

# **CANINE PROTECTION**

***Dogs and Dog Handlers in the South African  
Private Security Industry***

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## **Executive Summary**

The renewed interest in the regulation of dogs and dog handlers in the private security industry in South Africa represents a bold leap forward envisioned in imminent amendments to the Private Security Industry Regulatory Act 56 of 2001, in the form of the Private Security Industry Regulatory Bill of 2012. The Bill is currently awaiting signature from the President of the Republic, after which it will become law. The Bill underpins certain research imperatives that are intended to articulate the strengths and weaknesses of the current legislation in order to reinforce and curtail these, respectively.

Clause 35 21 A (o) of the Amendment Bill seeks to emphasize that the Minister is intended to make regulations relating to 'the training, registration, transportation and general care of working animals by security service providers and other persons who employ security officers, in connection with rendering a security service, as well as the registration of training centers with regard thereto.'

The PSIRA Act 56 of 2001 is the legislative point of reference for the regulation of private security services and signaled the formation of the Private Security Industry Regulatory Authority (PSIRA) to ensure the implementation of the prescripts of the Act. This report analyzes the regulatory approach towards the dogs and dog handling sector of the private security industry. The aim is to identify the shortcomings in this approach and address these to facilitate enhanced regulation of this sector that is conducive to, ensuring proper care of dogs and proper working conditions for security officers employed as dog handlers. Understanding what entails in the regulation of dogs and dog handlers in the private security industry will form the point of departure for this research report.

## **Acknowledgements**

The findings presented here would not be possible without the invaluable insights from members of the dog and dog handling sector of the private security industry, and the representative of the National Society for the Prevention of Cruelty to Animals (NSPCA), and various end-users of the services provided by this sector. I believe that I have articulated your contributions in a way that will lead to positive changes for dogs and dog handlers and generally the private security industry in South Africa.

## **1 Introduction**

This report seeks to uncover the undercurrent that informs various factors associated with the dog and dog-handling sector of the private security industry with the overarching aim of promoting high standards in the training of security providers and prospective service providers in South Africa. The report also addresses allegations of corruption in the sector associated with poor training, allegations of poor and unreliable outcomes from training (dogs unable to detect illegal substances or explosives), and how the sector relates to PSIRA, SASSETA and other relevant stakeholders. It further also uncovers the dynamics around the non-compliance to the Private Security Industry Regulation Act, if non-compliance is a factor. This is aimed at determining how this sector and the general regulation of the industry could be strengthened in order to foster greater compliance.

This research precedes the coming into force of the Private Security Industry Regulatory Amendment Bill of 2012 (the Bill) is currently awaiting Presidential assent. The Bill seeks to address some of the current challenges associated with use of dogs and dog-handers in the private security industry. In terms of Clause 35 21 A (o) of the Bill, the Minister of Police is entrusted with the responsibility of developing regulations relating to 'the training, registration, transportation and general care of working animals by security service providers and other persons who employ security officers, in connection with rendering a security service, as well as the registration of training centers with regard thereto.'

This research will, therefore, make a contribution towards the enhancement of the regulation of the dog and dog-handers sector. It will contribute towards the regulation, training, registration and transportation of dogs by security service

providers. It is further hoped that the research findings will create a foundation for further research on the use of working animals within the private security sector in South Africa, which should commence as soon as the Amendment Act comes into force.

## **2 Background**

In terms of the Private Security Industry Regulatory Act 56 of 2001 (the Act), the definition of a “private security service” does not expressly include the use of dogs. However, section 1 of the Act provides that a private security service means, “protecting or safeguarding a person or property in any manner.” The use of dogs as a means of providing a security service finds expression in the definition of protecting or safeguarding of a person or property in any manner. In the PSIRA’s Annual Report 2012/13, dog training is listed as one of the different categories or classes of Security Service Providers. This indicates that suppliers of dogs and the number of dogs as well as persons with dog handler accreditation have not been under sufficient scrutiny and oversight; owing to the fact that they are not explicitly recorded as being registered with the Authority.

It is however encouraging that this glaring lacunae on the use of dogs and dog-handlers in the private security industry is facing imminent reform as already mentioned above, in the Amendment Bill, that seeks to introduce a new approach to regulating the training, registration, transportation and general care of working animals by security service providers and other persons who employ security officers, in connection with rendering a security service, as well as the registration of training centers with regard thereto. The Bill outlines that new regulations are to be informed by research.

Various situations require the use of a dog for security purposes, this may include but not limited to, personal security and explosives and narcotics detection. Dogs are also used in the provision of security by private security providers and the South African Police Service (SAPS). SAPS also trains dog handlers who are employed in the Dog Unit within the SAPS. SAPS represent not only the frontline actors in the enforcement of law in South Africa, but in the context of the proposed research a key and valuable stakeholder. Insights that can determine if the training received by dog units from the SAPS resembles those of the dog-handling sector of the private security industry hold considerable merit.

Although dog training is a category listed as a security service in PSIRAs Annual Report, scant information exists on what pertains with regards to dogs and dog handlers involved in the private security industry. This may be attributed to the fact that the use of dogs, and the role which dog handlers and dog training play, is insignificant, when looked at from the perspective of other more prominent services, such as the guarding sector in the private security industry. According to the 2012/2013 PSIRA Annual Report, out of the 6370 guarding service providers, only 9 services providers were involved in dog training.

Interestingly in the most recent PSIRA Annual Report 2013/2014, the categories of security services section reveals a growth of registered dog training centres from 9 to 13, despite there being a moratorium in place for the registering of new training centres by PSIRA. Further investigation revealed that perhaps this increase was recorded by mistake, and does not reflect an accurate state of things, it was further surmised that perhaps this increase is related to the fact that training centres and suppliers of dogs are not recorded as the same thing.

Arguably, the lack of credible information on this topic indicates a lack of expertise in the regulation of this sector of the private security industry. This is also evidenced in the fact that only dog trainers are recorded as being registered. In the past PSIRA used to send subject matter experts to accredit a dog training centre in order for the Authority to verify the centres ability to be registered as a capable training centre for security dogs. Consequently, this creates ambiguity regarding the real scope of the use of dogs and other animals in the private security industry. The need for greater engagement in this neglected sector of the private security industry cannot be over-emphasized.

It is encouraging to know that developments in terms of greater engagement in this sector have already begun. This is indicated by the new requirements recently introduced on the 27th of February 2015 via email and communicated to security service providers and the use of dogs in the private security industry.<sup>1</sup> The new requirements reiterate the training standards for dog handlers, requirements for dogs to have permanent identification and establish novel requirements for end-users of security dogs.<sup>2</sup> It is further reinforced that dog suppliers are required to be registered with PSIRA, and further states that with regards to end-users the email reiterates Section 38 (3)(g) of the Private Security Industry Regulation Act, which states that

Persons who knowingly or without the exercise of reasonable care contract for the rendering of services contrary to the Act, are guilty of a criminal offence and on conviction liable to a fine or to imprisonment for a period not exceeding 24 months, or to both a fine and such imprisonment. The Act therefore places an explicit legal onus on

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<sup>1</sup> Email communication from PSIRA Law Enforcement regarding the use of dogs in the private security industry, 27 February 2015.

<sup>2</sup> Email communication from PSIRA Law Enforcement regarding the use of dogs in the private security industry, 27 February 2015.



users of private security services to only use legitimate and registered security service providers.<sup>3</sup>

### **3 Methodology**

The success of understanding the dog handling sector and the effective implementation of regulations, to ensure that the sector continues to contribute to safety and security, devoid of abuse and exploitation of dogs is dependent upon stakeholder engagement and buy-in. Therefore, to engender a robust debate amongst relevant stakeholders involved in the dog handling sector was deemed essential for the purposes of responding to challenges of the industry and enhancing regulation of the sector. Indeed, for any regulations to be effective, the participation of the private security industry in the research, which informs the development of those regulations, remains crucial. The research conducted, therefore, placed a considerable merit on engaging all stakeholders in the dog handling sector, as well as the Society for the Prevention of Cruelty to Animals (SPCA), whose founding and current principles are based on upholding animal rights and welfare.

Field research was carried out in Cape Town, Durban, Johannesburg, Pretoria and Port Elizabeth in February 2015. The field work research entailed face-to-face engagements in order to elicit opinions, perceptions and suggestions about the strengths and weaknesses of the sector and how to develop and mitigate these, respectively. Random sampling was used to determine service providers that would be consulted and both individual interviews and focused groups were used to gather information. It must be noted that some requests for

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<sup>3</sup> Email communication from PSIRA Law Enforcement regarding the use of dogs in the private security industry, 27 February 2015.

interviews were rejected because the persons were not interested or were unable to, due to organizational commitments; the responses therefore are from individuals who were available and willing to participate in the research.

Unless otherwise stated, for referencing purposes only the date of the interviews will be provided, so as to preserve anonymity as requested by some of the participants. In this report contributions from participants will be referred to as responses from undisclosed managers of private security companies, in cases where consent to use the PSCs name was not granted. This condition was deemed necessary to elicit authentic responses, but mainly due to the fact that some participants were unwilling to confer consent to allow the names of their PSCs to appear in this report.

