

CoESS' POSITION PAPER

SUBJECT:

- **DIN PROPOSAL 77200 for European Standardisation of Security Services**
- **CEN RESOLUTION BT C012/2004 on the creation of a new Task Force BT/TF 167 "Security Services"**

A. Introduction: Standardization through CEN in general

1. The European standardization process under the CEN (European Committee for Standardization) umbrella is a voluntary, consensus-driven activity, carried out by and for the concerned parties themselves, based on openness and transparency, within independent and recognized standards organisations leading to the adoption of standards compliance with which is voluntary.
2. There are three officially recognized European standards organizations which have been mandated to develop European standards. **CEN**, the European Committee for Standardization, deals with all sectors except the electro technology and telecommunications, which are being dealt with, respectively, by **CENELEC** (European Committee for Electro Technical Standardization) and by **ETSI** (European Telecommunications Standards Institute).
3. The national Members of CEN are the National Standards Institutes of the European Union, EFTA and some Eastern and Central European countries. These national members make up the delegations to the technical committees by finding expertise in each country, they vote for and implement European Standards as national standards, they provide the secretariats of the committees, and they finance more than 50 % of the work. In turn they are largely financed by industry, sales of standards and government grants.
4. Following principles apply to the standards developed within CEN:
 - standards come from the voluntary work of participants representing all interests concerned: industry, authorities and civil society, contributing mainly through their national standards bodies;
 - draft standards are made public for consultation at large;
 - the final, formal vote is binding on all members; and
 - the European Standards must be transposed into national standards and conflicting standards withdrawn.

B. The DIN proposal 77200 (content)

5. **DIN** (the German Standards Institute) has elaborated, in consultation with **BDWS** (the German private security association and member of CoESS) and submitted to CEN the German security standard for "Guarding, Patrolling and Security Services". The proposed standard covers a wide range of security services including manned guarding services, monitoring centres, CIT requirements, qualification requirements of guards, the deployment of guard dogs, key holding services, traffic control, event security and security vetting.
6. DIN has submitted this proposed set of standards to CEN in view of the elaboration of a European set of standards, arguing that there is currently no European Standard available for the private security sector. At present, most existing standards for private security services are national; European countries have their own standards and legislation for security services and these standards and legislations can vary substantially between the countries.
7. The reason why DIN has submitted their proposal for a standard to CEN as a basis to discuss a European standard is mainly because of the draft EU Directive on Services in the Internal Market (security services are included in the scope of this directive). This Directive sets out the requirements for the free movement of services across national boundaries. It is obvious that the free movement of services requires a number of safeguards to be put in place to ensure mutual trust between Member States in order to avoid a complete harmonisation downwards. This includes the use of European standards and of "*modernisation of national systems for regulating service activities*". Therefore DIN has proposed the national German standard as a basis to discuss a European standard.

C. CEN's reaction to the DIN proposal

8. CEN has sent a request to all its national members (National Standards Institutes) to ask if each Member State could support the German proposal as a basis for discussion for a European private security standard. Each National Standards Institute could either vote for or against the proposal.
9. **CoESS** has urged its members, in an internal consultation request dated 4 March 2004, to contact their National Standards Institute in order to make sure their association would be consulted and, if possible, included in the preparatory work at the national level, and that their association would be represented in the national delegation that will attend the European meetings.

D. Creation of a CEN Task Force "Security Services" with the scope of the DIN proposal

10. After the positive vote of various National Standards Institutes, the standardisation procedure at the European level was initiated on 6 April 2004 by the creation of a Task Force (BT/TF/167) 'Security Services' installed directly

under the European Committee for Standardisation. This means CEN has approved the DIN proposal as a basis for discussion.

11. To comply with the existing CEN rules, the interested National Standards Institutes must be able to provide evidence that they are prepared to participate in the notification procedure for national work, which includes a "standstill" on all national work in areas of agreed European standardization work.
11. CEN has sent Resolution (BT C012/2004) to its members (the National Standards Institutes), informing them of the creation of a new CEN/BT Task force 167 'Security Services'. This resolution agrees to allocate the Convenorship and the Secretariat of CEN BT/TF 167 'Security Services' to DIN. DIN must now prepare a detailed programme of work, including precise titles, scopes and targets for the proposed work item(s), for submission to BT approval, by June 2004. This resolution is applicable as from 26 March 2004. A first meeting of the Task Force will be held on 27 May 2004, in Berlin.
12. Participation to this Task Force is in principle open to representatives of each country affiliated to CEN (the National Standards Institutes), and each representative/country has the right to vote. The Task Force follows the progress of work on standardisation, basically consisting of meetings to discuss draft versions and scientific content of the standard.
13. If national private security federations (members of CoESS) would like to be involved in a direct way in this work, they have to cover their national membership fees to their National Standards Institute, without any direct contribution to CEN.
14. It is highly important to note that with the creation of this Task Force, the standardization work will proceed, disregarding the number of National Standards Institutes that will effectively contribute and thus participate within the scope of the Task Force.
15. The participants of the Task Force act in a double role as (i) national representatives in the Task Force and (ii) also as technical experts, thus bringing in their expertise to define the specifications the standard has to fulfil. In addition, other technical experts (academics) from the field have been invited to participate at the standardisation work of the Task Force. According to DIN, the National Standard Institutes will have to nominate the participants of the Task Force, by filling in the formal Nomination Form (sent by the DIN secretariat) by mid May 2004.

E. Possibility for CoESS as a European Confederation to participate in the work of the Task Force

16. In a general way, CoESS is of the opinion that its presence is essential and that, together with its members federations at the national level, it must have a direct input in the whole process.

