

# Results of the public consultation on our draft code of conduct

**January 2021**

## Introduction

The Security Industry Authority (SIA) is interested in the idea of a code of conduct for SIA licence holders and for people applying for SIA licences. It would set out the behaviour that is expected of licence holders and applicants.

We wanted to hear the thoughts of our licence holders and other interested parties on this idea. This report presents the results of our consultation.

## The Security Industry Authority

We are the public body responsible for regulating the private security industry in the United Kingdom. We are an independent body reporting to the Home Secretary and were established under the Private Security Industry Act 2001 (“the Act”).

We have two main duties:

1. The compulsory licensing of individuals undertaking designated activities within the private security industry. This covers the activities of cash and valuables in transit, close protection, door supervision, key holding, security guarding, public space surveillance (CCTV), and vehicle immobilisation. Both front line (that is, those undertaking licensable activity) and non-front line (those who manage, supervise and/or employ those engaging in licensable activity) roles require SIA licences
2. Managing the voluntary Approved Contractor Scheme, which measures private security suppliers against independently assessed criteria

The Act also gives us a duty to set or approve standards of conduct, training, and levels of supervision for licence holders, and to make recommendations and proposals for the maintenance and improvement of those standards.

## A code of conduct

It is our responsibility to ensure that only “fit and proper” people hold an SIA licence. We have been exploring whether a code of conduct could make clearer what is meant by “fit and proper” by describing what behaviour a fit and proper person should, and should not, do. We produced a draft code of conduct which focussed on the behaviours we have come across that have shown licence holders acting with professionalism and dedication in protecting people and tackling crime.

A code of conduct would build on the standards of behaviour that are part of the licence-linked training that applicants for most SIA licences are required to successfully complete.

## The consultation

Our consultation on a draft code of conduct was held between 9 January and 23 February 2020. It sought views, in the format of an online survey, on the content of the draft, and on the potential impacts of introducing it.

We alerted all licence holders, SIA approved contractors and other interested parties to the consultation and included details in our communications with the industry.

## Summary of responses

We received 3,853 responses to the online consultation, with over 4,200 comments made in response to the free text (open) questions. A vast majority of responses (98%) were made by existing SIA licence holders. We also received 73 emails with comments on the consultation and one letter.

Many respondents did not answer the free text questions, and the numbers answering the free text questions varied. Many respondents made more than one point in their responses to the free text questions, so the total number of comments in answer to each free text question exceeds the number of people who answered the question.

The results are set out in detail below.

## Next steps

The responses provided a very wide range of views and comments about the draft code of conduct and the form it might take if introduced. Several respondents used the consultation to comment on the principle of a code of conduct and the challenges of implementing and enforcing it.

We recognise that introducing a code of conduct would be a significant step for both the private security industry and us. We will now consider in more detail whether a code of conduct is a proportionate regulatory approach, and what impact it might have on the private security industry. We will also consider how, if introduced, it would work in practice.

## Questions

The consultation asked 14 questions about the draft code of conduct, along with 3 questions to ascertain respondents' licensing status and who they were replying on behalf of.

### Questions about the draft code of conduct

Question	Answer options
1. Do you think the draft code of conduct is easy to understand?	Yes/No/Don't know
2. Do you like the six commitments?	Yes/No/Don't know
3. Please tell us any comments you have about the six commitments.	Free text
4. Is anything missing from the draft code of conduct?	Yes/No/Don't know
5. If yes, what do you think is missing? Why should it be included?	Free text
6. Is there anything that you think should not be in the draft code of conduct?	Yes/No/Don't know
7. If yes, what do you think should not be in the draft code of conduct? Why is that?	Free text
8. Please describe any examples you have of behaviour that you think shows that someone is not fit and proper to hold an SIA licence	Free text
9. How easy would you find it to follow the draft code of conduct?	Very Hard; Hard; Neither easy nor hard; Easy; Very easy
10. Are there any other comments you would like to make about the draft code of conduct?	Free text
11. Do you think that you would incur costs because of this draft code of conduct?	Yes/No/Don't know

Question	Answer options
12. If yes, please estimate how much this cost might be, and give a brief explanation of why you would incur this cost	Free text
13. Do you think that this draft code of conduct would bring you any benefits?	Yes/No/Don't know
14. If yes, please say what these benefits are. If you think it will bring you financial benefits (e.g. save you time or money), please estimate how much this financial benefit might be	Free text

