

REGULATING THE

PRIVATE SECURITY INDUSTRY
IN SCOTLAND

A Consultation paper



SCOTTISH EXECUTIVE

Making it work together



SCOTTISH EXECUTIVE

**Justice Department
Police Division**

**Saughton House
Broomhouse Drive
Edinburgh EH11 3XD**

To all consultees

**Telephone: 0131-244 2594
Fax: 0131-244 2666
psiconsultation@scotland.gsi.gov.uk
<http://www.scotland.gov.uk>**

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10 September 2001

Dear Sir/Madam

REGULATING THE PRIVATE SECURITY INDUSTRY IN SCOTLAND

Scottish Ministers wish to introduce measures to regulate the private security industry in Scotland.

The enclosed consultation paper has been drawn up following informal discussions with representatives of the industry, the police and local government.

I invite you to consider the proposals outlined in this paper, and to submit any views or comments that you may have to me by 14 December 2001.

Yours sincerely

D G BURGESS



SCOTTISH EXECUTIVE

**REGULATING THE PRIVATE SECURITY INDUSTRY
IN SCOTLAND**

-A CONSULTATION PAPER-

September 2001



PROPOSALS TO REGULATE THE PRIVATE SECURITY INDUSTRY IN SCOTLAND

Foreword

There is a clear need for regulation in the private security industry in Scotland. That is the message I have received from the police, from local government, from the industry itself and from individual members of the Scottish Parliament and, indeed, members of the public.

The industry has grown enormously in recent years. It now encompasses a broad spread of organisations involved in work ranging from guarding people and property to private investigators and security consultants.

Yet, there are no reliable statistics on the number of individuals and companies operating within the sector in Scotland. And the rapid growth, combined with the lack of any over-arching regulatory provisions, have provided opportunities for a few unscrupulous operators to exploit the potential for profit without proper regard to the quality of service provided in sensitive areas where public trust and confidence and the integrity and expertise of those involved are of paramount importance. While some parts of the sector have introduced forms of self-regulation, too many others are not covered in this way. Some local authorities have introduced arrangements specifically to try to achieve minimum standards for door stewards but, again, there are gaps with no overall consistency across Scotland.

I want to see a common regulation system covering every organisation in the sector. That is what this consultation paper proposes. Initial proposals have already been discussed in outline with the police, the Convention of Scottish Local Authorities, the British Security Industry Association and the Joint Security Industry Council. As a result of those discussions, we have adapted our proposals and I am pleased now to issue them for general consultation.

The consultation period lasts until 14 December. I urge all those with an interest to let us have their views.

A handwritten signature in black ink that reads "Jim Wallace". The signature is written in a cursive style and is underlined with a single horizontal line.

Jim Wallace MSP
Deputy First Minister and Minister for Justice
September 2001

Introduction

1. The Scottish Executive has decided to introduce measures to regulate the private security industry in Scotland. This paper puts forward options for doing so. It has been drawn up following informal discussions with representatives of the industry, the police and local government. What is clear from all those who have so far expressed an interest is that the status quo is not an option. But, if regulation is to be introduced, it is important not just that it meets the needs of those who use the industry or are affected by it but also that it provides a sound framework for all those who work in the sector.

2. The paper therefore invites all those with views or comments to submit these, by **14 December 2001**, to:

Darren Burgess
Scottish Executive Justice Department
Room E1-2
Saughton House
Broomhouse Drive
EDINBURGH
EH11 3XD

Or e-mail to psiconsultation@scotland.gsi.gov.uk

Responses may be made public unless respondees make clear they wish their response to remain private.

Background

3. The private security industry includes a range of distinct activities. These include not just the broad spread of organisations involved in guarding persons and property but also those involved in activities such as immobilising vehicles (wheelclamping), or as private investigators or security consultants. Growing numbers of organisations are using private companies for specialist tasks involving security and safeguarding the movement of cash. There has also been a substantial increase in the numbers employed as door supervisors and stewards by the licensed trade and by the sports and entertainment industries to control entry to premises and deal with problems of unruly or violent behaviour.