The questionnaire developed consisted primarily of open-ended questions particularly due to the emphasis on establishing candid views by those involved in the training, provision and use of dogs and dog handlers for safeguarding purposes. The concerns raised during the course of the interviews, have defined the modalities that underpin the current gaps in knowledge about this sector of the private security industry. The aim is to develop new ways of engendering compliance with the Act, the imminent Amendment Bill and its forthcoming prescriptions and ultimately improving regulation of the sector.

Various stakeholders were consulted including, eight of the nine registered training centres in the country, four end users represented by the security management at the Port of Cape Town and the port of Port Elizabeth, Koedoespoort a South African railway mechanical workshop, all are operated by Transnet, and the security management for the Cape Town International

Airport and seven private security companies that provide dogs and dog handlers for patrolling, and explosives and narcotics detection.

Clarity regarding the multiple role of a trainer, a supplier and a security service provider may be prudent in the context of dogs and dog handlers. This is because persons that engaged in the training of dogs are in most cases also the same persons that train the dog handlers. The common trend for trainers is an insistence that all dogs that are requested by a private security company (PSC) must be trained in the same center and in tandem with the handler. This is deemed necessary in order for the dog to adapt to its handlers and for the handler to be well versed with the requirements of the working with the dog.

Dog suppliers have not in the past been recorded as a security service provider, and it may present an opportunity for further debate to determine if they can be classified as such, some dog suppliers are merely breeders of dogs, and there are some suppliers who do not train the dog. The different dog suppliers interviewed were also responsible for the training of the dog and the dog handlers and registered as such. Notwithstanding this this report deems it necessary that dog suppliers are sufficiently scrutinized by PSIRA through the obligation to be registered.

In addition a representative of the National SPCA was consulted in order to elicit neutrality and a perception from an organization that is lauded globally for being a front-runner in ensuring that animal rights and welfare are upheld in all contexts. Efforts to gain greater insights into the dog units of the South African Police Service were unsuccessful, despite visiting a police station in Pinetown Cape Town that houses the largest number of police dogs in the Western Cape.

The limitation was due to the focus of the research, which was beyond the use of dogs within the SAPS.

Nonetheless several of those who participated during the field research were adamant that indeed the SAPS dogs were better trained and the SAPS Dog Unit was in some ways more effective as compared to the dogs and dog handlers within the private security industry. It was, however, acknowledged that differences in terms of the type and scope of work for state and non-state security agents was a key factor that underpinned the said differences. Anecdotal evidence from the representatives from parastatals that were interviewed during the field work is used in this report due to the more frequent interaction the latter has with members of the SAPS dog unit, as recorded during the interviews

#### **4 Regulating dogs in the private security industry**

The Security Officers' (SOB) Board Notice 15 of 1998 published in Government Gazette No. 19067 contains the first explicit establishment of training standards for security dogs and handlers. The SOB was PSIRAs predecessor and since the establishment of the training standards under the SOB, no amendments in this regard have taken place. The Board Notice defines the training standards using the abbreviation DH to refer to dog handlers and each standard for a DH increased in number and capacity from 1 to 5; it is worthy to note that all standards were deemed to be proficient based.

This is a key difference to current training standards administered through the Safety and Security Sector Education and Training Authority (SASSETA) with regards to course duration; this is elaborated on later in the report. DH 1 to DH 3

are all levels of 'patrol dog' training that gradually increased capacity requirements, DH 4 is termed 'special patrol dog,' and DH5 'substance detection.' The minimum requirement for a person wishing to train and become a dog handler was and still is a PSIRA security officer 'Grade E' qualification; this is the most basic qualification for security officers, the highest being a 'Grade A.' Table 1.1 below depicts the training standards for the use of dogs in a security concept as stated in the 1998 Board Notice.

Table 1.1

Instructional objectives and aims	
DH 1	<p>After the completion of this module, the trainee must be able to, discuss the classification and use of dogs in a security concept under the headings: patrol dog, free range dog, corridor dog, tracking dog, substance detection dog.</p> <p>Aim: to ensure that a handler is able to take care of his dog and to utilize it in order to, Secure premises (against unlawful entry, vandalism etc);            Have the dog as protection for the handler;            Be warned timeously of unlawful intrusion;            Carry out his lawful security task accordingly.</p> <p>Objectives: at the conclusion of the training period the handler must be able to do and explain the following,            First examination of the dog and the kennel;            Report any incident or unusual behavior regarding the dog;            How to put a slip (choker) chain on a dog;            How to remove a dog out of a kennel;            How to put a dog on a kennel;            How to care for a dog on site (hygiene and grooming);            How to use a security dog effectively;            How to patrol on an applicable site.</p>

	<p>Minimum standards of the dog:</p> <p>Must be able to react to teasing and bite a tease bag or sack;</p> <p>Indicate the presence of an intruder;</p> <p>Heel on leash.</p>
DH 2	<p>Aim:</p> <p>To enable a trained handler and his dog to be capable of working in an environment where staff and/or members of the public are present, e.g. shopping centres, banks, car parks, residential complexes, sports venues etc. Handler must be able to control dog on leash.</p> <p>Objectives: at the conclusion of the training period the handler must be able to and explain the following,</p> <p>How to use a security dog effectively in applicable areas;</p> <p>How to patrol a pedestrian congested site.</p> <p>Dog (DH 1 standard plus):</p> <p>Sit at the halt;</p> <p>Heel on leash with change of direction-left turn, right turn and about turn;</p> <p>Bite on arm guard or suit;</p> <p>Two metres attack on criminal with arm guard or suit (handler moves forward with his dog)</p>
DH 3	<p>Aim: to enable a trained and dog to be capable of working in an environment where staff and/or members of the public are present, and where the requirements are more specialized, Handler must be able to control dog on leash.</p> <p>Objectives: at the conclusion of the training period the handler must be able to understand the following,</p> <p>The factors which can influence the results of a dog, handler and equipment;</p> <p>The implications of the utilization of a dog on a leash.</p> <p>Dog (DH 2 standard plus):</p> <p>5-10 metre attack on criminal with an arm guard or protection suit (dog on leash,</p>

	<p>handler moves forward with dog);</p> <p>Distance control at 1 metre (dog to follow sit and down commands);</p> <p>Stay in any of the above positions for 30 seconds at 5 metres;</p> <p>Recall of dog, the handler to be approximately 5 metres away</p>
DH 4	<p>Aim: to enable a trained handler and dog to be capable of working as a Rapid Response Team, for a key holder or a warden service employer. Handler must be able to control dog off leash.</p> <p>Objective: at the conclusion of the training period the handler must be able to do and/or be able to elaborate on the following,</p> <p>Carry out arrests with the aid of his dog within the ambit of the law;</p> <p>Undertake crowd control;</p> <p>Continuation training of his dog for the objectives as listed above;</p> <p>Factors influencing the dog's work.</p> <p>Dog (DH 3 standard plus):</p> <p>Heel course with changes of direction on and off leash;</p> <p>Distance control at 10 metres (dog to follow sit and down commands);</p> <p>Stay in any of the above positions for 3 minutes at 10 metres;</p> <p>Recall of dog, the handler to be approximately 10 metres away;</p> <p>Area search in building or open area;</p> <p>Attack on criminal, dog off leash;</p> <p>Crowd control;</p> <p>Be able to negotiate natural and unnatural obstacles according to the specific needs or requirements of the client (these to be specified on certificate)</p>
DH 5	<p>Handler qualification: DH 4 handler qualification with or without aggression training or recognized equivalent qualification.</p> <p>Aim: to render a trained handler and dog capable of detecting various specified substances. Handler must be able to control dog off leash.</p> <p>Objectives: at the conclusion of the training period the handler must be able to control his dog off leash and be proficient in handling his dog to minimum</p>

	<p>standard of DH 4 with or without aggression exercises.</p> <p>The handler must be able to elaborate on the following:</p> <p>Details on the method he is employing for his dog to identify a substance;</p> <p>Factors influencing the dogs work.</p> <p>Dog (DH 4 standard or similar, with or without aggression training plus:</p> <p>Heel course with all changes of direction on and off leash;</p> <p>Distance control at 10 metres (dog to follow sit and down commands);</p> <p>Stay in any of the above positions for 3 minutes at 10 metres;</p> <p>Recall of dog, the handler to be approximately 10 metres away;</p> <p>Area search in building or open area;</p> <p>Be able to negotiate natural and unnatural obstacles according to the specific needs or requirements of the client (these to be specified on certificate);</p> <p>The dog must be able to positively identify and indicate a specific substance or a specific group of substances as required (these to be specified on certificate).</p>
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In order to become accredited as a patrol dog and handler instructor the Board Notice stated that the prospective instructor is required to meet the following criteria: have a DH 4 or equivalent recognized dog handler qualification, an SOB instructors accredit course or any other recognized dog handler instructors course qualification, one year of applicable dog handling experience, have trained a minimum of 12 handlers and dogs to the standard of DH 4 under the direct supervision and guidance of a qualified instructor.<sup>4</sup> The Board Notice states that in order to be accredited as a substance detection dog and handler instructor the following requirements are needed: DH 5 or equivalent recognized substance/explosive detection dog and handler qualifications, one year applicable dog handling experience, SOB instructors accredited course or any other recognized dog handler instructors course, qualified patrol dog and handler instructor, and have trained a minimum of 6 handlers and dogs to the