### Questions about the respondent

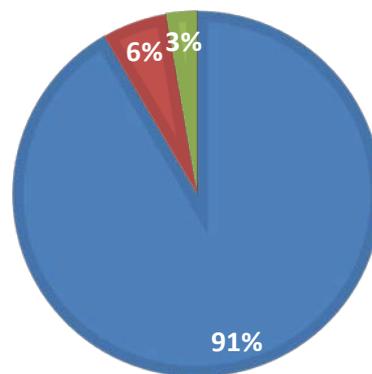
Question	Answer options
15. Do you hold an active SIA licence?	Yes/No/Don't know
16. If you hold an active SIA licence, which licence(s) do you hold?	Cash & valuables in Transit; Close protection; Door supervision; Key holding; Non-front line; Public Space Surveillance (CCTV); Security guarding; Vehicle immobiliser
17. Who are you answering on behalf of?	Own behalf; Private security business; Police force; Another public body; Other

## Responses in detail

The results of our consultation are set out in detail below. Percentages have been rounded to the nearest whole percentage point.

### Q1. Do you think the draft code of conduct is easy to understand?

■ Yes ■ No ■ Don't know

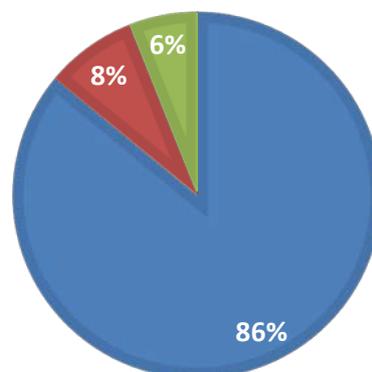


We received 3,705 responses to this question.

3,394 respondents said that the draft code of conduct was easy to understand and 212 respondents said it was not.

### Q2. Do you like the six commitments?

■ Yes ■ No ■ Don't know



We received 3,696 responses to this question.

3,165 respondents said that they liked the six commitments and 293 said that they didn't like them.

Some types of licence holder liked them less than the average: for example, 73% of Close Protection licence holders who responded to the public consultation liked the six commitments, with 21% not liking them.

**Q3. Please tell us any comments you have about the six commitments.**

We received 1,098 responses to this question.

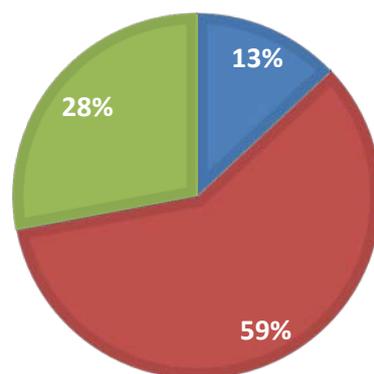
A wide range of comments were received. 397 respondents (36%) reiterated their support for the six commitments, and 85 respondents (8%) said the document was clear and easy to understand. 52 respondents (5%) said explicitly that it would improve standards in the industry.

43 respondents (4%) said the document was hard to understand and/or used poor language and a similar number said that the behaviours mentioned were already being addressed within the industry.

Of the remaining comments, 107 respondents (10%) discussed how the commitments could be implemented and a number had comments specific to a particular commitment or issue.

**Q4. Is anything missing from the draft code of conduct?**

■ Yes ■ No ■ Don't know



We received 3,702 responses to this question.

492 respondents said that they thought something was missing from the draft code of conduct and 2,190 respondents said that they thought nothing was missing.

**Q5. If yes, what do you think is missing? Why should it be included?**

We received 451 responses to this question.

Respondents gave a wide range of answers as to what they thought was missing from the draft. The most common points made were:

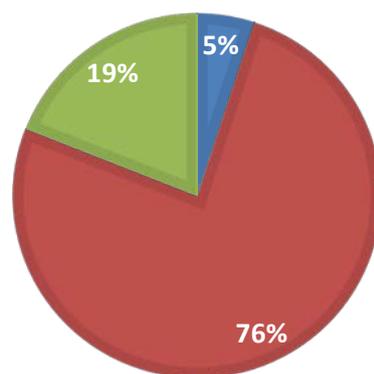
- 50 respondents (11%) suggested including requirements on professionalism (for example, good customer service, neat appearance, time keeping).
- 40 respondents (9%) suggested including requirements on terms and conditions (for example wages, shifts).
- 30 respondents (7%) suggested it should address the behaviour of managers and/or businesses.
- 29 respondents (6%) suggested a requirement to speak English to a particular level should be included.