4. There are no reliable statistics on the number of individuals and companies operating within the sector in Scotland, nor on the total numbers employed. But the available evidence indicates that the industry is now a significant one.

5. The rapid growth in the sector, and the lack of any over-arching regulatory provisions, have provided opportunities for some organisations to exploit the potential for profit without proper regard to the quality of service provided in sensitive areas where public trust and confidence and the integrity and expertise of those involved are of paramount importance. While some parts of the sector have introduced forms of self-regulation, a significant number of businesses are not covered in this way. Some Scottish local licensing authorities have introduced arrangements specifically to try to achieve minimum standards for door stewards but, again, there are gaps with no overall consistency across Scotland.

6. A common regulation system which caught every organisation and every individual involved would address some of the concerns which have been raised particularly regarding some door stewards and some other organisations which provide “protection”. There are three key concerns.

- The first is a general concern that organisations in this sector and their staff should be properly accredited so that businesses and the public can be reassured about their status, professional standing and personal integrity.
- The second, also a general concern, is that some of the organisations engaged in private security do so as a cover for criminal activities such as drug dealing, extortion, money laundering and other illegal activities involving intimidation and violence.
- The third concern relates to the employment of door stewards. It has been alleged that some door stewards use unnecessary and excessive force in dealing with members of the public. It has also been suggested that many of those employed in the industry may be inadequately trained for the work they do. Given the nature of that work, which brings them into contact with members of the public who may be incapacitated through drink or drugs, they need to be not just “drugs aware” generally but also able to deal with the range of injuries, illness or incapacity that may arise.

7. There have been widespread calls from the police, from local government and from the general public to ensure that the industry in Scotland is properly regulated and the individuals who work within it act in a responsible manner. These calls have been supported by responsible businesses within the sector. There is therefore a clear consensus for action. But, given the links between the industry north and south of the Border, there is also a need to take full account of the recent decision of the United Kingdom Parliament to establish a Private Security Industry Authority to regulate the industry in England and Wales.

The position in England and Wales

8. In 1994, the Home Affairs Select Committee conducted an inquiry into the private security industry in England and Wales. In its report, published in June 1995, the Select Committee concluded that:

- there should be better access to criminal records for the industry as a whole;
- no statutory controls (beyond better access to criminal records) were needed in most parts of the industry; but
- statutory measures were necessary for the contract manned guarding sector, both to regulate standards and training and to license individuals.

9. Following consultation with the industry, the police and others, the Home Office issued a White Paper on 26 March 1999 (CM4254) outlining a proposed framework for comprehensive regulation of the private security industry. The proposals, which covered England and Wales, have now been approved by the United Kingdom Parliament and have their legal basis in the Private Security Industry Act 2001.

10. The Act contains provisions to establish a Private Security Industry Authority for England and Wales whose primary functions will be to:

- license individuals in the private security industry, including managers and directors of companies; and
- maintain and improve standards within the industry.

11. Individuals will have to have a licence before becoming an employee or a manager in the private security industry or setting up a private security firm. Licences will be based on consideration of an applicant's full criminal record, exempt from the provisions of the Rehabilitation of Offenders Act 1974, obtained from the new Criminal Record Bureau to be set up under Part V of the Police Act 1997. Those whose criminal record was considered such as to make them unsuitable for employment in the industry would be refused a licence. For managers and directors, consideration will also be given to any records on Companies House registers of undischarged bankruptcy and disqualified director status.

12. In order to ensure that licensing is effective, a new offence will be created of employing someone as a security operative who is unlicensed, or offering security services, or operating as a security operative without being licensed. An Inspectorate will be set up to carry out spot checks on businesses to ensure compliance with the new requirements.

13. The Home Office proposals do not involve the licensing of private security companies at this stage. Building on the self-regulating mechanisms that are already in place, it is proposed to establish an 'Inspected Companies' scheme. Companies will be able to volunteer to be inspected to the standards that will be set for their particular sector by the new Authority. The new Authority will also be able to set different criteria for different sectors of the industry such as manned guards. And it will be self-financing, with costs being recouped from licence fees.

