



United Kingdom Crowd Management Association

UKCMA Industry Challenges and Ambitions

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1. EXECUTIVE SUMMARY

This document has been produced by the United Kingdom Crowd Management Association (UKCMA) to highlight the issues and concerns facing the crowd management industry, in the context of public safety, and Public / Private Policing Initiatives. There are systemic issues that require urgent stakeholder input and a long-term and comprehensive overhaul of the entire system.

Following months of work by the UKCMA to gather evidence, the aim of this document is to be a starting point for wider discussion: to identify the challenges and broaden the conversation, ensuring participation by a wider set of stakeholders. The crowd management industry has a direct impact on public safety, which is why it is important to broaden the scope of participants involved in this conversation. Only when senior-level representation is present can solutions be identified, developed, and delivered.

This is a pivotal moment for the industry: the results of the Protect Duty consultation, the findings of the Manchester Arena Inquiry and the long-term impacts of COVID-19 will all have financial and operational ramifications for anyone working, in any capacity, within the field of crowd management.

Key Considerations:

- 1.1. Imminent Threats:** There are real and imminent threats to public safety in the coming year, and particularly into 2022, which the event and safety industry cannot address alone.
- 1.2. Government Representation:** Crowd management does not have a strong political voice or advocate. Our concerns must be heard at Central Government, at a high enough level to affect change. To drive any form of effective change, the matters outlined need to be recognised in the wider frame of reference of public safety.
- 1.3. Urgent Supply Chain Shortages:** As with the wider hospitality industry, there are critical staff shortages that must be urgently addressed. Immigration restrictions and lack of public confidence are key factors in the supply chain shortages.
- 1.4. Improvements in Guidance:** There is a lack of regulation, legislation and enforcement within the industry, which urgently needs addressing.
- 1.5. Consistency in the Application of Guidance:** Where there is national guidance or legislation in place, this needs to be applied and enforced consistently.
- 1.6. Improvements in Training:** To professionalise the industry and provide a consistent level of delivery across all sectors will require investment. A set of realistic guidelines and recognised qualifications need to be developed and a body identified to enforce standards across all sectors.
- 1.7. Improved Recognition and Remuneration:** In order to retain experienced professionals in the industry, steps must be taken to ensure that reward and recognition are commensurate with the level of skill and liability, and that career paths are supported.
- 1.8. Sharing of Information:** Improvements are required in central sources of current information and in the collation and dissemination of information at all levels.

2. WHAT IS THE UKCMA?

The United Kingdom Crowd Management Association (UKCMA) was founded in 2001 to represent the interests of organisations within the crowd management industry. Over the years, the Association has grown and evolved, welcoming crowd safety and security professionals, academics and students, who are all committed to improving standards across the industry and sharing learnings from event sites across the world.

The UKCMA is the voice for this significant workforce who are tasked with ensuring public safety, operating in many different roles and environments. We are representing an industry estimated to be worth over £4 billion per annum to the economy. The UK events industry, within which we operate, is worth £70 billion ([BVEP article - Value of the Events Industry](#)) and employs, conservatively, in the region of 50,000 full-time, part-time and casual workers.

The combined knowledge and reach of the UKCMA is clearly demonstrated by the role it plays in national consultation: at the time of writing the Association Chairs the British Standard for Stewarding, is a representative on the SIA Strategic Forum, liaises with the NPOCC SIB (formerly known as NEIU), is part of the Home Office consultation process for the proposed 'Protect Duty' legislation and has submitted statements to the ongoing Manchester Arena Inquiry regarding the terror attack at the Ariana Grande concert in 2017.

The UKCMA collaborates with partner agencies across the UK, such as the Events Industry Forum (EIF), One Industry One Voice (Taskforce), the Football Safety Officers Association (FSOA) and the Night-Time Industries Association (NTIA). While we are a UK-based organisation, we also have friends and colleagues in many countries, so draw upon this global knowledge and alliances to help inform and shape our practices.

The Association has a set of key objectives which guide all its activities:

- To promote the UKCMA Code of Practice.
- To improve standards across the UK crowd management industry.
- To be the recognised voice of authority in matters relating to crowd management in the UK.
- To represent the interests of the industry (advice and consultation) to government bodies, stakeholders and other relevant organisations - UK and International.
- To provide a forum for the exchange of non-competitive information and support between members, subject to full compliance with all applicable UK laws.

3. CROWD MANAGEMENT IN CONTEXT

The science of crowd management plays a crucial role in everyday life: it underpins how commuters move around busy transport hubs, keeps audiences safe at cultural, sporting and faith-based events, and more recently has informed the logistical planning for COVID-19 relief efforts. Crowd management and public safety are inherently interdependent. Crowds will always exist in some form or another and some will be, by their very nature, more dangerous than others.

Public safety can be examined from many perspectives. Terrorism, security, and the use of safe spaces all have equal importance in keeping people safe. Crowd management is often afterthought, with crowd managers assumed to be ‘someone from the security team’ or, worse, not even considered until important decisions (like site capacity) have already been agreed through Licensing or Safety Advisory Groups with no attention to crowd flow rates, densities, queueing plans and reasonably foreseeable crowd behaviours. The application of some basic mathematics, an understanding of simple physics, and an appreciation of crowd psychology and human behaviours are all required to keep crowds safe. Experience on the ground is as important as theoretical learning.

The complexities of crowd management are recognised by the Health & Safety Executive (HSE), 1999:

The safety and enjoyment of people attending a music event will depend largely on the effective management of the crowd. Crowd management, however, is not simply achieved by attempting to control the audience, but by trying to understand their behaviour and the various factors which can affect this.

Examples of where appropriate crowd management has failed to be applied can sadly be observed throughout history: the Hillsborough disaster (1989) which resulted in 96 deaths; the Love Parade disaster (2010) which resulted in 21 deaths and, more recently, the Lag B’Omer crush in which 44 people lost their lives. Many further examples can be viewed [here](#) .

At all events there is the possibility of people coming to harm in any number of ways. The safety of everyone attending an event, including the staff that work there, is always the most important consideration. Event staff occupy a key role in a structure that is designed to ensure that everyone is kept safe. Each event is organised by a series of safety plans with the crowd and event safety management plans reviewed by local councils and governing bodies. Each SIA or Steward position, and their role, is factored into the event planning.