Other answers covered a wide range of topics, including matters such as physical intervention guidance, whistleblowing, equality and diversity and physical health/fitness requirements.

44 respondents (9%) used this section to make comments about the SIA generally and SIA licensing specifically.

**Q6. Is there anything you think should not be in the draft code of conduct?**

■ Yes ■ No ■ Don't know



We received 3,612 responses to this question.

2,759 respondents said that there was nothing in the draft code of conduct that should not be in it. 182 respondents said that there was something that shouldn't be included.

**Q7. If yes, what do you think should not be in the draft code of conduct?  
Why is that?**

We received 149 responses to this question.

No part of the draft code of conduct attracted significant comment that suggested its removal. 25 respondents (17%) raised points around implementation and whether we had the powers to implement and enforce it (a point raised elsewhere in the consultation). 24 respondents (16%) used the opportunity to express their opposition to the principle of a code of conduct.

**Q8. Please describe any examples you have of behaviour that you think shows that someone is not fit and proper to hold an SIA licence.**

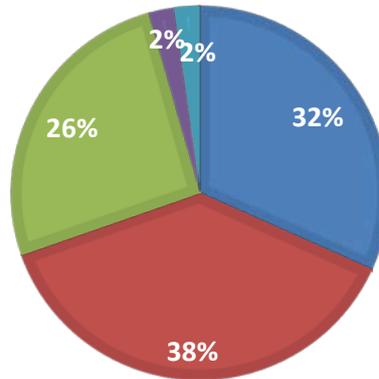
We received 1,007 responses to this question. Respondents gave a very wide range of examples; the main issues raised were:

- **Lack of professionalism** was the most common response, with 182 respondents (18%) raising this. This included factors such as appearance, customer service ethos and punctuality. Some respondents said these were factors that SIA could take responsibility for through the code of conduct.
- **Dishonesty** was mentioned by 98 respondents (10%). A number of these gave an example of dishonesty (particularly theft and corruption). A small number of respondents were concerned about the definition, and interpretation, of honesty.
- **Bullying, aggression, and violence** - 178 respondents (18%) mentioned licence holders bullying, swearing, and/or being aggressive. A further 82 respondents (8%) mentioned licence holders being violent. Some respondents mentioned bullying of licence holders by their colleagues, including supervisors and managers. Several people who commented on this theme also made a comment about alcohol use by licence holders.
- **Alcohol and drug use** - 150 respondents (15%) said that alcohol and drug use were examples of behaviour that showed someone is not fit and proper. A number of these responses suggested SIA should start random drug and alcohol tests of licence holders with a view to revoking licences of those testing positive.
- **Poor language skills** - 97 respondents (10%) gave poor English language ability as an example; some also suggested that poor English language skills among some licence holders implied fraud or other malpractice during licence-linked training.

Other suggestions included those with a history of violent behaviour, those with criminal records, poor physical fitness, and insufficient physical intervention training.

**Q9. How easy would you find it to follow the draft code of conduct?**

■ Very easy ■ Easy ■ Neither hard nor easy ■ Hard ■ Very hard



We received 3,655 responses to this question.

2,545 respondents said that the draft code of conduct would be easy or very easy to follow. 159 respondents said that it would be hard or very hard to follow.

There were differences in how people with different licences answered this question. A notable proportion of non-front line licence holders (75%) said that it would be easy or very easy to follow the draft code of conduct.

**Q10. Are there any other comments you would like to make about the draft code of conduct?**

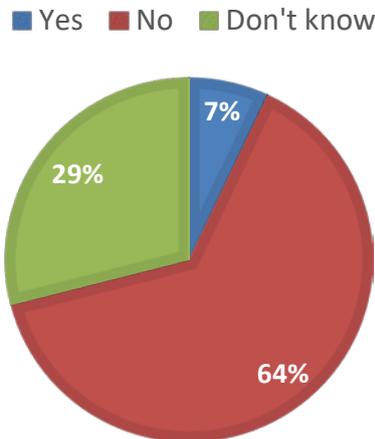
We received 568 responses to this question. Many comments reflected points made in the answers to previous questions, and many were about wider issues in the private security industry.