14. The proposals will not extend regulation to all sectors of the industry at once. Regulation will be phased in starting with the whole of the manned guarding sector (excluding 'in-house' staff), door supervisors, cash-in-transit, wheel clampers, the use of guard dogs, security services in retail, public and semi-public areas and local neighbourhood or patrol services and private investigators. The Authority's licensing function in relation to door stewards will be "devolved" to local authorities in England and Wales. Other sectors of the industry, such as the installation and maintenance of alarm and CCTV systems, may be brought within the scope of the legislation in due course.

Options for action in Scotland

15. Taking account of developments in England and Wales, there appear to be 4 possible options for regulation in Scotland.

Option 1 - Through self-regulation, encourage companies and individuals operating in the private security industry to adhere to a voluntary code of practice.

Option 2 - Extend the remit of the Private Security Industry Authority for England and Wales to cover Scotland.

Option 3 - Establish a Scottish Private Security Industry Authority that would operate independently from that proposed for England and Wales but otherwise have the same functions and, wherever possible, operate the same standards and practices.

Option 4 - Introduce a mandatory licensing system under the powers in the Civic Government (Scotland) Act 1982 requiring companies and/or individuals working in the industry to obtain a licence from the local authority.

16. In considering these options, one key factor needs to be borne in mind. The private security industry is not homogeneous. It comprises a range of operations from major businesses such as Group 4 and Securicor to small businesses which will deal only with local pubs and clubs in their area. Some of the biggest concerns have been around those operations at the small end of this spectrum, mainly those providing door stewards.

Option 1

17. A voluntary code of practice would not be effective in dealing with the sort of unscrupulous company or individual that regulation would be designed to weed out. The industry itself is keen that a regulatory system be introduced. The police support tighter controls. To do nothing risks encouraging criminal activities within the industry and presents a risk to public safety. Following regulation south of the Border, failure to regulate in Scotland could send the wrong signal that Scotland was a “safe haven” for unacceptable practice. Scottish Ministers have already ruled out the status quo. Because Option 1 is akin to the status quo, it would appear also to be a non-starter.

Q1: Should a voluntary scheme be ruled out?

Option 2

18. A standard system of regulation across the whole of Great Britain would have a number of attractions.

- There would be benefits from economies of scale.
- There would be consistency throughout Great Britain in terms of numbers of licences, licence conditions, training standards and costs – and duplication and bureaucracy could be kept to a minimum.
- Individuals would require only one licence no matter where they worked.
- There should be better and more consistent enforcement.
- Informal discussions with the police, the industry and local government make clear the desirability of having, as far as possible, uniform provisions and rules north and south of the Border.

19. However, the private security industry in Scotland falls within the devolved responsibility of the Scottish Parliament. Extending to Scotland the remit of the Private Security Industry Authority for England and Wales, as proposed in Option 2, could only be undertaken through legislation promoted by the UK Government. Scottish Ministers' preference is to legislate through the Scottish Parliament. Doing so would rule out Option 2.

Option 3

20. Legislating separately for Scotland should not mean that the advantages of a single system of regulation operating across the whole of Great Britain would necessarily be foregone. This is what Option 3 seeks to address. In effect, it proposes the establishment of a Scottish Private Security Industry Authority along similar lines to that being established for England and Wales. To that end, close contact is being maintained with the Home Office about the structure and operations of the English and Welsh body. Though the provisions for each Authority would be entirely separate, the intention would be that, so far as possible, the provisions in the Scottish legislation would mirror those in England and Wales with the aims that:

- (i) both Authorities would operate under the same general structure, responsibilities and operating arrangements;
- (ii) both would adopt broadly the same standards and licence conditions; and
- (iii) both would liaise regularly and share information.

It may also be desirable to aim to ensure that the award of a licence by one Authority would be recognised by the other.