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<sup>4</sup> Security Officers' Board Notice 15 of 1998.



standard of DH 5 under the direct supervision and guidance of a qualified instructor.<sup>5</sup> Alternatively it is noted that for both patrol and substance detection dogs and handler, an instructor can be accredited provided that after 6 months has lapsed since the implementation of these standards, 'application by persons who have been involved in a similar type of training and work for recognition as a patrol dog and handler instructor, will be considered by the SOB.' It notes that an oral written and practical evaluation may be required.<sup>6</sup>

Requirements in order for a training centre to be accredited include, kennels with a minimum size of 1800mm x 1500mm x 1300mm per dog, that must have proper drainage, ventilation, access to water, dry storage facilities for food and cleaning materials, are needed.<sup>7</sup> Further criteria include a practical training area and access to open areas for obedience and agility training, such as, buildings, shopping centres and factories. The training centre is expected to have agility equipment, a sound producing device and protective clothing and access to veterinary services for proper care of sick or injured animals.<sup>8</sup>

Criteria for dog suppliers is similar to that of training centres save for, a requirement to keep a register of all the dogs under the suppliers control, and records of the following information; name, identification number, date of birth, breed and colour description, date acquired and previous owners name, address and telephone number.<sup>9</sup> Suppliers are also required to ensure that permanent identification is available for the dog, either a tattoo in the ear or a

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<sup>5</sup> Security Officers' Board Notice 15 of 1998.

<sup>6</sup> Security Officers' Board Notice 15 of 1998.

<sup>7</sup> Security Officers' Board Notice 15 of 1998, Government Gazette 19067, 1996.

<sup>8</sup> Security Officers' Board Notice 15 of 1998, Government Gazette 19067, 1996.

<sup>9</sup> Security Officers' Board Notice 15 of 1998, Government Gazette 19067, 1996.

microchip, and expected to keep all security dogs on a standard slip chain, and leash plus a hand loop attached to the end and a bridle snap or similar attached to the other end.<sup>10</sup>

The Memorandum of Understanding (MoU) that was concluded between PSIRA and the Safety and Security Sector and Education and Training Authority (SASSETA) in 2014 facilitates opportunities for skills transfer and development for all South Africans in the safety and security sector, seeking nationally recognized industry qualifications. SASSETA has been accredited by the South African Qualifications Authority (SAQA) to perform the function as an Education and Training Quality Assurance Body in terms of the SAQA Act and in agreement with the Quality Council for Trades and Occupations, in terms of the National Qualifications Framework Act in respect of security qualifications registered on the National Qualifications Framework.

Synergy between the PSIRA and SASSETA is critical in the sense that while the mandate of the former is to “promote high standards in the training of service providers and prospective security service providers” (PSIR Act), the latter’s mandate is to “promote learning programmes” within the area of safety and security (Skills Development Act, 1998). It is worthy to note that unlike PSIRA training standards that take into account the requirements for both the dog handler and the dog, SASSETA skills programmes focus solely on the dog handler. The following table 1.2 depicts the SASSETA skills programmes and their equivalent value in terms of PSIRA grades.

Table 1.2

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<sup>10</sup> Security Officers’ Board Notice 15 of 1998, Government Gazette 19067, 1996.

Skills programme- PSIRA Grade Equivalent	Unit standard	Unit standard title	NQF Level	Credits
Protection dog- DH1 & DH 2	243188	Care for a service dog	3	15
	243190	Handle a trained service dog to deter crime	3	8
Skills programme- self protection dog total credit value				23
Patrol dog- DH3 & DH 4	243188	Care for a service dog	3	15
	243190	Handler a trained service dog to deter crime	3	8
	120463	Handle a patrol dog to assist in searching for and the apprehension of a suspect	4	15
Skills programme Patrol dog total credit value				38
Sniffer dog- DH5	243188	Care for a service dog	3	15
	120461	Handler a trained sniffer dog to assist in the detection of substances OR	4	15
	120456	Utilize a tracker dog to follow a human scent trail OR	4	10
	120468	Utilize a search and rescue in structured scenarios to locate missing persons and evidence OR	5	15
	120469	Handle a sheep dog in the investigation of stock theft	5	15
Skills programme Sniffer dog minimum credit value				25

It was noted during the field work that SASSETA training and accreditation takes longer and costs more, a manager is lucky if a security officer stays that long. PSIRA grades were always proficient based nothing wrong as entry level (DH 1 –DH4) is basically the same thing, adding that DH 1 was too basic and dog handlers need to learn extra skills for handling their dogs.<sup>11</sup> The assertion was made that if PSIRA recommends 3 days for DH 1- that is proficiency based- and if a prospective dog handler understands everything in one day, then they can get qualified.<sup>12</sup> He noted that zero persons had been trained and received

<sup>11</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>12</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

SASSETA accreditation- at his training centre and that SASSETA manuals should be integrated with PSIRA DH 1- without talking so long costing so much; emphasizing that no one could commit to the SASSETA training duration of 150 hours.<sup>13</sup> He noted that he had been waiting 5 years for SASSETA but no one wants it and just send security officers for PSIRA grades.<sup>14</sup> However he conceded that PSIRA training material need to be upgraded, as it was currently too basic and should be made more challenging and inviting for prospective dog handlers, while acknowledging that it was too big a jump from PSIRA to SASSETA and there was a need to find a middle ground.<sup>15</sup>

Despite the requirements for dogs in the private security industry being outlined relatively clearly in the 1998 Notice Board, some current developments, such as, the rapid growth of security service providers in this sector particularly for dog suppliers who are not recorded or registered with PSIRA, changes regarding regulation are indeed relevant. Further interaction with members of the private security industry that supply, train and use dogs and dog handlers is critical to ensure that their needs are met, particularly concerns regarding the limited training centres and the challenges for established training centres, this is elaborated below. Parallel to better regulation and implementation of regulatory policies, PSIRA should perhaps consider seeking the support of various animal welfare organizations, in order to ensure that inspections at security service providers in this sector are fair, and effective. The concerns from this sector in terms of certain animal welfare organizations, amongst other things, are elaborated on below.

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<sup>13</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>14</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>15</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

## **5 Research Findings**

### **5.1 The role of dogs in providing security**

A view was expressed numerous times during the course of the field research that a dog is a lethal weapon and is the equivalent of a firearm. This explains the dual role played whereby the person responsible for training dogs in this sector of the private security industry, is also by extension a provider of a security services by the very nature of his/her work. For purposes of understanding the role of dogs in the provision of security, reliance will be made on the role, which dogs play within the SAPS. The SAPS website indicates that personnel in dog units are trained in the care, training and handling of dogs for functions catered to the prevention, combating and investigation of crime. Minimum entry requirements for dog handlers in the SAPS is the completion of 'basic police training, at least two years' experience in uniform duties, being physically fit and healthy and not allergic to animal hair and have good motor and observation skills.'<sup>16</sup>

Two PSC managers who had been operating with dogs since 2000, noted that they were the only PSC that had one dog handler for each dog, because most of the managers were previously in the SAPS and some had served in Correctional Services.<sup>17</sup> It was stated that the PSC did not rent out dogs even if a client insisted and rather encouraged the client to take the dog and the dog handlers.<sup>18</sup> It was emphasized that when the DH went on leave the dog was also

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<sup>16</sup> SAPS Website. Available at: [http://www1.saps.gov.za/careers/career\\_quest/blue/dog\\_handler.htm](http://www1.saps.gov.za/careers/career_quest/blue/dog_handler.htm) (accessed 03/09/2014).

<sup>17</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>18</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

on leave and thus the dog was never overworked.<sup>19</sup> Some variables that are of importance in the process of enhancing the understanding of what pertains in the dog and dog handling sector of the private security industry. This refers to, for example, the number of dogs and dog handlers that work in the private security industry, what kind of training they undergo, and the kind of treatment they face.

Issues that surfaced during the field work included disputes about the role of the SPCA in this sector of the private security industry, the role of the Performing Animals Protection Act 24 of 1953, and the lack of newly accredited training centres. Members of the private security industry and the dog sector in particular, hold various but mainly negative views regarding the influential role of the SPCA in the type of work carried out by members of this sector of the private security industry. Furthermore, there were also issues that emerged regarding training, particularly on whether training standards need to be changed as proposed in the relatively recent transition from PSIRA grades to SASSETA skills programmers. The other issues were linked to the working hours of dogs, the importance of bonding between the dog and the handler, the sizes of dogs kennels, and an allowance to be paid to dog handlers.

