



PSIRA
Private Security Industry Regulatory Authority

**SECURING
THE THEATRE
FOR CHAMPIONS:**

**Special Events Sector
of the Private Security
Industry in South Africa**

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CONTENTS

Executive Summary	2
Acronyms	3
1. INTRODUCTION	4
2. METHODOLOGY	5
3. SPECIAL EVENTS SECTOR LEGISLATION	6
4. MORE STRINGENT CRITERIA AT CITY JOC	8
5. RESEARCH FINDINGS	9
5.1 Background: SASREA vs PSiRA	9
5.2 Enforcing PSiRA's mandate	10
5.3 Security at Special Events: Municipal JOC Criteria for Approval	10
5.4 SASREA's Shortcomings	11
5.5 Role Played by SAPS	12
5.6 Special Event Service Providers: Role of Public Relations	13
5.7 Access Control and More Vigilant Monitoring	13
5.8 Training for Special Events Security	15
5.9 Fit for Purpose Training	17
5.10 Liability: Who takes the Blame?	17
5.11 Successes in the Special Events Security Sector	18
5.12 Weaknesses in the Special Events Security Sector	18
5.12.1 Training	18
5.12.2 Lack of Compliance in the Appointment Process	19
5.12.3 Implementing PSiRA Regulations to the Environment	19
5.12.4 Verifying Identity	20
6 RECOMMENDATIONS	21
6.1 Aligning SASREA and PSiRA	21
6.2 Criteria for Letter of Good Standing	21
6.3 Adapting Regulations	21
6.4 Fit for Purpose Training	21
6.5 Eliminating Fraud in the Appointment Process	21
6.6 Implement Self-Inspections	22
6.7 PSiRA Re-Certification Process	22
6.8 Improved Service Delivery	22
6.9 PSiRA Re-Registration	22
6.10 Special Events Accreditation System	22
6.11 Greater Vigilance to Pre-Empt a Terrorist Attack	23
7. CONCLUSIONS	24
References	25

EXECUTIVE SUMMARY

The primary objectives of the Private Security Industry Regulatory Authority (PSiRA) 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 national interest and in the interest of the private security industry itself.¹ The Safety at Sports and Recreational Events Act, No. 2 of 2010 (SASREA) sets out to ensure the safety of people attending events, as well as their property. The enactment of SASREA is largely in response to incidents that have taken place in which spectators were injured or killed. Important to note is that the SASREA does not work in isolation and local authorities play a pivotal role in this process.

Special events security also has a public relations component and the success of special events has a lot to do with being conscious of the client's needs. Special events security differs drastically from usual security guarding and entails not only the protection of property but also the protection of delegates and guests. Hence, there is a bigger emphasis on the customer and being able to handle vital risks. This requires higher quality standards and a special events security officer needs to be able to think on their feet.

PSiRA was not viewed as an important stakeholder when SASREA was being promulgated in parliament, and was barely consulted during the drafting process. This arguably created a lapse in awareness of and compliance with

PSiRA regulatory principles. Notwithstanding this lacuna, the PSiRA legislation continues to be relevant for this aspect of security provision and its enforcement is applied without exception. This is despite a distinct emphasis of the importance of private security actors and their regulation within the SASREA regulations. Some provisions in the SASREA regulations are not comprehensively enforced.

The lack of physical training for special events security is highlighted as a major shortcoming, as visiting a classroom would not enable a special events security officer to know how to deal with large crowds. Internal measures that must take root within the Authority are linked to the curbing of identity fraud and enhancing coordination with all relevant stakeholders related to the special events sector.

For the most part, the South African special events sector of the private security industry can be described as being professional. The sector is one that employs thorough planning prior to events; this has led to clear and distinct communication routes. The hosting of major international and domestic sports and recreational events around the country without any major security lapses demonstrates the measures in place to integrate checks and balances for special events. However, room for improvement still exists, particularly as far as the involvement of the private security industry and its regulation is concerned.

¹ Section 3 of the Private Security Regulation Act No 56 of 2001.

ACRONYMS



ESSPC Event Safety and Security Planning Committee

FIFA Fédération Internationale de Football Association

JOC Joint Operations Committee

JDA Johannesburg Development Agency

JMPD Johannesburg Metro Police Department

JRA Johannesburg Roads Agency

LOC Local Organising Committee

PSC Private Security Company

PSiRA Private Security Industry Regulatory Authority

PSL Premier Soccer League

SANS South African National Standards

SAPS South African Police Service

SASSETA Safety and Security Sector Education and Training Authority

SOB Security Officers Board

VIP Very Important Person

VVIP Very Very Important Person

VOC Venue Operating Centre

1. INTRODUCTION

The primary objectives of the Private Security Industry Regulatory Authority (PSiRA) 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 national interest and the interest of the private security industry itself.² In order to achieve these objectives, the Authority has a mandate to promote an industry characterised by professionalism, transparency, accountability, equity and accessibility.³

The Private Security Industry Regulatory Act No. 56 of 2001 (Principal Act) defines a security service to mean, among other things, as providing a service aimed at ensuring order and safety on the premises used for sporting, recreational, entertainment or similar purposes. Special event security is the specialized field of security provision that forms the focus of this report. The objective is to understand the intricacies of providing security at special events as far as the South African private security industry is concerned. The most successful example of a special event hosted in South Africa is the 2010 Fédération Internationale de Football Association

(FIFA) World Cup. The execution of this event demonstrated effective coordination by private security personnel involved in providing security during the national event.

This research report will uncover the undercurrent that informs various factors associated with the special events sector of the private security industry. This will include examining how this sector is managed, to what extent persons responsible for training prospective service providers adhere to laws relating to such training, and how this sector complements and works together with the South African Police Service (SAPS) and other relevant stakeholders. Further, it undertakes an examination of the role that the SAPS plays in steering the coordination of special events held in the country. The findings are intended to support the unlearning of assumptions and the development of a substantial understanding of how this sector contributes to safety and security during the staging of special events. Ultimately, the research findings are also intended to enhance PSiRA's regulatory approach to this sector of the private security industry.

2 Section 3 of the Private Security Regulation Act No. 56 of 2001.

3 Section 3(c) of the Private Security Regulation Act No. 56 of 2001.



2. METHODOLOGY

The hypothesis for this research is as follows: special events require specialised security provision; PSiRA plays a critical role in ensuring that special events held in the country are safe and secure. Moving forward from this hypothesis, the main research question is ‘what further measures can be introduced in the special events sector of the private security industry to enhance the role of private security personnel during special events?’

A literature review was conducted in an endeavor to collate information regarding the trends and characteristics of the special events environment for private security actors. The focus was on global and local perspectives, and was undertaken largely through desktop research. This exercise failed to identify any academic literature on the special events sector of the private security industry in South Africa. At the international level, it was noted that guidelines for safety at special events are linked to distinct legislation as it pertains to each specific country.