21. Of course it would be for the Scottish Parliament to determine the legislative provisions which govern the operation of the proposed Scottish Authority. New legislation would also be required in the United Kingdom Parliament to require the England and Wales Authority to take account of the position in Scotland. But, in general, the intention would be to seek, so far as is practical, a seamless system north and south of the Border. This would be particularly important for those businesses which operate on a national rather than a local basis, although it would not be possible to avoid the requirement that any company or individual operating both north and south of the Border would still require to be registered in both jurisdictions.

22. In due course, it may be possible to go further and consider more formal liaison arrangements between each Authority. However, at this stage, we would consider that to be premature.

23. It would also be important that licensing costs, particularly fees charged by each Authority, are kept broadly similar. As with the Private Security Industry Authority for England and Wales, the aim would be to ensure that the fees charged per application would be sufficient in the main to cover the operating costs of a Scottish Authority in the medium and long term. In the short term, it is recognised that there will be initial start up costs which will have to be borne by the Scottish Executive.

24. Initial consideration suggests that a fee of around £40 per application might be appropriate. This figure represents a balance between the cost of processing the application and what those involved in the industry could afford to pay. What would be undesirable would be pitching the fee at too high a level if that were to discourage applications and either result in those involved being forced out of work or much of the industry being driven underground. If, however, unit costs were higher than this level, the implication is that the Scottish Executive would have to provide an ongoing subsidy. At this stage, in advance of firmer indications of the level of business of the proposed Authority, it is not possible to estimate how much that might be.

25. There are several ways in which costs might otherwise be held down. The first would be if it were possible to share standards, systems and training so far as is possible with the English and Welsh Authority. That should provide some offsetting savings for both Authorities. A second could be by seeking to ensure that many small firms operating wholly in Scotland, particularly those involved in providing door stewards for clubs or bars, are covered by local authority licensing schemes. This is described in more detail under Option 4 below. A third would be to explore options for locating the new authority within, or as part of, another Scottish organisation, where it made practical sense to do so.

26. There is one other key task that a Scottish Authority could be given – that of collecting and publishing information on the scale and scope of the private security industry.

Q2: Should a new Scottish Private Security Industry Authority be given the task of collecting and publishing information on the scale and scope of the industry in Scotland?

Option 4

27. Option 4, to the extent it was applied, could be delivered in 2 ways.

- The first would be to extend the remit of liquor licensing boards also to give licences for door stewards engaged at licensed pubs and clubs.
- The second would make use of the licensing framework already available to councils under the Civic Government (Scotland) Act 1982. Section 44 of the 1982 Act would allow an order to be made by Scottish Ministers to designate private security providers as an activity requiring a licence. They may also designate that requirement as mandatory. The effect of this will be that local authority licensing powers would be extended to cover the regulation of (such parts as are agreed of) the private security industry.

28. A board (under the first route) or a council (under the second route) would be expected to consult the local Chief Constable for its area before awarding a licence. Under the second route, councils would require to be satisfied that any private security business providing door stewards for any premises seeking a liquor licence was also licensed for private security purposes. The second route described appears to us to be the more straightforward and we do not therefore consider the first route any further.

29. Under the second route described, Scottish Ministers would introduce a mandatory licensing requirement for designated activities coming within the general ambit of private

security work. Designated activities could be limited to door stewards or they could cover other activities. A statutory order would define private security work for licensing purposes. Councils would be responsible for operating and enforcing the licensing scheme and would have discretion to determine what, if any, conditions might be applied to the granting of the licence, subject to the statutory requirements on reasonableness. The licensing scheme could apply to individuals or to companies, or both. As with Option 3, fees would be charged with a view to making schemes self-financing so far as possible. Where schemes apply to individuals, each individual would have to undergo a criminal record check. It would be for authorities to decide if this check should be provided by applicants at their own cost or whether the check should be carried out by the local authority and the cost recouped, in whole or in part, within the overall fee. If schemes applied to companies, each company would be required to satisfy the council that a criminal record check had been carried out in respect of each of its employees.

