these respondents also made the case for the need for those with a door supervisor licence to complete conversion training in order to be allowed to work as a manned guard.

- 4.2.3 Of those who expressed concerns over the training proposal for security guards, 57% of people suggested that it was of no significant value for existing security officers and that there should instead be a greater recognition of current training courses that comply with British Standards. One respondent made a specific appeal for ‘grandfather rights’ to be applied for security guards.

4.3 The keyholder sector

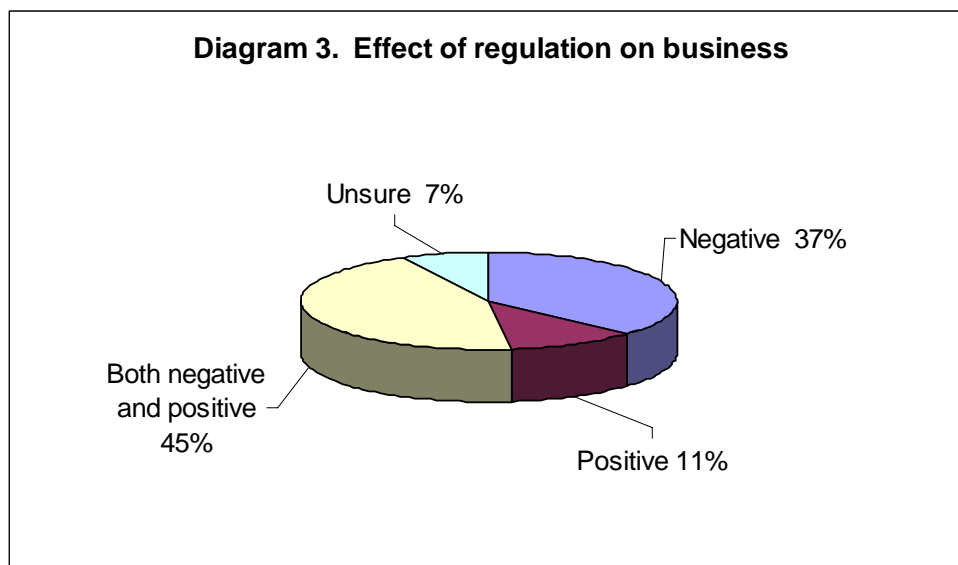
- 22 people (45%) offered their views on the keyholder sector.
- 64% of respondents expressed support for the regulation of the keyholder sector as they felt that it was a very important area of the security industry, requiring the highest level of responsibility.
- 36% of people stated that there was no need to develop a separate keyholder licence as it could simply be incorporated into the manned guard licence, owing to the two sectors being interconnected and in an effort to prevent further costs for the industry.

4.3.1 2 people suggested that a separate training course ought to be established for keyholders as a supplement to the standard training for security guards.

4.3.2 2 people put forward the view that a clearer definition was required in order to detail the licensable activities of a keyholder.

4.3.3 1 respondent said that they were awaiting further proposals from the SIA regarding the keyholder sector.

4.4 The effect of regulation on business



- 27 out of 49 people (55%) submitted a response to this question.
- 37% of people held the view that the regulations were likely to have a wholly negative impact on business.
- 11% of respondents only noted the positive effects that regulation is expected to have on business.
- 45% of people observed both positive and negative effects on business that may result from regulation.
- 7% of people were unsure of what the effect of regulation on business might be.

4.4.1 Of those who expressed the view that the regulations would have an altogether negative impact on business, the majority identified the following as the probable results of regulation:

- staff shortages;
- the move of purchasers to develop their own in-house security;
- reduced competition as some supplier companies went out of business; and
- the general decline in business.

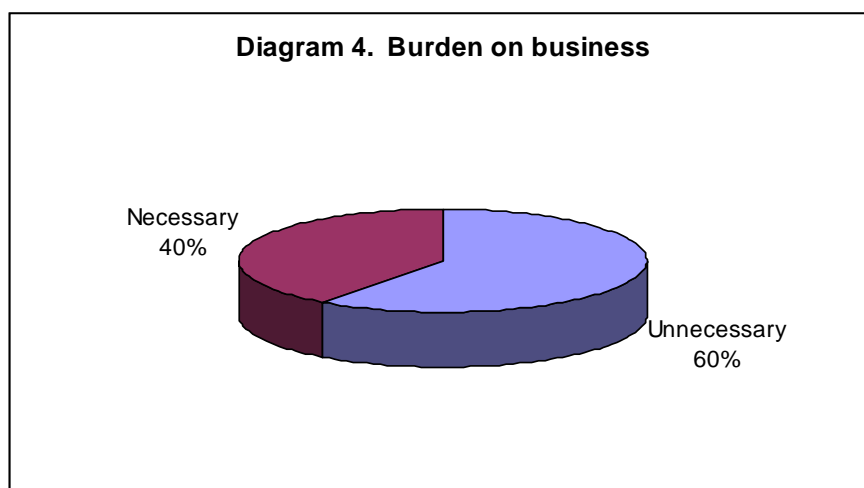
4.4.2 The respondents who felt that the regulations would only have positive effects on business associated regulation with:

- a more professional industry that could prove its competence;
- the ability to deliver a better service;
- better pay for security guards; and
- hopefully bigger profit margins for supplier companies.

4.4.3 The 45% who noted both the positive and negative effects of regulation acknowledged the short-term costs and administrative burden of the licensing process, but also recognised the obvious gains to be had from a well-regulated industry.

- 4.4.4 56% of the total respondents to this question had specific concerns regarding the increased costs with which supplier companies would be burdened with, such as:
- the cost of training and the licence application;
 - absence cover for those on training leave; and
 - the likely need to increase wages for licensed staff.
- 4.4.5 30% of respondents felt that a disproportionate negative impact would befall smaller supplier companies, as they would be less able to cope with the burden of licensing than larger companies.

4.5 Do the regulations place an unnecessary burden on business?



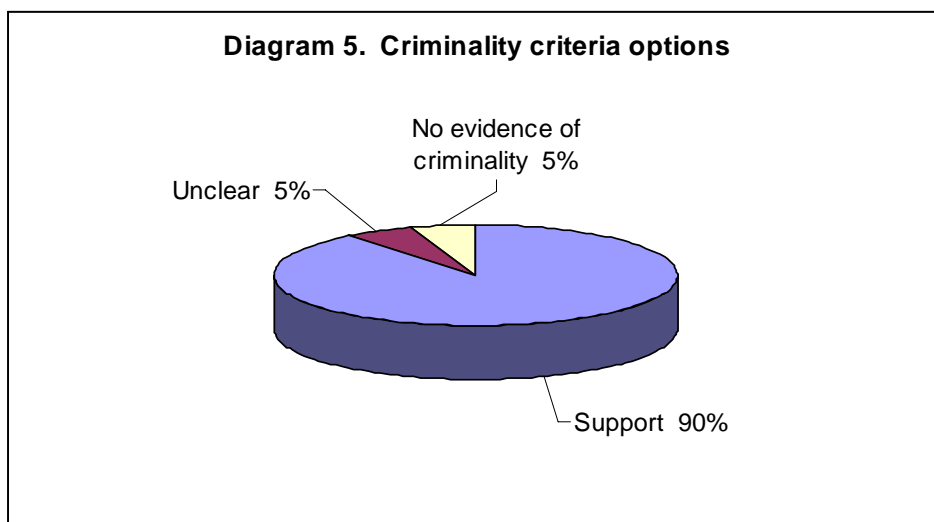
- 35 people out of 49 (71%) provided a comment on whether the regulations place an unnecessary burden on business.
 - 60% of respondents expressed the view that the regulations would place a huge, unnecessary burden on business.
 - 40% of respondents put forward the idea that the regulations were a necessary responsibility.
- 4.5.1 Of the respondents who maintained that the regulations would place an unnecessary burden on business, the majority of people in this group identified the cost of licensing as the biggest burden which could be reduced. Other unnecessary burdens were identified as:
- re-training existing security guards;

- more red tape;
- staff shortages; and
- recruitment difficulties due to the cost of the licensing process.

4.5.2 The 40% of people who recognised that regulations were necessary felt that regulations were needed in order to improve the standards of the industry, and that in fact, the regulations were a manageable obligation.

4.5.3 One respondent asserted that the poor communication channels and quality of information provided by the SIA added to the burden on businesses.

