

## ACS Review – Phase 1

### Summary of key findings

#### Introduction

The Security Industry Authority (SIA)<sup>1</sup> was established under the Private Security Act 2001 to regulate the private security industry in the UK and has a specific mission ‘to hold the private security industry to account for continuously improving standards in order to protect the public’<sup>2</sup>.

The two main duties of the SIA are: the compulsory licensing of individuals undertaking designated activities within the private security industry; and managing the voluntary Approved Contractor Scheme, which measures private security suppliers against independently assessed criteria.

The ACS is periodically reviewed to ensure it serves the needs of security suppliers and buyers and to identify ways that the scheme may be improved (the most recent was completed in early 2017). This 2017/2018 review of the ACS is a separate, comprehensive/wholesale review to ensure the scheme continues to meet the original objectives of protecting the public, ensuring fit and proper participants in the industry, and improving standards of the regulated industry.

The review was given specific objectives of gaining a comprehensive understanding of the advantages and disadvantages of the criteria of the scheme; whether the current pass/fail and scoring methodology is apt; what lessons can be learned from other standards, schemes, accreditation, certification and memberships and; the role of the regulator in terms of the future delivery of the ACS and if the industry should play a fuller part.

This document summarises the main conclusions that can be drawn from the Phase 1 research and the key strategic considerations to take forward in the remaining phases of this review.

A full report of this review will be published at the end of the project - in the summer 2018.

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<sup>1</sup> The security services covered by the SIA are: manned guarding (including security guarding, door supervision, close protection, cash and valuables in transit, and public space surveillance using CCTV), key holding and vehicle immobilising.

<sup>2</sup> Home Office – SIA framework Document

## Methodology

The research was informed by: a desk based review of the ACS Standard and the Self-Assessment Workbook (SAW), and previous reviews undertaken by the SIA; a series of interviews with internal SIA teams; two separate online surveys with approved contractors and non-approved contractors, and buyers and stakeholders; depth telephone interviews; and 8 workshops. The number of participants contributing to the review totalled 655.

Overall, the research has engaged a wide range of Approved and non-Approved Contractors, assessors, stakeholders and buyers, totalling as follows:

**Table 1. Total number of participants in the Phase 1 review, 2017**

Research activity	Number
Contractor survey respondents	365
Depth interview participants	31
Internal stakeholder consultations	22
Stakeholder and buyer survey respondents	123
Workshop participants (excludes SIA staff)	114
<b>Totals</b>	<b>655</b>

Compared with previous surveys this consultation has achieved a bigger sample size overall and has had a higher number of non-SIA Approved Contractors taking part (102). It was noteworthy that, as the research progressed, there was an increased willingness and enthusiasm to get involved in the ACS Review and help support the promotion of the surveys and workshops.

The workshop sessions were well attended, well received and covered a wide range of topics.

## Key findings

There is no definitive evidence from the research in Phase 1 that radical change to the ACS is required. The recommendations discussed in the report are submitted on the basis that, while the ACS scheme does not appear to be fundamentally broken, a number of key aspects are in need of strategic decisions on change or improvements on the way forward. The next steps section sets out the options to be considered for Phases 2 and 3 of this review.

## **Awareness of the ACS – buyers and stakeholders**

Awareness of the ACS appears high overall, with 82% of respondents being aware prior to completing the survey. Buyers are least aware, with only 67% having prior awareness of the ACS. Buyers also have a lower understanding of the ACS compared with other respondent groups.

Buyer and stakeholder respondents most commonly become aware of the ACS through SIA publicity or the SIA website. Respondents have also become aware from working in industry/previous experience, and through contractors referring to it in marketing material.

## **Perceptions of the ACS**

Buyers and stakeholders were asked to rate how effectively the ACS fulfils the following functions: protect the public; ensure that participants in the private security industry are 'fit and proper'; and improve standards of the regulated industry. Average ratings are low (notably among contractors), with none of the three functions rated higher than 6.5 (out of 10).

Workshop participants believe the effectiveness of the ACS is limited because much of the private security industry is *outside* the ACS. Many participants called for an increase in the number of contractors in the ACS and the subject of business licensing was a common topic.