30. The types of activities which might come under licensing arrangements might include, for example, door stewarding, security guarding (including the use of guard dogs, security services in retail outlets), secure transportation (including cash-in-transit), installing and maintaining security equipment (e.g. alarms and CCTV), locksmiths, wheel clampers, private investigators and precognition agents. Alternatively, the activities could be limited initially to door stewards only and extended to the others at a later date. These arrangements would be expected to apply to any individuals and/or companies operating within Scotland. We see no way to avoid the requirement that any company or individuals operating both north and south of the Border would require to be registered in both jurisdictions – although, as indicated above, we would wish to encourage authorities to liaise in order to ensure the greatest possible consistency. It is worth noting that the Private Security Industry Act 2001 includes wheelclamping and private investigators but does not cover precognition agents (which do not exist in England and Wales) nor the installing and maintaining of alarms and CCTV. Regulation of these areas may be considered at a later date. Option 4 would be intended to confer on Scottish councils similar licensing functions to those of the Private Security Industry Authority in England and Wales so far as they relate to door stewards.

31. An advantage of Option 4 is that, with local government co-operation, it could provide a mechanism for introducing a mandatory licensing regime building on an existing framework in reasonably quick time. Indeed, some councils – including the City of Edinburgh, Aberdeen City, Dundee City and Glasgow City – already have schemes of this sort in place. A further factor is that it would have the advantage of enabling councils to take account of local conditions and circumstances and reflect these in the conditions that they may attach to the licence. A number of features would have to be built in to ensure the success of a council-based scheme. In particular, there would need to be:

- effective enforcement arrangements to ensure appropriate checks/inspections were carried out regularly, thoroughly and consistently; and
- a consistent approach to licence conditions across Scotland with an agreed set of standard licence conditions common to all local authorities.

32. While Option 4 appears to make good sense in relation to small locally based companies, the implications for regulation of the sector as a whole and particularly for the larger companies which operate across local and national boundaries are more difficult. For larger companies to have to satisfy 32 local licensing arrangements could lead to anomalies

and increased bureaucracy. For example, one council might impose conditions in its area which are not replicated in other areas. Equally, if one council were to refuse to grant or withdraw a licence for any company, should that action impact in other areas? For companies which operate in Scotland and south of the Border, such anomalies could be compounded. And having 32 separate licensing agreements covering many of the same companies/individuals, some of which were already separately regulated by the new England and Wales Authority, could lead to a substantial duplication of effort and resources.

33. It may be possible to address at least some of these issues, by analogy with trading standards practices, if local authorities in Scotland were to operate on a lead authority basis. The lead authority in each case could be that in which the head office of the private security company is (or is deemed to be) located or, possibly, the area in which most of its employees generally work. As with trading standards, councils would be expected to consult where problems arose. While it would normally be for the lead authority to act where a breach of conditions arose, this should not prevent any other council taking action. Such action might involve suspending or revoking a company's licence either in an area or across the whole of Scotland.

34. There are therefore a number of possible avenues which could be followed under Option 4. In light of the responses to this consultation paper, we would expect that further discussion with local authorities and the police as well as with the private security industry, the brewing industry and the licensing trade would be needed to clarify the issues and address outstanding legislative, definitional and operational aspects. Continued contact with the Home Office would also be needed to ensure, so far as is possible, no loopholes or incompatibilities are created with the position south of the Border. But, as indicated, Option 4 is at best only a partial solution for one part of the sector.

Initial assessment of likely costs

35. In light of the comments made earlier about Options 1 and 2, this section focuses only on Options 3 and 4. Because little is known about the nature of the private security industry in Scotland, including the number and turnover of staff within the industry, it is difficult to carry out an accurate assessment of the cost implications associated with each of the identified options. Subject to this caveat, the following initial and largely subjective assessments may be informative.

