



PSiRA
Private Security Industry Regulatory Authority

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(ill) Advised

**Security Consulting
in the Private Security Industry
of South Africa**

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ABOUT THE REPORT

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Author: Tebogo Seanego

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EXECUTIVE SUMMARY

Security consulting is one of the specialized sectors of the private security industry in South Africa. It is aimed at understanding the sector and identifying areas of regulatory improvements. This report provides an in-depth analysis of the status of regulation of security service providers rendering consultancy services.

The growth of security consulting services was found not to be parallel with other categories of security services and the industry at large. There are only a limited number of security consultants in the private security industry of the country compared to other types of security service providers. This is because the consulting sector is an experience centred, highly skilled sector where only experienced and skilled security officers can make it. Critical skills required for any consultant include risk assessment, research, investigation, report writing and presentation. The study further established that the term 'security consultant' is not defined anywhere, however there was a consensus amongst the participants that there is a need to identify who should be regarded as consultants in relation to the private security industry. The study further revealed that there are at least four different types of security consultants, namely: independent consultants, sales consultants, consulting engineers and in-house consultants.

The lack of dedicated training for security consultants was identified as a major cause for concern as consumers of security consulting services are left with a "lottery" of appointing consultants whose level of expertise cannot be verified by their qualifications. A course for security and aspiring consultants is amongst other recommendations made. It was established that PSiRA never received a complaint relating to rendering of consultancy services. However, room for improvement still exists, particularly in relation to the regulation of services rendered by sales consultants.

The study further revealed that the security consulting sector is largely untransformed and is dominated by white males. There are very few coloured males, Indian males, black males as well as white females. There was no African black female who was found to be rendering security consulting services during field research. Finally, recommendations were made in line with the objectives of the Authority as found in the Act. These recommendations are aimed at aiding the Authority to achieve its legislative mandate, particularly in relation to regulating the rendering of security consulting services. The recommendations take into consideration all practical and legal possibilities of implementing the same.



ABBREVIATIONS AND ACRONYMS

ALWINCO	Always in Control
AOI	Ability, Opportunity and Intent
CCTV	Close Circuit Television
DCS	Department of Correctional Service
PSiRA	Private Security Industry Regulatory Authority
IAPSC	International Association of Professional Security Consultants
KZN	Kwa-Zulu Natal
SA	South Africa
SANDF	South African National Defence Force
SAP	South African Police
SAPS	South African Police Service
SOB	Security Officer's Board



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1. INTRODUCTION

1.1 Rationale and brief overview

The Private Security Industry Regulation Act No. 56 of 2001 (PSIR Act) established the Private Security Industry Regulatory Authority (otherwise referred to as PSiRA or the Authority) and vests upon it certain powers. Section 3 the PSIR Act provides that the primary objects of the Act are to regulate the private security industry and to exercise effective control over the practice of the occupation of security service provider in the public and the national interest, and the interest of the private security industry itself.

Amongst its functions, the Authority has to conduct an ongoing study and investigation on the rendering of security services and practices of security service providers in order to identify shortcomings in the PSiR Act and the Levies Act.¹ Security consulting is a sector of the private security industry of South Africa, which is subject to regulation by PSiRA. Security consulting sector is generally unregulated and the study, among other things, will look at the reasons behind lack of effective regulation of this sector.

The Private Security Industry Regulations, 2002 were promulgated in order to assist the Authority to achieve its primary objectives,² As time evolves so does the need to amend and update rules and regulations in order for

them to be relevant with challenges brought by changes in society. Therefore, there was a need for a study on security consulting, in order develop knowledge and for PSiRA to adequately address the challenges in the private security industry sector and/or to strengthen the current regulatory mechanisms relating to security consultants.

The study considers different methods used by security consultants in analysing the risks for their clients or employers. This research serves as a platform for PSiRA to effectively regulate the security consulting as a sub-sector within the private security industry. It is hoped that the study will assist PSiRA to exercise effective control over the practice of the occupation of security consulting in the public and national interest and in the interest of the private security industry as required by the Act. The study also discusses the role that could be played by internal and external stakeholders in assisting the Authority to carry out its mandate in relation to the security consultancy sub-sector. A distinction is also drawn between in-house, product affiliated and independent security consultant in relation to regulation of this sub-sector.

Among other things, the study analyses the demographics in security consulting to determine the level of transformation in the sub-sector. The Private Security Industry Regulation Act 56 of 2001 in section 3(k) and (q) provides for greater transformation in the private security

¹ S 4(d) of the PSiR Act.

² Section 3 of the PSiR Act.

industry of South Africa with the aim of promoting the empowerment and advancement of persons historically disadvantaged through unfair discrimination.

This study is divided into five components. Firstly, it discusses the rationale behind the study and also presents the research background, objectives, hypothesis, questions, methodology and limitations to the study. Secondly, it presents the literature review focusing on four important aspects, namely:- security consulting and consultants; the need for security consultants; functions of security consultants; and regulating security consultants and the private security industry as a whole. Thirdly, the study presents research findings. Fourthly the study makes recommendations as informed by the research findings. Lastly, a conclusion is drawn.

1.2 Research background

By definition, a security service in the PSiR Act includes “giving advice on the protection or safeguarding of a person or property, on any other type of security service as defined in this section, or on the use of security equipment.”³ Giving of such advice is otherwise referred to as “security consulting”. Security consulting, therefore, is a sub-category of the private security industry of South Africa, which is subject to regulation by the Authority.

Crime trends have evolved over the years and this gave rise to a need for people with special skills to assess and give appropriate advice on security matters. Opportunity is one of the major causes of crime the world over. Crime opportunities are necessary for crime to occur, this makes them causes in a strong sense of the word. In order for government, businesses and individuals to reduce opportunities to commit a crime, there is a greater need for security consultants to analyse the risks and provide informed advice. The main purpose of security consultants is to reduce crime opportunities in order to protect their employer or clients by using prevention methods that are tailored to each situation and environment.

South African security consultants are giving security advice to their South African based clients and other clients outside the borders of the republic on various security matters. Due to the extra-territorial nature of the PSiR Act, private security service providers are allowed to render services outside the borders of South Africa and they can be held accountable by the Authority for any act constituting an offence in terms of the Act which is committed outside the country.⁴ Some of these consultants are not registered with PSiRA as required by section 20 of the PSiR Act.

There are currently 1897 businesses on the PSiRA database registered to render services as security consultants and 18 consulting engineers.⁵ Currently there is no clear definition of who consulting engineers are and what are the registration requirements of such category of service providers. Moreover, it cannot be confirmed that all these businesses are indeed conducting consulting business as per their registration on the PSiRA database, although there are reasonable grounds to believe that the majority of businesses on the database are not trading as security consultants.

1.3 Research objectives

The proposed research seeks to uncover the specialized field of security consulting within the private security sector in South Africa. The study will analyse the sector within South Africa with a view of understanding its dynamics. Furthermore, the study will look at what the Authority can do to strengthen the regulation of security consultancy in the public and national interest and in the interest of the private security industry.

The research findings intend to assist PSiRA in understanding the security consulting sector with a view of developing policy that will inform the development of regulations relating to security consulting, if needs be. The study will look at ways to empower previously disadvantaged people to enter into the sector as security consultants. Furthermore, the study will analyse the adequacy and/or lack thereof of training provided to security consultants if there is any such training and will provide recommendations on how such training could be improved, if at all.

1.4 Research hypothesis and question

The hypothesis for this study is as follows:

Security consultants play a very pivotal role in the prevention of possible crime by providing advice on various aspects of security and are regulated in terms of the PSiR Act.

³ See S 1 of the PSiR Act.

⁴ S 39 of the PSiR Act.

⁵ PSiRA Annual Report 2017/2018.

The main research questions for the study are as follows:

1. *What role do security consultants play in the South African private security industry?*

Secondary research questions are as following:

2. *What security services do security consultants render?*
3. *What are the minimum training requirements for a professional security consultant?*
4. *What are the PSiRA registration requirements for security consultants?*
5. *What are the risk factors involved in the provision of security services?*
6. *What regulatory mechanism are in place for security consultants?*

1.5 Research methodology

The study relied on both desktop and field research, with the intention being to gather as much information as possible in order to provide deeper insights into the security consulting sub-sector. Qualitative research method was used in order to gain an appreciation of the lived experiences of security consultants. The study was exploratory in nature, particularly due to the fact that it was the first research by the Authority in this specific subject matter. Needless to say, exploratory studies are predominately used to gain insights, discover new ideas, and for increasing knowledge on the phenomenon. This field research enabled the researcher to deeply engage and interact with security consultants, through structured and unstructured interviews. Unstructured interviews were mostly used as tool for data collection as it provided participants with the opportunity to fully describe their experiences.