Field research was also carried out, which 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. Participatory observation was also used to make inferences. A key limitation of this study was the lack of participation

by private security providers regarding the current state of the sub-sector and expectations about its future direction. It must however be noted that the Private Security Companies (PSCs) and relevant stakeholders that did take part in the research contributed an immense wealth of knowledge. Demonstrable interest in the processes that will lead to the development of a policy and related regulations governing special events, from the perspective of subject matter experts, was encouraging.

As part of the research methodology a workshop was hosted on February 10 at the PSiRA head office, with representatives from the industry, stadium managers, local municipality actors and PSiRA legal and compliance members in attendance. The purpose was to validate the research findings and gain input from stakeholders in order to develop a policy for this sub-sector. Representatives were critical of the fact that most of the research focused on Johannesburg as a metro area. It was emphasised that other municipalities and districts also needed to be consulted in order to gather best practice. Contributions made during the workshop were considered. This report contains the key findings and recommendations for improvements to the special events sector and general improvements for regulation of the private security industry.

3. SPECIAL EVENTS SECTOR LEGISLATION

South Africa's legislation for special events was enacted in correspondence with developments, such as disasters at stadiums and the much publicised and successful hosting of the 2010 FIFA World Cup. In the past, weak or no regulations were in place in relation to special events security. Hence, the Ellis Park disaster on the April 11, 2001 occurred during a match between two of the most popular football teams in South Africa, Kaizer Chiefs and Orlando Pirates, in which 43 people died.⁴ A further 250 people were injured as they poured into a stadium that exceeded its capacity of 60,000 spectators.⁵ A police spokesperson put the figure at 120,000.⁶ Fans interviewed after the tragedy condemned the clubs' attitude to safety, accusing them of being more interested in ticket sales than the safety of the spectators. The police were also blamed for not keeping order outside the stadium.⁷ This was one of the biggest tragedies in South African sporting history, and exposed poor and uncoordinated policies as they related to safety and security in the context of special events management.⁸

The Safety at Sports and Recreational Events Act No. 2 of 2010 sets out to ensure the safety of people attending events, as well as their property. Arguably, SASREA was enacted in response to the Ellis Park disaster, the most salient incident in which spectators were injured or killed.⁹ SASREA seeks, among other things, to 'provide for measures to safeguard the physical well-being and safety of persons and property at sports, recreational, religious, cultural, exhibitional, organisational or similar events held at stadia, venues or along a route and to provide for the accountability of event role-players.'¹⁰ No event may be organised unless a risk categorisation has been made, which is done by the South

African Police Service (SAPS). Another requirement is that public liability insurance be in place for the event. Important to note is that SASREA does not work in isolation. Local authorities play a pivotal role in this process and general safety certificates for existing stadiums and venues, safety certificates and grading certificates must be obtained where applicable.

The City of Johannesburg Joint Operations Committee (JOC) was established to ensure that all events held are safe and that event organisers comply with all by-laws and city regulations. Observations at the JOC demonstrated the varied nature of special events governed by the SASREA, which range from church gatherings and school events to international or local sports events, music concerts and marathons.¹¹ Presentations by different event organisers were required to clearly indicate the level of risk categorization for the event, which would determine the level of security needed.¹² "Event organiser" means any person who plans, is in charge of, manages, supervises or holds an event or sponsorship rights to an event, or in any manner controls or has a material interest in the hosting of an event as contemplated by the SASREA.¹³ Medium and high-risk events specifically require the involvement of the SAPS, whereas the appointed safety officer can manage low risk events.¹⁴

Another notable incident where the safety and security of a special event was compromised occurred on November 9 2014. 64 people were injured when a stage in a community hall in Elandsfontein near Kempton Park collapsed.¹⁵ "The people on the stage fell about 4 metres into a void area."¹⁶

4 South African History Online. Available at: <http://www.sahistory.org.za/dated-event/ellis-park-soccer-stampede-kills-43> (accessed 05 October 2016).

5 Ibid.

6 Ibid.

7 Ibid.

8 Ibid.

9 JOC & SAPS Guideline. Available at: <cdn.entelectonline.co.za/wm-553616-cmsimages/JOC&SAPSGuideline.pdf> (accessed 05 October 2016).

10 Safety at Sports and Recreational Events Act, No. 2 of 2010.

11 City of Johannesburg Joint Operations Committee, 22 September 2016.

12 Ibid.

13 The Safety at Sports and Recreational Events Act, No. 2 of 2010.

14 Ibid.

15 News 24. Available at: <http://www.news24.com/SouthAfrica/News/64-hurt-as-East-Rand-stage-collapses-People-fall-4m-20141109> (accessed 14 February 2017).

16 Ibid.

On May 9 2015, a fan died after allegedly being shot during an altercation with a police officer during a pitch invasion at the Nelson Mandela Bay Stadium.¹⁷ “The man tried to take the policeman’s gun and during the scuffle the gun went off and the person was shot.”¹⁸

During the drafting of this report, an incident took place on February 11 at Loftus Stadium. Chaos erupted during a match that saw Mamelodi Sundowns defeat Orlando Pirates 6-0.¹⁹ Play had to stop for over an hour as opposing fans clashed, invading the pitch and vandalising stadium and television equipment.²⁰ At least 13 people were admitted to hospital with many more injured.²¹ Pitch invasions during sports events are not uncommon in other parts of the world, and there is a legal firm in the United Kingdom dedicated entirely to helping fans who transgress the rules.²² Pitch invasion is a criminal offence in the UK and there are

clear protocols for dealing with these issues because it happens so often.²³ The perpetrators at Loftus were caught and escorted away, and the onus has been placed on the Premier Soccer League (PSL) to ensure that such incidents of hooliganism do not occur again.²⁴

The reality is that many actors contribute to safety and security at a special event and one of the key actors is the private security industry. Event organisers do not perform due diligence in terms of the private security provider contracted.²⁵ In some cases the cheapest private security provider is contracted and this typically indicates that the cost of compliance has not been borne.²⁶ The Event Safety and Security Planning Committee (ESSPC) and the JOC should be familiar with the requirements for a private security provider, as a further measure of control.

17 Sport 24. Available at: <http://www.sport24.co.za/Soccer/PSL/Fan-death-mars-Chiefs-title-celebrations-20150509> (accessed 14 February 2017).

18 Ibid.

19 Muller, A, Pirates, invaded: PSL owes fans safety and a critical response in wake of Loftus violence, Daily Maverick. Available at: <https://www.dailymaverick.co.za/article/2017-02-13-pirates-invaded-psl-owes-fans-safety-and-a-critical-response-in-wake-of-loftus-violence/> (accessed 14 February 2017).