It is very positive that almost two thirds (64%) of approved contractor survey respondents agree with the statement "*the ACS facilitates continuous improvement of our services*". Evidence indicates a need to tighten up both ACS eligibility criteria checks at the application stage and the screening and vetting of staff, to exclude inappropriate contractors. Respondents suggest including stricter 'fit and proper person criteria'.

## **Strengths and weaknesses of the ACS**

Broadly, the picture is a positive one. Although some changes are suggested in terms of the tightening up of the eligibility criteria for the ACS, in the main participants do not appear to be asking for radical change. This overall perception is supported by a finding that 62% feel the ACS achievement level should remain the same and not be changed, though there were some variations across size of business and service delivered. Other findings add to this such as that 53% agree that the current system of pass/fail scoring is appropriate.

Participants in the research value the positive aspects of the ACS in terms of:

- Setting and raising standards in the industry;
- The self-assessment process as an effective business management tool for facilitating continuous improvement; and
- Reductions in criminality since the scheme was introduced.

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Considering all the groups engaged in the research (stakeholder, buyers, ACS assessing bodies/assessors and contractors), as might be expected, awareness of the ACS was the highest amongst the Assessing Bodies/Assessors and the lowest amongst buyers of private security. The value of the ACS in providing assurance to buyers of private security as a mark of quality is cited by the buyers and stakeholders consulted.

Furthermore, 43% respondents refer to the SIA role in operating and regulating the scheme as a positive aspect and say it gives it credibility that it is being led by an independent regulator/ government body. There is a concern about accountability and impartiality should others (e.g. the private sector or trade bodies) become responsible for administering the ACS instead of the SIA. However, 36% strongly disagree or disagree with this. Only a minority (12%) of buyers/stakeholders were in favour of the private sector having a fuller role in the ACS.

Workshop participants can see a wider role for trade bodies and advisory groups to ensure that the ACS Standards are kept up to date and relevant to those in industry. Whilst a positive suggestion it indicates a lack of awareness of the Strategy and Standards Group which is composed of industry and trade bodies and has responsibility for identifying good practice in the private security industry and considering how this should be incorporated into the ACS Standard.

### **The ACS Standard, the Self-Assessment Workbook and the assessment process**

Firstly, although not a dominant theme, a point was raised at a couple of workshops, relatively late on in the review, that it is unclear if the Standard is a product or a process/quality scheme, currently it appears to be a hybrid. This begs the question what is the purpose of the Standard and is this, in of itself, in need of review and restating?

The desk-based review of the ACS Standard and the Self-Assessment Workbook (SAW) highlighted areas where improvements can be made to strengthen each of the nine criteria and their indicators, as well as a number of areas where changes could help with wording, the language and streamlining the density of text. This research suggests that there is room to simplify the language used in the SAW and the Standard. Currently the language is formal and the indicators and sub-indicators are fairly lengthy. Some of the terms are not defined within the SAW itself and require further definition (e.g. 'customers' and 'consumers'), explanation and clarification for which is provided in a separate Workbook Guide.

In contrast with other standards (such as the ISO standards), it was also noted the ACS Standards and criteria are currently not written in 'outcome based' terms. The ACS indicators, in particular, are written in language more akin to evidence requirements that one might see in a qualification. Furthermore, the indicators do not always set out a qualitative benchmark illustrating good practice in service delivery, or business practices, although this might be implied.

Interviewees called for greater weighting for some criteria particularly the 'Results' section (which covers operational factors) and which is arguably closest to the outcome focused approach that the ISO standards adopt. It was suggested that there should be less emphasis on processes and paperwork and more on the operational areas and service delivery, such as response time, customer care, number of visits achieved and false alarms and this might

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make it more relevant to buyers. Changes such as these will require further investigation in later phases of the project.

Some assessors indicate that the Assessor Guide should be improved over time as it is complicated, too vague and should be written in 'everyday language' with more examples to show what is considered as acceptable with good practice examples to illustrate. Refinements to the Assessor Guide will require further exploration during Phase 2 and Phase 3 dependent on any future changes.