In the context of the intrinsic link between public safety and crowd management, however, we should not only be considering large-scale crowd disasters but also everyday events in the workplace and public realm. Whether it’s a slip and trip which causes injury (see example here), or a restraint of a member of the public gone wrong (see example here) – without the support of crowd managers and crowd planning, we would undoubtedly see a great deal more injuries and fatalities.

4. INDUSTRY CHALLENGES

4.1. Member Concerns: UKCMA members were asked to complete several surveys over the last year, with the most recent asking them to rank their key areas of concern. The survey results reported the following concerns:

- **Staff and Wider Supply Chain Shortages** – as we return to events and mass gatherings.
- **Protect Duty** – the potential ramifications of the proposed Protect Duty legislation.
- **Training** – poor access to training, the range of industry training available, and lack of support from industry governing bodies. The issues include: the incoming changes to the training required to gain an SIA license, the financial impact this will have on employers, and the potential challenges this will create for recruitment.
- **Regional Variation** – the lack of a consistent approach to the licensing of public events, and to Counter Terrorism planning, by Local Authorities, the Police or other agencies.
- **Monocausal Thinking** – a focus on COVID-19 to the detriment of other potential threats by organisers and Local Authorities as we return to events and mass gatherings.
- **Financial Support** – the lack of financial support (funding for training, insurance etc.) for the crowd management industry and its workers provided by Central Government and other industry bodies.

Members were also asked to highlight any other issues not included in the list. Comments broadly fell into three additional areas of concern:

- **Company Practice:** members had concerns about the variable calibre within the crowd management industry and a lack of scrutiny of competencies. Recognition, rates of pay and the potential for poorly qualified companies to exploit the current gaps and shortages in the market were also raised.
- **Interoperability:** members highlighted ongoing and current issues around multi-agency and multi-stakeholder working, the sharing of information, the impacts of COVID on staff and knowledge retention and current planning timescales.
- **Legislation / Standards:** comments responded to the implications of the Manchester Arena Inquiry and incoming changes to SIA training and licensing, as well as the lack of a standardised approach to national legislation and guidance.

The full survey can be viewed in Appendix 1.

4.2. Supply Chain Shortages: Due to the shortage of work for security professionals in the night-time economy and special events sector during pandemic restrictions, many licensed door supervisors have sought more stable sources of income through work in other security roles, and some have left the sector altogether. The challenges include an unprecedented increase in demand for SIA personnel (it is estimated that over 5,000 licensed staff per day are providing direct or indirect support to the UK Government, taking them away from traditional roles); during the pandemic the security workforce has secured employment in other areas such as retail and manufacturing.

4.3. Security Industry Authority (SIA) Considerations: The UKCMA and Football Safety Officers Association (FSOA) have written a series of representations to the Security Industry Authority (SIA) and the Sports Ground Safety Authority (SGSA), in their respective roles as regulatory authorities. These concerns are time-critical, as remobilisation of the industry is expected over the coming weeks and months and any significant shortages will have an impact on public safety. Whilst in regular, open communication with the SIA, the UKCMA has looked in detail at statistics provided, in relation to concerns about supply chain shortages. Findings include:

4.3.1. The importance of considering not only the numbers of licenses granted but usage, including demand on the services and the number of active workers in the field.

4.3.2. Pre-pandemic, the Door Supervisor (DS) license resource was insufficient to meet demand, particularly during peak periods from May to December. Whilst the 4.5% increase in recent years is welcome, it may not be sufficient to meet the expected peak-time demands of this year.

4.3.3. Although the actual number of license holders exceeds 430,000, up to 60,000 (14%) of those may be holding more than one license. Additionally, a proportion of these license are held by non-Frontline operatives. The biggest uncertainty is how many of those licenses will remain active during their three-year tenure. It is safe to assume that the number of active operational licenses is significantly less than 430,000.

4.3.4. According to statistics produced by the SIA in March 2021, 145,000 licenses have been granted within the last 12 months. 44,000 of those were new application awards which would suggest that 100,000 were renewed. It is difficult to assess the licenses against individual workers' numbers, but it may be reasonable to assume that 14% were secondary licenses.

4.4. Competence levels: Pre-pandemic, it was already widely accepted that competency levels were variable within the crowd management industry. The depletion of resources caused by COVID-19 has opened the door for unregulated and less experienced organisations to fill this vacuum, which is a further cause for concern.

4.5. Status and Recognition: COVID-19 has served to further highlight the lack of recognition for our workers, not just during the pandemic response, but more generally in UK infrastructure and emergency planning. Our industry's status is not commensurate with what is currently being asked of us and what may be expected in the future. More government and regulatory support and recognition is required to promote the sector as a career rather than a stopgap until moving on to other more attractive and potentially lucrative sectors.

4.6. Remuneration: Rates of pay within the industry are low (compared with other sectors, such as retail) and the pay gap between stewards (unregulated, unlicensed) and Security Industry Authority (SIA) licensed security is becoming negligible. This current level of remuneration is simply not adequate, especially when considering what may be asked of staff in the future and what responsibilities a security or crowd management provider could be asked to take on under any new legislation.

5. PLANNING AND A RISK-BASED APPROACH

5.1. Risk-Based Approach: We firmly believe that a risk-based approach to crowd management should be adopted, in which each potential risk is identified, assessed, and mitigated. Many different factors contribute to the overall picture, and individual risks should not be viewed in isolation.

5.2. Balancing Commonplace Risk: It is necessary to consider other commonplace risks in public spaces within wider public place planning context, such as medical or fire risks. These risks cannot be viewed in isolation and need to be thought of as interrelated. There are times where mitigating measures for Counter Terrorism may need to be balanced with (and may even conflict with) other risk mitigation measures, such as fire evacuation routes. When such mitigation is considered, a new and balanced assessment of other risks and their likelihood and consequence must be agreed by the person with responsibility for public safety. Clarity is needed as to who carries the burden of risk if advised mitigation is accepted but then causes other unintended risks.

5.3. Single Focus or Monocausal Thinking: Planning for major events relies very heavily on the understanding that each public place is different: a layered, holistic approach should be taken when planning for public safety. Such planning should be approached not as static risk, but as evolving risks, encompassing weather, transport routes, ingress, circulation, egress over time and all other matters of crowd safety. In the same vein, COVID-19 and Counter Terrorism should not be viewed in isolation or be allowed to become the only focus. There needs to be a balance between higher and lower probability risks and proportional risk management.