20 Ibid.

21 Ibid.

22 Ibid.

23 Ibid.

24 Ibid.

25 Workshop contributions, 10 February 2017.

26 Ibid.

4. MORE STRINGENT CRITERIA AT CITY JOC

It was observed that during presentations at the JOC, questions were posed by representatives of various local authorities to event organisers regarding the nature of the event.²⁷ Pre-eminence was given to establishing the following; if a risk assessment was done by the safety officer, if the risk categorisation was issued by the SAPS, the number of expected spectators, the appointment of a safety officer, and if any roads would be disrupted and thus necessitate the assistance of the Johannesburg Metropolitan Police Department (JMPD). If this was indeed the case, JMPD would need to be notified.

Other important checks include the Emergency Medical Services (EMS) application, an emergency evacuation plan, a Certificate of Acceptability (COA) if food will be sold or provided at the event, and if waste management mechanisms are appropriately provided for. A security operational plan is also required; this is typically drawn up by the contracted private security provider. However, it was noted that more specific questions regarding the private security provider and their role, whether the security personnel are in possession of special events training, and if the company is PSiRA registered, should be implemented. A better alternative would be that PSiRA place as a requirement that all event organisers submit a PSiRA letter of good standing as part of the criteria to be met before an event can be authorised.

During the drafting of this report, this suggestion was made to PSiRA's acting Deputy Director of Law Enforcement and duly expressed to the JOC. This means that in future, event organisers will be expected to provide their private security company's letter of good standing from PSiRA. This is expected to curtail the use of non-compliant PSC's at special events and encourage awareness of the importance

of private security personnel being trained and registered according to PSiRA prescriptions.

In the main, incorporating good practices with regard to safety at special events, particularly as it pertains to the role of private security providers has, in terms of legislation, been selectively applied. This is in part due to the absence of a specific legislative requirement in SASREA to have all private security service providers deployed for an event, to be PSiRA registered, and trained according to the PSiRA special events curriculum.

SASREA regulations do include a comprehensive section on the deployment of private security providers, but these are not consistently applied. Notwithstanding the current shortcomings to be found within the training regime for special events, which is discussed in more detail later in this report, merely having PSiRA registration is not enough. Being registered with PSiRA is not a sufficient measure with which to ensure that private security actors in this environment will be fit and proper persons. This is because a much needed re-registration process has not taken place and PSiRA's database cannot ascertain how many private security actors have, since their once-off registration been convicted of a crime.

In the face of this, PSiRA legislation continues to be relevant for this aspect of security provision and its enforcement is applied in the special events environment. In the 2014/2015 financial year, PSiRA registered 3018 special events security service providers, and 2648 were registered in the 2015/2016 financial year. The suggestion of incorporating a letter of good standing to qualify for the approval of an event should enhance compliance in this sector.

27 Muller, A, Pirates, invaded: PSL owes fans safety and a critical response in wake of Loftus violence, Daily Maverick. Available at: <https://www.dailymaverick.co.za/article/2017-02-13-pirates-invaded-psl-owes-fans-safety-and-a-critical-response-in-wake-of-loftus-violence/> (accessed 14 February 2017).



5. RESEARCH FINDINGS

5.1 BACKGROUND: SASREA VS PSiRA

SASREA was the brainchild of Patrick Ronan, a former registrar at PSiRA's predecessor, the Security Officers Board (SOB).²⁸ After leaving PSiRA he became involved in the security arrangements for the 2003 Cricket World Cup as a consultant, and developed a blueprint for special event security.²⁹ This quickly became a business venture for Ronan, who saw an opportunity for developing legislation regarding special events.³⁰ When the bill was first published for comment, it was modelled on the concept of 'stewards' or 'marshals' and this was immediately problematic for PSiRA, whose view was that these were security officers.³¹ The Bill tried to differentiate between stewards and security officers and PSiRA took exception to that.

SASREA sidelined PSiRA and the latter was, in parliament, forced to make a public submission regarding the distinction between a security officer and a steward.³² With anticipation for the 2010 FIFA World Cup, PSiRA had a further issue because the Local Organising Committee (LOC) brought forward the steward concept, as they had already signed an agreement with City and Guilds to train stewards.³³ City and Guilds has its headquarters in the United Kingdom and offers qualifications and apprenticeships and describes itself as a 'global leader in skills development, providing services for training providers, employers, and trainees across a variety of sectors to meet the needs of today's workplace.'³⁴

"Ronan's Bill" was based on the European model, and PSiRA only recognized a steward as a person showing spectators to their seats, with other actors seen as being strictly there for security.³⁵ Before the 2010 World Cup there was a face-off regarding the 2009 FIFA Confederation Cup, and indeed major antagonism between PSiRA and the LOC, while the Department of Sports attempted to remain neutral.³⁶ PSiRA in its presentation to parliament did not recognize stewards, seeing them as security officers, and had a problem with the definitions in SASREA.³⁷

PSiRA, after consultations with State Security Intelligence officials, refused to approve the go-ahead for the final game for the 2009 FIFA Confederations Cup, a prelude to the 2010 World Cup.³⁸ The LOC had a problem with police taking over security at stadiums, and preferred the presence of private security actors.³⁹ Only after détente and acquiescence to PSiRA's regulatory requirements were the events able to kick off. This was after the SAPS legal services and the Department of Sport required the LOC to go back and consult with PSiRA.⁴⁰

Despite this, the Department of Sport pushed through the Bill without consulting PSiRA, and the Bill was promulgated by parliament. Ultimately, PSiRA was not concerned with the content of SASREA and required all security personnel, despite their title, to be registered.⁴¹ Thereafter, it was agreed that the LOC had to cancel their agreement for training with City and Guilds. That training was not recognised by PSiRA and 3000 people that were already trained had to be retrained on PSiRA special events security and be registered.⁴²

28 Interview anonymous respondent, 7 November 2016.

29 Ibid.

30 Ibid.

31 Ibid.

32 Ibid.

33 Ibid.

34 City and Guilds Website. Available at: <http://www.cityandguilds.com/what-we-offer>, accessed 14 November 2016.

35 Interview anonymous respondent, 7 November 2016.

36 Ibid.

37 Ibid.

38 Ibid.

39 Ibid.

40 Ibid.

41 Ibid.

42 Ibid.

5.2 ENFORCING PSIRA'S MANDATE

Enforcement of PSIRA's mandate at special events in the country is still adhered to. Security personnel from the point of 'mag and bag' search, through to the turnstiles and then the stadium are required to be registered and trained.⁴³ Security personnel that fall outside the stadium do not need special events training, but need to be registered. FIFA was happy with the running of special events in Europe and wanted to copy that model here but had to adhere to South African law.