4.6 Criminality criteria options

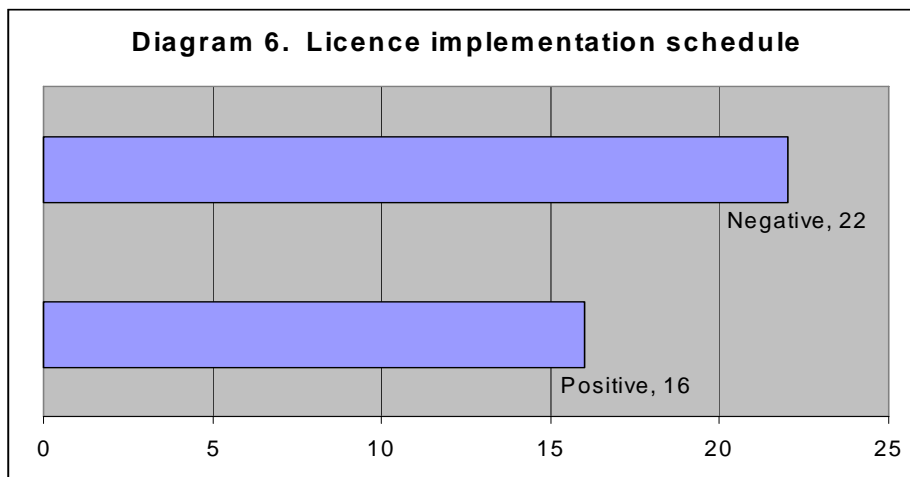


- 37 out of the total 49 (76%) respondents put forward their views on the criminality criteria options.
 - 90% supported having a uniform system of criminality checks for those applying to be security guards.
 - 2 people claimed that there was no evidence of any criminal element in the security industry and as such, the criminality checks were futile.
 - 2 people expressed confusion over what problem of criminality the SIA were seeking to address through the criminality checks, asserting that it would not entirely prevent offences from being committed in the future by licensed security guards.
- 4.6.1 54% of people specifically chose option 3 as the most fair and realistic criminality criteria to apply when putting into consideration the needs of the security industry as a whole.

4.6.2 16% of people asserted that very strict criminality criteria needed to be employed in the security sector in order to make a real difference to the levels of crime and safety in the industry.

4.6.3 14% of the respondents expressed concerns over the need for applicants who had spent more than 6 continuous months out of the UK to obtain international criminal record checks. They highlighted the impracticality of such a requirement, as some countries might not have equivalent central criminal record bureaus and the records could not be guaranteed to be as accurate as those of the CRB.

4.7 Licence implementation schedule

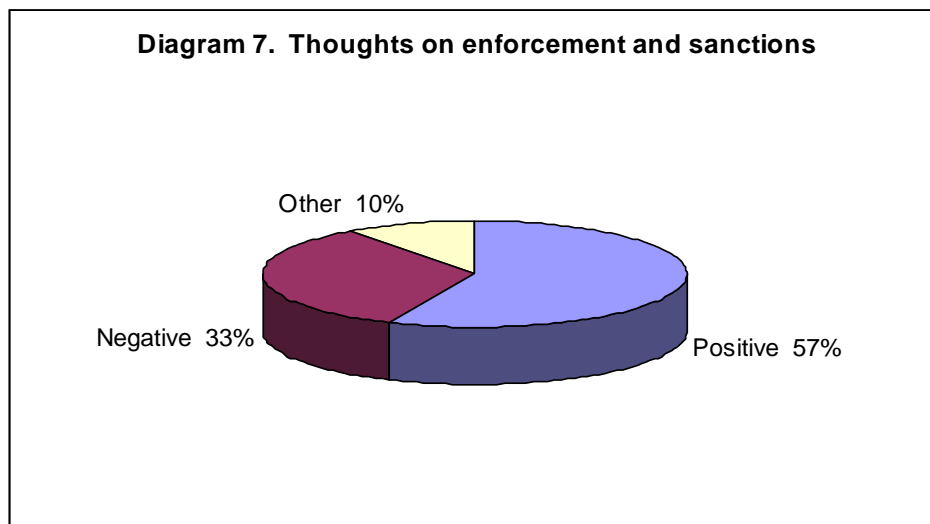


- 38 out of 49 people (78%) provided their thoughts on the proposed licence implementation schedule.
- 22 respondents (58%) put forward negative comments on the licence implementation schedule.
- 16 people (42%) gave their support for the schedule.

4.7.1 The majority of those in the group that put forward negative comments argued that the schedule was unrealistic, as the transition period seemed far too short for the completion of the training, application and administration process. They feared that the schedule would be unachievable, 2 of the respondents basing their conclusions on the delays experienced with licensing the door supervisor sector.

- 4.7.2 The 42% who offered their support for the licence implementation schedule felt optimistic that it was achievable, as it applied a realistic time frame that would allow all those affected to be able to comply by the deadline.
- 4.7.3 13% of the respondents noted the disincentive in making an early application, as it would in effect shorten the lifespan of the licence, thus indirectly encouraging a rush of application submissions close to the deadline date that would make it more difficult for the SIA to award the licences on time.