Almost two-thirds of the contractors are using the ACS Standard route, and say that this is because this is the only route available to them, demonstrating they are either unaware of the Passport route or potentially they do not hold any of the relevant Passport route qualifications (e.g. ISO 9001, the EFQM standard, or the relevant Security British Standard Codes of Practice e.g. BS7499). It appears from the research findings that the Passport route is providing an opportunity to give businesses recognition for the other standards they hold, however further work may be required to raise awareness of this facility for prior recognition.

Approved contractors using the Passport route, like and emphasise the advantages: cost savings and the avoidance of duplication. Concerns are raised about the stringency of monitoring the Passport route and that assessments might not be as robust as those for the Standard route. However, there is a general perception— mainly expressed in workshops - that the Passport route might enable smaller contractors to achieve ACS status more easily.

A number of concerns are raised by contractors through the research about the difficulties that the ACS can present to smaller businesses with some of the ACS Standard criteria and indicators considered irrelevant.

### **Achieving the standard**

Approved contractors report moderate to low levels of difficulty in achieving the ACS standard (4.2 out of 10) and 62% of approved contractors believe the required achievement level should remain the same. The common belief is that all contractors should be at the same level – i.e. approved.

A higher proportion of micro businesses suggest the level should be easier to achieve, compared with small, medium and large businesses. Those finding it difficult to achieve the required level attribute this to the resources and time needed. Some contractors perceive the resource cost outweighs the benefit of ACS membership.

Thoughts on making the ACS more accessible include reducing the cost and making the wording of the Standard and the SAW more understandable.

### **ACS assessment and guidance**

Just over a third of contractors employ a consultant to assist them with the self-assessment process (56% amongst micro businesses). Contractors are largely positive about assessment methods: 61% agree there would be no adverse effect if intervals between assessments were increased. Almost two-thirds have used the ACS Standard

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route. However, awareness of the Passport route is limited, although those familiar with it generally agree it has value. Only 9% of micro and 28% of small contractors use the Passport route. Raising awareness of the Passport route may lower barriers to entry to the ACS.

Contractors, asked if the SAW could be improved, were divided: 38% 'yes'/36% 'no' and 91% of approved contractors use the ACS Workbook Guide. Use of other guidance is limited. The ACS Assessor Guide is regarded largely positively by Assessors. Problems with the Assessor Guide include: assuming that Assessors have specialist knowledge; the guide signposting other sources rather than providing them; vagueness; and a lack of updates. Respondents say tightening assessor guidance would contribute to a more consistent assessment process.

### Scoring and differentiation

Currently a company can pass and be approved with the minimum overall score which is zero (the maximum overall score is 174). Just over half of ACS Approved Contractors (53%) felt that the scoring is appropriate, compared with just under a third who said that it was not. This research also identified views that gaining ACS accreditation with a score of zero is inappropriate and undermines the credibility of the scoring system.

Some contractors made the point that the highest score for some criteria is practically impossible to achieve for smaller businesses. A number of the standards criteria themselves may create unintentional barriers to smaller organisations attaining the maximum score. e.g. *'the structure of the control rooms/response rooms can withstand possible major hazards events...'* (indicator 5.2.3) and *'the employer provides a defined benefit final salary pension scheme to all staff'* (indicator 6.3.2).

It is unclear why criteria are included that not all businesses can achieve.

In general the scoring system prompted much debate at the workshops because it is regarded as confusing, adding to a perceived lack of consistency between Assessing Bodies. Added to that there are concerns that the current scoring system is unsuitable for use as a basis for differentiation between SIA Approved Contractors.

Buyers in the main could not see the point in the scoring system when they are unclear on how it works or the fact that all scores are not officially published.

There appears to be little support for making the ACS open to more of the industry by revising or making it easier to achieve the base level of achievement. Across the sample of Approved Contractors, 62% suggested that the ACS achievement level should remain the same, but it is unclear if that majority view of keeping the entry level pitched the same as it currently is also means that the zero scoring approach should stay as it is.

The qualitative results from the depth interviews and workshops, however, reveal that there is a level of support for an entry level ACS or staged/tiered approach to ACS accreditation. Participants (including contractors, assessors and regulatory partners) say this should involve meeting the entry level criteria that would cover all statutory and legal

matters including: insurance, PAYE and tax, a view largely endorsed by a stakeholder who feels that all ACS Approved Contractors should be VAT registered.