PSIRA was not seen as an important stakeholder when SASREA was adopted in parliament, and was barely consulted during the drafting process. This, it can be argued, has created a lapse in awareness and compliance with PSIRA's regulatory principles. During the visit to the Johannesburg JOC, it was deemed useful to develop industry-specific criteria for the JOC regarding what they should require from event organisers. Hence, discussions with PSIRA's acting Deputy Director of Law enforcement led to the suggestion, as part of the criteria for the JOC, of a PSIRA 'letter of good standing' for all event organisers in order to have their event approved. The letter of good standing is a more credible marker of compliance, as it is issued by PSIRA after 'good standing' has been ascertained, and is valid for three months.

5.3 SECURITY AT SPECIAL EVENTS: MUNICIPAL JOC CRITERIA FOR APPROVAL

Special events range from major ones such as sports or music festivals, to smaller domestic ones such as church gatherings, school events and marathons. There was consensus among the stadium managers and event organisers interviewed that a key component in the planning of a special event is the recruitment of a safety officer who is conversant with compliance requirements. This is typically followed by the appointment of the service providers, who will be mitigating risks as identified in the risk assessment and other services.

An ESSPC meeting is then called by the South African Police Service (SAPS), where other relevant stakeholders are required to render any reasonable and necessary support in terms of the planning of the event. This is where the risk categorization by the SAPS is determined according to the event concept presented. In order for an event to be given the 'go-ahead' the respective municipal JOC must approve it. The organiser has to follow certain procedures as set out by the municipality in the jurisdiction which the event is to be held. These are compiled and presented to the respective municipality.

For the city of Johannesburg for example, this ranges from: disaster management, city parks, city power, disaster management, emergency management services, environmental health, Johannesburg Development Agency (JDA), Johannesburg Metro Police Department (JMPD), Johannesburg Water, Johannesburg Roads Agency (JRA), metrobus and pikitup - and the South African Police Service are in most circumstances represented at the JOC.⁴⁴ The JOC meets once a week, on Thursday. One event organiser described the Johannesburg JOC as the most functioning JOC, with a knowledgeable committee.⁴⁵

The event organisers' presentation must clearly state who their contracted PSC is and what their role is. All event organisers are questioned on whether their PSC is familiar with the particular venue and inducted on evacuation procedures, and are expected to give assurances that the PSC contracted is capable of handling security at the event. The PSC should provide the event organiser with a security or operational plan to be included in the presentations made at the City JOC. Evacuation procedures, fire management, by-laws, and a medical safety plan should be integrated into the presentation.

Event private security officers play a crucial role in the disaster management function prior to and during an emergency evacuation.⁴⁶ Private security personnel also play a supporting role during a catastrophic incident whereby the Local Authority Disaster Management takes over responsibility from the authorised SAPS member.⁴⁷

43 Interview anonymous respondent, 7 November 2016.

44 City of Johannesburg Website. Available at: http://www.joburg.org.za/index.php?option=com_content&id=5971 (accessed 11 November 2016).

45 Whitehead. G, Mr-Safe-T, 06 February 2017.

46 Workshop contributions, 10 February 2017.

47 Ibid.

A fire plan is expected if the event is expected to have spectators parking on grass, and this should come from the PSC. Fire safety issues are considered one of the biggest shortcomings, owing mainly to the inconsistent information at the national level, as opposed to the different municipal levels.⁴⁸ Different by-laws are interpreted as inconsistencies. For example, indoor car exhibitions in the Western Cape permit a vehicle to have a quarter tank of fuel or less, whereas in Johannesburg the fuel itself is considered a flammable risk and a static or moving drip tray is required.⁴⁹ It was highlighted that there is no fuel regulation for events taking place outdoors.⁵⁰

Any risks related to weather conditions are also taken into account, for example, if extreme winds are expected during an event where fireworks are supposed to take place. Most events go over 12 -16 hours, and it was mulled if it was prudent to expect a person to perform optimally for 16 hours while standing. The opinion was expressed that the issue of working hours for security personnel at special events should be re-evaluated.

5.4 SASREA'S SHORTCOMINGS

The safety officer must sign an appointment letter acknowledging that he/she is aware of their duties. The planning of an event is closely linked with who the safety officer is. The SASREA refers to the safety officer as one who is appointed to assist with the planning and oversight of safety and security measures at an event. Respondents highlighted that the lowest qualification a safety officer should have is NOSA, which provides occupational health, safety and environmental risk management services and solutions and is the exclusive provider of both the NOSA

Five Star Grading System and SAMTRAC.⁵¹ The view was taken that because the SASREA references safety from a construction perspective, for example how cables are supposed to be covered, that a safety officer with a background in construction is preferred.⁵²

However, section 4 (4) (a) of SASREA is vague about what, if any qualifications the safety officer is expected to have, and only states that 'the person should be sufficient to be responsible for safety and security at the event.' Even a 21 year-old person is eligible to manage security at an event just because they have completed the course in occupational risk management in the workplace: SAMTRAC. The 'safety officer' concept was imported from the European Green Book from the UK, which requires a safety officer to be in charge of all health and safety requirements, and no responsibility is delegated to the police.⁵³ SASREA included it with no clarity of what the role of the safety officer is.⁵⁴

Furthermore, it was noted that there is no law requiring safety officers to have SAMTRAC training, emphasizing the ambiguity of the requirements for the safety officer. The lack of specific regulations for safety officers was linked to the fact that the NOSA requirement could not be enforced.⁵⁵ It was stressed that the safety officer was specifically responsible for the safety, security and medical requirements of any special event, and that this person had to be neutral, negating the possibility of this role being delegated to a private security provider.⁵⁶ This was because the profit motive central to private security provision may lead to a conflict of interest for a safety officer.⁵⁷ The issue was raised as to whether safety officers were registered with any controlling body, and the question was posed if PSiRA was willing to regulate them.⁵⁸ This reflects the need to assess the ways in which SASREA and PSiRA interact.