4.8 Enforcement and sanctions

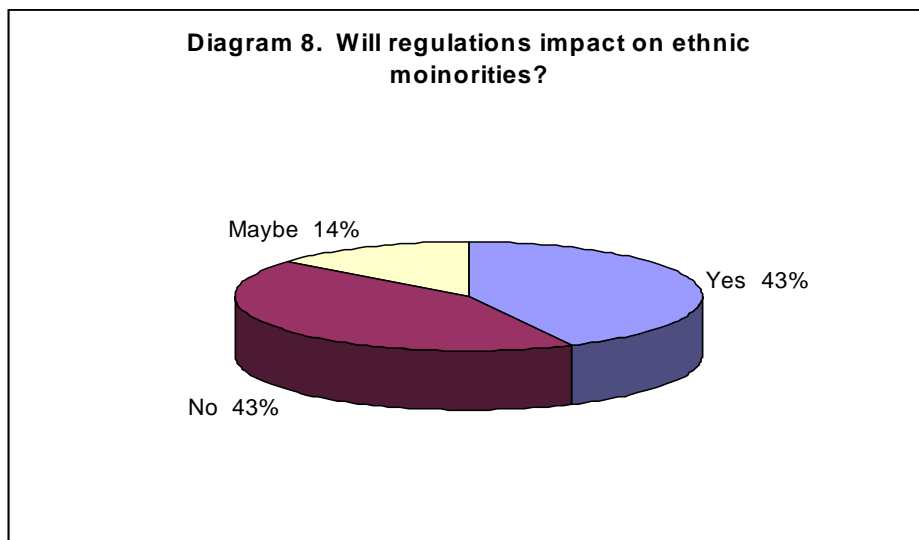


- 30 out of 49 people (61%) contributed their thoughts on the proposals regarding enforcement and sanctions.
 - 57% of respondents gave positive feedback in support of the proposals relating to enforcement and sanctions.
 - 33% of people put forward negative comments regarding the proposals.
 - 10% of the respondents did not specify whether they supported the plans for enforcement and sanctions as they stood.
- 4.8.1 The people who offered their support for the proposed enforcement and sanctions believed them to be fair and workable. The majority in this group asserted that enforcement must be rigorously applied in order to fulfil the aims of the regulations and in turn build confidence in the industry.
- 4.8.2 Those who put forward negative statements expressed scepticism about the capacity of the SIA to enforce the regulations owing to:
- the seemingly small scale of the Compliance and Investigation Team;
 - their reliance on ‘whistle-blowers’ to detect cases of non-compliance;

- some people felt that the penalties were too light; and
- responsibility was not being passed to the purchaser as well as the supplier company for checking the licence of security guards.

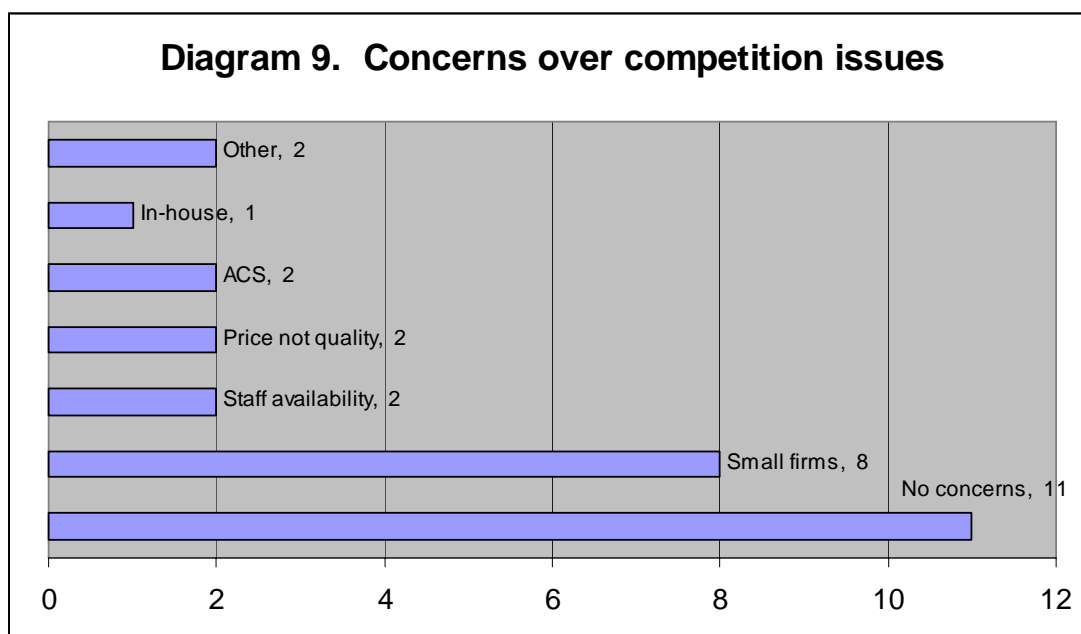
4.8.3 Of the 10% of respondents who did not clearly specify whether they supported the proposals for enforcement and sanctions, one respondent maintained that only time would tell, another asserted that the SIA would have to police the enforcement of regulations directly and another offered the qualification that flexibility was required in the interim period of the licensing process in order to make the proposals more acceptable.