Purposive sampling was used for this study and in this case, registered security consultants on the PSiRA database were firstly sampled. The participants were selected based on their particular knowledge of security consulting, for the purpose of sharing their knowledge and lived experiences. Due to the fact that non-registered security consultants were also actively operating, the snowballing sampling method was used. In this case, where unregistered security consultants were found this method was used in order to identify other unregistered consultants. This necessitated the need to interview some of the unregistered security consultants throughout the country.

1.6 Limitations of the study

The study amongst others found that security consultants in South Africa were fewer than the number reflected on the PSiRA database. This made it difficult for more data to be collected from security consultants. It is also important to note that the specialized nature of consultancy services has led to all available security consultants being only available in urban areas. This implies that participants in the study were drawn from all urban areas of South Africa.

Another major limitation is the dearth of literature in the security consultancy discourse as reflected in the case of South Africa, where no literature was found during this study. Despite the limitations, the study was able to unpack interesting perspectives from the participants.





2. LITERATURE REVIEW

2.1 Security consulting and security consultants

The growth of security consulting as a profession parallels that of the entire industry of private security, whose products and services have expanded significantly within the past decade.⁶ Writing from an American perspective, Sennewald⁷ notes that security consulting had flourished by the mid-1980's as an integral, necessary discipline within the security industry, and also that professionals engaging in consulting prior to 1980s in America were few and far between. The term 'security consultant' means different things to different people, with definitions varying from sector to sector.⁸ Unlike protected terms such as 'architect' or 'solicitor', calling oneself a security consultant is not regulated by either a professional association or legislation.⁹ Furthermore, Gill¹⁰ explains that it is odd given the fact that this term is frequently used in relation to a diverse range of disciplines, from securing IT infrastructure and networks through to protecting against cyber attack, developing integrated security systems, providing science based advice on blast

mitigation or designing the physical and operational layout of business facilities.

The American Heritage Dictionary¹¹ (cited in Sennewald, 1989), defines a consultant simply as (1) a person who gives expert or professional advice; (2) a person who consults another. Furthermore, Sennewald¹² indicated that the International Association of Professional Security Consultants (IAPSC) defines a consultant as a person who provides security advice, information, and recommendations to management. There are independent security consultants, product affiliated security consultants and in-house security executives. Gill¹³ indicates that some security systems installers employ in-house security experts who determine what a client requires in terms of cameras, detection systems and so forth, the concern being as to whether these are truly independent assessments of need. Keller¹⁴ confirms the doubts raised by Gill and argues that "consultants" who are product affiliated, are not likely to make recommendations that are contrary to their own interests. Keller¹⁵ argues that many years of security

⁶ Sennewald, C.A., (1996). *Security consulting*, 2nd. Butterworth – Heinemann.

⁷ *Ibid.*

⁸ Gill, D., *Security Consultants and 'The value Proposition'*. Accessed on www.risk-uk-com on the 18 April 2019.

⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ *American Heritage Dictionary*

¹² Sennewald (n 6 above).

¹³ Gill (n 8 above).

¹⁴ Keller, S.R., (1994), *Security Consultancy*. Atkins.

¹⁵ *Ibid.*

consulting business have seen a number of situations where clients have been ill-served by system vendors who call themselves consultants. A security executive on the other end is a full-time salaried employee of a given corporation and serves in some measure as a proprietary or in-house consultant to senior-level management.¹⁶

2.2 The need for security consultants

According to Sennewald¹⁷ the increasing demand for consulting services is not surprising, except for the few security practitioners who have recognised the opportunities it presents.¹⁸ Cunningham¹⁹ maintains that there is a need to hire someone who knows the ins and outs of security to support those who know little or nothing about security and its analysis. The main goal of security consulting is to assess all liabilities or risks on security issues and reduce or eliminate them.²⁰

Cunningham²¹ points out that competent security consultants know what to look for when they identify security issues. Such consultants know how to deal with issues in a cost effective manner and how to identify what works for a variety of business types in a particular area of location. Cunningham²² further argues that, it makes sense to use a security consultant to get the best benefits, and to think of expenses as an investment for future that will keep one out of bad publicity and provide piece of mind. It was further stated that it is better to be prepared by having security systems in place and not need it than not to be prepared and need it.

2.3 Functions of security consultants

Security consultants gather information relating to the client's security arrangements, analyse the vulnerabilities, prepare a report outlining the findings, and list recommendations to improve vulnerabilities.²³ Functions of security consultants differ with those of security executives in that, security executives recommend appropriate and cost-effective strategies to achieve a wide variety of security objectives, loss control, crime prevention and investigative goals.²⁴ The process, which is conducted by security consultants for their clients, is called security risk analysis.

The risk analysis process provides management with the information they need to make informed decisions concerning security.²⁵ The preliminary step in the risk assessment process is to subject the facility under assessment and to list all threats; and assess the applicability of occurrence of such threats at the facility based on geopolitical situation, current events, and historical data within the region that are relevant to the facility.²⁶ Jenkins²⁷ maintains that the procedure identifies the existing security controls, calculate vulnerabilities, and evaluates the effect of threats on each area of vulnerability. It is important to note that certain threats are peculiar to a particular security environment whilst others can occur at any time under any environment.²⁸

Bayne and Jenkins agreed that the threat and risk assessment process is not a means to an end but a continual process that once started, should be reviewed regularly to ensure that the protection mechanisms currently in place still meet their required objectives, and are relevant and effective.²⁹

2.4 Regulation of security consultants and the industry at large

Gill explains that historically, there has been no recognised benchmark to assess a consultant's competence and consumers have been faced with soothing of a lottery when engaging security consultants operating with few effective controls in place. The PSIR Act greatly increased the scope of the legislation by defining "security service providers" as including both security officials and businesses.³¹ Berg³² referred to previously excluded security service providers such as locksmiths, private investigators, security training, manufacturers, importers and distributors of monitoring devices, installers of security devices, labour brokers, those who monitor electronic security equipment, those who manage or control the rendering of security services and security consultants.

According to Berg³³ there has been a realisation in South Africa, that allowing a private entity to perform a policing function within a democracy necessarily requires some form of clear-cut regulations. This means that there is a need to have clear and implementable regulations

¹⁶ Sennewald (n 6 above).

^{17, 18} Ibid.

¹⁹ Cunningham G.L., (2004) *Why Hire a Security Consultant*. Found on www.ezinearticles.com/?why-Hire-a-Security-Consultant&id=115 accessed on 11 April 2019.

^{20, 21, 22} Ibid.

²³ Sennewald (n 6 above).

²⁴ Ibid.

^{25, 27} Jenkins, B.D., (1998) *Security Risk Analysis and Management*. Countermeasures Inc.

^{26, 28} Liu C. et al (2012) *The Security Risk Methodology*. Elsevier Ltd.

²⁹ Bayne, J., (2002) *An Overview of Threat and Risk Assessment*. SANS Institute.

³⁰ (n 8 above).

³¹ Berg (n 29 above) and Liu (n 26 above).

³² Ibid.

³³ Berg (n 29 above).

for the private security industry sector in South Africa. Gill³⁴ argues that there is a valid case to be made for the regulation of security consultant and that professional security practitioners require a compliance framework to underpin the delivery of their services.

An attorney, accountant, teacher or registered nurse has a clearly defined path of preparation to follow to earn that title.³⁵ This is true with virtually any profession. If the person deviated from the prescribed preparatory steps and yet claimed to be, say, engineer, such person could be viewed as a fraud because credentials are mandatory

in today's world. There is a need to ensure that one is qualified to perform as promised. Sennewald³⁶ points out that, there is no clearly defined academic path that qualifies one to be a consultant in America. He further points out that there is no college or university programs that lead to a consulting undergraduate or graduate degree. Sennewald³⁷ identifies four broad areas of competence that a consultant must achieve in order to be qualified, which are, areas of experience, education, professional credentials and personal and interpersonal skill. It is however worth noting that these four areas were spoken about from an American context.