On the question of what role dogs played in securing the activities at the port of Cape Town, it was found that dogs and dog handlers were primarily used for general patrol in reserved and expansive areas, where limited manpower was available. This role was due to the advanced sense of sight and smell that dogs had when executing their duties.<sup>20</sup> The main risks the port faced were identified in the International Shipping and Port Security Code (ISPS) which states that no

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<sup>19</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>20</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

trade could take place without certain codes being followed, and entailed information security, systems security, that is, CCTV intruder detection, ensuring oversight responsibility of vessels that were privately owned or operated under government control, and personnel security, for example, criminal checks to ensure that personnel were certified to operate in the port.<sup>21</sup> Mr Fester, a security manager at the Port of Cape Town, stated that certain requirements applied to security officers that worked at the port, including confirmation of their PSIRA registration, a site file, medical records and police clearance.<sup>22</sup>

The two biggest threats at the Port were trespassing and the presence of stowaways.<sup>23</sup> It was noted that regarding the latter, any private vessel was allowed to request any PSC to search the vessel if stowaways were suspected to be on board, provided that the PSC was registered with PSIRA.<sup>24</sup> The PSC contracted, deployed its own dogs and conducted a stowaway search prior to the vessels departure from the port.<sup>25</sup> However, it was noted that state agencies such as the South African Police Service (SAPS), the South African Revenue Service (SARS), and the Department of Agriculture, Forestry and Fisheries (DAFF) had the authority to inspect any vessel without prior warning.<sup>26</sup>

The security manager at the Cape Town International airport advised that government stakeholders provided security at the airport using dogs, no PSC

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<sup>21</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>22</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>23</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>24</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>25</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>26</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

was contracted for this service.<sup>27</sup> It was stated that SAPS and SARS were asked to respond to any incidents that required the use of sniffer dogs, while cargo companies outsourced this service from the PSC of their choice.<sup>28</sup> It was further noted that there is a pre-arrangement regarding what is the appropriate response for an incident at the airport. For example, when there is an unattended bag the dog squad is called in to detect for a bomb; the dog squad from the SAPS comes with their own dog, the dog is not permanently stationed at the airport and is only deployed for a specific incident.<sup>29</sup>

The SAPS dog unit is stationed in close proximity to the airport and when deployed would typically take a maximum of three minutes to arrive.<sup>30</sup> It was asserted that dogs were very effective in detecting threats as they were not subjective like human beings, and it was further noted that the airport had experienced no challenges with DH's that were highly trained from the SAPS and SARS, and typically had a close bond with the dog.<sup>31</sup> He asserted that there had never been an incident where the dog made a mistake and if the dog was not sure it would still indicate that it was a risk; over the past 5 years there had been three incidents of this.<sup>32</sup>

More damning accounts of dogs and dog handlers in the port of Port Elizabeth was observed. An interview with the Port Security Manager Mr Masophi revealed that since his tenure in that position (2009), it had been an uphill battle to get

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<sup>27</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>28</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>29</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>30</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>31</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>32</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.



the two PSCs operating at the port to comply to, both the PSIRA Act and the National Ports Act 12 of 2005.<sup>33</sup> In terms of the former, it was identified that PSCs are independently contracted to perform stowaway searches by different international shipping agents, and were using handlers that were not PSIRA accredited and that the dogs used were not properly trained and accredited to conduct stowaway searches.<sup>34</sup>

Additionally, some dogs used by PSCs were too large to actually fit in some of the compartments in the vessels and this may be part of the problem.<sup>35</sup> With regards to the latter legislation it was noted that rules derived from the Ports Act stated that animals could not be transported without the proper vehicles, and that the vehicles used by the PSCs conducting stowaway searches, were not designed to transport dogs.<sup>36</sup> It was noted that before he instructed the PSCs to follow strict criteria, one of the PSC was transporting the dogs in the back seat of a personal vehicle.<sup>37</sup> One manager of a PSC that specializes in searching for stowaways on ships in Port Elizabeth highlighted that his dogs typically stayed on their leash and were not allowed to go into the engine room, he stated that this was due to the noise in the engine and the limited ability to sniff in that environment.<sup>38</sup> He noted that the dogs used for stowaway searches were concentrated in the accommodation and deck areas.<sup>39</sup>

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<sup>33</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>34</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

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<sup>36</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>37</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>38</sup> Undisclosed: Manager of Private Security Company, Port Elizabeth, 24 February 2015.

<sup>39</sup> Undisclosed: Manager of Private Security Company, Port Elizabeth, 24 February 2015.

The indictment of the poor training and thus discredited PSCs is a result of the common occurrence of stowaways being detected on board the vessel mid-sea.<sup>40</sup> It was lamented that it was impossible to state if dogs and dog handlers from PSCs were effective or professional owing to the mismanagement of such a vital aspect of port security.<sup>41</sup> The International Ship and Port Security (ISPS) Code is derived from the International Maritime Organization (IMO) and prescribes security measures for ports, the Department of Transport acts as the custodian of these prescripts.<sup>42</sup> Failure to detect stowaways is detrimental to port security that is, required to report on whether the stowaway was imported from another country or was a stowaway from South Africa.<sup>43</sup> This is compounded by the reality that international shipping agents contract PSCs using their own discretion, and there were only two PSCs offering these services in Port Elizabeth.<sup>44</sup>

Although stating that there was no provision in the PSIRA Act that could be used to regulate PSCs in the port environment, Mr Masophi highlighted that he has used the following criteria to enforce compliance, namely requesting managers and employees PSIRA accreditation and that of the dogs, proof of training and specific procedures for the transportation of dogs.<sup>45</sup> It was underscored that the security manager only identified the poor services of PSCs at the port of Port of Elizabeth as a concern, as other threats that the port faced, such as, trespassing

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<sup>40</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>41</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>42</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>43</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>44</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>45</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

were effectively deterred through the use of surveillance cameras.<sup>46</sup> He further noted that police training was much higher and that when the SAPS and SARS carried out their own inspections with dogs- this was a requirement for government vessels- the searches were always effective.<sup>47</sup>

## **5.2 Training: dogs and dog handlers**

According to one interviewee the training requirements for prospective dog handlers includes the obligation to be registered with PSIRA, keeping the site of the kennel clean and prescripts of the Criminal Procedure Act as it pertains to the sector.<sup>48</sup> DH 1 training entails safety of the handler, the dog and the suspect. It was stated that it is one thing to have an Act and another thing entirely to enforce it, a DH can only do schedule one arrest, and DH1 can only release the dog to bite the suspect if the latter runs away or attacks; after warning the intruder of what crime her/ she is committing.<sup>49</sup> This basically requires the DH to know how to walk with a dog on a leash and for the dog to be able to react when agitated, however it was stated that this was impractical in the context in which DH's worked, and could be interpreted that if the DH encounters an intruder with a weapon that does not agitate the dog then the DH cannot make an arrest.<sup>50</sup>

The owner of Cape Canine Services began by indicating the level of accreditation that he commonly trained dog handlers for, which was Dog

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<sup>46</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>47</sup> Nelson Masophi, Port Security Manager, Port of Port Elizabeth, 23 February 2015.

<sup>48</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>49</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>50</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

Handler (DH) 1- 4.<sup>51</sup> This covered the practical work including the requirements for a dog handler when he/ she arrived on site namely, checking the cage and looking for any loose stool, and checking if the dog is walking properly, amongst other things.<sup>52</sup> The dog trainer highlighted that dogs being used in the security industry had a limited role and were primarily there to act as a deterrent that stayed next to the handler; he expressed frustration with dog handlers that chained their dogs to one spot while they went and sat elsewhere.<sup>53</sup>

It was noted that dogs were very effective, even more so than a firearm, dogs are expected to alert the handler of the presence of an intruder and the handler is expected to be alert of the dogs' reaction.<sup>54</sup> This is done through the command to 'watch,' which through appropriate training should suffice.<sup>55</sup> In the case when the dog does alert the handler of an intruder the handler should put the chain on dead lock to prevent the dog from chocking and signal to the dog of the opportunity to bite.<sup>56</sup>

The DH when faced with a possible intruder must ascertain first before any further action, who the intruder is by shouting out a warning for the potential intruder to either identify him/herself or, stop running or whatever he/she is doing.<sup>57</sup> This warning if not adhered to leads to a further warning that the handler will release the dog to bite. A second warning is shouted out in the case

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<sup>51</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>52</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>53</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>54</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>55</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>56</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>57</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

whereby the intruder is carrying goods, potentially stolen ones, and is asked to drop the goods or the dog will be released to bite, the intruder is asked to stand still with his/her hands up, if this is not obeyed the dog is released.<sup>58</sup> It must be noted that dogs can only be released if the DH has a DH 3 or higher level of training.<sup>59</sup>

It was noted that a DH 4 trained guard is trained to deal with more than one suspect, how to stop a dog from biting, body search with the aid of a dog, calling for back-up, guidelines for confronting suspects, escorting suspects and report-writing.<sup>60</sup> The same outcomes are envisioned with the SASSETA training programmes as with the PSIRA DH courses; the aim being to ensure that the DH is well prepared.<sup>61</sup> People that get bitten would most likely press charges and hence the importance of ensuring that dog handlers are properly trained and minimum standards were raised. It was stated however that SASSETA was not working towards this end.<sup>62</sup>

In the instance whereby the dog handler and his/her dog encounter an intruder, it was noted that if the intruder was not brandishing a weapon the handler was trained to challenge and chase the intruder with the dog on the leash.<sup>63</sup> It was further stated that only dog handlers with DH 3-4 level of training were allowed to release the dog onto the suspect after shouting out warnings.<sup>64</sup>

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<sup>58</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>59</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>60</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>61</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>62</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>63</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>64</sup> Cape Canine Services, Cape Town, 04 February 2015.