Once contractors have achieved that minimum requirement there would then be a phasing in of other quality criteria over a period of time. This tiered approach is seen as fundamental to allow and encourage new business to enter the scheme and progress onto the full ACS.

On the subject of differentiation, higher proportions of contractors agree than disagree that the ACS should be amended (45% and 19% respectively) to show further differentiation between contractors. Overall the views were mixed on what this would mean and how it could operate.

In support of this, nearly half (47%) of the buyers in the survey say that further differentiation between ACS contractors would be useful, compared to a third (33%) that selected 'no', and a substantial proportion (20%) who do not know.

Further depth feedback reveals that contractors are divided on the issue of differentiation. The main argument against differentiation relates to the disadvantages for smaller companies, new ACS applicants and new market entrants. Concern is expressed about the economies of scale inherent in achieving a higher level which is more favourable to larger organisations.

Some believe that further differentiation would have little effect until buyers of security have a heightened understanding of the benefits of the ACS.

A system that other schemes have adopted such as Bronze, Silver and Gold tiering was generally perceived as an elitist system and once again has consequences for smaller companies.

The potential for adopting a modular approach was also explored to some extent during the workshops, however attendees did not convey much of an appetite for this. This concept may require further exploration and testing in the next stages of the review.

A strategic decision will need to be taken on whether and in what form this approach is adopted going forward.

### **Barriers to joining the scheme**

In general, barriers to ACS accreditation include:

- Cost of the SIA fees and assessment;
- The bureaucracy involved in becoming registered and the amount of paper work required;
- A lack of perceived benefit from ACS membership when they can foresee little return for their investment
- Not all clients require ACS approval.

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Overcoming some of these barriers to accreditation requires increasing the value proposition to buyers, which in turn could increase the perceived value for money for contractors in the ACS.

Those identified as areas for improvement in the Standard and the SAW, described above, are likely to be creating barriers to joining the scheme; not only that, but in turn they have time implications of completing the SAW. Smaller businesses rely on consultants to support their application process: just over a third of surveyed Approved Contractors employ a consultant to assist them with the self-assessment process, this rises to 56% of micro businesses stating that they use a consultant.

Contractors and Assessing Bodies/Assessors perceive that there can be inconsistency in the way that independent assessing bodies score applicants to the ACS. Given ambiguity in some of the language used in the SAW this may be leading to the variations in the scores because the assessors are able to use their own value judgements.

The inconsistencies in assessment are also thought to arise from a lack of knowledge and understanding of the private security industry and businesses that operate within it. As one representative from an Assessing Body says:

*“There can be inconsistency in the way that independent assessing bodies score applicants to the Scheme...this arises because some assessors have insufficient knowledge and understanding of the private security industry. They are also not experienced at judging the businesses that operate within it (a security business is different from a vehicle repair garage for example but not all assessors have that insight).”*

*Assessing Body – Feedback*

As stated earlier, across the surveyed sample of Approved Contractors, the majority say that the achievement levels should remain the same and the scheme is pitched at the right level. The main criticism lies in that those who are in the scheme are working to different standards than those not in the scheme. Business licensing or mandatory ACS is seen as important as a means to drive down criminality and ensure that businesses are working across the same level playing field. This was mentioned repeatedly in the contractors survey and in the workshops, however there is unlikely to be legislative support for mandatory ACS in the short term due to preparations for leaving the EU taking priority at Government level.

### **Tightening the eligibility criteria and the ACS Standard**

Enforcement of the ACS is seen as a weakness, but some respondents appear to be confusing the ACS with individual licensing in this regard. The SIA and regulatory partners, and Approved Contractors point to the need for tightening up of the eligibility criteria checks at the application stage, and the screening and vetting of staff, in order to keep out “*inappropriate contractors*”. Improvements suggested include: better definitions of “fit and proper person criteria”<sup>3</sup> for both organisations and management.