96 respondents (17%) took the opportunity to register their support for the principle of a code of conduct. 84 respondents (15%) raised issues around implementing and enforcing it. A similar number of respondents said the draft code of conduct was either easy to understand or not easy to do so. Those who said the draft was hard to understand commented that the document was too vague, long, and/or would be difficult for licence holders to understand. Some said the language used was patronising and that it seemed like it was written mainly for Door Supervisors.

39 respondents (7%) made comments about the SIA or its licensing regime.

Several respondents provided suggestions for how the drafting of the document could be improved.

**Q11. Do you think that you would incur costs because of this draft code of conduct?**



We received 3,687 responses to this question.

272 respondents said that they would incur costs because of this draft code of conduct. 2,364 said that they would not incur costs.

Of the non-front line licence holders who answered this question, 10% said that they would incur costs, while 69% said that they would not. Of those answering on behalf of private security businesses, 12% said that they would incur costs, while 64% said that they would not. Across all these results, roughly a quarter of respondents did not know whether they would incur costs.

**Q12. If yes, please estimate how much this cost might be, and give a brief explanation of why you would incur this cost.**

We received 164 responses to this question. 90 of these responses (55%) made general comments on costs and/or the SIA in general which were not directly attributable to the code of conduct. 24 respondents (15%) gave estimates of quantifiable costs. Three of them gave a total cost to their business ranging from £1,500 to £27,500. Nine respondents gave an estimated cost per employee, ranging from £5 to £150 per licence holder. For these respondents, the costs were seen as coming from training licence holders on the code of conduct and providing them with copies of it.

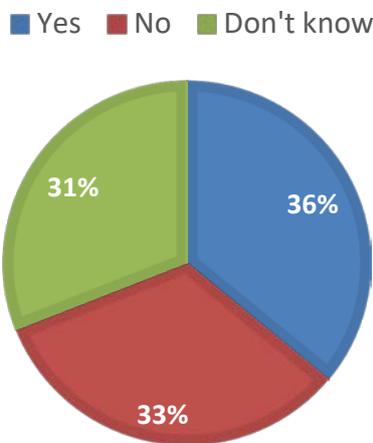
12 respondents gave a figure without any context (for example. number of operatives covered or what the costs involved) ranging from £20 to £250.

The majority of other respondents explained that they expected the code of conduct to cost them money but were not able to quantify the amount. They responded that the costs would

come from additional training and staff induction, as well as removing staff that breached the code of conduct.

The other respondents to this question were concerned about costs arising from enforcement of the code of conduct, including the potential for suspensions and revocations. Others criticised the SIA and said that the code of conduct would be simply a ruse to raise additional funds and/or the licence fee.

**Q13 Do you think that this draft code of conduct would bring you any benefits?**



We received 3,687 responses to this question.

1,322 respondents said that they thought the draft code of conduct would bring them benefits and 1,128 respondents said that they felt it wouldn't.

Non-front line licence holders were more likely to believe that there would be benefits, with 44% saying that it would do so. This was matched in the responses from people responding on behalf of private security businesses, with 42% saying that it would bring benefits.

**Q14. If yes, please say what these benefits are. If you think it will bring you financial benefits (e.g. save you time or money), please estimate how much this financial benefit might be.**

We received 832 responses to this question.

536 respondents (64%) answered that the draft code of conduct would provide clarity on the roles and responsibilities of operatives and would improve accountability.

172 respondents (21%) responded that the draft code of conduct would improve standards and professionalism in the industry. Respondents stated that it would level the playing field, so that all licence holders would operate to the same standards. They also indicated it would weed out unprofessional and unsuitable individuals.

75 respondents (9%) noted that the draft code of conduct would improve the image of the private security industry. Moreover, it was stated that this might lead to enhanced job opportunities, conditions and pay for licence holders, and improve the perceptions of businesses.

Several respondents said the benefits of the code of conduct could only be realised if it was properly enforced. Some respondents mentioned the need for a means for whistleblowing to us about potential breaches.

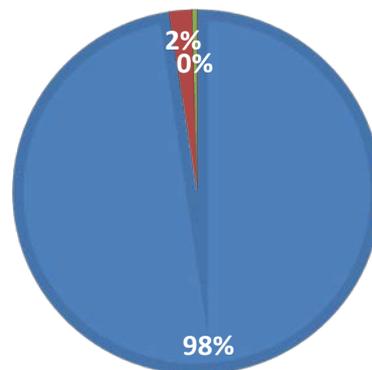
No consultees provided a detailed monetary value for predicted savings.

## Additional Questions

We asked respondents three questions about their SIA licence status and who they were responding on behalf of.