48 Whitehead. G, Mr-Safe-T, 06 February 2017.

49 Ibid.

50 Ibid.

51 NOSA Website. Available at: <https://www.nosa.co.za/about/our-story/about-nosa/> (accessed 12/01/2017)

52 Masikane. M, Safety and Security manager, Moses Mabhida stadium, 12 January 2017.

53 Workshop contributions, 10 February 2017.

54 Ibid.

55 Ibid.

56 Workshop contributions, 10 February 2017.

57 Ibid.

58 Ibid.

5.5 ROLE PLAYED BY SAPS

Coordination starts from the point that the police are notified of an event and provide a risk categorisation, which can range between low, medium or high risk.⁵⁹ However, the police do not necessarily get involved in events categorised as low risk.⁶⁰ Event organisers have to apply for an event categorisation Section 6 (3), which must give a clear indication of various factors that may impact the risk category that the event is allocated. This includes but is not limited to: the name and nature of the event; the venue, date, scheduled time and expected duration of the event; the popularity of the event and of persons attending the event; the level of rivalry that may exist between competing teams; the historic record of safety at similar events; if any Very Important Persons (VIP's) or Very Very Important Persons (VVIP's) are attending the event; the expected weather conditions on the day of the event, and the nearest SAPS police station.⁶¹

ESSPC is responsible for coordinating the functions of the role-players that are involved in the demarcation of safety and security zones and for advising the National Commissioner of the committee's assessment of the categorisation of an event.⁶² Relevant stakeholders such as fire safety, the JMPD, Metrorail, or ReaVaya bus services are present.⁶³ In Johannesburg, ESSPC planning takes place as often as the SAPS requires, to go through the planning and clarify people's roles; as the overall liability of an event lies with SAPS.⁶⁴

According to legislation, SAPS are responsible for overseeing the planning requirements of a medium and high risk event,

and thereby chair the ESSPC meetings.⁶⁵ Moreover, the police carry out a bomb sweep, and require that an outline of manpower and the operational plan be sent to the SAPS commander. The latter would, together with the Venue Operating Centre (VOC) assume overall responsibility of planning prior to the day of the match, while the PSC would be in charge on the day of the match.⁶⁶ The VOC is the central point where the entire safety and security operation in respect of an event at a stadium, venue or along a route is coordinated.⁶⁷

One security manager stated that if a game started at 17h00, the police would be at the venue to carry out a bomb sweep by 08h30.⁶⁸ At the FNB Stadium, it was stated that at every event the visible policing arm of SAPS were always present, as well as being involved in crowd control and tactical planning.⁶⁹

Regulations that seek to hinder the sale of tickets on the day of an event are due to the Ellis Park disaster, after which event organisers were no longer allowed to sell tickets on the day of the match at the stadium.⁷⁰ Despite prescriptions in SASREA prohibiting the sale of tickets on the day of an event, this still took place, assumedly in instances where the event was low-risk in nature. The Ellis Park disaster also shifted the approach to special events for the police. It was stated that there was an insufficient number of police at the stadium on that fateful day and since then the police have been in charge of every event.⁷¹

It was noted that SAPS members had the power to conduct inspections, akin to the powers of a PSiRA inspector.⁷² It was stated that although the provision exists for members of the

59 Lieutenant Colonel G.F. Kraemer, SAPS Booyens, 31 August 2016.

60 Ibid.

61 Safety at Sports and Recreation Act 2 of 2009. Available at: <http://www.gov.za/sites/www.gov.za/files/safetyatsports.pdf> (accessed 05 October 2016).

62 Ibid.

63 Lieutenant Colonel G.F. Kraemer, SAPS Booyens, 31 August 2016.

64 Ibid.

65 Hugo Kemp, Venue management, Loftus Versfeld Stadium, 25 August 2016.

66 Ibid.

67 Safety at Sports and Recreational Events act, No. 2 of 2010.

68 Interview, anonymous respondent, 14 September 2016.

69 Ibid, 26 September 2016.

70 Ibid, 14 September 2016.

71 Ibid.

72 Workshop contributions, 10 February 2017.

SAPS to conduct inspections on private security providers, there is a lack of awareness from the ‘cop on the street.’⁷³ The alternative was evident at the National JOC level where SAPS members at that level were familiar with the requirements of PSiRA inspectors and how this coincided with the powers of SAPS members.⁷⁴

5.6 SPECIAL EVENT SERVICE PROVIDERS: THE ROLE OF PUBLIC RELATIONS

Special events have a public relations component and success of special event security had to do with being conscious of the client’s needs. It was noted that what special events security officers had to do was called ‘verbal judo,’ defined as the art of out-maneuvering oneself from a situation through talking, particularly where the race issue came to the fore.⁷⁵ Image is very important as the security personnel are the first and last persons seen when entering and leaving the venue, and they determine the mood of the crowd.⁷⁶ It was stated that one should be strict with a smiling face.⁷⁷

The point was made that the only weapon a special events guard had in his or her possession was a sound mental state and skill in how to assess a situation, as guards do not carry firearms.⁷⁸ Training and experience, it was underscored, would determine the success of operations.⁷⁹ The view was expressed that each event requires different disciplines and that different dynamics applied to each event. An example was made of the difference between rugby and soccer matches. In the former context, spectators took longer to exit the venue after the match was finished and wanted to

sit and drink, while in the latter context persons were more inclined to leave as soon as the match was finished.⁸⁰

Most people who attended soccer matches were black and less affluent and were reliant on public transport to get home.⁸¹ Hence, they were ushered out of the stadium faster than white people attending rugby matches.⁸² It was stated that at stadiums everything was already in place, and the security operation mainly entailed posting people at the appropriate positions.⁸³

The venue manager for Loftus Stadium highlighted that complaints received were typically very tongue-in-cheek and not always valid, but rather from a patron who essentially just looked down on security.⁸⁴ He affirmed that special event security had a critical component of public relations, and it was to be expected that if the special events guard had people walking past him the whole day who were rude, it was inevitable that he may also become rude. He called it the most thankless job on earth.⁸⁵

5.7 ACCESS CONTROL AND MORE VIGILANT MONITORING

SASREA notes that ‘the planning, management and enforcement of safety and security at sports and recreational events, must be handled by people experienced in the field of safety and security.’ It further notes that event organisers, stadium or venue owners and their managers must have proper safety and security measures in place. Special events security was considered as being distinct from regular security guarding services. It was indicated that planning

73 Workshop contributions, 10 February 2017.

74 Ibid.

75 Interview, anonymous respondent, 13 September.

76 Ibid, 14 September.

77 Ibid.

78 Ibid.

79 Ibid, 13 September 2016.

80 Ibid, 14 September 2016.

81 Ibid.

82 Ibid, 13 September 2016.

83 Ibid.

84 Hugo Kemp, Venue management, Loftus Versfeld Stadium, 25 August 2016.

85 Ibid.

needs to be more detailed. This was in reference to the legal framework that applies to this sector that is not in place for normal security guarding, an example being the stricter health and safety requirements.⁸⁶

Normal guarding is very basic, whereas special events security requires attention to crowd control measures, although there is not enough emphasis placed on training for this specifically.⁸⁷ It was stated that the private security company is typically responsible for everything during the staging of a special event and that the event organiser also plays a crucial role.⁸⁸ One PSC had a contract for providing security at football derby's and in these cases the company was responsible for traffic management and crowd control with the SAPS there to serve as back-up.⁸⁹