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<sup>3</sup> The company seeking approval must be considered a fit and proper organisation. Directors must be considered fit and proper persons: (1) Directors must hold a licence issued by the SIA or have taken adequate steps to obtain such a licence; (2) Directors shall not be an



Stricter Standard criteria for financial probity was suggested, including: more demanding screening of directors, detailed checks for financial viability, insurance cover, and scrutiny of PAYE and NI records. There are concerns about sub-contracting and the use of self-employed staff. This was in the context of preventing undercutting the competition on price, and winning tenders on this basis by not directly employing their staff. A stakeholder was keen on the idea of a random audit, to help with such monitoring, but recognised this would have a negative impact on SIA resourcing.

Including mandatory PAYE within the ACS was suggested at the Strategy and Standards Group workshop. This will require further consultation (during Phase 3) before such changes can be made to the ACS. It may be that some sectors would be adversely disadvantaged by such changes and provision for security at large events (where significant numbers of staff are hired for one-off events) would make this requirement impossible.

### **Buyers and attraction of the ACS**

Nearly half of contractors (46%) say less than 25% of their clients require a company to be SIA ACS accredited to bid for a contract. Feedback suggests ACS is increasingly becoming compulsory, especially for public sector tenders. Buyers are divided as to whether they would pay more for ACS (40% would/37% would not).

Buyers were asked to rate a range of factors presented to them in relation to procuring security services within their organisations. Costs and response time are described as the most important factors in procuring security services by buyers in the sample. Contractors being part of the SIA ACS scheme is the fourth highly rated factor, alongside security operatives' working conditions (e.g. rates of pay, hours etc.). Contractors highlight that ACS is increasingly being requested for public sector contracts. In contrast, more than a third of non-approved Contractors (37%) say this is why they do not apply to join the ACS scheme as they perceive there to be no such requirement.

Those buyers that note a discernible difference between Approved Contractors and non-Approved Contractors<sup>4</sup> say this difference is manifested in a more professional approach, competence and accountability, quality assurance and a general higher level of service. Indeed, as mentioned above, contractors are positive about the ACS in terms of the ACS facilitating continuous improvement in their organisation with 64% of approved contractors agreeing that the ACS does this.

One of the main themes is the perceived need to raise awareness, promote the value and the purpose of the ACS to buyers of private security services. Stakeholder and buyers alike called for more engagement with industry, including approved and non-Approved Contractors, buyers and enforcement partners.

The need and desirability for improved marketing, public relations and promotion along with the need to educate buyers about the benefits of Approved Contractors are all cited.

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undischarged bankrupt; and (3) Directors shall not be subject to a disqualification order. Significant concerns or complaints against the organisation or its senior management may be investigated.

<sup>4</sup> Results from this group should be treated with caution as the sample size is small (10 respondents).

## **A fuller role in the future delivery of the ACS?**

Only a small minority (12%) of approved contractors favours placing parts of the ACS in the private sector as they were concerned about lack of impartiality and independence if other bodies played a greater role in the delivery of ACS.

Approved contractors are committed to the ACS. Overwhelmingly the opinion was that industry should have a role in the future direction of the ACS, with the Strategy and Standards Group playing a pivotal linkage between the SIA and industry into the future.

## **Recommendations**

As there is no definitive evidence from the research in Phase 1 that radical change is required, the following recommendations are put forward to help with relevance and effectiveness. They are made on the basis that, while the ACS scheme does not appear to be fundamentally broken, a number of key aspects are in need of change or improvement and some strategic decisions are required on the way forward.

Allied to this is the question – raised by many Approved Contractors – why there is not more of the industry approved to be an ACS Contractor. On this topic, however, discussions with the industry always led back to a need for the introduction of business licensing. As there is unlikely to be legislative support for this in the short-term, due to preparations for leaving the EU taking priority at Government level, this has not been explored further below.

The aspects that require some strategic decisions are set out below and the concepts that could be worthy of testing in the next phases are summarised in the Next Steps section that follows.

### **The ACS Scheme and approval process**

- 1. A fundamental decision is required by the SIA on whether in the future the scheme aims at gaining further coverage in the industry by increasing membership and acquiring new members, or raising the level of entry to the standard.**

The ACS is regarded by Approved Contractors as relatively easy to enter (notwithstanding comments about the wording of the Standard/SAW and some barriers to smaller businesses). The SIA should consider and take a decision as to whether the current requirements for passing the assessment are pitched at the right level, or whether it is desirable to allow more of the industry to be part of the scheme by perhaps lowering the level.