4.9 Impact on ethnic minorities



- 35 out of 49 respondents (71%) put forward their views on the possible impact of the regulations on ethnic minorities.
- 43% of people did not think the regulations would have a negative impact on ethnic minorities.
- Another 43% of people, however, felt that the regulations would impact negatively on ethnic minorities, the main reasons being language (which might cause problems for some in the training and examinations, hence deterring some ethnic minorities from entering the security sector) and the possible difficulties some applicants might face in obtaining international criminal record checks.
- 14% of respondents expressed concerns over the possibility that regulations could indirectly have a negative impact on ethnic minorities, many once again referring to the possible complications with acquiring international criminal records.

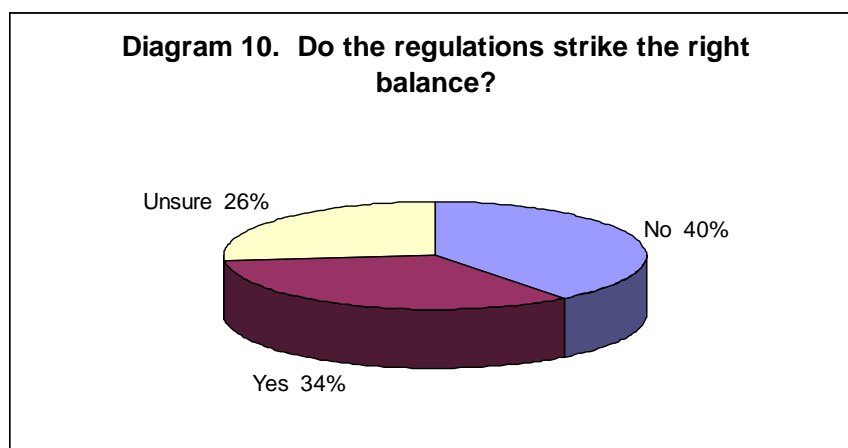
4.10 Competition issues



- 28 out of 49 people (57%) expressed an opinion on the competition issues that might arise in the security industry as a result of the regulations.
- 11 respondents (33%) said that they did not have any concerns over competition issues. They recognised that the security industry was an inherently competitive business sector, and as such, regulations should help raise standards and create a fairer system.
- 8 people (29%) articulated concerns regarding the disproportionate burden that was likely to be placed on the smaller supplier companies, being less able to absorb the increased costs resulting from the licensing process.
- 2 respondents highlighted the possibility of licensed security staff becoming a valuable commodity, with companies having to compete for their services through offering better pay and conditions. They expressed concern that licensing could lead to the ‘poaching’ of staff.
- 2 people asserted that contrary to the assessments of the SIA, supplier companies would continue to compete on price instead of quality. They felt that the SIA were overly optimistic and naive to suggest that the business ethos of the security industry would change overnight.
- 2 people felt that a split industry would emerge, with one set of companies working within the Approved Contractor Scheme (ACS) and the other working outside the ACS. They were unsure about which section of the industry would prove to be more lucrative.

- One respondent expressed great concerns over the exemption of in-house security from licensing in regard to its effect on competition issues within the security industry. The respondent felt that it would create a wholly unfair security market.