This interaction was critically dependent on the circumstances and also depended on the relationship between the dog and the dog handler; which was very important in determining their capacity<sup>65</sup>

It was Mr Jantjies personal opinion that if the intruder is brandishing a firearm he would not release the dog.<sup>66</sup> He stated that he informs his recruits that they should be able to make their own decisions as their lives are more important, and it would be more prudent to let the suspect go, monitor his movements and call the supervisor and police.<sup>67</sup> It was however noted that if the intruder had a knife or a stick then the dog handler could release the dog as the dog was trained to bite the hand that was holding the weapon.<sup>68</sup>

It was stated however, that there were those operating in the sector and were not compliant but PSIRA failed to enforce regulations on this challenge.<sup>69</sup> It was claimed by two interviewees in Cape Town and Durban, that the sector was dominated by white persons and this posed certain challenges for persons that wished to attain higher levels of accreditation, for example a DH 5 accreditation.<sup>70</sup> This was compounded by the lack of enforcement of regulations and the reality of an abundance of non-registered suppliers, providing security dogs.<sup>71</sup>

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<sup>65</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>66</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>67</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>68</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>69</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>70</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>71</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

It was noted that some actors in the private security industry that provided dogs and dog handler services were previously in the Correctional Services, and as a result of this had adopted the compulsion method used in that environment.<sup>72</sup> This meant that if the handler wanted to walk the dog he/she would put a choke chain on the dog and if the dog did not want to walk, the handler would pull the choke chain forcing the dog to walk.<sup>73</sup> Another example was made of the compulsion method for substance detection dogs, and it was highlighted that if a dog looked away while indicating a substance it was a sign of avoidance and that the dog had been forced to do it.<sup>74</sup>

This was contrasted with the training method that encouraged positive reinforcement and reward for the dog and stated that many security service providers in this sector used outdated methods and tactics and worked in isolation, hence their reluctance to be inspected.<sup>75</sup> He asserted that it was necessary to force dogs to perform commands and there was ways to trick them into doing it; he linked this with the fact that dogs in the private security industry did not receive sufficient training and some were only trained once with no follow up training.<sup>76</sup>

It was further lamented that there was no uniformity in the training standards used to train dogs as each training centre was applying their own methods, and noted that PSIRA should establish a process to ensure re-certification of dog

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<sup>72</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>73</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>74</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>75</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>76</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

handlers, similar to the re-certification process firearm owners go through.<sup>77</sup> It was highlighted that scenario training, which was basic training at Correction Services, was not previously applied to test dog handlers, and noted that dog handlers learnt more as a result of scenario training; that is the practical application of their duties.<sup>78</sup> Mr Jantjies noted that although according to the Criminal Procedure Act dog handlers and security officers were allowed to make a citizens arrest, there had been no incident that required this in the past 5 years.<sup>79</sup> It was noted that dog handlers were also taught about schedule 1 crime, and informed about their requirements to tell the suspect what crime they were being arrested for.<sup>80</sup>

### **5.3 Challenges for dogs and dog handlers**

In the context of dogs providing security services a premium was placed on the relationship between animal and human being. This was attributed to the fact that dogs were pack animals and tended to view their handler as the leader of the pack. Hence the value of ensuring the dog handlers were willing to work with dogs and not coerced and that they were properly trained to use the dog as a lethal weapon, in the private security industry this natural relationship is relatively neglected in favour of training the dog to be able to work with different handlers. This is determined from a practical point of view considering

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<sup>77</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>78</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>79</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>80</sup> Jantjies.C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.



the requirements of clients whose sites require security patrolling by dogs for a significant amount of time, that is, either day or night shift.

It was stated that some clients demanded very ferocious dogs but asserted that that required a dog handler that was capable of handling that kind of dog.<sup>81</sup> It was explained that the relationship between a dog and the handler was very important and after checking the kennel, the handler would proceed with his duty during which the handler is required to brush the dog which helped with the bonding between the animal and the handler.<sup>82</sup> The remark was made that the short training period in the private security industry for dogs and dog handlers meant that the ability of both was compromised.<sup>83</sup>

It was noted that the short training duration was compounded by the rapid change over of dog handlers which was the fault of the employer and the client, some of whom forced security officer's to be dog handlers even if they did not want to be; the changes were also made due to instances where a dog handlers was found sleeping, and summarily replaced.<sup>84</sup> This scenario was contrasted with what transpires in the SAPS in which case when a police dog handler was off duty the dog also went on duty, whereas in the private security industry there was release handler that alternated to conduct patrols with the dog.<sup>85</sup> It was asserted that this should lead to better trained dog handlers who are able to multi-task across different dogs- it was stated that currently this did

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<sup>81</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>82</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>83</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>84</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>85</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

not happen.<sup>86</sup> Notwithstanding this, the approach in the SAPS dog unit was also criticized because it ultimately meant that when the police dog handler was on leave the dog was left unattended in its kennel.<sup>87</sup>

A group of eleven prominent members of this sector of the private security industry were interviewed on the 19th of February in Johannesburg and disputed some of the views held in terms of the training environment. There was consensus expressed regarding the void that would be created if the PSIRA training standards were repealed and the SASSETA training regime was fully implemented.<sup>88</sup> The views were articulated that this would be very bad for security service providers who represented hundreds of thousands of clients, particularly due to the length it took to conduct basic training, though SASSETA.<sup>89</sup> Emphasizing that 7 weeks for 5 standards as proposed by SASSETA was too long and cost too much.<sup>90</sup> It was further stated that there was no way of knowing if SASSETA personnel were qualified to certify an explosive or narcotic sniffer dog, asserting that the SASSETA training standards had been made to high and there was a need to balance the theoretical and practical aspects of training, specifically for this sector.<sup>91</sup>

Managers present also lamented the fact that PSIRA was not registering new training centers and stated that the moratorium on the accreditation of new training centres should be raised; it was held that this merely led to increased

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<sup>86</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>87</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>88</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>89</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>90</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>91</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

non-compliance as training centres that were not accredited became operational.<sup>92</sup> The remark was made that PSIRA should reserve consultation from QCTO with regard to new training standards and that SSPs in the sector were already pursuing SASSETA accreditation just to allow work to continue.<sup>93</sup> Additionally it was noted that the minimum standards set by PSIRA in 1998 were still sufficient and there was no need to alter the current standards.<sup>94</sup> A very tongue-in-cheek remark was made probing whether 'PSIRA was regulating with PSIRA or SASSETA standards.'

Mr Lippstreu, a manager of the only training centre in PE gave the example of an acquaintance that lived in George and could not afford to transport his dogs and dog handlers to PE or Cape Town for training, he noted that the individual resorted to getting training without the accreditation.<sup>95</sup> It was stated that in East London and King Williamstown, as a result of a lack of training centres and inability for a trainer from PE to travel and train in those areas, dog handlers were getting trained by illegal training centres.<sup>96</sup> The view was held that either PSIRA must accredit new branches for already established training centres or allow trainers to travel; adding that it was frustrating for compliant companies to see non-compliant firms thriving.<sup>97</sup> He queried why training material could not be used to train in different parts of the country and highlighted that no PSIRA

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<sup>92</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>93</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>94</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>95</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>96</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>97</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

inspector ever asked to see the classrooms when inspections were done, and the inspectors were only concerned with the paperwork and not actual work.<sup>98</sup>

The dissenting views must be appreciated and it would be prudent to read the concerns expressed in the correct context, that is, challenges of members of the sector juxtaposed with the efforts to professionalize the private security industry as a whole. The views do still represent valid views, particularly the impact that increased duration and cost of training through SAAETA will have on the sector. Concerning is the impact that a complete exit by PSIRA from the training environment will have on the sector, this points to the need for greater communication and clarification from PSIRA regarding these concerns.

Amongst other things persons interviewed attributed the challenges of training to poor development and regulation of this sector of the private security industry. The view was held that SASSETA is supposed to be a part of the development of the sector, but its training programmes were solely focused on people and excluded the training development of the actual dogs.<sup>99</sup> It was reiterated that SASSETA accreditation only covered training for the handler, while PSIRA accreditation covered both the handler and the dog.<sup>100</sup> It is worthy to note that the interviewee had received accreditation from both PSIRA and SASSETA.

It was highlighted that a basic handler was expected to report if a dog was sick and should be able to describe what kind of injury or ailment the dog was

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<sup>98</sup> Mr Lippstreu, Bronx Security, Port Elizabeth, 25 February 2015.

