

*Private Security Services Industry views to the European Commission public consultation on the renewal of the EU Internal Security Strategy*

The Confederation of European Security Services (CoESS) is grateful for the opportunity to provide its input to the European Commission public consultation on the renewal of the EU Internal Security Strategy. CoESS has been actively involved during the adoption and was key partner in the implementation of the EU Internal Security Strategy for the period 2009 - 2014. Therefore, CoESS would like to cooperate fully in the renewal process in setting the priorities for the next five years.

CoESS is the European umbrella organization for 26 national private security services companies' federations and associations. The private security services industry has over the past years provided services to an increasing number of public clients, ranging from Ministry/EU Institutions buildings to nuclear plants, airports, critical infrastructure facilities, inter-modal transport hubs, public transport stations and areas, national governmental agencies and institutions (such as asylum seekers centers, public hospitals, universities, etc).

Consequently, the question is no longer "How to regulate private security" BUT "**How to define the role of private security in the context of a broader EU internal security strategy**".

Against this backdrop, CoESS' recommends that the renewed EU Internal Security Strategy should focus on:

- Horizontal issues in the framework of the already identified policy pillars in the EU Internal Security Strategy, in particular **Prevention and Preparedness**. In this respect, DG HOME should develop EU tools such as **risk assessments, contingency planning, trainings, public-private dialogue, best practices sharing** to support Member States, authorities and stakeholders in the coming years.
- CoESS has expertise on the Prevention and Preparedness tools mentioned above as well as sectoral policy expertise. Therefore, CoESS strongly insists that **private security services industry role and importance is recognized in any upcoming/reviewed EU Internal Security Strategy and legislation**.
- CoESS also believes that **special attention to victims of crime** should be ensured as part of the review of the EU Internal Security Strategy by developing **EU framework on Third Party Liability**.
- Furthermore, CoESS recommends that the EU Internal Security Strategy **focuses on a practical approach by enhancing public-private dialogue** to ensure that the already developed policy frameworks add real value on the ground and to those who are directly responsible and dealing with security on a daily basis.
- Finally, **research** remains fundamental to ensure that the renewed EU Internal Security Strategy is based on solid and comprehensive knowledge bank. CoESS suggests that **funding possibilities for smaller added value projects** are made available and where applicable simplified application procedure so all relevant stakeholders can apply without burden, especially SMEs.



The Confederation of European Security Services (CoESS) is grateful for the opportunity to provide its input and views to the European Commission public consultation on the renewal of the EU Internal Security Strategy. CoESS has been actively involved during the adoption and was key partner in the implementation of the EU Internal Security Strategy for the period 2009 - 2014. Therefore, CoESS would like to cooperate fully in the renewal process in setting the priorities for the next five years. CoESS considers that the current EU Internal Security Strategy has substantially contributed to enhancing the security of the European citizens - now is the right time to review and think how its objectives can be even further developed.

With this contribution, the Confederation for European Security Services aims to recommend areas where DG HOME should focus efforts on in the coming five years, highlighting the role that the Private Security Services could play in their realization and in general the role of the private security services industry in the renewed EU Internal Security Strategy.

## *2. About the Confederation of European Security Services (CoESS)*

CoESS, the Confederation of European Security Services, is the European umbrella organization for 26 national private security services companies' federations and associations. It was founded in 1989. CoESS is the only representative European employers' organization defending the interests of the private security services industry and is recognized by the European Commission (DG Employment, Social Affairs and Inclusion) as a European sectorial social partner in accordance with the European Treaties.

CoESS' core objective is to defend the interests of its national member federations and of their member private security services companies, both at European and at international level, and to represent those joint interests, in particular through its involvement in the work aimed at harmonizing national private security legislation and regulations.

CoESS represents members in 19 EU Member States and in a total of 24 European countries, which translates into some 60,000 private security services companies employing a total of approximately 2.2 million private security guards. The European private security services industry generates a yearly turnover of around € 35 billion Euros.

CoESS' member federations cover a wide range of private security services including, but not limited to: commercial manned guarding, beat patrol, in-house manned security, event security (crowd control), door supervision, bodyguarding, Cash-in-Transit (CIT) and the transport of valuables, cash processing, mobile alarm response and call-out services/response services, alarm and CCTV monitoring, monitoring centre and console operations, track and trace, aviation security, screening, canine (K9) services, maritime security, critical infrastructure protection, combined solutions, corporate investigation, emergency medical technician (first aid services), fire prevention and protection services, urban security, loss prevention, receptionist/concierge services, security

consulting, specialized guarding, private security training and many others. Further information on CoESS' activities and projects is available on [www.coess.eu](http://www.coess.eu).

### *3. EU Internal Security Strategy and developments in the private security services industry*

The EU Internal Security Strategy has contributed to enhancing security of the European citizens and creation of an Open and Safe Europe. As a matter of fact, the private security services industry has contributed substantially over the past years towards achieving some of the goals of the EU Internal Security Strategy in particular with regard to ensuring security and prevention of crime.