- 2. Consider the options for a tiered approach to accreditation and consult on these options during Phase 3.**

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The current approval process falls into these stages: self-assessment; eligibility; approval; and continuous improvement. It is only the approval stage that carries the formal recognition. The research suggests that these stages should be made more distinct and recognition is offered once the business is satisfied as ‘fit and proper’. The business would then be required to achieve full approval within a given time period.

**3. Undertake a review of the eligibility criteria and ‘fit and proper criteria’ seeking further advice from the SIA.**

Although this has been largely discussed to some extent by some stakeholders and mainly internally at the SIA, it is apparent that there is an element of concern about the success of the scheme given the three broad criteria. Suggestions are that the broad definitions need expanding. The following means of improving the fit and proper criteria were put forward as part of the research:

- A better definition of what is meant by ‘fit and proper criteria’ for both organisations and management;
- Payment of correct fees – firms to be honest when declaring the number of staff;
- Broaden the scope of the ACS to include all services delivered, including situations where the business has a single contract, but in addition provides many officers as labour;
- Tightening up the requirements about financial probity, having appropriate insurance, ensuring that staff are paid appropriately, ensuring employers check that the person with the licence/badge is the one doing the job.

The starting point for reviewing the eligibility criteria and ‘fit and proper’ should be to revisit the existing work on eligibility requirements and fee calculations developed as part of the SIA’s business licensing project.

**4. Consider the options further with regard to scheme differentiation.**

The research does appear to show some support, including from buyers themselves, for differentiation to help the scheme be clearer to buyers and this may be modular or progressive (bronze, silver or gold). However, such options need to be fully thought through to be sure they do not bring about unintended consequences particularly for smaller and micro businesses. One alternative option may be to focus more on service delivery (see recommendation 10d).

**5. Further explore the appropriateness of the pass/fail scoring methodology.**

The appropriateness of the pass/fail scoring methodology was not answered conclusively in the research, with mixed views surrounding its efficiency and purpose. Using the scoring system to differentiate is unlikely to succeed until its original purpose (which was for internal business benchmarking) is reviewed and ensuring that buyers fully understand it.

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Both of these latter points warrant further exploration and testing in Phases 2 and 3, including exploring alternative scoring methodologies.

- 6. The SIA and assessing bodies should ensure that the costs and benefits of both routes to accreditation (Standard and Passport) are promoted equally.**

Given that awareness of the Passport route to approval is relatively low and almost two thirds (62%) of non-Approved Contractor survey respondents are certified to ISO 9001, the Passport route to accreditation could be one way to encourage non-Approved Contractors into the ACS, which in turn would be an effective way to reduce some of the cost burden. Any promotion of the Passport route would however need to be undertaken carefully and balanced with promotion of the Standard route.

- 7. A strategic decision is needed as to whether the blueprint for increasing the role of the industry in the ACS is still required given its lack of overall support for it.**

Only 12% were interested in giving industry a fuller role in the ACS; there was concern about impartiality and independence if others were to take on this role.

#### The ACS Standard and criteria

- 8. Consider and further explore the ambiguity over whether the ACS Standard is a ‘product’ or ‘process’ standard.**

This would include developing suggestions for what an ACS product standard would look like, and what an ACS process standard would look like. This should draw on established good practice in setting these types of standards.

- 9. Irrespective of the decision on recommendation 1, modify the ACS Standard criteria to ensure that they are outcome focused rather than evidence requirements.**

Often the criteria simply request an existence of an approach, policy or plans. These criteria could be strengthened by requesting adherence, e.g. the indicator *‘The SIA Approved Contractor can demonstrate an approach to business that enables delivery of value to all stakeholders’*, could perhaps be strengthened by focusing more on adherence to strategy in its business operations; this would go further than simply requiring the existence of an approach or document.

- 10. Make improvements to the language used in the ACS Standards and the SAW.**

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Continue with the desk based review of the ACS Standard criteria and the SAW with a simplification of the wording used into 'everyday language'. Implement improvements in agreement with the SIA, and Strategy and Standards Group.