<sup>99</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>100</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

suffering from.<sup>101</sup> An example was made of a dog handler who could not carry out this basic task, and although the handler had called his supervisor the supervisor was unsure of where to go first, as he had other issues to address elsewhere, despite the dog being gravely ill.<sup>102</sup> It was asserted that what was needed was a 'marrying' of the dog and the handler, particularly because in most cases the handler was afraid of the dog.<sup>103</sup>

Lamenting the fact that security officers were pushed through the DH 1 course in 2 to 3 days, it was stated that this pointed to the supervisors who did not have a clue what dog handling entailed, like checking that water and kennels are clean.<sup>104</sup> However, the owner of another training centre asserted that the duration for DH 1 of 3 days was deemed reasonable and sufficient to train a prospective dog handler on how to patrol with a dog on a site where there were no people around- the outcome of which was perimeter protection (this was equal to a grade E qualification for PSIRA accredited security officers).<sup>105</sup>

The owner of Cape Canine Services described a scenario where the supervisor hoots at the gate, signs the Occurrence Book (OB) and drives off to the next site.<sup>106</sup> He emphasized that in such a case the supervisor was unlikely to know if the handler had a problem with the dog and attributed this to the fact that private security companies were more concerned with profits, and more sites

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<sup>101</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>102</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>103</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>104</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>105</sup> Undisclosed: Manager of training centre, Cape Town, 04 February 2015.

<sup>106</sup> Cape Canine Services, Cape Town, 04 February 2015.

meant no time for proper supervision.<sup>107</sup> He highlighted that PSC's paid dog handlers an extra rand a day and that more incentives were needed for entering this sector; the view was held that dog handlers should receive an allowance but do not, and that further the additional qualification should translate to increased remuneration.<sup>108</sup>

It was further stated that there should be measures in place so that if a dog handler was found abusing a dog he/ she should be blacklisted from working with animals; it was stated that currently all that happened was the dog handler was fired.<sup>109</sup> It was reiterated that there should be a method of blacklisting the dog handler and incentives for good dog handlers, he suggested that perhaps this should be through the supervisor's report and an assessment of how many break-ins there were.<sup>110</sup> It was underscored that the nature of the private security industry was profit-driven and keen on cutting costs and not interested in investing in training and incentives.<sup>111</sup>

Mr Jantjies took care of dogs that belonged to a major PSC as well as training the dogs and the DH for the PSC, this was done from the SPCA kennels in Durban where 50 kennels were rented out and maintained there.<sup>112</sup> Mr Jantjies highlighted that he was accredited as a DH 5 handler through SASSETA's accreditation process and had attained DH 4 PSIRA accreditation.<sup>113</sup> The DH's

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<sup>107</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>108</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>109</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>110</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>111</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>112</sup> Jantjies. C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>113</sup> Jantjies. C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

he had trained had general DH 2 accreditation until last year where some were trained at the DH 3 level, it was remarked that DH 1 to DH 2 dogs and dog handlers worked on site where there were no other persons present, while DH 3 and DH 4 were trained to work on sites where they were likely to interact with other people.<sup>114</sup>

It was observed that some security officers may fail port security at the Port of Cape Town by for example, falling asleep on duty. It was emphasized that this was strictly monitored in line with continuous assessment at the port, and according to health and safety requirements, which ensured that no dog handler reported to duty under the influence of alcohol, and that this also deterred theft at the port.<sup>115</sup> The outsourcing of dogs for patrol purposes was carried out under very strict conditions and the PSC responsible for the dogs was expected to, at the beginning of the contract, carry out an inspection on site and determine what the most preferable conditions were for the dogs.<sup>116</sup>

The owner of Cape Canine Services elaborated on the tension that existed with the private security industry regarding hours on duty and training to develop the skills of dog handlers. He noted that some employers would usually send their security officer's that worked the night shift for training to become a dog handler during the day, begging the question of when the security officer got any time to sleep.<sup>117</sup> He asserted that the private security industry presented a

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<sup>114</sup> Jantjies. C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>115</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>116</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>117</sup> Cape Canine Services, Cape Town, 04 February 2015.

catch 22 dilemma of what was to be prioritized more between quality and quantity.<sup>118</sup>

It was established that for the private security industry to improve more professionalism was needed, and that this was hindered by security officer's that were not properly trained and also not paid enough. The view was asserted that poorly paid security officers were a liability to themselves and the public and needed to be made more professional.<sup>119</sup> Poor work ethic was further lamented in the private security industry and stated that this was not just about education but dedication.<sup>120</sup>

It was conceded that the private security industry was a very corrupt one and it was unfortunately very common that brown envelopes were passed around in order for contracts and tenders to be awarded.<sup>121</sup> An example was made of an acquaintance whose dog discovered some narcotics and was recognized for good service delivery, but the dog was actually a private dog and was just lucky to find the drugs, this was used as a metaphor of how the lack of credibility of the sector was pervasive.<sup>122</sup> It was asserted that under-quoting in the sector was a major problem and in some cases one would only make a profit from the guarding services provided and not necessarily the dogs and dog handlers, noting that big sites all wanted one dog for the day shift and another for the

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<sup>118</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>119</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>120</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>121</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>122</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.



night shift.<sup>123</sup> It was suggested that perhaps a regulated price would help route out fly-by-night service providers in the sector.<sup>124</sup>

The view was expressed that there was a need for standards to be levelled and perhaps transfer the same courses for SAPS to be used in the dog sector of the private security industry.<sup>125</sup> The remark was made in reference to the allegations of lower standards in the sector and it was stated that as one would never cut the costs for the brakes of a car, and it was similarly imprudent that fly-by-nights were operating with low standards and no checks and balances.<sup>126</sup> It was stated that the private security industry needed to be more forthcoming and have a change of attitude and begin to emphasize to customers the importance of a complaint PSC.<sup>127</sup> He referred to an accounting term that is used describe the need to hold end-users accountable, and stated that 'jointly and severally' an outsourced company is an extension of the client who was thus equally liable.<sup>128</sup>

#### **5.4 Performing Animals Protection Act 24 of 1935**

One interviewee stated that he had to endure a long and tedious process to get his PAPA license issued, this entailed having to be interviewed by the magistrate, provide his businesses tax clearance, a site list, physically go to SPCA

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<sup>123</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>124</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>125</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>126</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>127</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

<sup>128</sup> Undisclosed: Security Manager, Cape Town International Airport, 06 February 2015.

for them to inspect his sites, and transportation vehicles for the dogs.<sup>129</sup> He stated that his PSC had to buy a vehicle to specifically transport dogs, and had to submit to the SPCA's requirements although the contract with the client that needed dogs on site was being delayed due to the delay of the PAPA license being issued.<sup>130</sup> It was conceded that the client had threatened to sue the interviewee as he had already signed an agreement stating that dogs would be provided on site.<sup>131</sup> He remarked that despite trying to be compliant in the context of the SPCA 'you are doomed if you do, and doomed if you don't,' and after going through that process he eventually received the license in mid-October, but was futile as PAPA licenses all expire on the 31st of December.<sup>132</sup> He stated that this should change and the PAPA license should be valid for a full year despite when it was applied for or issued.<sup>133</sup>

Another PSC had experienced no challenges getting a PAPA license except the delay in the license getting issued, which was attributed to the length of time it took to conduct a criminal check and the view was held that this process should be expedited.<sup>134</sup> It was further elaborated that casinos were already regulated by the Gambling Board which carried out a much faster criminal record clearance, and that perhaps criminal checks for attaining PAPA license should be outsourced to a private body that was more expedient.<sup>135</sup>

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<sup>129</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>130</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>131</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>132</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>133</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>134</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>135</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

The PSC is a security service provider for one of the biggest casinos in the Western Cape and carries out bomb sweeps for suspicious parcels and provides an added service value for the casino.<sup>136</sup> It was noted that the casino has had 3 incidents in 15 years and has never had any lawsuits for its canine operations.<sup>137</sup> The PSC also has a contract with the Cape Town Civic Centre and are required to keep sniffer dogs that can detect explosives on stand-by, to conduct sweeps on the Council Chamber as and when requested, the Centre houses the City of Cape Town municipal offices.<sup>138</sup> The remark was made that the PAPA license did indeed take too long to be issued and linked to fact that, the magistrate that was expected to issue PAPA licenses was usually at the Child court, so issuing PAPA licenses was not seen as a priority.<sup>139</sup>

Contradictory views emerged when a scenario was painted regarding dog suppliers that rented out dogs and it was stated that these persons lacked integrity and hence the need for the PAPA license, this was followed by an debate regarding who should acquire a PAPA license.<sup>140</sup> The example was made a manager of a training centre who provided dogs for the national supermarket Checkers, asserting that the latter did not have a PAPA license although they were using dogs to safeguard their property.<sup>141</sup> The debate ensued to suggest that the PAPA license should be made more flexible as not all

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<sup>136</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>137</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>138</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>139</sup> Undisclosed: Training centre, Cape Town, 04 February 2015

<sup>140</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>141</sup> Mrs Annette Van Rensburg, manager of training centre, Johannesburg, 17 February 2015.

clients have the license, and further noted that despite this being a legal requirement no prosecutions had been made.<sup>142</sup>