6. ROLES & RESPONSIBILITIES

6.1. The UKCMA Board and Steering Group are currently working on a document providing guidance for members on roles and responsibilities. This will be made available on reasonable request.

6.2. Specialisms: The triumvirate of crowd and public safety, security and Counter Terrorism is understood by many to be one and the same thing. We would state emphatically that, in a complex and difficult environment, this is not the case. Each of the three are separate but interrelated complex specialisms. The triumvirate must remain in balance, and none treated as an absolute above the others. An example here is the language used in each specialism; public safety considers Risk Assessment, whereas Counter Terrorism considers Threat Assessment.

Each can be broken down into identified elements as follows:

Area	Examples of considerations
Crowd Management	Type of event, audience profile, arrival, ingress, egress, emergency procedures, Health and Safety, and Risk Assessment.
Security	Crime, VIP Visits, protection of equipment, search and access control.
Counter Terrorism	Current information, current threat level, potential identified risk from attack, hostile reconnaissance monitoring and types of attack most likely.

6.3. Roles: Roles and responsibilities must be outlined in the planning stages with clear chains of command and communication for each event, in such matters as who should lead in terms of advice, where information should come from and what competencies are required. A member recently demonstrated the risk of assumption of role when they commented, ‘I need to know what the weather is going to be and its impact on my crowd. Be it heat, rain or high wind, it will make a difference and if it is lightning, it is immediately life threatening and I understand this. However, that does not make me a meteorologist and access to a weather app does not make me an expert. I think that should be obvious to everyone and why would they expect anything different when it comes to terrorism?’

6.4. Counter Terrorism: This is a specialist area that requires specialist training, and we seek absolute clarity on the responsibilities and expectations of organisations and their personnel in the face of such a risk. Currently the intelligence services are responsible for providing up-to-date information regarding potential incidents within the United Kingdom. Whilst we agree that that the Government, Police and Security Services cannot be held wholly accountable for all aspects of Counter Terrorism, we would be remiss in our duty if we did not similarly challenge any attempt to apportion culpability to the private sector if the expectations placed on us are beyond the industry’s means and outside our powers to implement.

6.5. Availability: Currently there is a significant lack of specialist expertise in Counter Terrorism within the private sector, which we expect to be recognised in the Manchester Arena Inquiry findings. There is a clear difference between ‘event security’ as it currently exists under the Security Industry Authority (SIA) badged scheme, and specialist Counter Terrorism risk management. If new measures seek to vest more responsibility with private companies, venues, Local Authorities and private security, then the equivalent functions to those of Counter Terrorism Security Coordinators (CT SecCo) and Counter Terrorism Security Advisers (CTSAs) must be established. There is a skills gap to be addressed between the handful of existing private specialists and the number that will be needed.

7. PLANNING FOR COUNTER TERRORISM

The UKCMA has made submissions to the Manchester Arena Inquiry (MAI) and Protect Duty consultation and continues to closely monitor the Inquiry as we wait for the final report to be delivered.

We fully support the introduction and implementation of powers and measures designed to prevent similar disasters, and suggest that, with our accumulated experience, it is our responsibility to provide support in the drafting of such measures to ensure that they are feasible to implement but do not reduce the overall safety of other areas of significant concern.

We refer you to our statement issued in 2020: click [here](#)

The ‘Protect Duty’ Legislation UKCMA considerations can be viewed using this link: [click here](#)

From the Chair’s findings from the Manchester Arena Inquiry, we know that Protect Duty will be a framework for change. The MAI concentrated on one aspect (large public venues), and we are unclear on its conclusions on the complex issues of responsibility and liability. That scope would be widened infinitely by the adoption of Publicly Accessible Locations (PALs), which could be detrimental to the practical implementation of the legislation.

In order for UKCMA members and stakeholders to respond effectively to the Protect Duty Consultation, a guidance document was created to help form a better understanding and think ‘around’ complex questions without influencing their response.

This is a link for the final version sent to members

 [UKCMA Member Considerations - Protect Duty Consult DRAFT 2021-05-17.1.pdf](#)

The UKCMA’s most recent submission on Protect Duty is available upon request. It is acknowledged that this is just the initial consultation and Protect Duty processes will take quite some time.

The Government’s own statement on Protect Duty is [available here](#)

The first duty of the Government is to protect the public. The terrorist threat we currently face is multifaceted, diverse and continually evolving.

Is the Government trying to abdicate that duty to the private sector? Without access to the intelligence of the ‘diverse and continually evolving’ situation, any attempt by private industry is likely to be flawed and leave those attempting to do so vulnerable in the event of another Manchester attack or similar incident.

Key UKCMA considerations for Protect Duty include:

7.1. National Threat Levels: Even when requested, Counter Terrorism assessments are often not made available to event planners. Without access to the relevant information, a security company or event planner will struggle to initiate an event-specific Counter Terror Threat Assessment. A reasonable baseline of what must be provided and what subsequently is expected needs to be established.

- 7.2. Lack of regional consistency:** There is regional disparity in planning, and a variable application of national powers and guidance. Given these current challenges, it is difficult to conceive how new guidance or legislation could be uniformly applied and enforced.
- 7.3. Multi-Agency Working:** Complex multi-agency and multi-stakeholder working is required on most event sites, for large venues, and to deliver activities taking place in the public realm. A clear understanding of how these relationships operate and where liability sits needs to be agreed. Part of the solution is finding common language and understanding between the public sector and private industry.
- 7.4. Applicability:** Clarification is required regarding how legislation is applied, and to whom/what. There are multiple layers of different guidance applicable to the same event, venue or publicly accessible location and, going forward, it is unclear if the proposed Protect Duty legislation will usurp current guidance.
- 7.5. Publicly Accessible Locations:**
- 7.5.1.** With a seeming move towards an all-encompassing term – ‘Publicly Accessible Locations’ – the physical remit and the definition of spaces require further clarity. It is unclear if the proposed new Protect Duty legislation will be expected to cover such open spaces as parks, beaches, riverbanks etc., where informal but substantial gatherings might reasonably be expected; and if so, to what extent would Local Authorities or Responsible Persons be required to assess the threat and establish safety mitigation proportionate to a live event or even a busy summer’s afternoon.
- 7.5.2.** We believe the definition of Publicly Accessible Locations is simply too broad to be effective. It is also unclear what the financial implications might be, and who would be responsible for them.
- 7.6. Zone Ex / Grey Space / Last Mile:** To date, no proportionate and consistent resolution to the responsibility for activities within Zone Ex has been forthcoming, which has the potential to leave gaps in provision and confusion regarding liabilities. Any new legislation would need to clearly identify the level of responsibility placed on the organiser/ landowner for each event and the parameters of responsibility, and who should be involved in this decision-making process.
- 7.7. Capacity:** With reference to the proposed Protect Duty legislation, clarification is required around the suggested application of thresholds and where one might supersede another (e.g. staff numbers vs. event capacity).
- 7.8. Methods of attack:** There are many varied Terror Attack methodologies including, but not restricted to: Person-Borne Improvised Explosive Device (PBIED), Marauding Terrorist Attacks (MTA), bladed weapon, chemical or drone. This range of attack methodologies is currently not adequately addressed, with myopic planning often focussing on a single method, such as the one used in the last attack. It is unclear how, or if, the proposed Protect Duty legislation plans to address the myriad of potential Terror threats and whether this is even possible using a single piece of legislation.