³⁴ Gill (n 8 above).

³⁵ Sennewald (n 6 above).

^{36, 37} Ibid.



3. RESEARCH FINDINGS

3.1 Security consulting definition conundrum

As already highlighted above, the definition of a security service as found in section 2 of the Private Security Industry Regulation Act 56 of 2001 includes providing advice on the protection or safeguarding of a person or property, on any other type of security service as defined in section 2 of the Act, or on the use of security equipment. In most instances the giving of advice is a stage in the consulting process which is done after risk analysis or investigation. The minimum entry requirements for one to be registered as a security consultant are not clearly defined by the Authority. A research participant pointed out that security consulting entails giving advice on various aspects of security (internal and external threats) and providing mechanisms to prevent or reduce such threats.³⁸

There is no prescribed definition for the term security consultant, however, the general consensus amongst all the consultants that took part in the study was that there is a need to have a definition of who is a security

consultant although some were not sure how this should be defined. An independent security consultant pronounced that there is a need for a definition of a security consultant which must include the provision that they must not have interest in the rendering of services or they must not be part of the solution.³⁹ It was further pointed out that security consulting is about training and educating one's client.⁴⁰ There was concurrence with the above statement from another consultant who indicated that sales consultants must be registered as such and not as security consultants and that consultants must be independent.⁴¹ The rationale behind prohibiting security service providers and those who wish to be part of the solution in being security consultants is to prevent conflict of interests.⁴²

One participant who held a different perspective indicated that any person giving advice on security for any form of payment must be regarded as a consultant.⁴³ Another participant, stated that there must be a definition of security consultant and that the definition must be informed by what the consultant do. This opinion was in line with statement made by another participant.⁴⁴

³⁸ Norman Van Rooyen, *Jewellery security consulting*, 09 June 2019.

³⁹ Andre Mundell, *Director at Alwinco* 10 May 2019.

⁴⁰ Ibid.

⁴¹ Alan Carey, *Director at Alan Carey Consulting*, 27 May 2019.

⁴² Ibid.

⁴³ Interview with Anonymous participant, conducted on 09 June 2019.

⁴⁴ Jock Walters, *Director at Spentas*, 09 June 2019.

A training consultant stated that if the Authority is unable to define who is a security consultant, there must at least be guidelines of who can be regarded as a security consultant.⁴⁶

Andy Lawler of Sentinel defined security consulting from an independent security risk assessment point of view and held that it helps to identify those areas in your property or person that are vulnerable to break-in or attack and should be protected.⁴⁷ The general sentiments shared by all those that participated in this study is that there is a need to define a security consultant even though there is no consensus on how this should be done.

3.2 Security consulting and investigation

The research established that there is a very close relationship between security consulting and investigation as some private investigators are also rendering services as consultants. To be precise, both the processes of risk assessment and investigation are part of security consulting in most cases. One participant stated that risk assessment is part of investigation.⁴⁸ During the process of risk assessment, investigation is conducted to identify possible risks and threats.

Alan Carey of Alan Carey Consulting indicated that the first step of investigation is to understand the business of the client and what are the client's worries and what are they trying to achieve.⁴⁹ This statement serves to confirm that investigation is part of the consulting process whether its at the initial stages or in the middle, it remains a critical part of the security consulting process. Majority of consultants who took part in the study indicated that they conduct investigations in one form or another. Any consultant who is well conversant with the business of the client will be adequately abled to assist the client,⁵⁰ and the investigation process starts with understanding the customer's business.

The importance of investigative experience in security consulting is further strengthened by the findings that the majority of security consultants have worked for the SAPS and in particular in the detective services as criminal investigators. The nexus between investigation and consultation was well explained by a consultant who specializes in investigation by saying that when theft is committed at the client's premises, they investigate the system and the procedure of receiving and despatching

the good and identify the loopholes.⁵¹ Risk assessment is an in-depth investigation into the current status of the client's security system or framework.⁵² The relationship was best summarized by a consultant with over 10 years in the police experience by saying that they produce a report after consultation and investigation.⁵³ The words risk assessment and investigation in relation to consulting services are so close that consultants themselves often use them interchangeably.

3.3 Types of security consultants

The research revealed that there are four main types of security consultants. There are independent security consultants as well as the product-affiliated consultants. The former refers to the security consultants who advise the client and is not part of the solution, and the latter refers to the product or service affiliated consultants who assess, make recommendations and become part of the solution. Product affiliated consultants are also referred to as sales consultants and the majority of them are employed by companies that are selling security services or security equipment. Within the above-mentioned two categories of security consultants, there are those that can be regarded as general consultants (advising on any aspect of security service), and specialist consultants who are advising on only specific aspects of security service(s).

There is also in-house security consultants/managers or building managers and there are consulting engineers. PSiRA database is only reflecting two types of consultants, which are security consultants and engineering consultants. The Authority registers both independent security consultants and sales consultants under the category of security consultants.

3.3.1 Independent consultants

Independent security consultants or independent risk assessors are in essence security consultants whose job is to assess the risk for their client, produce a report with findings and recommendations, and leave the client with a report. They do not form part of the solution by doing installation or rendering the actual security service, as recommended in the report. There are very few independent consultants operating in South Africa currently. It is alleged that there are many advantages in appointing an independent person to conduct a risk assessment. One of the advantages of investing in a

46 Michelle Kramer, Director at IDME consulting, 27 May 2019.

47 Andy Lawler, Director at Sentinel, 03 October 2019.

48 Walters (n 47 above).

49 Carey (n 44 above).

50 Ibid.

51 Interview with anonymous participant, conducted on 27 May 2019.

52 Mundell (n 47 above).

53 Interview with anonymous participant, conducted on 27 May 2019.

professional risk assessor to carry out the risk assessment is that an experienced assessor enters your premises with a critical eye; a person who is not used to seeing the same landscape every day and therefore will notice the risk easier.⁵⁴

One consultant indicated that it is often convenient and cheaper for consumers to make use of an assessment from their installer or service provider.⁵⁵ This can be a risk as one does not know if the assessor will provide a proper risk assessment or will devise a solution to suit their company's products or services.⁵⁶ Many consumers in South Africa continue to enter into this type of business arrangement, relying on ethical processes from their service providers and trust they would provide a proper assessment, especially since any problems would reflect negatively on the service provider.⁵⁷ An independent assessor is not intimidated or influenced. In the world of an independent risk assessor, a risk is a risk and whether the assessed entity can afford to remedy the risk immediately is not part of the equation when the risk is identified and solutions are recommended.⁵⁸ It is argued that the objectivity of independent consultants is very limited when they also operate in the security sector and at a time where there are no regulations to guide or regulate their conduct.

3.3.2 Sales consultants

The research revealed that there are more sales consultants operating in the private security industry of South Africa than any other type of consultants. Majority of specialists are also sales consultants who are trained and knowledgeable about a specific product and they advise clients on such product. The independence of sales consultants is a major cause for concern in the industry. This is in particular because of a possible conflict of interests between their business interests and the client's interests around safety. The credibility and independence or lack thereof of sales consultants was highlighted not only by independent security consultants, but also by some of the sales consultants. It was argued that product-affiliation is not an issue, because they will mostly recommend what they can provide although independent consultant is much better because they are not conflicted.⁵⁹ Product-affiliated consultants were heavily criticised because it was alleged that they conduct an assessment "with an eye" of getting a job. Another participant indicated that there will always be a conflict of interest with product-affiliated

consultants and therefore there is a greater need for an objective person to advise further.

As expected, some of the sales consultants who participated in the study, justified the practice of selling products in the name of consulting by saying that their services and products are the best in their area of operation and for that, they will never recommend any other service provider or product over theirs.⁶⁰ It was further stated that although their service is profit driven, they never compromise the safety of the client and that in most cases they terminate the consultation process if the service provider requires lower than what they offer.⁶¹ The truthfulness or lack thereof of the above statement has not been tested. It was acknowledged that sales consultants will always sell their own products, although sometimes they recommend others in particular on services that they do not offer. Further allegations were made that independent consultants are not very independent themselves in particular in their hometown.⁶² This comments raised the question of how independent are independent security consultants? What are the mechanisms to ensure impartiality in the rendering of consultancy services?