It was remarked that the PAPA license is of no use in the private security industry and that dogs should be excluded from it, noting that there were enough standards including the PSIR Act to make sure that dogs were treated well.<sup>143</sup> It was highlighted that initially the PAPA license was about making sure that dangerous animals in an area are well maintained, which applied mainly for animals in the circus.<sup>144</sup> The statement was made that a crucial meeting regarding this topic was not attended by anyone from PSIRAs management, who should have been there because they have the responsibility to protect the industry. The managers interviewed recommended strongly that dogs not be required to be part of PAPA license.<sup>145</sup>

## **5.5 Different stakeholders and the use of dogs**

### **5.5.1 The SPCA and Security Service Providers**

The National Council of SPCAs is a statutory body in South Africa, established under the SPCA Act No 169 of 1993 and have specific aims and objectives which include, but are not limited to; to promote the highest care and welfare standards for all animals.<sup>146</sup> The Council states that they do “not stand opposed

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<sup>142</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>143</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>144</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>145</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>146</sup> National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) ‘The Welfare of Dogs Used For Safeguarding/Protection in South Africa,’ January 2015.

to working animals subject to welfare standards being met.”<sup>147</sup> The NSPCA drafted a document that is designed for any person or company involved in the business of providing and managing security dogs used to safeguard premises, goods or persons within the confines of South Africa. The document makes provisions for owners of security dogs at kennels and during transportation,<sup>148</sup> these include;

- (a) provision of accommodation and equipment which suits the physical and behavioural requirements of the dogs held;
- (b) the protection of dogs from people, other animals or adverse environmental conditions;
- (c) provision of appropriate space for dogs to stand, move around freely, stretch fully and rest;
- (d) provision of suitable quality and quantity of food for working dogs to maintain full health and vigour;
- (e) protection of dogs from disease, distress and injury;
- (f) provision of veterinary treatment in cases of illness or injury in no longer than 24 hours;
- (g) maintenance of hygiene of the security dog establishment, the kennel, mode of transportation, the exercise areas and premises being worked on;<sup>149</sup>

It was noted that the SPCA involvement in giving a recommendation to the magistrate in order for a Performing Animal Protection Act (PAPA) license to be issued was a problematic.<sup>150</sup> This was linked to the fact that PAPA license was essentially intended for circus animals and disputes still abound about its role in the private security industry.<sup>151</sup> Furthermore it was stated that the SPCA was not

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<sup>147</sup> National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) ‘The Welfare of Dogs Used For Safeguarding/Protection in South Africa,’ January 2015.

<sup>148</sup> Ibid.

<sup>149</sup> Ibid.

<sup>150</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>151</sup> Cape Canine Services, Cape Town, 04 February 2015.

neutral and in fact charged the municipality and used money from donations to euthanize animals, emphasizing that although the SPCA was well intentioned they were ill-informed.<sup>152</sup> It was noted that it was good for the NSPCA to be involved but they were reading the law differently, and approached the private security industry with a bad attitude and distorted the law to suit them.<sup>153</sup> It was expressed that the SPCA must have nothing to do with standards or how PSIRA operates.<sup>154</sup>

The example was given of SPCA officers that were unclear of the types of dogs they were inspecting and the working conditions required for them, and highlighted an SPCA officer who asked where the food bowl for the dog was while the dog was on duty; he noted that it should be common knowledge that a dog should not eat before going on duty as this increased the risk of torsion.<sup>155</sup>

Torsion referred to

Gastric dilation and volvulus syndrome (GDV), more commonly referred to as gastric torsion or bloat, is a disease in dogs in which the animal's stomach dilates and then rotates, or twists, around its short axis. A variety of factors, including genetics, anatomy, and environment, are most likely to blame... Some factors that are believed to contribute to the development of GDV include ingestion of excessive amounts of food or

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<sup>152</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>153</sup> Mrs Annette Van Rensburg, manager of training centre, Johannesburg, 17 February 2015.

<sup>154</sup> Mrs Annette Van Rensburg, manager of training centre, Johannesburg, 17 February 2015.

<sup>155</sup> Cape Canine Services, Cape Town, 04 February 2015.

water, delayed emptying of the gastrointestinal system, and too much activity after eating.<sup>156</sup>

It was stated that personnel from Animal Anti Cruelty that were encountered by security service providers were more knowledgeable than some officers from the SPCA in terms of different types of dogs and their working requirements.<sup>157</sup> This view was seconded by the group of managers from training centres and PSCs, who stated that the SPCA should not be the only animal cruelty foundation to be consulted with regard to the role of dogs in the private security industry.<sup>158</sup> It was observed that for example, dogs suitable for sniffing explosives and narcotics were of a certain breed and this knowledge was lacking with some SPCA officers.<sup>159</sup>

At the Port of Cape Town it was conceded that there was a six month period between 2013 and 2014 where, all dogs and dog handlers were relieved of their duties due to an assessment by the security manager that found compliance with legislative requirements for the dogs and the dog handlers on site to be wanting.<sup>160</sup> This was after the SPCA was called in to inspect the safekeeping, treatment, feeding, cleaning and general care of the dogs on site and recommended changes to the caging and housing of the dogs which was the main problem identified.<sup>161</sup> It was highlighted that the dogs that worked on the

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<sup>156</sup> PetMD, Available at:

[http://www.petmd.com/dog/conditions/digestive/c\\_dg\\_gastric\\_dilation\\_volvulus\\_syndrome](http://www.petmd.com/dog/conditions/digestive/c_dg_gastric_dilation_volvulus_syndrome) (accessed 24/02/2015).

<sup>157</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>158</sup> Undisclosed: Managers of training centres and PSCs, Johannesburg, 19 February 2015.

<sup>159</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>160</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>161</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

port of Cape Town site were not directly sourced from the PSC contracted to provide security at the port, but rather that the dogs were outsourced from Fidelity Security Group.<sup>162</sup> It was emphasized that there was no mistreatment of dogs at the port and that any challenges experienced before had been addressed.<sup>163</sup>

On the 13 February 2015 the Department of Agriculture, Forestry and Fisheries (DAFF) published a notice in the Government Gazette (Notice No. 103 of 2015, Gazette No. 38458) indicating that the Minister intends to introduce the Performing Animals Protection Amendment Bill, 2015 to the National Assembly shortly.<sup>164</sup> The Bill seeks to amend the Performing Animals Protection Act, 1935 (Act No. 24 of 1935) and transfer the functions of issuing of licences for performing animals from the judiciary to the executive. The application was brought to the court by the National Society for the Prevention of Cruelty to Animals (NSPCA).<sup>165</sup>

The new Bill aims to relieve magistrates of the functions of issuing of licences for performing animals. In future, these licences will be issued by members of the veterinary profession and members of the natural scientist profession with the appropriate expertise required to perform such licensing functions. Magistrates will continue to issue licenses until 12 July 2015; licenses issued by magistrates will

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<sup>162</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>163</sup> Fester. A, Security Manager, Port of Cape Town 02 February 2015.

<sup>164</sup> DAFF, media statement, 13 February 2015. Available at:

[http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20\(PAP A\).pdf](http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20(PAP%20A).pdf) (accessed 19 February 2015).

<sup>165</sup> Ibid.



remain valid until 31 December 2015.<sup>166</sup> Without a capacitated and effective inspectorate, in terms of the dog and dog handling sector, various stakeholders have felt the need to step in and create additional requirements for the private security actors in this sector. In order for PSIRA to effectively carry out its mandate of ensuring effective control over the practice of the occupation of those in the private security industry, greater engagement with this sector is needed.

### **5.5.2 Kennels and working hours**

The SOB Notice Board states that with regards to kennels, they are required to be well constructed and be an adequate size which is considered to be a minimum of 1800mm x 1500mm x1300 m per dog. However the field work carried out underscored that kennels should be significantly larger to allow both the dog and the handler to work more efficiently. The latter is in this context deemed a more current assessment of what dogs and dog handlers really need to carry out their duties, as recorded during the field work process to better understand the use of dogs in the private security industry. One interviewee noted that 3m x 3m sized kennel was the ideal size for a dog in the security industry, and should be able to accommodate the handler or other person involved with ensuring the care of the dog comfortably.<sup>167</sup> He highlighted that certain information was needed on the kennel in order to inform other persons that would be working with the dog, including but not limited to; name, breed,

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<sup>166</sup> DAFF, media statement, 13 February 2015. Available at:

[http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20\(PAP A\).pdf](http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20(PAP%20A).pdf) (accessed 19 February 2015).

<sup>167</sup> Jantjies. C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

sex, special instructions, feeding, treatment, training standard, and medical history.<sup>168</sup>

The NSPCA document on the welfare of dogs used for safeguarding gives prescriptions regarding the working hours that are appropriate for security dogs and state that 'no dog may spend more than a maximum of 12 hours at a premises being worked on and must then be returned to the security dog establishment kennels for the next 12 hours.'<sup>169</sup> If possible, a dog should not be worked longer than 8 hours; no dog may work for more than 5 days continually without having a minimum of one day off in between.<sup>170</sup> This means that from the end of the last shift to the start of the new first shift there will be an off time period of between 36 hours to 48 hours depending on whether the dog has changed shifts with regards to day or night shifts; dogs must spend a minimum of 1 hour twice daily in the exercise camps on all days which it does not work and records must be kept of all time spent in the exercise camps for every dog.<sup>171</sup> There was consensus from all the managers of training centres, PSCs and end-users, regarding the 12 hour shift that dogs and their handler worked per shift.