7.9. Queues in the public domain: Consideration should be given to mitigation measures that have the potential to increase queuing into the public domain. Access Control measures create longer waits and larger queues which become easier targets. We feel it would be inappropriate to support any mitigation, which, by its nature, increases threats to the public from other deliberate attack methodologies, road traffic accidents and natural phenomena.

8. LEGISLATION & ENFORCEMENT

8.1. Existing legislation: Whilst new legislation is considered, the potential offered by existing regulations should not be overlooked.

8.1.1. The Health and Safety at Work etc Act 1974 and associated legislation

8.1.2. The Civil Contingencies Act 2004

8.1.3. Licensing Act 2003

8.1.4. Occupiers Liability Acts 1957 and 1984

8.2. Safety Advisory Groups (SAG): SAGs play an important role in advising sporting and event organisers on matters relating to the safety of an event and of the public attending. SAGs are a non-statutory body made up of Local Authorities and Emergency Services and are sometimes linked, although not in law, to the Local Resilience Forums (the 'delivery arm' of the Civil Contingencies Act). A lack of guidance until 2015, and no statutory requirement, means delivery by SAGs is vastly inconsistent across the country. There is desire from some organisations, including the police, to empower SAGs, but such a move would have to be balanced by ensuring competence of members and consistency in training and decision-making nationally.

8.3. Framework of existing legislation: It is unclear how the proposed new Protect Duty legislation will work within existing frameworks, or if it will indeed supplant current guidance. Duplication in legislation should be minimised where possible and conflict avoided.

8.4. Enforcement: As previously mentioned, there is a lack of consistency in the application and enforcement of national guidance and regional variations in the planning process. There is a concern around how the new Protect Duty legislation will be enforced and by whom. If it is not consistently applied and enforced, there is a risk that its impact and effectiveness will be severely diminished.

8.5. Definitions: There needs to be clear definitions of 'reasonably practicable' and 'proportionate' prior to any new guidance being introduced.

8.6. Business Licensing: Security Industry Authority Approved Contractor Scheme (SIA ACS) is voluntary rather than mandatory, and some consider it expensive and onerous. Significant changes may be required to meet the demands of proposed new legislation.

8.7. Stewarding: This role is currently unregulated and the burden of responsibility for any due diligence checks falls on the employer. This risk is magnified at peak times, when large amounts of staff are required, and organisations may be required to sub-contract. Liability for training sits with the

employer; however, there are currently no legal requirements/recognised national standards. This applies to both paid staff and volunteers. Whilst there is a British Standard for stewarding (BS8406) there is not one that refers to safe planning for crowds. There is currently no equivalent in the UK to the US Safety Standard (ANSI ES1.9) for Events Safety – Crowd Management.

8.8. National Events Register: There is currently no National Events Register to gather the collective requirements of safety and security personnel at events across the UK. Event licenses are granted by all UK councils/local governments and the requirements for documentation as part of that process should include staffing deployments. Major clashes across the UK at peak times create a demand far higher than can be physically supplied and puts some events at risk. Linking with resources such as the National Events Intelligence Unit and the SIA investigations team would provide a coordinated effort to improve standards and reduce risks at events.

9. EDUCATION

9.1. Qualifications and Competencies: There is an identified lack of security personnel sufficiently qualified, experienced, and competent to meet the demands of the industry. It is therefore important to continue to train more personnel to ensure the safety of people at events nationwide. Recent changes in the recognised qualifications and the lack of associated funding to support them have rendered the training more challenging to deliver, and often not viable if delivered on a commercial basis.

There are no laws governing the level of qualification required to work in crowd management. There is guidance for sports grounds, but this does not cover other events or mass gatherings. It is important to ensure that qualified and competent programmes are established to train and undertake required assessments, and that viable routes for Continued Professional Development (CPD) are made available to meet the needs of the industry. This training must also be relevant and achievable.

9.2. General Funding: There are considerable challenges around access to training: NVQ funding has been reduced and this will have financial implications due to longer course modules. Prior to February 2021 the Government (Education Skills Funding Agency ESFA) funded the Level 2 NVQ Certificate at approximately £1,400 per learner. The qualification requires several work-based competence assessments that are difficult to manage logistically and require an assessor to attend several events for each person. An assessor can observe around ten candidates per event (maximum). The new Certificate in Spectator Safety (RQF) was released on February 1st, 2021, and the Government have allocated a reduced fee of £450 to the new qualification. The new qualification is very similar to the previous one, yet the funding available is nearly £1,000 per person less. This will undoubtedly impact on the availability of trained and proficient staff, which could have significant implications for delivery of public safety.

9.3. Funding for Sports Grounds: Prior to February 2021, there were three primary qualifications available to those who wished to undertake stewarding, stewarding supervision, and safety officer positions within a sports ground. These qualifications have since changed. The sports industry has been reliant on these qualifications being funded by The Education Skills Funding Agency (ESFA). However, with

the new changes, the associated funding does not cover the cost of delivering this qualification, and therefore many training providers who would have access to funding are not able to facilitate the training.