The practice is not illegal or contravention of any law for sales consultants to advise and sell their products to the consumers. This kind of practice only raises ethical issues because sales consultants are in the business of selling products or services for profit. Majority of sales consultants are conducting assessment free of charge for their clients. Free assessment is certainly the most appealing one, but when it comes to security, it is definitely not the best option.⁶³ A free assessment was further criticised as mere guesswork and often based on what the sales person sells or what the installer prefers to install.⁶⁴ A camera installer will look at your premises with the intention of putting up the cameras at all vulnerable areas.⁶⁵ This will be influenced by the fact that this is how they generate an income, the client may be subjected to sales pitch of a person pretending to be a risk assessor whilst aiming to sell as many cameras as they can, or to the client the most expensive cameras within their available range.⁶⁶ An independent security consultant from Alwinco, Mr Andre Mundell analogized the purchase of services or equipment from sales consultants before conducting a risk assessment in the following manner:

⁵⁴ Lawler (n 50 above).

⁵⁵ Mundell (n 42 above).

⁵⁶, ⁵⁷, ⁵⁸ Ibid.

⁵⁹ Interview with anonymous participant, 30 November 2019.

⁶⁰ Interview with anonymous participants, conducted on 01 October 2019.

⁶¹, ⁶⁴, ⁶⁶ Ibid.

⁶² Interview with anonymous participant, conducted on 01 October 2019.

⁶³ Mundell (n 42 above).

⁶⁵ Lawler (n 50 above).

It is like going to a pharmacy when sick to buy whatever random medication the pharmacists decides to give you to treat symptoms. The possibility is that you will eventually have to visit the Doctor because the medicine you received from the pharmacist just treated the symptoms and not the root cause.⁶⁷

The definition of security risk assessment as provided by independent security consultants dictates that it must be conducted by a person who is not having a continuous or retainer relationship with the client. The critical and rigorous nature of such an examination must be maintained and that standard can only be achieved and maintained by an independent person who is not afraid to tell the client the truth even if it does not sit well with them. The unrealistic nature of having a risk assessment conducted by a security business rendering services or selling security equipment to the clients was further analogized in the following manner:

To get a security risk assessment done by the same company you retain is like asking your mom if you are fat. In all likelihood she will not tell you the truth because she does not want to hurt your feelings.⁶⁸

3.3.3 Consulting engineers

The registration requirements and the functional areas of engineering consultants are not defined in the PSiR Act and in the regulations drafted in terms of the Act. This category emanates from the SOB era as engineering consultants were required to register then. In the financial year, 2018/2019 PSiRA database reflected 18 registered consulting engineers.⁶⁹

3.3.4 In-house consultants

The study discovered that there are security executives or managers, who are in-house security advisors and whose duties are amongst others to advise management on various security matters. These are salaried employees of businesses or government departments responsible for security in the premises of the employer. It was argued that the problem with in-house security advisors is that they will not be able to tell their employer that he/she is part of the problem because of fear to lose a job.⁷⁰ The nature of services conducted by in-house security managers or consultants varies from one business to another. The nature of their employment status dictates that they must be subjected to every regulation which is applicable to in-house security service providers.

Practically it will be difficult if not impossible for the Authority to make regulations applicable to this category of consultants.

Research participants had conflicting views with regard to whether in-house consultants should be regarded as consultants or not. For the purposes of this study and regulation of the private security industry as mandated by the PSiR Act: in-house security consultants will not be regarded as security consultants for the following reason(s). In-house consultants are salaried employees of businesses and therefore section 3(o) of the Act is not applicable because when the employer is not satisfied with the services of such employee, they will terminate the contract of employment. This category of consultants can only be encouraged to register if their job description is in line with the definition of a security service as found in section 1 of the Act, particularly paragraph (i) of such definition.

3.3.5 Unclassified consultants

This research furthermore discovered that there are consultants in the security industry that are advising clients on the administration side of private security industry, from drafting duty rosters, posting sheets, attendance register and the payslips. A consultant based in Polokwane was found to be advising clients on the administration part of security. In terms of the definition of a security service as found in the current PSiR Act there is no obligation to register with the Authority as a security service provider for a consultant who is advising clients of administration part of security.

Giving advice on the administration of security is not regarded as a security service in terms of the Act. In the financial year 2017/2018, a total of 2350 improper code of conduct dockets against business security service providers were compiled by PSiRA against security service providers.⁷¹ This number of dockets opened indicates that there is a high level of non-compliance in the industry that might require consultants who can help the Authority as well as the service provider with regard to compliance issues and building a culture of compliance in the industry.

A security consultant from the province of Kwa-Zulu Natal was found to be advising consumers of security service providers on how to manage security contracts, help security officers to understand their duties, and train security supervisors and managers on how to effectively supervise and manage their sides. It was established that they registered with PSiRA although the nature of their

⁶⁷ Mundell(n 42 above).

⁶⁸ Ibid.

⁶⁹ PSiRA Annual Report, 2018/2019.

⁷⁰ Mundell (n 42 above).

⁷¹ PSiRA Annual report 2017/2018

consulting services cannot be regarded as a security service in terms of the Act.

The obligation to register with PSiRA as a security service provider is determined by section 20 of the PSiRA Act read with the definition of a security service as found in section 1 of the same Act.

3.4 Structure of SA security consultancy sector

Importantly, independent registered security consultants are rare. Contrary to the literature review findings that the growth of the consulting sector has paralleled that of the whole security industry, the research revealed that independent security consulting has been left behind by other sectors of the private security industry as far as growth is concerned.

The nature and structure of consultancy services in the private security industry of South Africa is that majority consumers, as much as they want security in many ways to protect themselves and their properties, do not want to pay independent consultants. This is because of the economic conditions in the country and budgetary constraints of clients or even because security is regarded by many as a grudge purchase.⁷²

Majority of sales consultants indicated that their business would have to be closed if they were to focus mainly on being security consultants; this is because clients do not want to pay someone who will come and do the assessment, get a cheque and go without being part of the solution. The market thus created more sales consultants than independent security consultants.

3.5 Banking on ethics and clients influence

The absence of regulations for security consultants means consumers have to rely solely on the ethics of security consultants who they appoint, often having to trust strangers. Participants of this study were asked if they have any ethical guidelines they abide by when they conduct their business and is there a way the clients influence the manner in which they conduct their business? Answers to these questions varied from one participant to another.

Majority of the participants indicated that they try their best to do what is right for their clients in order to protect the reputation of their businesses. One participant

indicated that they follow company ethos to never compromise the client because of money.⁷³ Ethics guide every aspect of the business because the name attached to the product has to be protected.⁷⁴ It was asserted that consultants must try to be as honest and transparent as possible and try to ensure that their recommendations are not influenced by financial gain for the company.⁷⁵

One participant indicated that they make clients sign conflict waiver forms if they have to serve more than what they were initially appointed to do.⁷⁶ The business had membership of the following organizations: Cape Chamber of Commerce, American Society for Industrial Security, Jewellery Council of SA, American Polygraph Association and SA Polygraph Association and that they will never put in jeopardy these organizations.⁷⁷

The study further revealed that some of the clients of security consultants will from time to time try to influence the manner in which consultants conduct their business or work. It is alleged that this type of behaviour is influenced by the client's intention to save costs or having some knowledge they received from a friend, family or internet.

3.6 Registration and Inspection of security consultants

The Authority is legislatively mandated to regulate the rendering of security consulting services as a sector within the private security industry. Security consulting is defined as the giving of advice on the protection and safeguarding of a person or property, on any other type of security service as found in the definition of a security services found in the Act, or on the use of security equipment.⁷⁸

The definition of what is a security equipment is also found in section 1 of the Act.

The Authority is currently using a recognition of prior learning (PSiRA 42A form) system to register security consultants and other specialized categories of security services providers and do not necessarily require security grades training to register. The requirements in terms of this procedure are as follows: -

- A completed and signed PSiRA 42 A form
- 3 submitted testimonial letters from the previous employer on the relevant letterheads
- A comprehensive curriculum vitae

⁷² Mundell (n 42 above).

⁷³ Interview with anonymous participants, 01 October 2019.

⁷⁴ Basheeruo Adams, 30 September 2019.

⁷⁵ Vic Von Abo, Ops manager at King Risk Management, 30 September 2019.

⁷⁶ Van Rooyen (n 41 above).