4.11 The balance of regulations



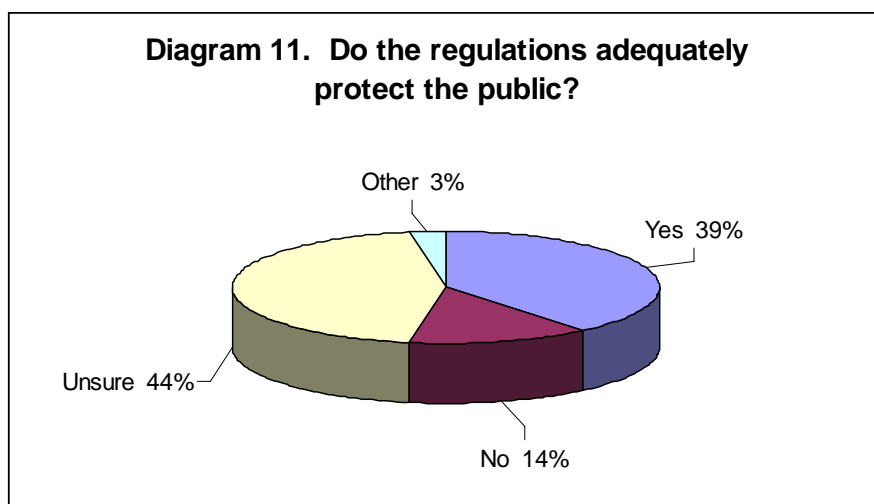
- 38 out of the total 49 people (78%) put forward their thoughts on the balance of the regulations.
- 40% of the respondents felt that the regulations failed to strike the right balance. They had concerns regarding:
 - inconsistencies within the Act;
 - the exemption of in-house security;
 - the inclusion of events stewards;
 - the lack of emphasis on increasing competency skills; and
 - the unnecessary option chosen by the SIA to licence individuals rather than supplier companies.
- 34% of people gave a definitive 'yes' in answer to the question of whether the regulations struck the right balance.
- 26% of respondents were unsure or gave a qualified 'yes' answer. They felt that they would only be able to evaluate whether the regulations struck the right balance with any accuracy when licensing had commenced.

4.11.1 Of the total respondents to this question, 26% maintained that licensing needed to be applied to in-house guards, volunteers and agency staff in order to achieve uniformly high standards throughout the security industry.

4.11.2 Of those who responded, 21% felt that getting rid of the criminal element in the industry was the most important function of licensing, so thorough

criminal record checks and methods of on-going enforcement were asserted to be the central elements of the regulations.

4.12 Public protection



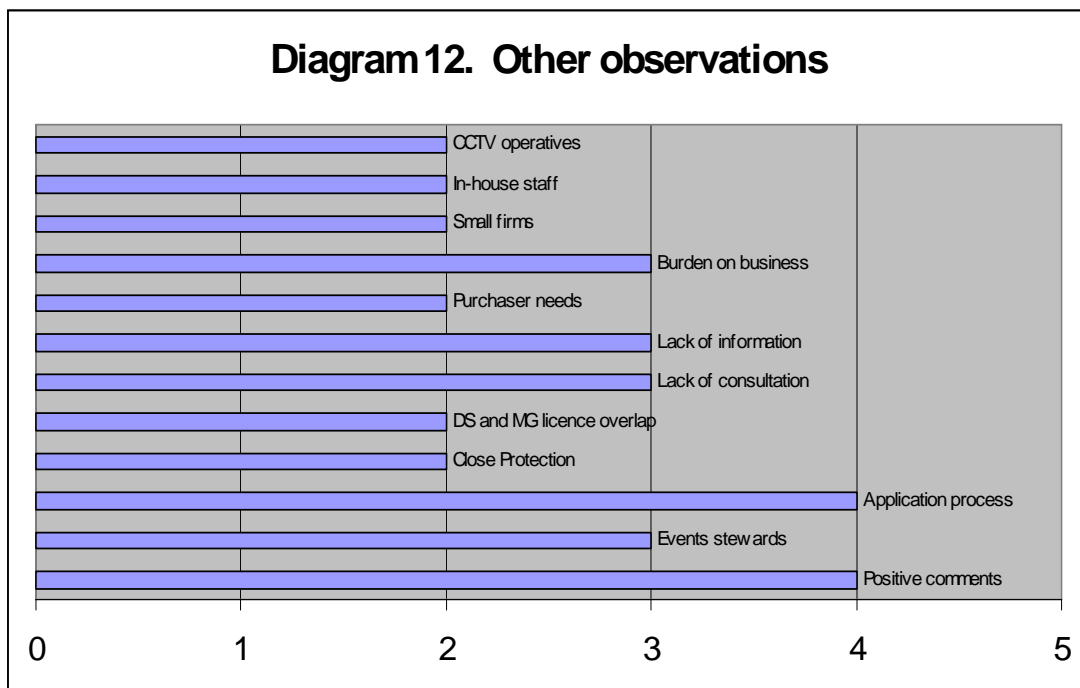
- 36 out of 49 people (73%) gave their comments on the issue of the impact of the regulations on public protection.
- 39% of respondents to this question felt that the regulations did adequately protect the public. They argued that a regulated industry would increase public safety through producing competent staff that had gone through criminality checks.
- 14% of people claimed that the regulations failed to adequately protect the public and might wrongly reassure the public in regard to the security industry as a whole. Those in this group identified the following points:
 - the vetting procedure was not as thorough as current British Standards;
 - possible staff shortages and the exemption of in-house security from licensing were major threats to public protection; and
 - regulation in no way guaranteed against the risk of crime in the security industry.
- 44% of people gave a response of uncertainty, believing that it would depend on which criminality criteria were chosen by the SIA and how effectively the regulations were implemented. Some of those in this group of respondents expressed doubts about whether there would be any noticeable changes from current circumstances regarding the levels of public protection.
- One respondent felt unsure as to why the question of public protection was being raised, considering that 97% of protection provided by the private security industry had no direct contact with the public.