36. **Option 3** could be established at relatively modest cost. It is estimated that there may be around 12,000 people currently employed in the private security industry in Scotland. If licences run for 3 years, the annual volume would then be around 4,000 licences. If it is assumed that half of these will be straightforward cases, the remainder would have some sort of criminal record, of which 40% may be for minor offences which are irrelevant to their application so that licences could be issued. That would leave around 1,200 cases per year to be more carefully considered. Appeals would be additional.

37. It is assumed that it will take an average of 30 minutes to 1 hour to consider a case and therefore perhaps 10 cases could be considered per person per day. Assuming 224 working days a year (taking account of leave), this suggests that 1 manager should be enough to consider cases outside the criteria and manage the licensing section, with 1 administrator to issue licences in straightforward cases and input data. In practice, because of

annual and sick leave; the need to liaise with the English and Welsh Authority; the likelihood that the Authority would face a flood of applications in its first year; and the likelihood of appeals, it would appear desirable to at least double these levels in order to give a reasonable indication of possible costs.

38. There would also be a requirement for an inspectorate function. It is not known how many private security companies there are currently in Scotland. There are thought to be around 8,000 in England and Wales. On this basis, it is assumed that there could be perhaps 800 in Scotland. Assuming that 25% of these are inspected each year and that an inspection takes a day plus reporting and travelling time this would point to 1 full-time Inspector – although there may be a need for a part-time second inspector as cover.

39. If the new Authority is to be stand-alone, it would be necessary to appoint a Chairman who might receive a salary. Board members would receive expenses but not salaries. It would certainly be necessary for any Authority to have access to legal advice and a fund to meet any legal challenges (which might have to be substantial - say £100,000).

40. On this basis, the total staff annual costs of Option 3 could be between £150,000 and £175,000. Adding in superannuation and other employee costs, and also accommodation, equipment, IT, travel, legal and other running costs, would boost the total annual running cost to around £300,000 to £350,000. Start up costs would be additional. On the basis of these estimates, a fee per licence of around £70 to £80 might be required to break even, though much would depend on annual demand, how flexible the Authority's costs could be made to different levels of demand, and what ways can be found sensibly to minimise these costs.

Q3: Is any better information available to make more robust estimates than those given in paragraphs 36 to 40 and, if not, are the figures given otherwise considered to be reasonable?

41. **Option 4** would involve placing a requirement on local authorities to license individuals wishing to operate within the private security industry. Some local authorities already operate licensing schemes for door supervisors in their area. These could be extended, so minimising the additional costs involved in establishing a system for regulating the private security industry by building upon the administrative systems already in existence within local authorities for licensing other business areas. It has not been possible to estimate the additional costs that would fall on local authorities because different administrative arrangements exist throughout the country. Local authorities are entitled to recover their administrative costs from licence fees so that these would be set to provide for self-financing and may therefore result in differing charges at local level.

Other costs and benefits

42. There would be additional costs to companies operating within the private security industry arising from the need to pay greater attention to checking the credentials of their employees, to maintain records which can stand up to inspection and to provide the necessary training. It is felt, however, that the costs involved would be minimal and, in any case, responsible companies will already have appropriate vetting, administrative and training procedures in place.

43. The benefits are difficult to quantify but nonetheless real. The intention is to reduce offending in the private security industry and to give the public greater confidence in the industry. By regulating all door staff, it should be possible to reduce the incidence of drug dealing and use in clubs and reduce deaths from drug abuse. Licensing will ensure that known criminals cannot be involved in the private security industry. The private security industry is also likely to benefit if the police, local authorities and the public themselves can have confidence in the people that are employed.

Other aspects

44. Regulation of the private security industry may have other implications. Significant numbers of civilians are now employed by forces. In some cases, this has enabled police officers to be released for core duties. A similar outcome followed the extension of the role of traffic wardens in the case of certain road traffic offences. And support for the police at the recent Lockerbie trial at Camp van Zeist was provided by a private sector company. These developments suggest that regulation of the private security industry in Scotland could, in principle, provide a potentially valuable resource for Chief Constables to utilise in certain circumstances to support the work of the police where this did not otherwise cut across their key role to prevent and detect crime. But there is certainly no intention that this will involve private security firms in a direct policing role.