- 9.4. Counter Terrorism/ Safety Personnel:** There will need to be additional and improved training on Counter Terrorism following government and intelligence agency advice and recommendations. It will be important to ensure such measures are proportionate to role and activity, and commensurate to the activities of personnel who have no more powers than members of the public. Multiple courses will be required to achieve a desired level of Counter Terrorism competence and there needs to be clear Government guidance to help set these competency levels. The current Actions on Counter Terrorism (ACT) training may not meet the proposed requirements of the new legislation. Fast-tracking may be considered for those with up-to-date CT Secco Police training.
- 9.5. Public Education:** The public and non-crowd management staff should be better educated about recognition and reporting. The public and non-crowd management staff should be better educated about recognition and reporting. Whilst the ‘Run, Hide, Tell’ message is spread widely on public information boards on transport networks etc., it must be followed up with a more detailed explanation; and basic life support training should be made available at no cost.
- 9.6. Early Education:** School-aged children should be educated beyond ‘Run, Hide, Tell’. They should be taught about recognition of problems and basic emergency life support.

10. WIDER IMPACTS

- 10.1. COVID-19 Recovery:** The initial findings from the Event Research Programme (ERP) test events were shared on 06th May 2021 and the specific areas flagged clearly relate to public safety and crowd management. These included ingress and egress, ticketing systems, public transport, Zone Ex / Grey Space, public communication and staff welfare, including testing.
- 10.2. Calendar Clashes:** Due to COVID-19 mitigations, many activities have been ‘stacked’ towards the end of the year to give them a better chance of happening. When added to events of national significance, the resulting congestion will put a strain on already depleted resources and increase the risk of unlicensed businesses entering the market with untrained staff. It is unclear whether the proposed new legislation will simply increase these pressures or will help to introduce better regulation of the industry.
- 10.3. Collation of current existing information:** Existing sources of information need to be collated to allow for improved access and dissemination, for example, The National Counter Terrorism Security Office (NaCTSO) and Centre for the Protection of National Infrastructure (CPNI), which relates directly to organised crime and the urbanised crime economy.
- 10.4. Sharing Information:** Business Improvement Districts (BIDs) and Local Enterprise Partnerships (LEPs) are run by civilian operatives. Information should be shared from one source, at

appropriate levels for the recipients' security clearance, to avoid the risk of messages being misunderstood or information misrepresented. Sharing Agreements should be considered.

10.5. Business sustainability: The proposed new Protect Duty legislation will have significant financial implications for small private businesses and spaces under Local Authority control. Additional spend will be required to cover training, insurance, undertaking threat assessments and implementing mitigation measures that are beyond the capacity of many smaller organisations.

10.5.1. Smaller Community Events: Smaller volunteer-led, often not-for-profit, community events will be some of the most hard-hit by new legislation. Smaller village fetes, craft fairs, community fun days, local fundraisers etc. which are often specifically designed to build community cohesion, and which take place in publicly accessible locations are unlikely to be able to deliver under the proposed new legislation. There is a real possibility that these kinds of events will no longer be tenable. There is also a risk that they will go ahead regardless unchecked. It is unclear who would enforce the new legislation at this hyper-local level.

10.6. False public assurance: We must consider if it is possible to put any realistic, achievable mitigation in place against Terrorism threats. There is a real risk that the public will lose confidence in any legislation when there is another attack, which could result in a loss of credibility, support and compliance.

10.7. Public transport: Given the complexities of multi-agency working, the layers of different legislation applicable to transport providers (and the environments they work in) as well as the proposed exemptions within Protect Duty, it is unclear how public transport can be made secure without associated queues becoming even more of a target

11. ACTIONS REQUIRED

11.1. Address Imminent Threats: There is a real and imminent threat to public safety in the coming year and particularly into 2022 which the event and safety industry cannot address alone. We wish to raise these concerns in a way that allows for further discussion and seeks solutions in good time.

11.2. Government Representation: Crowd management does not have a strong political voice or advocate, unlike industries such as football. Our concerns are not heard at the levels required to instigate change. A central voice is needed to represent the sector that can sit across multiple departments in government including DCMS, BEIS, DHSSPS, the Home Office and DfES. It is important for us, as the crowd management industry, to better understand how government departments will work together to tackle these matters.

11.3. Address Urgent Supply Chain Shortages:

11.3.1. Supply and Demand: The industry is seeing a vast increase in the staffing level requirements to meet Covid-19 mitigation measures. Large deployment requirements at recent sporting

events have seen the supply chain being stretched to the limit. Concerns have been raised in discussions with the Care Quality Commission (CQC) surrounding the same supply chain issues within the medical industry in relation to the supply of onsite medical and ambulance facilities to the outdoor events industry.

11.3.2. The Bigger Picture: Wider stakeholder engagement is required in order to have a greater understanding of what the demand for personnel will look like going forward. There are concerns around staff shortages in other sectors that are parallel to our industry that will also have an effect on public safety.

11.3.3. Improving Confidence: Consider a campaign to encourage workers back to the industry, giving them confidence to return to work as part of the Step 4 lifting of restrictions. More government / regulatory support is required to promote the sector as a career rather than a stopgap before moving on to other more attractive and potentially lucrative sectors.

11.3.4. Mentoring and Apprenticeships: More funding is required for mentoring and apprenticeships to encourage people to join the industry. Extending the use of funds from the apprenticeship levy would enable organisations to upskill frontline staff with approved training and or qualifications. This would also give these organisations the opportunity to recruit and train more personnel in order to continue to meet the demands for staffing and improve public safety.

11.3.5. Immigration Regulations: Government support is needed to urgently address the critical labour shortages within the crowd management sector. In relation to immigration, these supply chain shortages have been widely reported in the media and highlighted to the government by the Events Industry Forum (EIF). See letter and links in Appendix 1.

11.4. Standards: There are no agreed standards around competencies, or the level of qualifications required to work within the industry. A set of realistic guidelines and recognised qualifications need to be developed and sufficiently funded, and a body identified to enforce standards across all sectors. This relates to currently licensable and non-licensable staff.

11.5. Training: The consistency, quality and availability of training, especially within the area of Counter Terrorism, as well as the considerations around funding and costs, is currently unacceptable. A standardised programme of training must be developed and barriers to participation removed.

11.5.1. Casual and Seasonal Worker Training: For a part-time role, with an average of 12 working hours a week, training in crowd management becomes disproportionately costly. Overheads are higher for the required recruitment, training and uniform costs for four part-time staff compared to that of one individual permanent worker.