The research revealed that guarding was confined to a particular and rigid contract period, whereas event security was more *ad hoc*, typically with no permanent contract in place.⁹⁰ One venue's security manager held the view that duties for security personnel dedicated to special events differed drastically from guarding, and were not only about protecting property but also protecting delegates and guests.⁹¹ Stating that there was a bigger emphasis on the customer and being able to handle vital risks, this required a higher quality standard and special events security officers need to be able to think on their feet.⁹²

The point was made that securing a venue for a special event entailed a variety of measures that had to be in place well before the spectators arrived. This was dependent on the size

of the venue and the police had a very specific approach to this, which the private security industry had also adopted.⁹³ In some instances a stadium would be divided into different zone colours. This approach would be employed when there was more than one PSC providing security at a given event.⁹⁴

Moreover, with regard to the planning and coordination of any special event it was noted that the private security company played a secondary and complementary role to the primary role of the SAPS.⁹⁵ The contention was that the process of securing a venue started from the authorisation to enter the exclusion zone, where only those spectators permitted to attend the event are allowed.⁹⁶ It was highlighted that the most important thing was to make sure that only authorised objects are allowed into the venue, and to ensure that exclusion zones were secured.⁹⁷ For example, this may in some cases refer to alcohol, while in others it could be something as trivial as an umbrella.

The techniques used to screen entrants at access and egress points during special events are dependent on the type of event. One respondent noted that at major high-risk events, screening is done in conjunction with the SAPS.⁹⁸ In reference to matches during the 2010 FIFA Soccer World Cup, metal detectors were used to search for weapons and regular physical checks done for liquor, if this had been prohibited as part of the event requirements.⁹⁹ One respondent in Cape Town noted that metal detectors were only used if the event had been classified as medium or high risk, but that hand-held devices were more regularly used.¹⁰⁰ He also highlighted that only female security guards could search female spectators.¹⁰¹

86 Interview, anonymous respondent, 10 August 2016.

87 Mr Lamprecht, Secure Cargo Handling: Operations Manager, G4S Secure Solutions (SA) PTY Ltd, 12 August 2016.

88 Ibid.

89 Ibid.

90 Interview anonymous respondent, 15 September 2016.

91 Ibid, 16 September 2016.

92 Ibid.

93 Ibid, 13 September.

94 Ibid.

95 Ibid.

96 Mr Lamprecht, Secure Cargo Handling: Operations Manager, G4S Secure Solutions (SA) PTY Ltd, 12 August 2016.

97 Ibid.

98 Interview, anonymous respondent, 10 August 2016.

99 Ibid.

100 Ibid, 13 September 2016.

101 Ibid.

Security officers conducted access and egress control but were also responsible for searching spectators. It was noted that the SASREA section 20 (1) (b) places the responsibility of searching spectators on the peace officer. Despite this, the searching of spectators was done by private security personnel.

Discussions at the workshop sought to understand the kind of person coming to work at an event. It was noted that these private security officers were not employed and were merely casual workers, most typically had 'grade C' training, and some were not even registered with PSiRA. Further modules were suggested if security officers were to be competent to work at specific stadiums, and perhaps a national blueprint of all stadiums would enable this to be realised.¹⁰² In such a context, security officers providing security at special events would be required to sign a form indicating that they have received induction for that specific venue/event.¹⁰³ This should form part of a national database and lead to accreditation. This is discussed in more detail below.

The first security checkpoint is the 'mag and bag' search, which also entails a body search and is the point where prohibited items such as cooler boxes and umbrellas are confiscated. The second checkpoint is conducted where tickets are scanned and security personnel filter out who is authorised to enter. The third checkpoint entails security personnel directing spectators to their allocated seats. It was highlighted that even security officers outside a stadium need to be trained in special event security, as there were certain events hosted directly outside the stadium.¹⁰⁴ This was clarified to mean that any area barricaded for the special event should require personnel to be trained in special events security.¹⁰⁵

5.8 TRAINING FOR SPECIAL EVENTS SECURITY

Respondents were asked to offer opinions on the specific training requirements for special event security and whether those working in the sector were required to be familiar with relevant legislation. One venue manager stated that the special events training manual was not special events oriented and did not refer to the specific duties expected of special events security personnel. In his opinion, the training should rather focus on event specific safety such as emergency evacuation, procedures, emergency drills, how to deal with assemblies and public relations.¹⁰⁶

One respondent whose PSC did special events in the Western Cape noted that the focus was mainly on adhering to the City's policies, which had a ratio for the number of guards for a set number of spectators, as well as the Gathering Act 205 of 1993.¹⁰⁷ He stated that identification was very important and that even if there were three or four different PSCs providing security at an event they all would have to be part of the VOC, highlighting that communication was integral.¹⁰⁸

Venue-specific training was deemed to be lacking. This was exacerbated by the fact that the private security providers used labour brokers who outsourced the security officers deployed for each match; who were usually not familiar with the venue.¹⁰⁹ It was lamented that current special events training was a summarized version of PSiRA Grade C training, and offered little to no specifics regarding how to handle special events security. For example, security officers were not taught what to look for on a ticket or what items were prohibited.¹¹⁰ This was reiterated by a security manager in Cape Town who stated that training was adequate, but gave the analogy of the difference between acquiring a driver's license and actual driving experience on the road which differed, in that one needed to deal with different factors.¹¹¹

102 Workshop contributions, 10 February 2017.

103 Ibid.

104 Ibid.

105 Ibid.

106 Interview, anonymous respondent, 16 September 2016.

107 Ibid, 13 September 2016.

108 Ibid.

109 Ibid, 17 August 2016.

110 Hugo Kemp, Venue management, Loftus Versfeld Stadium, 25 August 2016.

111 Interview, anonymous respondent, 13 September 2016.

One respondent interviewed stated that there were 1000 special events security officers for Cape Town stadium and less than half had received special events training.¹¹² He highlighted that what was learned in the classroom was very basic, with the real learning taking place in the stadium.¹¹³ A few years ago, when the National Qualifications Framework (NQF) training was initiated, it was considered too expensive and time consuming. It was conceded that although the NQF offered a better theoretical and practical component, it still needed different subjects.¹¹⁴ Examples were made of including training about prohibited items, public relations and the relevant legislation, asserting that the current PSiRA special events training only required the security officer to know where the medical services were located.¹¹⁵

An anecdote was shared of an incident when an old man fell down, and his son-in-law asked for help in picking him up and then later wanted to sue the venue management because the movement ended up being bad for the old man's back.¹¹⁶ In this context, the security officer should know to call the medical services and should not have moved the spectator.¹¹⁷ He remarked that security personnel trained in special events are not trained about the role of other stakeholders, and that this should be included in the training manuals going forward.¹¹⁸ This was because unlike guarding where a permanent security officer was used, private security companies deployed different temporary security officers for each match.¹¹⁹