The private security services industry has over the past years provided services to an increasing number of public clients, ranging from Ministry/EU Institutions buildings to nuclear plants, airports, critical infrastructure facilities, inter-modal transport hubs, public transport stations and areas, national governmental agencies and institutions (such as asylum seekers centers, public hospitals, universities, etc). In an increasing way, private security companies also conclude contracts or cooperate formally with police and other public security stakeholders for supporting and assisting these in a wide range of security tasks. It is to be noted that in a growing number of cases, private security companies and private security guards are being deployed – without transfer of competences or without interfering in basic rights of citizens – as an extra pair of “ears and eyes” in several domains of fight against terrorism, fight against specific local, national or international criminal phenomena.

Due to the efficiency and quality of services provided by CoESS members, mutual trust has evolved substantially between the public authorities and security bodies and private security services industry where division of tasks has been a key element to its success. This in turn, has also resulted in more visibility of CoESS members in the public domain along with more direct contact with EU citizens. As a result, the role and importance of private security services for ensuring security is increasingly recognized in national legislation/security programmes/policies and strategies, for example in (Spain, Sweden, Belgium, UK, etc.).

What is more, the **socio-economic added value**<sup>1</sup> provided by the private security services and/or products consists of the improved or additional value for security so that the total value of security increases for and as a result of public authorities, the business community and the citizen. Security strategies (risk society, integral security concern and nodal orientation), from which the private security sector can no longer be excluded, provide added value purely and simply as a result of its socio-economic existence. Therefore, private security services represent an **additional complementary partner in total security management**.

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<sup>1</sup> White Book: *The Socio-Economic added Value of Private Security Services in Europe*, Prof. Dr. Marc Cools in cooperation with CoESS and Aproser, [http://www.coess.eu/\\_Uploads/dbsAttachedFiles/CoESS\\_witboek\\_Socio\\_economic\\_study\\_2013\\_final\(1\).pdf](http://www.coess.eu/_Uploads/dbsAttachedFiles/CoESS_witboek_Socio_economic_study_2013_final(1).pdf)

The 'value chain analysis' allows added value to be viewed from the perspective of end users such as the public authorities themselves, the business community and the citizen. Private security services can also identify 'building blocks' that provide added value for subsequent 'building blocks'. Private security services continue to offer services and/or products that the demands of the market designate as excludable and non-competitive club goods with a **predominantly preventive character**. As a result, public security can increase and improve its focus on more repressive tasks.

In addition, the 'human resources management' available in the security sector, which provides a considerable number of jobs (some 2 Million staff in the wider Europe) on the one hand, including background screening, vetting, professional education, training and/or lifelong learning, and technological developments and investments on the other, also has an **impact on the cost of crime**. As a result of **preventive surveillance and security measures** provided by private security services, the cost of crime increases for the perpetrator and decreases for the victim in general and for society in particular. Private security services prove that it is possible to provide added value in this respect.

Consequently, the question is no longer “**How to regulate private security**” BUT “**How to define the role of private security in the context of a broader EU internal security strategy**”. CoESS strongly believes that this must also be the case at EU level where defining a new role of private services security in the renewed EU Internal Security Strategy will be key contributor so ensuring an Open and Safe Europe.

#### *4. Private Security Services Industry views on the renewal of the EU Internal Security Strategy*

CoESS contribution to this public consultation focuses on the first three questions included below as they are most relevant for the private security services industry and where CoESS can add most value.

- i. Which specific challenges need to be tackled by EU action in the coming five years regarding international crime, radicalisation and terrorism, cybercrime and cyber-attacks, natural and man-made disasters? What role should the border security have in addressing those challenges?*

CoESS recognizes the value of the EU Internal Security Strategy and the results it has delivered with regard to enhancing the security of European citizens. Additionally, CoESS believes that the main themes of the program are comprehensive and have been well-selected. These themes will be important for the coming years too and should be kept in the period 2015 - 2020. As such, CoESS recommends continuing with the same themes in the future, however, assessing progress made where relevant.

ii. *Taking into account the developments in the next five years, which are the actions to be launched at the EU level?*

Against this backdrop, CoESS recommends that in the future there is more focus on horizontal issues in the framework of the already identified policy pillars in the current EU Internal Security Strategy. These horizontal themes specifically should focus on **Prevention and Preparedness**. Prevention and Preparedness are cross-cutting themes relevant for all sectoral policies and are crucial to ensure a Safer Europe. Increased focus of the future EU Internal Security Strategy in **Prevention and Preparedness** will have an added value and enhance security of citizens so security risks and threats are tackled at source at very initial phases.

**Prevention and Preparedness** should be a key concept in the design and operation of any EU Internal Security policy and not added on as an afterthought. Indeed, 'building in' security rather than 'bolting on' measures as an afterthought can reduce security costs, improve security effectiveness and citizens security as a final goal. **Risk assessments, contingency planning, trainings, public-private dialogue, best practices sharing are key tools with regard to Prevention and Preparedness.** Hence, CoESS believes that DG HOME should further develop these tools from EU perspective and support Member States, authorities and stakeholders with such tools for the coming years.