11.6. Improved Recognition and Remuneration: The majority of workers in the industry are not earning the living wage, yet they are expected to take on great responsibility for public safety. In order to retain personnel in the industry, steps must be taken to ensure that reward and recognition are commensurate with the level of skill and liability. In certain tenders we are now seeing the

requirement for companies to pay workers a minimum amount that is higher than the living wage, and there are concerns that this requirement may not be viable or practicable to meet.

- 11.7. Consistency in the Application of Guidance:** Where there is national guidance or legislation in place this needs to be applied and enforced consistently. This should cover any organisations or individuals involved in the delivery of activities requiring crowd management support, including the Police, Local Authorities and non-statutory bodies such as Safety Advisory Groups (SAGs).
- 11.8. Media Presence:** It will be imperative to have a presence in the mainstream media, to highlight our concerns to a wider audience. At the current time, discussions are all taking place within the professional community and the industry-specific press. The link must be made between crowd management and public safety by the wider public in order to put pressure on central Government and to help champion change.
- 11.9. Consultancy:** Feedback and comment is required on documentation drawn up by the UKCMA, including but not limited to: roles and responsibilities, suggestions for defining Zone Ex and Protect Duty consultation guidance.
- 11.10. Police Initiatives:** We are encouraged to see the lead being taken by the Police through National Police Coordination Centre (NPoCC SIB - formerly known as NEIU), and fully support initiatives currently being proposed. These include:
- An acceptance of regional variation while promoting consistency.
 - Setting up collaborative work with SAG to encourage value.
 - Encouraging wider stakeholder engagement.

Appendix 1: CASE STUDIES

Several case studies have been collected from UKCMA members, which can be viewed below.

Case Study 1

Provide a brief outline of your organisation's specialisms / offer (e.g., manpower, training, consultancy etc.). Who are your key clients?

Provision of Crowd Management and Event Security Services. Skilled management and labour provider.

Main clients are from Local Authorities, Music Venues, Sporting Venues, Festivals and Public Events.

Organisation size: how many full-time, part-time and casual employees do you have? How long have you been in business?

85 Full time staff expected to increase over next months.

Paying 1200 casuals per month at present. 2000 staff in abeyance and an intention to create opportunities for over 4500 casual staff.

Outline the challenges your organisation has faced during the pandemic and how you have addressed these e.g., if you have diversified, impacts on the company etc.

1 Loss of £30 million portfolio at the start of the pandemic.

2 Through networking and some tendering replaced Events work with alternative but related crowd management and security work. This includes: Covid 19 social distancing enforcement and guidance, asset protection, work on temporary mortuary sites and vaccination centres.

3 The profile of the workforce has changed significantly. Around 90% of work is Security work 10 % Stewarding and Administration, it involves a different type of work, requiring a commitment to longer more regular shifts. This type of work is largely unsuitable for short term evening and weekend workers.

4 Volume of work has reduced.

5 Significant, adjustments to resourcing and overheads. Benefited from furloughing to create a 'break even' position of trading at financial year end.

6 There will be a significant but highly volatile transition back to business as usual.

Future challenges: looking forward, what are your main concerns for the short-, mid- and long-term, particularly in relation to Protect Duty, the Manchester Arena Inquiry, and the impact on the industry of COVID-19. Please consider:

- Financial implications (staff costs, training costs, insurance costs etc.)
- Supply chain shortages and how they might / are impacting on your business.
- Changes in liability / responsibilities

1 Transition back to business as usual will demand significant recruitment, re training, new skills e.g., ACT, upskilling of SIA staff.

2 We have really struggled with unwillingness to provide supervision resourcing on some sites.

3 Reduced turn-over to around 50% of normal trading. Re adjusted pay rates to meet tariff rates.

4 Supply chain of staff has inhibited acceptance of work

5 Internal reductions of headcount has resulted in delay of change implementation, limited our development and impacted on ability to develop skills of staff

6 Increased proportionality of operational time v administration and training time

7 Permanent recruitment ceased for 14 months affecting ongoing development of company

8 Re adjusted business planning. New questions from Audit team over ongoing concern of business because of radical change of service

9 Covid 19 adjustments to all work practices have affected company

10 Home working has hindered ongoing developments and increased management and response times. Increase in inefficiency.

Case Study 2

Provide a brief outline of your organisation's specialisms / offer (e.g., manpower, training, consultancy etc.). Who are your key clients?

Specialisms:

Crowd Management – manpower and consultancy

Security Guarding

CCTV Monitoring

SIA Licence Linked Training & other security training e.g., NVQ Spectator Safety

Organisation size: how many full-time, part-time and casual employees do you have? How long have you been in business?

FT: 20

PT: 50

Outline the challenges your organisation has faced during the pandemic and how you have addressed these e.g., if you have diversified, impacts on the company etc.

Main challenge:

1. the lack of events resulting in the lack of work for the casual staff who have now sought employment elsewhere outside the security/crowd management industry

Secondary challenges:

1. motivating staff to work in a high-risk environment for a relatively low-income industry
2. managing cover shifts for short notice isolations/illness with the right calibre of replacements
3. managing the supply chain who face the same challenges as us but on a smaller scale

Impact on company:

Financial – an estimated (based on projected work) £600-£700k reduction in turnover (03/20-02/21)

Recruitment – down 50-60%

Future challenges: looking forward, what are your main concerns for the short-, mid- and long-term, particularly in relation to Protect Duty, the Manchester Arena Inquiry and the impact on the industry of COVID-19. Please consider:

- Financial implications (staff costs, training costs, insurance costs etc.)
- Supply chain shortages and how they might / are impacting on your business
- Changes in liability / responsibilities

Our main concern is whether we will be in a position to meet the outcomes of legislation/inquiry both financially and from a risk-based approach. We feel that if the outcomes (although justified) impose too many mandatory requirements that will in turn outweigh the viability of delivering service. The other concern is literally “do we want to continue in the new climate?” We can’t answer this question until we see the outcomes and how the new normal looks for the crowd management industry in general.

The financial implications of this include:

- Charge rate vs pay rate, will organisers and venues be willing to pay for the new requirements
- Staff training costs incl.
 - The new SIA requirements
 - The new NVQ L2 Spectator Safety award
- Insurance liability positions and associated premium costs

As previously mentioned, the supply chain is already suffering now as is recruitment, we only see this getting harder to manage over time.