Conclusion

45. The proposals in this paper point to Option 4 for door stewards (mirroring the arrangements being implemented for England and Wales) and possibly also for some other activities operated locally by individuals and companies in Scotland. This option would require local authorities to set up licensing schemes. That could, in principle, be done relatively quickly.

46. Other organisations within the industry operating in Scotland (whether or not they are based in Scotland) would then be regulated in due course by a new Scottish Private Security Industry Authority (Option 3), once legislation has been passed. In establishing these new arrangements, it would be important to minimise bureaucracy, particularly for those companies which operate both north and south of the Border and which, on present plans, would need separate licences in each jurisdiction. In that case, discussion would be needed with the Home Office and/or the new English and Welsh Private Security Industry Authority. It would be important to ensure, for example, that the criteria to be adopted north and south of the Border were as compatible as possible in order to reduce bureaucracy and cost on those in the industry to the minimum necessary and also to ensure that there were no loopholes in the systems adopted. An ideal outcome, though it would depend on further legislation in both the United Kingdom Parliament and the Scottish Parliament, would be for licences awarded by either body to be acceptable in the other's jurisdiction.

<p>Q4: Are the proposals for the new Scottish Authority to mirror that for England and Wales sensible and practicable?</p>
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Q5: Is the proposal for a twin-track system appropriate? This would involve local authorities operating and enforcing local licensing schemes for certain parts of the sector and a Scottish Private Security Industry Authority regulating, inspecting and overseeing companies (and/or individuals) operating at a national level.

Q6: What criteria should be adopted for deciding where an applicant is based if he/she or his/her organisation operates both north and south of the Border?

47. There are other factors which would also need to be taken into account.

- Given the implications for liquor licensing, it would appear sensible to take time to ensure that any proposals in this area are in line with what may emerge from the National Strategy for Alcohol Misuse currently being taken forward by the Scottish Executive.
- There is a need to ensure full consultation, particularly with local authorities, the police and representatives of the private security industry, the brewing industry and the licensing trade. Such a consultation process would, inter alia, inform the split between what might be covered by local authority schemes and by the new Authority.

Q7: What should the split be between what might be covered by local authority schemes and by the new Authority?

- There would be a need to develop guidelines to go alongside any local authority licensing scheme. It may be sensible to consider incorporating within these the need for training for those involved in the activities covered, including possibly training in health and safety matters given that the great majority of those involved will come into direct contact with the public.

Q8: Should the role of the new Authority extend into other areas such as health and safety?

48. Under the options proposed, the net costs of regulation in the medium and long term should be relatively low if the approach of self-financing through licensing fees is followed, although there will be some initial start-up costs.

Consultation and timetable for future action

49. Views are sought on all the issues covered in this paper. In particular, views are sought on which are considered the most appropriate options of those presented. Views are

also sought on the split of the industry between what might be covered under Option 4 and what might be covered under Option 3 and on the questions highlighted.

50. If the outcome of this consultation is in line with the proposals contained in this paper, measures to introduce licensing schemes would be developed as soon as possible. Measures to legislate for an Authority to regulate other elements of the industry would be taken forward thereafter, as soon as there is a suitable legislative opportunity.

51. This paper is being sent to a wide range of organisations including local authorities, the private security industry, the police, the licensed trade and sports and entertainment industries, and certain other organisations and individuals with an interest. A list of the main consultees is attached (at Appendix A).

52. Comments are invited on this paper by 14 December 2001, addressed to:

Darren Burgess
Scottish Executive Justice Department
Room E1-2
Saughton House
Broomhouse Drive
EDINBURGH
EH11 3XD

Or e-mail to:

psiconsultation@scotland.gsi.gov.uk

53. As previously indicated, responses may be made public unless respondees make clear they wish their response to remain private.