In so doing, other improvements should be made and these include:

- a. **Ensuring an equal number of steps in the process and/or that the 'Required Achievement Level' for each ACS indicator is set at the same level for each indicator, this would help with consistency.**

The SAW disaggregates each of the Standards criteria into indicators. For each indicator a 'Required Achievement Level' is stipulated. In some cases, this Level is fourth on a five point scale. For other indicators, the Level is third on a five point scale. However, for some indicators there is only a four point scale. This needs further consideration, but may help to ensure consistency and ease of use of the SAW.

- b. **Review and, where appropriate, remove overlapping ACS Standard criteria.**

There is some element of overlap between the criteria; for example: indicator 9.3 'That it measures and improves performance against key employee indicators', links with the People criteria; and indicator 9.3 'That it measures and improves performance against key outcomes and financial indicators critical to business', links with criterion 4 financial management.

- c. **Include a glossary within the SAW to ensure that all definitions and terms used are easily accessible to avoid the need to look elsewhere for definitions.**
- d. **Consult with the SIA and the Standards and Strategy Group to better understand the option of including additional service related indicators in the 'Results' section of the ACS Standard, or if in fact this warrants further exploration at a more strategic level.**

The 'Results' criterion would be aligned with service delivery (e.g. customer retention and staff retention) subject to being able to evidence these. This would respond to research findings that less emphasis be placed on process and paperwork, and more emphasis on operational areas such as response times, customer satisfaction etc.

- e. **Consider and further explore the potential for including mandatory PAYE in the ACS.**

This proposal was put forward powerfully by the Strategy and Standards Group as a means of preventing contractors from undercutting on cost. The potential impacts of this proposal will need to be carefully considered and should be explored further during Phases 2 and 3.

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## System Improvements

Some of these recommendations are already in work but are worthy of mention in support of the research findings.

- 11. Consider augmenting the continuous improvement function of the ACSs by incorporating the collection and sharing of aggregated data and best practice to help companies with benchmarking and improving their practice.**

Whilst this is undertaken to some extent in the ACS, updates more could be done to widely promulgate and encourage this approach.

- 12. The SIA should regularly check and possibly moderate the assessment scores that it receives from independent assessing bodies.**

This will help to ensure greater consistency in assessment and will reduce the distortion that the scores can create about the quality of a particular security provider.

- 13. There should be wider use of external verifiers of the assessment process.**

Moving into the future, the use of a verification visit is considered essential to ensure standardisation across the Assessor network, especially for those Assessors that are under- and over-performing based on the average scores across the network. An external verifier should visit a business unannounced in order to look at the assessment processes and review procedures and documentation.

- 14. The SIA should work more closely with Assessing Bodies to improve the training of Assessors.**

Participants felt that Assessors needed to heighten their understanding and knowledge of the intricacies of the different sectors within the private security industry, to help improve standardisation of assessment across the network.

In addition, it is recommended that the SIA provides further guidance on the content of the Assessor training courses.

- 15. If this is not already the case, the SIA should also review and monitor Assessors' qualifications to identify any gaps in qualifications and experience.**

## Increasing support

- 16. Increase the support for first time ACS applicants.**

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The SIA should continue to support contractors in the self-assessment process perhaps by providing a named contact at the SIA, offering drop-in surgery sessions or raise awareness of the opportunities that already exist for local support (such as the local enforcement teams).

The SIA could consider the development of online learning modules and videos to help support new applicants. Alongside this the SIA should raise awareness (via the website and e-alerts) of the existing support available such as: the online modules on Licence Dispensation Notice (LDN) and British Standards; and the ACS Application Form Guidance and Completion Notes<sup>5</sup>, and tips for completing the On-line Achievement Record (OLAR)<sup>6</sup>.

- 17. The SIA should provide a list of relevant contact details perhaps at the front of the SAW by identifying which number/individual/email addresses to contact for which type of support.**

#### Communication improvements

- 18. The SIA should undertake customer journey mapping (e.g. non-approved to becoming an Approved Contractor, information sources used and decision-making).**

There may be some value in analysing the customer journey of contractors who have recently become SIA approved; in terms of: points of contact, information sources used, barriers and enablers.