4.13 Other observations

The majority of respondents chose to contribute a wide range of other observations in relation to the licensing regulations for manned guards and keyholders.

- 9 respondents expressed concerns in relation to the different sectors of the security industry that would be included or excluded in the regulations e.g. the status of events stewards, in-house security, the ‘cross-over’ of the door supervisor licence into the manned guarding licence, and the separate licence for CCTV operators.
- 4 people made positive comments on the efforts of the SIA to regulate the security industry.

A breakdown of the subjects that received two or more comments is shown below.



COMMENTS FROM KEY RESPONDENTS

Please note that the quotes listed below are direct quotes/opinions and should not be taken as the correct legal interpretation of the Act. They have been catalogued in alphabetical order.

British Security Industry Association (incorporating the views of the Security Industry Training Organisation)

“Regulation must be robust, firmly enforced and well communicated otherwise it will not achieve its objectives of removing the minority criminal element, raising standards and reassuring the public. We believe that the SIA has reached the right balance between cost of regulation and the benefits it will bring.

It is the view of the vast majority of our members that regulation does not place an unnecessary burden on them per se. However the processes relating to the implementation of regulation could do so if not carefully managed. To date the SIA has responded cooperatively to suggestions about practical procedures (e.g. bulk applications from major employers).

The BSIA and SITO would like to put on record their admiration for the extensive efforts of the SIA (and especially its chief executive John Saunders) in consulting widely and in-depth with the industry and its clients on the implementation of the PSIA. Their promise to ‘do it with the industry, rather than to the industry’ has been fulfilled to date in every respect.”

Control Risks Group Limited

“There are a number of people as licensing comes up the industry, who work across a number of sectors and will require multiple licences. This is correct at the outset as such workers must prove competency in each sector to achieve a licence but should they have to pay a full licence each time- we feel not. In addition we feel that such licenses should be renewable co-terminus at a given point presumably three years after the first is granted for a single fee and similar to a driving licence then include the different groups of competency.”

Football Safety Officers Association

“The Football Safety Officers Association (FSOA) contend that the primary intentions of the PSIA and the SIA is to regulate what was previously an unregulated private security industry and this is supported by examination of the designated sectors to which the legislation applies. As an Association we would support the need for such regulatory controls however we view with great concern the apparent intention of the SIA to apply their licensing criteria to stewarding functions at football grounds and at other sporting events.”

GMB Trade Union

“The GMB accepts that the benefits of a regulated and licensed security will have some costs. The industry itself for many years put short term financial gain before the goal of a well-regulated industry. The consequences are well-known. It was not only the criminal infiltration of the industry, but also poor pay and working conditions that contributed to high staff turnover, and a poor public perception of the industry.

We have argued throughout the legislative processes that the licence fee should be regarded as an employment cost. Although some security companies are now agreeing to pay for or subsidise the licence fee, many are completely refusing to do so or to negotiate on this matter. This will not help to bring about a level playing field, nor will it help to reduce staff turnover, as security staff seek new employment in the industry as and when they are requested to pay a fee to do their existing jobs.”

GRB Security Limited

“The proposed training schedule is good for basics. It would seem, however, that little thought has been put into continuation/site training.

The regulations can only be looked on in a positive light. The screening, training, and general improvements can only do the industry good. The burden should not affect the security companies directly but will affect the client. The obvious cost increases will be the biggest burden.

Little to no consideration or thought has been given to the client. It seems that it has been forgotten that we are a service industry and our primary goal is to provide our services at a price our clients can afford. The needs and the affordability have been completely ignored.”