In this framework, CoESS would like to highlight the role of private security services – as an important and privileged stakeholder – in prevention, preparedness, risk assessment and contingency planning. Given that this role will always be played in close cooperation with public authorities, CoESS believes that it is vital that public authorities provide an explicit allocation of roles and responsibilities for security and protection for all actors involved, including private security service providers.

As outlined in the preceding section, the private security industry is a key to ensuring public security and the question is not whether to recognize their role of it but how to do it most efficiently. Most EU Internal Security Strategy pillars currently ignore the fact that the private security industry is part of global and EU security, since many years, in the field and with a huge accumulated expertise and experience throughout Europe.

CoESS strongly insists the **private security services industry role and importance is recognized in the renewed EU Internal Security Strategy**; especially on internal security strategy, protection against serious and organized crime, trafficking in human beings, border controls, terrorism, disaster management, CBRNe, protection against serious and organized crime. Prevention and Preparedness policies should take all stakeholders from early on into account. Currently, a main focus lies in the coordination of national authorities, while private security services often lack the integration into policy tools. Given the extensive work and expertise in areas such as risk assessments, contingency planning, trainings and other activities relating to prevention and preparedness, CoESS has witnessed a lack of use of expertise existing in Europe. The European Commission should focus in its



upcoming program on the integration of all actors, going beyond private security services and covering also operators, national regulators and citizens.

CoESS also believes that **special attention to victims of crime** should be ensured as part of the review of the EU Internal Security Strategy. Currently there is no clear framework for victims of crime because the EU does not have in place any **framework for Third Party Liability in cases of terrorist attacks**. In the event of another terrorist attack, victims of crime do not have a proper resort to remedies because it is not clear where the ultimate responsibility lies from all the actors involved. This is why, CoESS asserts that victims of crime should have a clear framework where their claims are addressed and the EU should develop one as part of the future EU Internal Security Strategy. Adequate and timely compensation for all victims and injured in a terrorist act and predictable and reasonable liability for security providers should be a priority for DG HOME going forward. Other Commission's Directorate-Generals are working already on Third Party Liability, for instance in the Commission Recommendation for accounting activities as well as work has started in relation to Nuclear Plants. Hence, DG HOME should further evaluate and develop the right framework for Third Party Liability for terrorist attacks in the future as one of its priorities.

Furthermore, CoESS recommends that the future of EU Internal Security Strategy **focus on a practical approach**, bringing them closer to what happens on the ground and enhance public-private dialogue to ensure that the already developed policy frameworks add real value on the ground and to those who are directly responsible and dealing with security on a daily basis. In this respect, CoESS supports the European Commission's approach to implement a more proactive approach to private security. Best practice sharing, as a key pillar of this pro-active approach should include all stakeholders, including private security service operators, given their experience outlined above. The private security services industry believes that a **useful tool for enhanced practical approach by DG HOME is increased public-private dialogue**. While currently some relevant ad-hoc platforms exist on different topics, a more comprehensive horizontal approach can be taken to ensuring the integration of all stakeholders into policy activities. As such, CoESS supports the set up of an EU Internal Security Consultative Forum mentioned in the last ISS implementation report published in 2014. This Forum can deal with issues specific topics (terrorism, border management, etc.) as well as horizontal topics such as Prevention and Preparedness where tools and best practices are developed with regard to risk assessment protocols, contingency plans, trainings, best practices sharing, etc. Such work is currently happening on some specific themes such as Critical Infrastructure Protection, CBRNe, etc. but not from a comprehensive EU security angle which can in the end lead to working in silos. CoESS members' daily activities focus on Prevention and Preparedness and have long standing experience with risk assessments, contingency planning, trainings, and best practices. Involving the private security industry in a capacity of an advisory role when these tools are developed will provide a knowledge and experience database for DG HOME to explore and draw conclusions and best practices from it for the EU level to be further disseminated to the Member States and relevant stakeholders.

What is more, when enhancing public-private dialogue, mutual trust is a key element for success demonstrated by the well-established Public Private Partnerships in the area of security. Any future



EU Internal Security Strategy must recognize the valuable co-operation with the private security services industry where mutual trust is crucial. Definition of roles and responsibilities and mutual trust underline the functioning of any partnership and the added value of the private security industry in it. This has to be explicitly recognized in the future EU Internal Security Strategy.

*iii. Which specific research, technology and innovation initiatives are needed to strengthen the EU's capabilities to address security challenges?*

Finally, **research** remains fundamental to ensure that the renewed EU Internal Security Strategy is based on solid and comprehensive knowledge bank. While there are different EU funding instruments already available CIPs, Internal Security Fund application for those is very burdensome for small organizations. Therefore, CoESS suggests that for the future EU Internal Security Strategy, funding possibilities for smaller added value projects should be made available and where applicable simplified application procedure so all relevant stakeholders can apply without burden, especially SMEs.