- 19. The SIA to develop a bespoke ACS communications strategy and raise awareness of the value of the ACS to all groups especially non-Approved Contractors, regulatory partners and buyers.**

As part of this awareness raising, this should include encouraging better linkages between trade bodies and umbrella organisations such as the LGA, as these provide important routes to raise buyer and stakeholder awareness of the value of the ACS.

In addition, the SIA should consider developing a communication toolkit for contractors and trade bodies to use when promoting the ACS, this could include a buyers' guide, example emails and key messages.

It is also essential that the current buyers' guide that is currently in development by the SIA is updated to include the risks of not using an ACS contractor, as well as the benefits.

- 20. The SIA to work with Approved Contractors to promote the ACS Standard.**

This research revealed that only 15% of buyers and stakeholders become aware of the ACS via contractor

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<sup>5</sup> <https://www.sia.homeoffice.gov.uk/Documents/acs/sia-acs-application-guidance.pdf>

<sup>6</sup> [https://www.sia.homeoffice.gov.uk/Documents/acs/sia\\_acs\\_saw\\_tips.pdf](https://www.sia.homeoffice.gov.uk/Documents/acs/sia_acs_saw_tips.pdf)

marketing/publicity. This suggest more could be done by Approved Contractors to promote the ACS to buyers.

**21. The SIA to consider engaging with the insurance industry to promote the benefits of the ACS.**

There could be benefits in the SIA promoting the ACS to the insurance industry, with a view to reducing premiums for organisation who use ACS Approved Contractors. This could also act as a lever to encourage more of the industry into the scheme.

**22. Over the longer term, buyers of private security should be encouraged by the SIA to only use SIA Approved Contractors.**

From a procurement perspective, buyers of security should be encouraged to give preference to Approved Contractors, as they do in Scotland, where contractors bidding for Government work must be ACS approved.

**23. The SIA should continue to engage the Strategy and Standards Group on a regular basis to ensure links between the SIA, industry and industry bodies, and that their views are fully integrated into any revisions to the ACS.**

The SIA should also seek to include additional buyers on the Strategy and Standards Group.

## Next steps

A number of actions are being taken forward into the Phases 2 and 3 of the Review:

- **Phase 2 (September - December 2017):** designing and developing a revised ACS Standard, assessment approach and supporting mechanisms.
- **Phase 3 (December 2017 – February 2018):** market testing the new approach.

Next steps already underway include developing a number of different options for revising the ACS Standard. These include:

1. A 'light-touch' streamlining, consisting of improvements to language.
2. Updating and revising the Standard in-line with the new ISO 9001 – including reflecting that terminology – and ensuring the ACS is therefore more aligned with a 'process' standard approach.
3. Amending the standard to better reflect a 'product', or 'service' standard, bringing in elements of service delivery (to reflect European best practice).
4. Adopting an outcomes-focused approach reflecting the practice of other regulators.

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Proposals for each of these options were taken forward to the Assessor conference on the 28<sup>th</sup> September 2017 to test and discuss the potential implications of adopting either of these models. Assessors were mostly in favour of the streamlining approach (option 1).

These approaches were further explored at the Strategy and Standards Group on the 16<sup>th</sup> October 2017 at which support was given for more of an outcomes-focus. Subsequent discussion raised a concern that streamlining should not impose a burden on assessors or contractors and should have demonstrable benefits. The group also confirmed their support for business licensing and mentioned perceptions over inconsistency of assessments.

Other considerations for wider testing during Phases 2 and 3 – and for strategic consideration by the SIA – include those around:

- accreditation of other standards that contractors already hold – should the SIA be designing a new method of accrediting ACS companies, or raising awareness of what already exists, such as the Passport scheme?;
- the possibility of adopting a modular approach (considerations around which were inconclusive in the market research);
- the current scoring system - the current 'zero' pass-mark seen as being unsuitable;
- further consideration around the possibility of differentiation and what this could look like if an alternative scoring mechanism was adopted.

During the next Phases, there is also the potential for exploring further (with regard to differentiation) interest expressed in the latest SIA update for “*aligning the principles of the ACS with those of Government in terms of countering terrorism, reducing violence and safeguarding the vulnerable*”.

Work is also continuing to suggest and put forward improvements to the SAW and Assessors Guide, both of which are viewed as being overly-wordy, not written in plain English, complicated and vague in places.