54. Copies of this consultation paper can be found on the Scottish Executive website at www.scotland.gov.uk or obtained by telephoning 0131 244 2594.

Appendix A
Consultation List

The following organisations have been invited to comment on the consultation document.

Government Departments

Crown Office

HM Treasury

Home Office

Northern Ireland Office

Scottish Executive Development
Department

Scottish Executive Education Department

Scottish Executive Enterprise and Lifelong
Learning Department

Scottish Executive Environment and Rural
Affairs Department

Scottish Executive Finance and Central
Services Department

Scottish Executive Health Department

Scottish Executive Justice Department

Parliament

Justice Committees

Scottish Parliament Information Centre

Police

Association of Chief Police Officers in
Scotland

Association of Scottish Police
Superintendents

Association of Scottish Police
Superintendents

Her Majesty's Chief Inspector of
Constabulary

Trade/Industry Bodies

British Security Industry Association

Confederation of British Industry
(Scotland)

Federation of Small Businesses

International Professional Security
Association

Joint Security Industry Council

Leisure, Safety and Security Association

Security Industry Training Organisation

Scottish Security Association

Master Locksmiths Association

Legal Bodies

Edinburgh Bar Association

Faculty of Advocates

Glasgow Bar Association

Law Society of Scotland

Scottish Law Commission

Society of Solicitor Advocates

Inspectorates

British Standards Institution (BSI)

National Security Inspectorate (NSI)

Insurers

Association of British Insurers

Loss Prevention Council

Suppliers

Andron Contract Services Ltd

Burns International Security Services
(UK) Ltd

Centuryan Security Ltd

Chubb Wardens Ltd

Direct Security Services Ltd

Group 4 Cash in Transit (Scotland) Ltd

Group 4 Total Security Ltd

Keyholding Response (UK) Ltd

Northstar Security

Profile Security Services Ltd

Reliance Security Services Ltd

Rentokil Initial Security Services Ltd

Rock Steady Security Ltd

Royal Mail Cashco

Securicor Cash Services

Securicor Guarding Ltd

Securiplan plc

Securitas UK Ltd

Security Planning Ltd

Specialized Security

Sutherland Investigations

Vizcount Security Services

VSS Security

Wakenhut UK Ltd

Users

Alliance of British Clubs

Association of Licensed Free Traders

Brewers and Licensed Retailers
Association

Brewers Association of Scotland

Brink's Ltd

British Entertainment and Discotheque
Association Ltd

British Hospitality Association

British Hospitality Association (Scotland)

British Institute of Inn-Keeping

Brunswick Group Ltd

Committee of Registered Clubs
Association

John Lewis plc

Scottish and Newcastle Brewers

Scottish Football Association

Scottish Licensed Trade Association

Local Authority

COSLA

SOLAR

Trading Standards

Unions

S.T.U.C.

Trade Media

Event Organisers Magazine

Scottish Licence Trade News

Voluntary Organisations, Forums and Interest Groups

Age Concern Scotland

Central Scotland Racial Equality Council

Citizens Advice Scotland

Commission on the Future of Multi-Ethnic Britain

Commission for Racial Equality

Disability Rights Commission

Edinburgh and Lothians Racial Equality Council

Enable

Engender

Equal Opportunities Commission

Equality Network

Fife Racial Equality Council

Grampian Racial Equality Council

Inclusion Scotland

S.C.V.O.

Scottish Civic Forum

Scottish Disability Equality Forum

Scottish Gypsy Travellers Association

Scottish Refugee Council

Scottish Travellers Consortium
Strategy in Scotland
Tayside Racial Equality Council

West of Scotland Racial Equality Council

Women's Forum Scotland

Women's National Commission

Churches and Faith Groups

Action of Churches Together in Scotland

Catholic Parliamentary Office

Evangelical Alliance (Scotland)

General Assembly

Scottish Churches Parliamentary Office

Scottish Council of Jewish Communities

Scottish Inner Faith Council

Union of Muslim Organisations of UK and
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