One respondent went as far as saying that current training for this sector of the private security industry was useless, and to

ensure security at the stadium the venue was forced to do its own in-house training.¹²⁰ He highlighted that he and other supervisors trained special events security personnel in scenario training and how to handle aggressive spectators.¹²¹ The point was made that the Safety and Security Education and Training Authority (SASSETA) training exhibited no significant difference to PSiRA training, and that both lacked a practical component. Clarity was sought as to exactly where the home of the training standards was.¹²² It was asserted that there needs to be a specialist panel to direct future training for special events security.¹²³ It was reiterated that open book tests for special events security made no sense, as the dynamics differed for each event, and what was needed was scenario training and in general more investment in training.¹²⁴

South African National Standard (SANS) 10366 was highlighted as part of special events training, as it highlights general requirements for health and safety at special events. The standard places an emphasis on the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993). It further notes that irrespective of any other legislation, special attention should be given to the fact that event organisers, controlling bodies, stadium and/or venue owners, promoters, contractors and everyone involved in the staging or organising of any event, are required by law to comply with the National Occupational Health and Safety Act as well as with SASREA.¹²⁵ The National Occupational Health and Safety legislation of South Africa is qualified by the duty to take action so far as is "reasonably practicable," which means that the time, trouble, cost and physical difficulty of taking measures to avoid risk are not wholly disproportionate to it.¹²⁶

112 Interview anonymous respondent, 14 September 2016.

113 Ibid.

114 Hugo Kemp, Venue management, Loftus Versfeld Stadium, 25 August 2016.

115 Ibid.

116 Ibid.

117 Ibid.

118 Ibid.

119 Ibid.

120 Interview, anonymous respondent, 14 September 2016.

121 Ibid.

122 Workshop contribution, 10 February 2017.

123 Ibid.

124 Ibid.

125 South African National Standard (SANS) 10366. ISBN 0-626-17628-X. Published by Standards South Africa.

126 Ibid.

In South Africa all entertainment events are classified as work activities and are therefore subject to the aforementioned Occupational Health and Safety Act No.85 Of 1993, as well as SASREA.¹²⁷ The standard specifies minimum requirements for a person or organisation planning, organising and staging an event, but subject to all applicable Acts relevant to health and safety at events, including SASREA and its regulations.¹²⁸ If any provision contained in SANS 10366 is in conflict with any of the provisions of the applicable legislation referred to above, the provisions of the latter legislation shall prevail.¹²⁹

Draft Regulations for the Training of Security Service Providers 2016 were published for comment in the Government Gazette on June 24, 2016. These entailed a definition of an event security officer and also included an 'event security officer' as a skills programme. Under the NQF/SASSETA framework, event security officer unit standards are expected to replace the PSiRA special events course. The unit standards requirement are also what is outlined as a definition of an event security officer.

Such a person is expected to: explain the procedures of becoming a Security Service Provider (SSP); conduct security at an event; conduct access and egress control; apply legal aspects in a security environment; handle complaints and problems; demonstrate ability to participate effectively in a team or group; use security equipment; conduct evacuations and emergency drills; maintain occupational health and safety; perform basic life support and first aid procedures; and carry out basic first aid treatment in the workplace.¹³⁰

Based on this it is clear that some of the criticisms that training is not fit for purpose and lacks a physical component ring true. The way forward in relation to training must entail better defined roles and responsibilities between PSiRA and SASSETA, particularly as this relates to on the job training.

5.9 FIT FOR PURPOSE TRAINING

It was stated that PSiRA should get more involved, to ensure that training providers giving special events training are adequately placed to do so and that PSCs are specifically trained in special events.¹³¹ The contention was made that a lot of PSCs taking part in special events, when inspected were found to have only been trained to do static guarding and not special events.¹³² It was stated that training providers likely did not give real physical training for special events, asserting that visiting a classroom would not enable security personnel to know how to deal with large crowds.

SASREA should be aligned with special events training, for example the 'red zone' that is outlined in the act; private security should know what that is.¹³³ Having security personnel specifically trained in special events means that they are responsible for coordinating people who enter a venue, or take part in a procession that is categorised as a special event. In this context, they are expected to usher large crowds of people, in an effort to ensure orderliness and deter stampedes. In cases where alcohol is permitted at a special event, training in the control of crowds and deterring hooliganism becomes even more critical. The view was expressed that legislation related to safety at special events needs to be amended due to growth of the special events sector.¹³⁴

5.10 LIABILITY: WHO TAKES THE BLAME?

Liability depends on what happens and who the negligent party is. All relevant stakeholders for an event in most cases have public liability insurance. One respondent recalled that there was an incident where a security officer had been injured on duty and the PSC was held liable.¹³⁵ It was stated that the onus for having public liability insurance lay with the

127 South African National Standard (SANS) 10366. ISBN 0-626-17628-X. Published by Standards South Africa.

128 Ibid.

129 Ibid.

130 Draft Regulation for the Training of Security Service Providers, 2016 Government Gazette No. 40091.

131 Lieutenant Colonel G.F. Kraemer, SAPS Booyens, 31 August 2016.

132 Ibid.

133 Ibid.

134 Interview, anonymous respondent, 14 September 2016.

135 Mr Lamprecht, Secure Cargo Handling: Operations Manager, G4S Secure Solutions (SA) PTY Ltd, 12 August 2016.

stadium management, but that the PSC was also required to have this in place for any event as part of the contract.¹³⁶

One respondent stated that the location owner would be held liable concerning construction regulations.¹³⁷ He stated that there was joint and several forms of liability for the landowner, city and event organiser and the SAPS, who would all be held liable; hence mitigation planning was critical for special events.¹³⁸ It was noted that even when major events are hosted in partnership with the city authorities no provision for joint liability exists and each actor must have their own public liability insurance in place, with the guidelines suggesting a minimum of R 5 million.

5.11 SUCCESSES IN THE SPECIAL EVENTS SECURITY SECTOR

The most successful approach to special events security was attributed to thorough planning prior to events and clear and distinct communication routes.¹³⁹ A PSC manager stated that this was related to a better sense of duty, and the fact that in his experience there were no guards absconding from their posts.¹⁴⁰ He further highlighted that the level of supervision was above par, and that the paperwork required before an event is approved indicates a sound method in the approach to event security, which has improved significantly over the years.¹⁴¹

For the most part, South Africa's special events sector of the private security industry can be described as professional and one that employs thorough planning prior to events, and this has led to the establishment of clear and distinct communication routes. The hosting of major international

and domestic sports and recreational events in the country without any major security lapses demonstrates the measures in place to integrate checks and balances for special events.