Other key requirements for dogs in the private security industry include; a wooden pellet for the dog to sleep on, proper drainage for the kennel, effective disinfectant for cleaning the kennels.<sup>172</sup> Consensus exists regarding this among

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<sup>168</sup> Jantjies. C, Fidelity Security Services, Dog Master, Durban, 09 February 2015.

<sup>169</sup> National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) 'The Welfare of Dogs Used For Safeguarding/Protection in South Africa,' January 2015.

<sup>170</sup> National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) 'The Welfare of Dogs Used For Safeguarding/Protection in South Africa,' January 2015.

<sup>171</sup> Ibid.

<sup>172</sup> Cape Canine Services, 04 February 2015.

members of the private security industry in this sector, majority of those interviewed attested to the fact that they were dog lovers, and thus made sure that their dogs were well taken care of. Given that those operating in the industry are considered subject matter experts in the field of providing security with the use of a dog and a dog handler, it goes without saying that they would know best regarding what is required for the clients security and how best the dog and dog handler can offer that.

Nevertheless, during the course of the field work carried out for this report, an observation was made regarding dog that had been left on site, and in some cases with no supervision. This constitutes abuse and exploitation of dogs, taints compliant service providers and provokes animal welfare organizations, particularly the NSPCA. The only remedy is a nuanced one, where the role of the Authority as a regulator of the occupation of security service providers is enhanced significantly to deal with dogs and dog handlers, and where necessary prescriptions from the NSPCA and other animal welfare organizations is heeded.

## **5.6 Shortfalls of current regulation of the use of dogs and dog handlers**

During the field work it was noted that regulation of the sector was questionable due to the reality that there were big and supposedly credible PSCs that provided dogs and dog handling services but fragrantly abused the law, by leaving dogs on site over the weekend with no supervision and being locked up.<sup>173</sup> It was revealed that some of the private security companies referred to had, approached him after hearing of his challenges in acquiring a PAPA

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<sup>173</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

license and offered him to fall under their companies names, as a sub-contractor.<sup>174</sup> The interviewee was in favour of joint inspections being carried out by both PSIRA inspectors and SPCA officers because currently the sector was not effectively regulated and dogs were frequently being abused.<sup>175</sup>

The view was expressed by the owner of Cape Canine Services that when he drove through Mitchells Plain a low income neighbourhood in Cape Town, he observed that every second house had a guard dog in front of it that was, most likely not properly trained.<sup>176</sup> He stated that the private security industry did not police itself and that PSIRA as a regulator needed inspectors that were able to verify the quality of the services being provided, and not just carrying out a 'paper function' (UIF, payslips etc).<sup>177</sup> He further affirmed that this was the role of PSIRA and not the SPCA.<sup>178</sup>

## **6 Recommendations**

PSIRA must articulate and give a clear definition of what a working animal is and particularly as this pertains to dogs in the private security industry, this should entail what the appropriate working hours and conditions of work should be. PSIRA must engage the NSPCA regarding their presumed and at times premature role in interfering with the conditions of dogs in the private security industry. Essentially PSIRA exists to protect amongst others the members of the

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<sup>174</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>175</sup> Undisclosed: Private Security Company, Cape Town, 05 February 2015.

<sup>176</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>177</sup> Cape Canine Services, Cape Town, 04 February 2015.

<sup>178</sup> Cape Canine Services, Cape Town, 04 February 2015.

private security industry it regulates, valid and pragmatic concerns from members of the private security industry should be taken into consideration.

The moratorium on registering new training centres in general and those that specialize in the training of dogs must be lifted even if this is only gradually applied, in favour of a regulatory measure that gives room for effective and professional training centres to be established. Failure to do address this only perpetuates non-compliance within the sector as prospective service providers ultimately use the services of training centres that are not accredited by PSIRA, and thus not regulated by the Authority. Perhaps amending the requirement that limits an instructor registered to a particular training centre, from travelling to another province to provide training services would be a good place to start.

Greater clarity regarding the current transition from PSIRA grades to SASSETA skills programmes is required particularly for this sector of the private security industry. Confusion still abounds with most of those security service providers that were interviewed, for example, what it mean if SASSETA takes over the training and quality assurance component of the private security industry, and PSC are assessed, facilitated and moderated by SASSETA accredited persons? Does PSIRA still maintain its regulatory role when security service providers turn to SASSETA for accreditation?

One of the biggest burning issues regarding the SASSETA/NQF transition is the cost and duration of the SASSETA skills programmes. Most security service providers were of the view that this transition was premature or perhaps not done in a gradual manner, the view expressed was that although PSIRA grades may have been too low in quality, and the skills programmes are too high. Middle ground is need in this regard, as currently only managers were able to

take the time and resources needed for skills programmes. This defeats the purpose of professionalizing the private security industry as security officers and dog handlers continued to be excluded from growth; this discourse should be complemented with an endorsement for PSIRA regarding the compulsory payment of an allowance for dog handlers.

PSIRA must after clarification of the new requirements for dogs and dog handlers in the private security industry, send out letters to all registered dog training centres, dog suppliers the new minimum requirements to operate in this sector. This should be carried out parallel to the establishing how many PSCs provide dogs and dog handlers, and they too should be informed of the requirements. Greater engagement with consumers of private security services is an essential aspect of ensuring compliance; this applies in the dog and dog handling sector, as well as every other sector of the private security industry. Measures to engage consumers and require compliance from them should be implemented more robustly.

## **7 Conclusion**

New interest in the use of dogs and the regulation of dog handlers and dog training plays in the private security industry is influenced by imminent amendments to the regulation, in the form of the Private Security Industry Regulatory Bill of 2012. The Bill is currently awaiting signature from the President of the Republic, after which it will become law. The Bill underpins certain research imperatives stated in Clause 35 21 A (o) that seek to emphasize that the Minister is intended to make regulations relating to 'the training, registration,

transportation and general care of working animals by security service providers and other persons who employ security officers, in connection with rendering a security service, as well as the registration of training centers with regard thereto.'

While appreciating that this sector of the private security industry has been relatively neglected and under-researched, it is laudable that reforms are imminent as proposed in the Amendment Bill. This speaks volumes for the hundreds of thousands of dogs that have to work in undesirable conditions and also for dog handlers that are exploited, through insufficient training and remuneration. It has been expressed numerous times, during the course of the field work that dogs are equivalent to a firearm and in fact may prove to be more effective than a firearm in deterring crime. This point is not lost to the thousands of consumers that contract dogs and dog handling services to protect their property and assets. However there is a critical aspect of this sector that demands greater oversight and regulation, lest the gains for safety and security and the role it plays in empowering and capacitating dog handlers be diminished. The research conducted points to grave shortcoming in the regulatory approach by PSIRA to the dog and dog handling sector of the private security industry.

Unless the transition from old PSIRA grades to new SASSETA training programmes is articulated and clarified with regards to the sector, the popular use of dogs in the private security industry will be tainted and be associated with discredited practices. The welfare of dogs is indeed crucial to their successful contribution to the credibility of the private security industry as a whole and, the safety and security for consumers that acquire their services. The role of the dog handler however, cannot be overstated and is one that requires incomparable and

effective training; indeed high caliber training must be reflected in other sectors of the private security industry. Concerns expressed by members of the sector regarding training deficits have partly contributed to the lack lustre training of some actors in the sector, PSIRA must boldly address this and enforce compliance. Working hours and the size of kennels for dogs may appear to be a dull aspect of the regulation of the sector. However the regulation of these menial aspects of the private security industry should be approached with more vigour and a keen commitment to uphold fair treatment of dogs and the professionalization of dog handlers.



## References

Security Officers' Board Notice 15 of 1998, Government Gazette 19067, 1996.

National Council of Societies for the Prevention of Cruelty to Animals (NSPCA)  
'The Welfare of Dogs Used For Safeguarding/Protection in South Africa,' January  
2015.

PetMD, Available at:

[http://www.petmd.com/dog/conditions/digestive/c\\_dg\\_gastric\\_dilation\\_volvulus\\_syndrome](http://www.petmd.com/dog/conditions/digestive/c_dg_gastric_dilation_volvulus_syndrome) (accessed 24/02/2015).

SAPS Website. Available at:

[http://www1.saps.gov.za/careers/career\\_quest/blue/dog\\_handler.htm](http://www1.saps.gov.za/careers/career_quest/blue/dog_handler.htm)  
(accessed 03/09/2014).

DAFF, media statement, 13 February 2015. Available at:

[http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20\(PAPA\).pdf](http://www.daff.gov.za/docs/media/Amendment%20of%20Performing%20Animal%20Protection%20Act%20(PAPA).pdf) (accessed 19 February 2015).