⁷⁷ Ibid.

⁷⁸ Section 1 of the Private Security Industry Regulation Act 56 of 2001.

- copies of the relevant certificates as per the category applying for
- copy of the identity document

Receipt of the application fee and over and above that the applicant must motivate and demonstrate competence as per the category they applying for and submit relevant proof of subjects completed for that specific category.

The training committee will thereafter assess and decide whether to approve or decline recognition of training.⁷⁹ The approval of registration of security consultants is the prerogative of the registration committee. A warning was issued against discretionary powers of the registration sub-committee because it was alleged that it opens up PSiRA's decisions for review.⁸⁰

The Authority is using inspections amongst other regulatory mechanisms to regulate and ensure compliance with PSiR Act. The Authority is using a dedicated inspection report pro-former to inspect security consultants. A participant who has since withdrawn their registration from the Authority stated that with no regulations in place the relationship between consultants and PSiRA is a one-way money stream benefiting the latter criticized the current situation of lack of regulation.⁸¹

Majority of the research participants in this study indicated that they have been visited by PSiRA inspectors before for purposes of inspection although the general view is that PSiRA inspectors do not understand what the security consulting is all about. It was pointed out during the infrastructure inspection, PSiRA inspectors look for the same requirements from consultants with the ones required from guarding companies. A form named PSiRA 32 informs this process, which is a standard form for infrastructure inspections. An independent security consultant from Kwa-Zulu Natal indicated that infrastructure requirements for consultants should be different from ordinary guarding companies and other categories of service providers that require a fixed infrastructure to operate.⁸² It was further reiterated by another participant that consultants do not necessarily need an office because they are almost at all times at their client's sites.⁸³ It is important to highlight that security consultants from time to time are required to write reports of their work of which they need to have infrastructure to do that and a conducive environment to do that is very important. The Authority also need to know where to find a registered security service provider for purposes of conducting inspections and serving of legal documents.

3.7 Training challenges in relation to security consultants

Majority of security consultants who participated in this study were found to have served as police officers in the South African Police Service (SAPS) or the old South African Police (SAP), military officers in the South African National Defence Force (SANDF) or Correctional Officers in the Department of Correctional Services (DCS) before becoming security consultants. Very few participants rose through the ranks in the private security industry to become consultants and only one consultant is from the legal fraternity (among those who participated).

None of the participants in this study were found to have studied for a formal qualification, be it a Diploma or a Degree from a college or university in confirmation of the literature review findings that there is no formal qualification designed for security consultants. Over and above the training obtained from various state law enforcement agencies and the private security industry, some of the participants were found to have attained related qualifications such as policing, criminology and forensic investigation from various institutions of higher learning. The most closely related course is a Diploma in Security Management, which is offered by some institutions of higher learning in South Africa, even though it is not as yet established how this qualification will provide a consultant a competitive edge over others and capacitate them as consultants.

As mentioned earlier in this report, PSiRA mostly uses the system of recognition prior learning to register security consultants. An applicant has to submit their proof of training and previous experience in a related field in order for the training sub-committee to consider their application. Only when the training sub-committee is satisfied with authenticity of supporting documents and qualifications are recognized that such applicant can be registered as a security consultant. Majority of the research participants highlighted the importance of PSiRA developing a course for security consultants although experience was highlighted as a very critical element of a good consultant. There was general consensus that the current security grades are not adequate nor relevant for one to practice as a security consultant. Criticism was made by a KZN based training consultant who said PSiRA grades training did not have an impact and was not fit for this purpose.⁸⁴

⁷⁹ Pinkie Sedise, PSiRA Training Consultant, conducted on 02 September 2019.

⁸⁰ Basheerud-Deen Adams, conducted on 30 September 2019.

⁸¹ Interview with anonymous participant, conducted on 03 October 2019.

⁸² Carey (n 44 above).

⁸³ Kramer (n 49 above).

A consultant from Western Cape indicated that it is imperative for PSiRA to ensure that consultants are adequately trained on any area of security they are advising clients on,⁸⁵ based on the premise that clients must get quality service from security consultants rather than being ill advised.

It was further suggested that training of consultants must be divided into grades according to areas of specialization. It was argued that there is a need to develop a module or course for risk assessment, this is a narrow approach considering the fact that security consulting is way more than just risk assessment because it includes aspects such as report writing and presentation. Another consultant indicated that there must be formal training for security consultants although not certain how this should be done.⁸⁸ A suggestion was also made for PSiRA to commission experts to develop a course for security consultants, as it is an absolute necessity to professionalize the sector.⁸⁹ Different suggestions were made with regard to the duration of a course on security consulting ranging from one week to six months. One consultant mentioned that it is difficult to put a time frame on the training of a risk assessor and that the training must outline what is risk assessment and it must be at basic level.⁹⁰ The difficulty of determining the duration of the course was further echoed by two other participants, who indicated that the course content should determine the duration of the training.⁹¹ This seemed to be a more realistic and practical suggestion. Another opinion relating to training and duration was that PSiRA needs to develop a course for consultants and that the duration should not exceed six months.⁹² Furthermore, it was suggested that one needs to have 5 years minimum experience in order to enrol for security consultancy training.⁹³

Almost all participants in this study agree that for any consultant to be successful, they must have experience as an investigator, in either crime scene management, security management or corporate investigation. A recommendation was made that for one to be registered as a security consultant they must have at least a minimum of 10 years' experience in the industry, which includes being a supervisor or 7 years managerial experience in addition to formal training.⁹⁴ A different perspective was

held by another consultant who indicated that in as much as experience is very important in the consulting space, a young person who is smart enough to learn quicker the dynamics of consulting must be given a chance to prove themselves and be given an experienced mentor for a period of 5 years.⁹⁵ Included in this category are graduates and diplomates of security risk management qualification. All the suggestions and opinions made by participants relating to training and registration of consultants leads to the conclusion that security consulting is experience based profession, which can only be strengthened further by formal training.

3.8 The future of security consultants in South Africa

The future of any industry or sector is determined by the demand and supply factor. If the supply exceeds the demand the eventuality is that the product will lose value and the industry will suffer, the same will apply if the product is not required any longer. The market has to be balanced for any product to continue to sell. Majority of consultants that participated in this study projected a bright future for security consultancy. The positive prediction was mostly based on the crime levels in South Africa. A training consultant indicated that as crime worsens, the need would increase for consultancy services.⁹⁶ Another consultant indicated, "With the crime rate going up, security consulting will continue to grow."⁹⁷ Consulting can only grow because companies continue to look for external services for solutions because of lack of trust in SAPS.⁹⁸ There is a definite need for it and it can only grow unless something drastic happens with crime in SA.⁹⁹

Another participant indicated that security consultancy will continue to be a necessity, particularly in the corporate world of South Africa because the SAPS cannot provide solutions for crimes experienced by the corporate world, and the service might be a once off or a retainer service.¹⁰⁰

84, 86, 93 Ibid.

85 Walters (n 47 above).

87 Carey (n 44 above).

88 Interview with anonymous participant on 09 May 2019.

89 Interview with anonymous participant, conducted on 28 May 2019.

90 Carey (n 44 above).

91 Interview with anonymous participants, conducted on 28 May 2019 and 10 June 2019.

92 Interview with anonymous participant, conducted on 11 June 2019.

94 Interview with anonymous participant, conducted on 09 June 2019.

95 Andre Duvenage, Director at Secure Logistics, 11 June 2019.

96 Kramer (n 49 above).

97 Interview with anonymous participant, conducted on the 27 May 2019.

98 Themba Ntobela, consultant at the iFirm, 26 September 2019.

99 Von Abo (n 79 above).

100 Carey (n 44 above).

3.9 Challenges in security consulting sector

Even though the future of security consulting services is predicted in a very positive way, challenges are inevitable like in any form of business. Security consultants highlighted different types of challenges that they face from time to time as they go about doing their business. The study revealed that one of the challenges in the sector is competition because every police officer who leaves the service moves into security and some undercut the prices.¹⁰¹ Three participants indicated the challenges that are being brought about by security companies is that they are dishonest with consultants when they want information and that it is always difficult to obtain information from them. It was further alleged that security companies hate security consultants.¹⁰² Kenny Naidoo of EThekweni Security consulting furthermore alleged that clients are part of the bigger problems because they are always looking to cut the costs and by so doing, they compromise security.¹⁰³

Client related problems were further highlighted by another consultant who indicated that clients sometimes try to influence the manner in which the work is done because they visited internet search engines for solutions.¹⁰⁴ It was further alleged that the biggest challenge is that nobody needs security consultants until they are attacked and their vulnerability is exposed.¹⁰⁵ Similar sentiments were echoed by another consultant who indicated that sometimes it is difficult to get recommendations approved by stakeholders because normally people listens better after incidents¹⁰⁶. The above two statements were corroborated by yet another consultant who alleged that due to tough economic times, people use consultants when they are at rock bottom.¹⁰⁷ This is more prevalent in businesses where managers or directors are looking for ways to cut costs on security.