17. CoESS stresses the absolute necessity to be consulted from the start and during the entire process, in the most active and positive way. CoESS believes its presence in the Task Force is essential. Therefore CoESS will submit an official request to have "observer status" within the Task Force, established by CEN (see above). In order to obtain "observer status" (to sit on the Task Force without having any voting rights), CoESS will send an official request to both CEN and the DIN Secretariat, submitting its statutes and its members list. At this stage, "observer status" is the most active role CoESS is allowed to perform. According to the DIN, CoESS will not be invited to the first meeting of the Task Force scheduled for 27 May 2004, because the list of possible "observers" will be discussed during that meeting.
18. According to our information, NORMAPME would also request "observer status". NORMAPME is the European organization focused on small enterprise interests in the European standardization system, and is linked with UEAPME (The European Association of Crafts, Trades and Small and Medium-Sized Enterprises). The presence of NORMAPME as an observer in the Task Force is regarded by DIN as particularly important to counter the concerns of some countries that the interests of SME's would be harmed.
18. Furthermore, CoESS has confirmed its participation at the "*Open Day for European Federations and Associations on Service Standardization*", organized by CEN on 11 May 2004. This open day briefing session will present the CEN strategy on service standardization, the role of European Federations and Associations therein - and the benefit it can offer to CoESS - as well as the policy of DG Enterprise on services and service standardization.
19. On a final note, it can already be said that in a later stage of this standardization process, (which was initiated by establishing the BT/Task Force) CEN will produce Workshop Agreements (CWA). Proposals for Workshops at European level may come from any interested party. Participation at the CWA's is open to all interested parties, which includes CoESS.

F. CoESS' point of view on the initiative and the process

20. First of all, CoESS has always underlined the need for European harmonization of standards for the private security sector. This point of view has been expressed by CoESS at numerous occasions (see, a.o., "*Joint Declaration of CoESS and UNI-Europa on the European harmonisation of legislation governing the private security sector*"(2001) and "*Code of Conduct and ethics for the private security sector*"(2003)).
21. However, CoESS has always equally stressed that all European harmonization in the private security sector must be done upwards. Some of the European countries have already developed very detailed and high quality legislation, including national standards. These regulations and standards must serve as a basis for European harmonization in order to attempt to upgrade the overall level of our industry.

22. The reasons why CoESS favours an upward standardization are the following:
- National regulations are sometimes non-existent, inadequate and do not guarantee the professionalism that the sector needs.
 - National regulations differ from one another and they prevent the sector from drawing on the full benefits of European integration.
 - Market practices are such that priority is all too often given to the price of the service, and little or no attention is paid to the quality aspects.
 - The often unattractive working conditions that the majority of workers in the sector have to contend with, the highly economically competitive environment and the perception of security services as a commodity, have a negative effect on the appeal of the sector, the quality of services, and more generally on the image of the sector.
23. CoESS fully recognizes all important work on European standardisation which has already been developed through CENELEC in relation to standardisation of norms for monitoring centres and technical aspects of alarm installation. EURALARM, an organisation CoESS is working closely with, has played a fundamental role in this work. Therefore, all standards already developed in this field should completely be integrated in the future work based on the DIN proposal.
24. CoESS also fully recognizes the standards already developed at European level relating to some important technical aspects of cash-in-transit. ESTA (the European Security Transport Association and a corresponding member of CoESS) has played in this a decisive role. Because of the specificities of this branch of our industry, CoESS therefore considers that all standards already developed in this field must equally be fully incorporated in the future work based on the DIN proposal.
25. For the above mentioned reasons, CoESS believes the scope given by the DIN proposal is at once too broad and too general and does NOT take into account nor the specificities of some parts of our industry nor the progress that has already been obtained in the formulation of European standards on very specific technical issues related to our industry. The DIN proposal is therefore not apt to cover in a specific and efficient enough way each branch of the private security industry throughout Europe.
26. CoESS therefore deeply regrets and cannot, in any possible way, accept that it has not been consulted, by DIN or by its German member federation, during the essential initial stage of the development of the DIN proposal. It particularly regrets that an early draft of the proposal has not been submitted to the different CoESS Working Committees (Guarding, Cash-in-Transit, Electronic Surveillance, ...) in order to allow these Working Committees to contribute, by their expertise and knowledge of their branches, to the definition of a proposal.

G. Prerequisites for the development of a European standard for the private security services

27. CoESS will support the development of a European standard for the private security services **only under the following essential conditions:**
- a) A different European standard for each discipline of the private security industry must be developed;
 - b) The standardisation process must fully integrate ALL standards already developed, in particular those related to electronic surveillance and to cash-in-transit.
 - c) Given the fact that a) the private security sector is already strongly regulated by national laws in a number of European countries, and b) that some National Standards Institutes have already developed very elaborated national standards for the private security sector, any future standardisation process must take into account this high level regulations and standards and may not lead to their lowering, thus jeopardizing the quality of the services, the professionalism of our sector and the public security as a whole.

H. CoESS' recommendations to its member federations

28. All national member federations must assure that they are fully aware of the position of their National Standards Institute vis-à-vis the DIN proposal.
29. If National Standards Institutes will participate in an active way in the standardisation process based on the DIN proposal, the national member federations must guarantee that their point of view is being fully communicated to these National Standards Institutes. National member federations must in that case try to be associated to the contribution their National Standards Institutes will make to the CEN process and, if possible, be included in the national delegation sitting in the Task Force.
30. All CoESS member federations should also try to assure that, at national level, representatives of the National Standards Institutes participating in the CEN standardisation process, communicate clearly the content of this CoESS position paper to all interested parties.

Adopted by the CoESS Board of Directors on 29 April 2004.

A copy of this position paper will be transmitted to all CoESS members, to CEN, to DIN and to all National Standards Institutes.