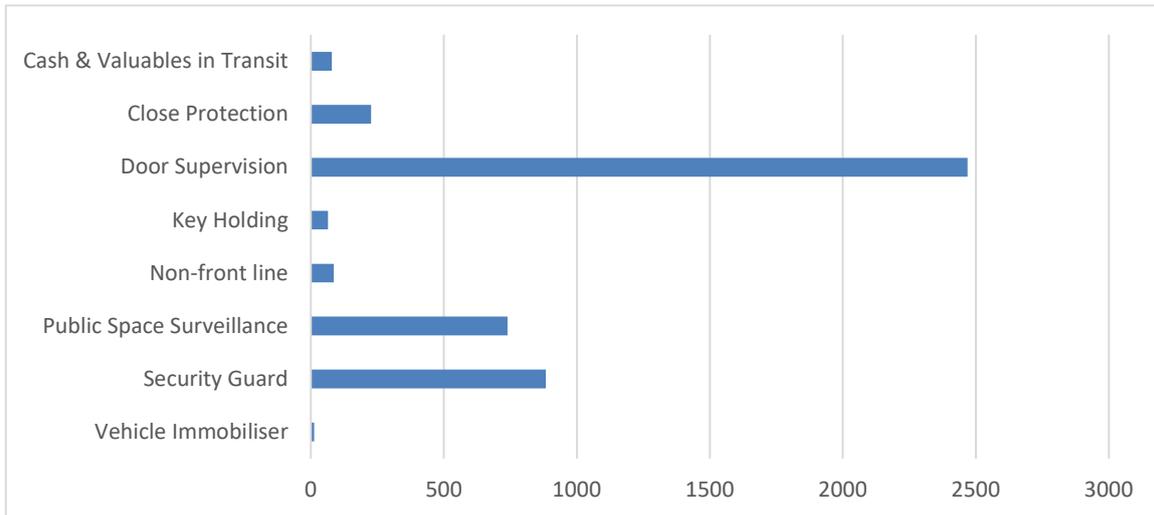
### Q15. Do you hold an active SIA licence?

■ Yes ■ No ■ Don't know



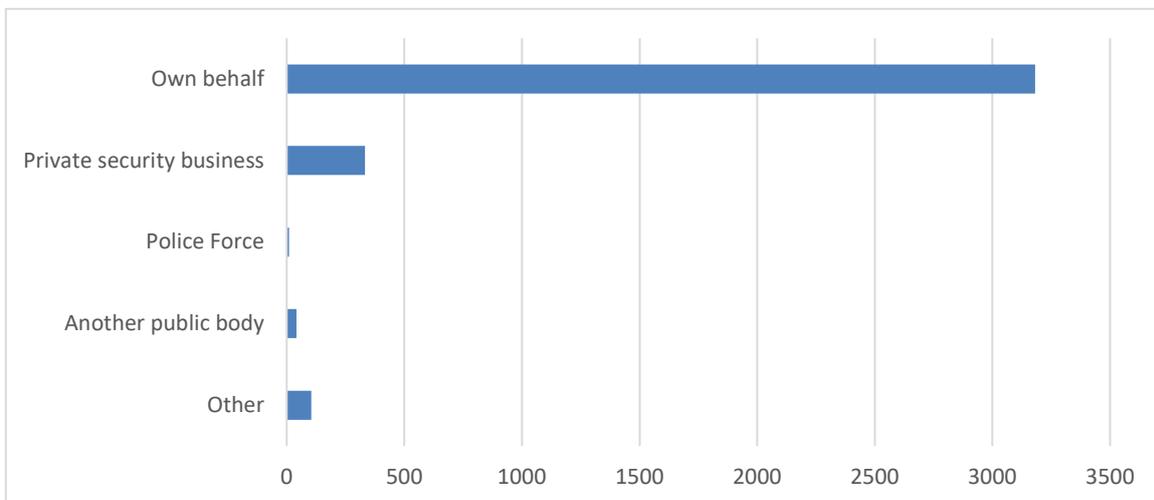
We received 3,687 responses to this question.

**Q16. If you hold an active SIA licence, which licence(s) do you hold?**



A total of 4,558 licences were declared in response to this question.

**17. Who are you answering on behalf of?**



We received 3,669 responses to this question.

We cross-referenced answers to this question and question 18 to determine the breakdown of licences held by people answering on behalf of private security businesses.