The issue of sales consultants visiting sites was pointed out as one of the challenges for independent security consultants as is alleged that they steal work from independent consultants.¹⁰⁸ Security sales consultants have a competitive edge over independent security consultants because their risk assessment are mostly free with the client paying for the services and products they sell as part of their core business. The study established that payment of security is a grudge payment in that

majority of consumers do not want to pay for it, but are just compelled by circumstances. Contrary to comments made by others relating to challenges, a consultant indicated there are no much challenges except that they have to roll-up the skill due to trends changing in the industry.¹⁰⁹ Another consultant indicated that operationally there are not many challenges because technology makes information readily available.¹¹⁰

3.10 Transformation

The study amongst others revealed that the industry is largely untransformed. Majority of the research participants were white males, followed by coloured and Indian males. Attempts were made to find security consultants from previously disadvantaged groups and such attempts were unsuccessful.

Whilst it is acknowledged that experience plays a major role in becoming security consultants, lack of transformation in the sector cannot be justified. It was alleged that a client indicated that they do not want a black person in their premises and therefore denied a black African consultant who was appointed by a certain business as security consultant access into the premises.¹¹¹ This incident is great example of racism issues entrenched in our societies. The lack of transformation is only a reflection of the realities of transformation and economic exclusion of some members of society.

The private security industry is not an island but rather and industry which is operating in a country with socio-political setting influenced by variety of things. That being said, the level of racism witnessed by a black security consultant is not an isolated incident in SA, therefore, there is a need a for a collaborated effort from all South Africans and across all the sectors of society to fight racism and inequality in all sectors of the economy.

3.11 Security consulting - what goes into the process?

The information collected from participants of this study in relation to what consultants do corroborate the literature review findings in that consultants in South Africa do gather information relating to the client's security arrangements, analyse the vulnerabilities,

101 Interview with anonymous participant, conducted on 27 May 2019.

102 Mundell (n 42 above), Carey (n 44 above) and Kenny Naidoo.

103 Kenny Naidoo, Director at Durban Security consulting, 28 May 2019.

104 Interview with anonymous participant, conducted on 09 June 2019.

105 (n 42 above).

106 Duvenage (n 99 above).

107 Kramer (n 49 above).

108 Lawler (n 50 above).

109 Interview with anonymous participant, conducted on 27 May 2019.

110 Interview with anonymous participant, conducted on 27 June 2019.

111 Interview with anonymous participants, conducted on 01 October 2019.

prepare a report outlining the findings, and list recommendations to improve vulnerabilities even if at times it means selling their own products. Although security-consulting can be summed up as giving advice on the protection or safeguarding of a person or property, on any other type of security service as defined in the Act, or on the use of security equipment, security consultants have different ways of conducting their business as part and parcel of security consulting. The methods to be used are determined by various factors, which amongst others includes the level of training and area of specialization of the consultant.

It is worth noting that dynamics of security consultancy are different from one area to another and from one company to another. Even though there is no standard way of rendering consultancy services, the following are three main common stages that are followed during the consulting process save for deviations informed by certain circumstances.

3.11.1 The Briefing Session

The process of security consulting under normal circumstances starts with the briefing session by a client with the consultant. At this stage of the process the client informs a consultant about their challenges and needs and what informs those needs. This is the initial stage of the consulting process. This stage is regarded as the most important stage of the consulting process as it will determine and inform the approach to be used during assessment or investigation. It was indicated that understanding the client's business is the first step of investigation, in particular what the client wants to achieve and what the client is worried about. The rationale behind this is that a consultant will not be able to adequately advise the client if they do not understand the nature of their business. It was further reiterated that a consultant who is adequately informed about the nature of the client's business would be able to assist the client satisfactorily.¹¹³ Sometimes this process ends with the signing of a contract or mandate by the parties involved.

3.11.2 Risk assessment or investigation

Risk assessment or investigation is the nucleus of the consulting process because that is where the findings are made and it informs the measures to be put in place. Depending on the briefing session that the consultant had with the client, the consultant will conduct either a risk assessment or investigation or take any appropriate

measure that will inform the advise to the client on any security service defined in the Act. The study established that most consultants have a common approach in conducting the assessment or investigation. One participant stated that as part of the service level agreement, they conduct the risk assessment on the existing client premises once upon every six months.¹¹⁴ This approach of free assessment was criticised by the independent consultants on the allegation that it is a sales pitch more than anything else.¹¹⁵ It was also alleged that a free assessment is not thorough¹¹⁶ and in most cases the report of such assessment is not detailed and does not exceed 10 pages, if at all written.

Risk assessment was defined as a systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking.¹¹⁷ It was further defined as an in-depth investigation into the current security status of the client.¹¹⁸ Risk assessment entails establishing the intangible elements such as patterns, habits, routines and the like that can create the opportunity for crime.¹¹⁹ The assessor must look at the client's property in conjunction with what is around it; open fields, highways, informal settlements, other residential premises and freestanding properties.¹²⁰

Similar approach was shared by a certain participant who asserted that a security risk assessment starts in the neighbourhood as this is where crime comes from and disappear into.¹²¹ Moreover, the property line, from both inside and outside, is thoroughly assessed at different times of the day and night as opportunities vary at different times.¹²² The reason these are considered a threat is that they provide either direct or indirect access to the property borders.

To determine the risk, it is important to consider crime statistics in the area and criminal tendencies for the immediate area in which the client's property is based.¹²³ In order to do this the assessor must triangulate the client's property in conjunction with the three nearest police stations.¹²⁴ Considering these statistics, one can make a logical assumption that the crimes affecting one's neighbours, by implication also affects the client.¹²⁵

The following factors should be considered during security risk assessment: - identify the hazard; evaluate the likelihood of an injury or illness occurring, and its severity; consider normal operational situations as well as non-standard events such as shutdowns, power outages and existing control strategies.¹²⁶

¹¹² Carey (n 44 above).

¹¹³, ¹¹⁶, ¹¹⁹, ¹²², ¹²³, ¹²⁴, ¹²⁵ Ibid.

¹¹⁴ Interview with anonymous participant, conducted on 11 June 2019.

¹¹⁵ Mundell (n 42 above).

¹¹⁷ Van Rooyen (n 41 above).

¹¹⁸ Mundell (n 42 above).

¹²⁰ Lawler (n 50 above).

¹²¹ Mundell (n 42 above).

The process of assessment involves; consulting with the client and staff as well as the areas they represent.¹²⁷ Examining the experience of the workplace or other similar workplaces including a review of incident data and other information such as prosecution decisions, reviewing relevant guidance material, industry codes of practice, South African Standards and the company policies and guidelines and reviewing information relating to incidents.¹²⁸ The above mentioned process was confirmed by other consultants who asserted that each and every part of the entire security aspect is taken into account: gates, access control, building doors and windows, management of security, communication, reporting line, security knowledge and awareness, general attitude towards security, habits, guarding, security company standard operating procedures, PSiRA registration and meetings with all stakeholders.¹²⁹

Some consultants use the possibility and likelihood method to analyse the risk in a particular area. The possibility and likelihood method or Risk Matrix, which is used by other consultants was criticised by Mr Andre Mundell who indicated that it was not designed for South African circumstances because there is no likelihood in SA.¹³⁰ A risk is an opportunity and the opportunity makes a thief. Many people committed crime purely because the opportunity presented itself.¹³¹ Ability, opportunity and intent/desire (AOI) factors are the drivers of crime in SA.¹³² If all three factors are present at the same time, crime is inevitable.