One recurring grumble from the staff is that the security industry is a low-wage industry, but the expectations and responsibilities are getting higher and higher including the demand for upskilling and top up training. Although the pay rates are down to each employer, there is always a fine line between remaining commercially viable and losing a client to a competitor who will offer (to intent and purposes) the same service cheaper. The other grumble from staff is the “steward vs SIA” pay gap, with the rises in living wage and the limited ability to increase charge rates, the pay gap between the two job roles is shrinking to almost similar. Again, this impacts on responsibilities and the willingness to renew licences on a risk vs reward basis.

Case Study 3

Provide a brief outline of your organisation's specialisms / offer (e.g., manpower, training, consultancy etc.). Who are your key clients?

The company operates in the security industry providing service in crowd management, security, customer services. We have our own academy that is our focal point on training the academy operates our learning management system which is our online portal which all employees are registered on joining the business.

Organisation size: how many full-time, part-time and casual employees do you have? How long have you been in business?

We currently have 40 full-time administration personnel, 250 fulltime operatives and 600 part time /casual operatives. The company has traded for 23 years.

Outline the challenges your organisation has faced during the pandemic and how you have addressed these e.g., if you have diversified, impacts on the company etc.

The business has diversified over the last five years into different markets due to the changes within the events industry and the reduction in promoters and event organisers. During the pandemic one side of our business increases its requirement considerably, providing sufficient work to keep the majority of our employees working all year.

Future challenges: looking forward, what are your main concerns for the short-, mid- and long-term, particularly in relation to Protect Duty, the Manchester Arena Inquiry and the impact on the industry of COVID-19. Please consider:

- Financial implications (staff costs, training costs, insurance costs etc.)
- Supply chain shortages and how they might / are impacting on your business
- Changes in liability / responsibilities

This is difficult to answer and totally dependent on your workload moving forward, we are looking at staying with our current business model and do not foresee any significant issues as we are only committing to work we can deliver.

If companies overstretch then service could be difficult as they are relying on a temporary pool of labour that might or might not be available, it will totally depend on the risk companies are prepares to take (chasing the pound is not what I am about).

The industry will change once the Manchester Arena inquiry and Protec Duty legislation are published, once they are it will be an individual choice for each company to make on the way forward and their future operating arrangements.

Case Study 4

Provide a brief outline of your organisation's specialisms / offer (e.g., manpower, training, consultancy etc.). Who are your key clients?

We are a training provider offering apprenticeships and government funded short courses to the event and other sectors. To the event industry we provide:

- Level 2 Certificate in Spectator Safety to Wembley Stadium, Tottenham HS, Liverpool FC, Charlton Athletic, Lords
- Level 3 Event Assistant apprenticeship to Southbank Centre, Channel 4, Harrow School, Macmillan Cancer Support, Royal Opera House as well as event agencies
- Level 3 Live Event Rigger apprenticeship assessment to the NEC.

In 2018/19 event and sport related training accounted for 47% of our learners and we believe ourselves to have had the leading market share of Event Assistant apprenticeships

Organisation size: how many full-time, part-time and casual employees do you have? How long have you been in business?

We are nearing our 30th anniversary, with 25 full time staff and 65 regular freelance staff we have become well-respected and currently hold the Queen's Award for Enterprise (Promoting Opportunity), BAME Apprenticeship Award and West London Business Education & Training Provider of the Year.

Outline the challenges your organisation has faced during the pandemic and how you have addressed these e.g., if you have diversified, impacts on the company etc.

Our spectator safety provision is focused on training stewards for sports and multi-use stadia and was the largest single part of our short course provision. Learners were invariably casually employed. The pandemic decimated demand for stewarding qualifications. Reflecting our clients' priorities, we started to provide equality & diversity, customer service, safeguarding and PREVENT training to stadia's pay roll staff through 2020 and 2021. Stadia were appreciative of learning activities which kept their staff engaged during the pandemic.

Although the volumes were consistent, the overall value of the replacement courses (with like for like duration) is approximately 50% lower, and this has had an impact on sales and profitability.

The Event Assistant Apprenticeship provision saw no starts between early 2020 and early 2021. During 2019 and 2020 we launched related marketing, creative & communications apprenticeships plus a specialism in public sector professions. Although there were next to no starts during summer 2020, diversification has protected the company. Despite substantial growth however, the provision is still to reach profitability.

We estimate that the pandemic has cost £1m in lost revenue, this is in context of 2020/21 sales of £2.5m. Government support was limited to a small amount of furlough.

Future challenges: looking forward, what are your main concerns for the short-, mid- and long-term, particularly in relation to Protect Duty, the Manchester Arena Inquiry and the impact on the industry of COVID-19. Please consider:

- Financial implications (staff costs, training costs, insurance costs etc.)
- Supply chain shortages and how they might / are impacting on your business
- Changes in liability / responsibilities

We are a family-owned company which values its people and has always chosen to be very conservatively financed with net cash in the bank and no debt. Despite the pandemic this long-term focus and strong cash holding has given us the ability to continue to fund investment in curriculum improvements, new courses and a new line of business through the pandemic. Such R&D investment continues to run at up to £200,000 per year.

The Sports Ground Safety Authority has worked with sector bodies to update and re-launch early in 2021 the level 2 Certificate in Spectator Safety. Whilst we strongly support the **increased rigour and scale** of the new qualification, we note with dismay that the national funding for the qualification has been **reduced by 64% and it cannot be profitably provided in a format which utilises trained tutors**. The lower funding level will encourage providers to cut corners, offering only pre-packaged online courses with no human interaction, at a time, post-pandemic, when stadia are re-opening without pools of well-trained stewards from which to draw.

The challenge of the loss of experienced and qualified staff is endemic, we have recently become aware of one instance of an organisation in which out of a team of 100 stewards, **52% have limited or no training or experience**, they are aged only 18-20. High quality training must be made available to teams like these, otherwise lives may be lost.

Training is an area of deep concern for those like JGA who are supporting the return of the event sector.