Group 4 Securicor (UK Security)

“We believe that it is of paramount importance that the Home Office and the SIA take the enforcement of the licensing standards very seriously, and they deploy the necessary resources to catch and convict any person or company flouting the standards through non-compliance. We believe that it is important very early in the implementation of licensing that those persons or companies in breach of the law are stopped, publicly identified and dealt with in accordance with the sanctions detailed in the Private Security Industry Act 2001.

The implementation of licensing will not be the panacea to all of the public safety issues and concerns. However, it will go a long way to reassure the public that any private security person will have been trained to a certain competency level and will have been screened for relevant criminal convictions.”

Initial Security Limited

“I have considerable concern given the exclusion of in-house security from Regulation. It is illogical that those who may fail in a regulated environment can then seek and secure employment in-house. This weakness undermines the integrity of the security industry and our (believed) joint desire to gain inherent credibility so that the industry may move forward.”

Lincolnshire Police

“Overall the regulations appear to strike the right balance, one element where stipulation has been made that a licence would not be required is that of a volunteer, in some organisations volunteers carry out a similar role to paid staff. Please consider in such circumstances a volunteer would need the security checks to be carried out and maybe a licence provided through the ‘employer’ of the volunteer.”

National Security Inspectorate (NSI)

“NSI supports the proposals [relating to training] which appear to represent an enhancement as compared with existing BS Codes of Practice.

Of the three options and their respective merits, NSI considers that Option 3 is the most realistic in the context of the security industry. As identified in the PRIA, it is important to ensure that standards are pitched at optimum levels.”

Reliance Security Services Limited

“Retrospective [training] requirements may discriminate against older or longer serving employees. System of ‘grandfather’ rights should have been applied.

The SIA want companies to support them by managing staff applications. Almost impossible given the lack of a bulk application and payment system, together with no system to track staff applications.

The regulations should have been applied to the whole industry, not simply the contract market. Exclusion of in-house teams will cause issues.”

Show and Event Security

“To regain consumer confidence we have to provide a service that equates to the increased professionalism within the security sector. By providing this service we can then expect to increase our charge rates, and accordingly pay staff additional money.

This regulation will force cost increases and provide a difficult eighteen months of trading after enforcement. However if you are prepared to invest in your business then you will survive and come out stronger.”

St. James Security Limited

“We welcome the mandatory training requirements. It will doubtless enhance the skills of officers, thus producing better service.”

Train 2 Protect International Limited

“I believe any form of licensing must be rigorously enforced if it is to be of any value, however I believe the industry needs to consider provisional licensing for those who have completed training. These could be issued by the training provider and would prove to employers that training has taken place.”

UK Sport

“As the government’s national agency for sport in the UK, we are writing in response to the [RIA] in respect of Manned Guards and Keyholders, to register our extreme concern and disappointment that the Home Office and the SIA are continuing to include sport under the auspices of the PSIA 2001 when this Act was never intended to incorporate this sector. The implications of these continued attempts at inclusion will be serious, if not disastrous, for sport in the UK.”

**RESPONDENTS TO THE CONSULTATION DOCUMENT
ALPHABETICAL ORDER**

1	Alison Spencer
2	Alandale Logistics Limited

3	British Security Industry Association (BSIA and SITO)
4	Broadland Guarding Services Ltd
5	Christopher Boaman
6	Chubb Security Personnel
7	Control Risks Group - D Churton
8	Control Risks Group - Clive Grant
9	Dan Donovan
10	David Menzies
11	First Security (Guards) Ltd
12	Football Licensing Authority
13	Football Safety Officers Association
14	Freelance Security Services Ltd
15	FSG Plc
16	GJK Defence Associates Ltd
17	GMB Trade Union
18	GRB Security Ltd
19	Group 4 Securicor (UK Security)
20	Guild of Security UK Ltd
21	Initial Security Ltd
22	ISS Facilities
23	John Purdy
24	Keepsafe Security Services Ltd
25	Kroll Security International
26	Legion Security Plc
27	Les Hall
28	Lincolnshire Police
29	Master Locksmiths Association
30	Moorford Security Services Ltd
31	National Arenas Association (Wembley London Ltd)
32	National Security Inspectorate
33	Production Services Association
34	Professional Security Management Ltd
35	Reg Briggs
36	Reliance Security Services Ltd
37	Sector Security Services Ltd
38	Show & Event Security
39	St James Security Limited
40	Stuart Dagger
41	The Security Watchdog
42	Train 2 Protect International Ltd
43	Unitrust Protection Services Ltd - Alan Gomm
44	Unitrust Protection Services Ltd - Ian Yexley

5 people requested that their comments remain confidential