The ability talks to the potential of a person to commit a crime, before a person can commit a particular crime they must have the ability to do that. Opportunity is mostly created by absence of capable guarding or security layers to prevent crime from happening. Andy Lawler of Sentinel best described the system of security layers by comparing security layers with an onion, stating that an independent assessor will look at client's premises like an onion, with various layers starting with the community around you and ending with the core of the client's home or business. Sometimes there are situations where the person has the ability and the opportunity to commit a crime but there are no intentions to commit the crime and therefore crime will not be committed. The list of reason that can prevent these factors to be existing at the same time is exhaustive ranging from disabled person, childhood, presence of walls, dogs, alarms, CCTV to lack of criminal intentions etc.

Figure 1.



Contrary to the common practice, one of the consultants stated that the risk assessment and investigation is always informed by the information provided by the client during consultation or initiation process.¹³⁴

3.11.3 Presentation of the findings

The standard way of presenting the findings is in the form of a written report submitted to the client and in most cases, followed by the presentation of such findings. This is particularly used by independent security consultants. The study further found that a majority of product-affiliated consultants or sales consultants do write assessment reports and if they do, it is a very brief report, which is aimed at persuading the client to purchasing the services of such consultant. There is no scientific method for writing this report although the majority of consultants that took part in this study were found to have a lot of similarities with regard to how they write their reports, although there were variables with regard to the quality thereof. Most of the research participants stressed the importance of report writing and presentation skills as an absolute necessity.

It was indicated that report-writing skill is a very critical aspect of any security consultant because the report is the most common method of communicating your findings and recommendations to the client.¹³⁵ Furthermore, it was recommended that report writing and presentation skills should form part of the curriculum for consultants training because consultants will never survive in the

¹²⁶ Ibid.

¹²⁷ Van Rooyen (n 41 above).

¹²⁸ Ibid.

¹²⁹ See e.g. Mundell (n 42 above).

¹³⁰ Ibid, 10 May 2019.

¹³¹ Ibid, 10 May 2019.

¹³² Ibid.

¹³³ Lawler (n 50 above).

¹³⁴ Carey (n 44 above).

industry without such skills.¹³⁶ One consultant suggested that one should have minimum presentation skills even before they can be registered as a consultant.¹³⁷ Report writing and presentation skills are very important due to the fact that they tell a story to a person who was not part of the analysing process.¹³⁸ Risk assessment report has to be clear and concise with no legal or technical jargon in order to get the message across.¹³⁹

Security consultants present their findings to individuals and committees that are at times comprised of people who are knowledgeable on the subject matter or security environment. It is therefore necessary for any security consultant drafting or presenting a report to have their facts straight and have deep industry knowledge.¹⁴⁰ Great industry knowledge can be built by experience and research; therefore, research skills are very critical.¹⁴¹ In most cases, audience and clients will judge consultants based on their report because the report has to “talk to the client” and educate them.¹⁴² Developing and understanding your methodology for assessment is as much critical because it builds credibility around the consultant’s work and put the client at ease.¹⁴³ Great findings and recommendations of a very skilled security consultant makes the entire consulting process a futile exercise if the report is badly written and not well presented to be understood by the client.

3.12 What could be deemed a bad consulting service?

Although the security risk assessment presented above seems to be an ideal process with the potential to benefit the consumers of consultancy services, there are certain things that some consultants do which is regarded as bad consulting services by fellow consultants. A bad consulting service is when a consultants visit the client’s premises for an hour and does not cover all the basics and think that they have assessed your place.¹⁴⁴ This kind of tendencies are potential threats to the reputation of the security industry, which is already tainted.¹⁴⁵

Being untruthful to the client in order to get quick cash was also pointed out as bad service by any standards.¹⁴⁶ The issue of consultants who are aiming to sell at all possible costs without looking at the interests of the client was also pointed out. After all, consulting service is a very subjective process to an extent and what can be deemed

to be a bad service to one person may, not necessary be bad to the next. At times it goes with the customer’s expectations.

3.13 Standardization of consulting services

The broad nature of consultancy services makes it difficult for the Authority to effectively regulate the rendering of consultancy services. A few security consultants, consult on various aspects of security, ranging from the protection or safeguarding of a person or property, to managing, controlling or supervising the rendering of any services as found in the definition of security service in the Act and the use of security equipment. Therefore, the services of security consultants in the South African private security industry are not standardised in any manner.

Consumers appoint consultants voluntarily as there is no legal obligation for any person, be it either natural or juristic, to appoint a security consultant for any purpose. A participant argued that South Africa should follow the examples of the United States of America and United Kingdom where it is compulsory for consumers to have a risk assessment report before appointing, changing security or fitting security equipment.¹⁴⁷ It was further indicated that good security equipment could be installed but if the application is bad, it serves no purpose¹⁴⁸ and the only way to resolve this challenge is to have standardized consulting services and this can only be done through regulations. Amongst other recommendations made was a suggestion that consultancy services must be regulated at a basic level.¹⁴⁹ This regulation could only happen when the services of security consultants are categorized and each category is having a set of rules and regulations to be followed when rendering services to the clients. This would have the effect of allowing consultants to be innovative and develop systems that would enhance their competitive edge and in the end, benefiting consumers.

135 Ibid.

136 Interview with anonymous participant, conducted on 10 June 2019.

137 Duvenage (n 99 above).

138 Ntobela (n 102 above).

139 Von Abo (n 79 above).

140 Lawler (n 50 above).

141, 142, 143, 144, 145 Ibid.

146 Interview with anonymous participant, conducted on 30 September 2019.

147 Mundell (n 42 above).

148 Ibid, 10 May 2019.

149 Interview with anonymous participant, conducted on 09 May 2019.

3.14 Risks factors associated with ineffective or lack of regulations

Any form of business which is not regulated because there are no regulations or whose regulations are ineffective, stand a great chance of compromising clients. People and businesses have shown since time in memorial that they cannot self-regulate. Consumers of consultancy services may implement incorrect security measures based on the wrong advice they got from unregulated consultants. The cost of incorrect security measure far outweighs the monetary value.¹⁵⁰ Furthermore, it was indicated that a security system that does not cover yours risks gives a false sense of security and people become relaxed, lax and less vigilant therefore making them perfect targets for the opportunistic and conniving criminals.¹⁵¹ It was further indicated that if the Authority is not regulating the sub-sector, clients are at a risk of getting taken advantage of.¹⁵² Another participant who stated that lack of effective regulations would attract consultants with very little or no knowledge of security and that would lead to consumers suffering.¹⁵³

It was opined that private security industry has a bad reputation already and that there is a need for it to be regulated to salvage the little of what is remaining of the industry is reputation and continue to build a good reputation.¹⁵⁴ It was further pointed out that an average consumer does not know that it is their responsibility to ensure that they appoint registered service providers and that there is not enough awareness from PSiRA to the end-user about the risk of using unregistered service providers.¹⁵⁵ In support of the above statement, another participant recommended that only competent, professional and qualified persons must be registered as security-consultants.¹⁵⁶

The study established that there are certain industries and companies that are having security consultants that are conducting risk assessments for such companies and it is alleged that they are not registered with PSiRA. It was alleged that the Consumer Council of South Africa is using risk assessors that are not registered¹⁵⁷ and it further alleged that the majority of risk assessors used by insurance companies are not registered with PSiRA as required by section 20 of the PSiR Act.¹⁵⁸ Therefore,

the importance of regulating the security-consulting sub-sector cannot be over emphasised. In terms section 3(o) of the PSiR Act the Authority has a legislative mandate to protect the interests of users of security services through regulation and other mechanisms.¹⁵⁹ The lack of effective regulation on the services rendered by security consultants leaves the consumers with a dilemma of not knowing whether they have been properly advised or ill-advised by the so called security experts, hence they are saying “in the land of the blind, the one eyed man is the king”.