Appendix 2: SUPPORTING DOCUMENTATION

1. Full UKCMA Survey Results (section 4):
 - [UKCMA Key Issues Survey Results v2.pdf](#)
2. Other useful members surveys for background information on the impact of COVID-19 on finances and staffing (section 4):
 - COVID-19 impact Survey Sep 2020 [UKCMA Impact Survey EIF 20_09 EXTERNAL FINDINGS.pdf](#)
 - Follow-up member survey Dec 2020 [UKCMA Survey December 2020 – Results final.pdf](#)
 - Supply chain shortages [Supply Chain Shortages – NTIA release](#)
3. Previous SIA/ SGSA correspondence for background (section 4):
 - Original letter to SIA/ SGSA:  [Impending Threats to Public Safety Security Stewarding Staff Shortages UKCMA.FSOA.pdf](#)
 - SIA Statistics:  [SIA Industry Stats Licensing February 2021.pdf](#)
 - SIA to UKCMA:  [SIA reply- letter to UKCMA, FSOA 01.04.2021.pdf](#)
 - UKCMA response to SIA:  [UKCMA. FSOA reply- letter to UKCMA FSOA 12.04.2021 FINAL.pdf](#)
 - SGSA to UKCMA [Letter from Derek Wilson to FSOA and UKCMA \(002\).pdf](#)
 - UKCMA response to SGSA [UKCMA reply- letter to SGSA 27.04.2021.1.pdf](#)
4. Previous Submissions relating to the Manchester Arena Inquiry and Protect Duty (section 7):
 -  [UKCMA Manchester Arena Inquiry Statement V3.0.pdf](#) – Marked Confidential
 -  [SUBMISSION 1 20-11-30 UKCMA Board Submission regarding the Proposed ‘Protect Duty’ Legislation v5.pdf](#)
 -  [SUBMISSION 2 20-11-17 UKCMA Statement re MAI FINAL.pdf](#)
 -  [SUBMISSION 3 17 UKCMA Press Statement re Manchester v2.pdf](#)
 -  [Excerpt of Manchester Arena Inquiry MAI-Day-42 ref UKCMA.pdf](#)
 -  [Excerpt of Manchester Arena Inquiry MAI-Day-43 ref UKCMA.pdf](#)
5. Further reports on immigration and supply chain shortages can be found here (section 11.3.5):
 - EIF letter to Government:  [Staffing shortages v2 proposed \[78640\]\[1\].docx](#)
 - EU Settlement Scheme backlog: <https://www.theguardian.com/politics/2021/jun/26/hundreds-of-thousands-of-eu-citizens-scrabbling-to-attain-post-brexit-status-before-deadline>
 - Impact of Brexit and recruitment from the EU: <https://www.theguardian.com/politics/2021/jun/17/number-of-eu-citizens-seeking-work-in-uk-falls-36-since-brexit-study-shows>

- Conference Industry Concerns on Staff Shortages: <https://conference-news.co.uk/index.php/hbaa-backs-cbis-call-visa-flexibility-combat-staff-shortages>
- SIA recruitment and retention of door supervisors: https://www.gov.uk/government/news/sia-publishes-sector-profile-on-recruitment-and-retention-in-the-door-supervision-sector?utm_medium=email&utm_campaign=govuk-notifications&utm_source=1b27be03-ff4e-4b76-bbd9-1afef005335f&utm_content=immediately
- UKCMA 'Top Tips' for securing resources (July 2021)  [Securing Industry Resources- Organisers' Top Tips UKCMA.pdf](#)
- NTIA warnings over shortages in the industry <https://www.ntia.co.uk/representatives-for-10000-businesses-warn-pm-security-shortages-are-urgent-risk-to-public-safety/>

ADDITIONAL SOURCE MATERIAL

- [EIF Outdoor Events Survey Email](#)
- [APPG BVEP CRC Media Release](#)
- [APPG BVEP Submission to the COVID Recovery Commission](#)
- <https://www.bbc.co.uk/news/uk-57021128> - Mini umbrella firms costing UK taxpayer millions
- [Sky News - Supply Chain Shortages](#) – Supply chain shortages
- <https://www.bbc.co.uk/news/business-56474930> - Shortage of Door Supervisors

Appendix 3: UKCMA MEMBERS

[A.C.T. \(National\) Ltd](#)

[Adam Robson](#)

[A.P. Security \(APS\) Ltd](#)

[Bradford Metropolitan District Council](#)

[Buckinghamshire New University](#)

[C2S3](#)

[Carlisle Security Services](#)

[Centre Circle Event Management Ltd](#)

[City Security Ltd](#)

[Controlled Space](#)

[Corvus Security Ltd](#)

[Coventry University](#)

[Crowd Dynamics](#)

[Crowd Safety](#)

[CSP \(The Combined Services Provider Limited\)](#)

[Culture Liverpool](#)

[Delta Alpha Safety Limited](#)

[ESM Event Security Management](#)

[Eventsec Limited](#)

[ExcluSec Group Ltd \(The\)](#)

[FGH Security Ltd](#)

[Foamhand Ltd](#)

[FSOA](#)

[G4S](#)

[Gentian Events Ltd](#)

[Gough & Kelly](#)

[Halo Solutions](#)

[Harrier UK Ltd](#)

[Headline Security Ltd](#)

[Hybred Events Ltd](#)

[Íse Murphy](#)

[J-EMSS Limited](#)

[James Lackovic](#)

[JGA Group \(The\)](#)

[Josie Pether](#)

[Knights Group Worldwide Ltd](#)

[LFX Events Ltd](#)

[Logical Safety Solutions Ltd](#)

[Major Events Boss Ltd](#)

[MAN Commercial Protection Limited](#)

[McKenzie Arnold Group](#)

[Ministry Protective](#)

[Movie Lot Services Ltd \(The\)](#)

[New Dawn Security and Training Ltd](#)

[Organise Chaos Ltd](#)

[Phase01](#)

[Provide SESS Ltd](#)

[ResponSec](#)

[Richards Events & Recruitment Services Ltd](#)

[Right Guard Security UK Limited](#)

[Risk Offset](#)

[Rock Safely](#)

[Safestyle Security Services Ltd](#)

[SecurePro](#)

[SecuriGroup Services Ltd](#)

[Security & Event Solutions](#)

[Security Scotland](#)

[Select Security & Stewarding Ltd](#)

[SES Group \(The\)](#)

[SGC Security Services](#)

[Showsec](#)

[Square Metre \(The\)](#)

[SRM Security](#)

[STORM 4 Events Ltd](#)

[Sword Security](#)

[Symphotech](#)

[The Event Safety Shop Ltd \(TESS\)](#)

[Titan Risk Management Ltd](#)

[TMS Protection Ltd](#)

[United Protection Security Ltd](#)

[Vespasian Security](#)

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