Majority of participants indicated that further delays in relation to the introduction of regulations will lead to more rogue security consultants coming into the sector. Mr Themba Nthobela of The iFirm opined that the risk will always be attached to the client as the consultants will promise them what they do not offer or lie to them about the products they sell.¹⁶⁰ Clients will not have guarantee of training and abilities of the consultants if they continue to work without regulations.¹⁶¹

3.15 What to look for before appointing a consultant

To eliminate the risk of appointing a rogue security consultant, some participants provided suggestions on what to look for before appointing a security consultant to render services. Section 38(1) of the PSiR Act states that any person who knowingly or without the exercise of reasonable care contracts for the rendering of security services contrary to a provision of this Act or the Levies Act, is guilty of an offence upon which on a first conviction is liable to a fine or imprisonment for a period not exceeding 24 months, or to both a fine and such imprisonment.¹⁶²

Consumers must be educated in many platforms about the importance of using registered security service providers and being in contravention of section 38. PSiRA Annual Reports for 2016/2017 and 2017/2018 indicates a high level of non-compliance with regard to the employment or contracting of unregistered security service providers with a total of 231 and 375 arrests respectively. All the arrests were solely for contravention of section 20(1)(a) and such security services providers were contracted by

¹⁵⁰ Mundell (n 42 above).

¹⁵¹ Ibid.

¹⁵² Kramer (n 49 above).

¹⁵³ Interview with anonymous security consultant, conducted on 27 May 2019.

¹⁵⁴ Carey (n 44 above).

¹⁵⁵ Ibid.

¹⁵⁶ Interview with anonymous participant, conducted on 09 June 2019.

¹⁵⁷ Interview with anonymous participant, conducted on 11 June 2019.

¹⁵⁸ Interview with anonymous participant, conducted on 09 June 2019.

¹⁵⁹ PSiR Act.

¹⁶⁰ Nthobela (n 102 above).

¹⁶¹ Interview with anonymous participant, conducted on 30 September 2019.

¹⁶² Section 38(1)(g) of the PSiR Act.

the South African based clients. This statistics confirms the prior allegation made by a participant that an average South African consumer does not know what to look for when contracting with a security service providers, which include the security consultants. There were several suggestions made in an effort to assist consumers on what to look for when appointing a security consultant. References, experience of the consultant and the background of the business should serve as guidelines for appointing a consultant.¹⁶³ Before appointment, consumers must ask the bidding consultants to write brief expression of interest to indicate what areas of consulting are they specializing in; this must then serve as a guideline on who to appoint. Other competences such as ability to conduct research and write and how do the consultant apply themselves to the job can serve as additional factors to be considered.¹⁶⁴ The registration status as well as experience should be looked at before the appointment.¹⁶⁵ References through word of mouth of mouth, reliability as well as sustainability of both consultant and the product were also highlighted as factors that should inform the decision to appoint a consultant.¹⁶⁶

Experience was once again mentioned together with the background of the consultant, knowledge of the product and well as empathy were highlighted as some of the important factors. A general understanding of the area and situation were mentioned.¹⁶⁷ Overall it important for any consumer of consultancy service to conduct the background check on the consultant and their business to test the credibility and establish the experience of such consultant as security consulting has proved to be experience oriented sector.

3.16 What to regulate?

Regulations are necessary for the purposes of exercising effective control over the rendering of consultancy services. Majority of participants agreed that there is a need for the Authority to develop regulation that will regulate the rendering of security consultancy services from training, registration and practice. As much as there is consensus with regard to development and implementation of regulations on the rendering of consultancy services, warnings were issued for the Authority not over regulate businesses away. Certain aspects of the sector were identified for the purposes of regulation. It suggested that regulations must ensure

that consultants are knowledgeable about the sector or product and are credible with no previous offences.¹⁶⁸ The regulations must further insure that where installations need to be made or where services need to be rendered, the assessor and installer are two different service providers¹⁶⁹ unless the disclaimer form is signed by the client to reduce and cover conflict of interests on the site of service provider.

The consultants must be compelled in terms of the regulations to advise their clients on the advantages and disadvantages of any product or service that they are selling in order for the client to make an informed decision.¹⁷⁰ This information should be communicated in the risk assessment report produced for the client. It was further suggested that every consulting contract must have an annexure of confidentiality and disclaimer to protect the client.¹⁷¹ It was further advised that the Authority must ensure that any provision of regulations aimed at regulating the security consultancy sector is as practical and implementable as possible. Similar sentiments were echoed by a participant consultant who stated that regulations need not be too stringent to an extent that they kill the sector. Registration requirements for consultants might be difficult to regulate since there is no formal training for consultants.¹⁷³ It was further suggested that time-frames for consultation must be regulated in particular if clients are charged based on time spent on the work.¹⁷⁴

A need for effective and pragmatic regulations for security consultants cannot be overemphasised. Based on the research finding, the report recommends the following:-

¹⁶³ Ntobela (n 102 above).

¹⁶⁴ Interview with Basheerud-Deen Adams 30 September 2019.

¹⁶⁵ Interview with anonymous participants, conducted on 01 October 2019.

¹⁶⁶ Interview with anonymous participants, conducted on 01 October 2019.

¹⁶⁷ Eugene Pike, 02 October 2019.

¹⁶⁸ Ibid.

¹⁶⁹ Lawler (n 50 above).

¹⁷⁰ Ibid.

¹⁷¹ Basheerud-Deen Adams, 30 September 2019

¹⁷² Interview with anonymous participants, conducted on 01 October 2019.

¹⁷³ Interview with anonymous participant, conducted on 30 September 2019.

¹⁷⁴ Ibid.



4. RECOMMENDATIONS

4.1 Categorization of consultants

The study has established amongst others that there are different types of security consultants separated by the type of work that they do in the industry, it is therefore important that the Authority categorized security consultants for administration and regulatory purposes. The registration and regulations of sales consultants or product-affiliated consultants must not be similar to those of independent security consultants.

The registration certificate and a certificate of identification issued to the security officer must reflect the type of consulting services they are rendering e.g. security sales consultant or security consultant. This assist any consumer of is appointing a consultant to know and understand the type of a consultant they are appointing.

4.2 Effective regulation of consultants

PSiRA must exercise effective control over the rendering of consultancy services with the aim of protecting the interests of the users of consultancy services. The Authority has to ensure that all security consultants rendering services within the Republic are registered with PSiRA and are adequately trained and skilled to assess and advise clients on their area of specialization.

4.3 Recognition of Certain Qualifications

The training sub-committee of PSiRA must identify course and qualifications that are relevant to the security consulting sector for purposes of registering applicants who have completed such courses or qualifications. This will have the effect of addressing not only the training challenges in so far as security consulting is concern but to address transformation within the sector.

4.4 Renaming of consulting engineers on PSiRA database

For the purposes of ensuring credible and reliable data, the Authority must rename consulting engineers on its database to be security consulting engineers. In doing so the Authority will ensure that the current 18 registered consulting engineers are allocated the correct sectors within PSiRA database depending on the type of services they are rendering.

5. CONCLUSION

Security consultants continue to play a pivotal role in securing persons and property the world over. South Africa has a total of 1897 security service providers registered with PSiRA, although this number does not reflect the reality on security consultants carrying the trade. They advise clients on various security matters ranging from ordinary guarding to the use of security equipment. The growth of security consulting as a sector in South Africa was found to be lagging behind as compared with that of other sectors of the private security industry such as guarding and installation of security equipment, hence majority of security consultants in South Africa are consulting informally and as such they become sales consultants.

Although there is no formal definition of who a security consultant is, the definition of security consulting as found in the Act is used to identify security consultants. The research revealed that there are at least five categories of security consultants, namely: Independent consultants, sales consultants, consulting engineers, in-house consultants and unclassified security consultants. The study found there are few security

consultants rendering security services as such in SA and majority of the few that are available are sales or product-affiliated consultants. The issue of sales consultants is a major cause for concern since their objectivity has been questioned and will always be questioned.

Currently the Authority does not have regulations to guide the functioning of security consultants, which leaves the consumers with a dilemma of not knowing whether they have been advised or ill advised. There is no training dedicated for security consultants, therefore majority of consultants use the experience they accumulated from other sectors to serve their clients. The study further revealed that the sector is largely untransformed although participants predicted that the consulting sector can only grow even if they acknowledged some of the challenges in the sector. Majority if not all security consultants are advising clients on their personal safety or safety of their properties by conducting security risk assessments.





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Business



PSiRA
Private Security Industry Regulatory Authority

Head Office

420 Witch-Hazel Avenue | Eco Glades 2 Office Park
Highveld Ext 70 | Centurion 0158

Tel: 086 10 PSiRA (77472) | **Helpdesk:** 086 133 3850

Email: info@psira.co.za

www.psira.co.za

082 803 4329 | Private Security Industry Regulatory Authority
@Psirlive

APP: available on:  