5.12 WEAKNESSES IN THE SPECIAL EVENTS SECURITY SECTOR

5.12.1 Training

Weaknesses in the special events security approach pertain mainly to shortcomings in the training environment and PSiRA's regulatory and enforcement approach. Training should not consist of just a written exam, but rather involve an introductory course on how to communicate and handle different situations.¹⁴² Personnel need to be familiar with health and safety, as events can change in a second. SASSETA training was perceived as too expensive. This was reiterated and the view was expressed that PSiRA should get more involved and look into the prevalence of PSCs that are providing security at special events but have not been specifically trained for this.¹⁴³

The lack of physical training for special events was highlighted as a major shortcoming, and it was underscored that visiting a classroom would not enable a security officer to know how to deal with large crowds.¹⁴⁴ A common view was expressed by a company manager that if PSiRA really wanted to clean up the industry they should rather focus on those deploying untrained people but who are never inspected.¹⁴⁵ The sentiment expressed can be summarised as 'PSiRA only regulates the big boys, many small PSC's recruit guys from the street with no training.'¹⁴⁶

136 Mr Lamprecht, Secure Cargo Handling: Operations Manager, G4S Secure Solutions (SA) PTY Ltd, 12 August 2016.

137 Interview, anonymous respondent, 14 September 2016.

138 Ibid.

139 Ibid, 15 September 2016.

140 Ibid, 14 September 2016.

141 Ibid.

142 Ibid.

143 Lieutenant Colonel G.F. Kraemer, SAPS Booyens, 31 August 2016.

144 Ibid.

145 Interview, anonymous respondent, 14 September 2016.

146 Ibid.

5.12.2 Lack of Compliance in the Appointment Process

A further challenge is that most security officers contracted for special events security are paid per day. This is because the typical modus operandi of private security companies, stadium managers and event organisers is to issue a call in the press. This is usually in the form of a newspaper advertisement requesting a certain number of security officers for an event on a pre-determined date. PSiRA requires all private security officers to be registered and to have undergone PSiRA accredited special events security training. PSiRA staff from the law enforcement unit observed that during inspections conducted before a special event, most security officers were indeed PSiRA registered. However, there have been a significant number of instances where even though security officers were registered, they did not have special events training.

This observation suggests that registered but non-active security officers may likely be the ones contracted to provide security at special events. Their lack of PSiRA accredited special event security training is hence waived. Even if PSiRA inspectors uncover non-compliance and charge the PSC responsible, the event must still go ahead with the same security officers that have already been contracted. This poses a risk for the event and spectators as a whole.

It was asserted that the onus is on PSCs to ensure that the private security officers they deploy are registered and appropriately trained. It was suggested that the special events security sector, in tangent with other stakeholders, learn from other industries such as aviation concerning pre-screening and maintaining a reliable database. The use of ratios was found to be problematic because event organisers, including private security actors, seek to save costs and have a specific budget that requires the deployment of security actors in the areas that need it most.¹⁴⁷ It was stated that ratios could work in certain contexts while in others this would be difficult to apply.¹⁴⁸ It was highlighted that ‘safety

and cost do not go together’ and that if there was a potential risk it was essential that security be deployed there.¹⁴⁹ The suggestion was made to include disaster management modules in the training of special events security personnel, as they were most likely the first responders in the case of an incident.¹⁵⁰

5.12.3 Implementing PSiRA Regulations to the Environment

The visibility and capacity of PSiRA inspectors was questioned in the context of the soccer derby, which entails around 1000 security officers, as it was unlikely that they could check each security officer individually to verify registration.¹⁵¹ Conducting an inspection on match day was considered a poor strategy, and in some cases disrupted the safety and security plans.¹⁵² It was expressed that contracts had penalties for any misconduct or delays, which PSiRA inspections were alleged to create.¹⁵³ The fact that there was no report from the PSiRA inspectors after their inspections was also criticised. It was stated that all requirements are typically ascertained at the JOC level and that this is where PSiRA regulatory and enforcement scope should begin.¹⁵⁴ This is a moot point, and it remains to be seen if the JOC is a sufficient point for ensuring special events security is guaranteed. Another critical factor that hinders effective regulation is that most special events take place on weekends, when PSiRA inspectors are off duty. Consulting the SAPS in order to encourage its members to conduct inspections on private security personnel during the special events they attend must be considered as a supplementary strategy.

Other deficiencies observed include, but are not limited to, the burgeoning special events sector and the failure of the corresponding legislation to facilitate effective regulations to ensure much needed checks and balances. Provision for a media plan is outlined in SASREA, however this was

147 Workshop contributions, 10 February 2017.

148 Ibid.

149 Ibid.

150 Ibid.

151 Interview, anonymous respondent, 26 September 2016.

152 Ibid.

153 Ibid.

described as vague, which led to few event organisers providing clarity regarding prohibited items, road closures and any other risks that spectators might benefit from knowing in advance.¹⁵⁵ It was alleged that some PSCs were giving false information to organisers and getting appointed, and that there was an increasing number of PSC 'jumping on the special events bandwagon' because regulations to the Act have not been published.¹⁵⁶ It was highlighted that many things in the Act were not enforced because everyone wanted the regulations published.¹⁵⁷ In the context of the role the private security industry plays, this is underscored by the lack of a clear provision in the Act for all security personnel at special events to be trained on special events and be registered with PSiRA.

5.12.4 Verifying identity

Some event organisers send a list to PSiRA for the verification of security officers that are scheduled to provide security on the day of the event. The problem with this is that on the day of the event there is no guarantee that the same people on the list will be the same people working. This is where PSiRA identification cards play a role in ensuring that the identity of a security officer can be ascertained. PSiRA cards contain a photo of the private security official, his/her level of training and, in this case also if special event training has been undertaken.

The only flaw in this train of thought from a regulatory perspective is the fact that most private security officers do not carry their PSiRA ID cards at all times. The use of an electronic scanning device for PSiRA inspectors may aid in proving the identity, or lack thereof, of a security officer. Ideally this is something that should be linked with a secured database of the fingerprints of security officers. It was noted that private security officers seeking to be contracted for security at a special event will only come with their PSiRA certificate as proof of identity. PSiRA certificates are infamous for their ease of duplication and or forgery,

and hence are not a good way to establish the identity of a security officer. It was noted that the City of Tshwane's JOC no longer accepts old PSiRA certificates for this reason.¹⁵⁸

Furthermore, there is a concern about the way in which private security officers qualify for a PSiRA identity card, namely that they need to be actively employed and linked to a particular PSC. This may prove to be a challenge and points to the need for a re-orientation to this approach for the special events sector of the private security industry. The reason for this is that most security officers contracted for a special event are not always linked to a PSC and thus may form part of the group of inactive security officers.

Security officers may be unable to secure a one day contract due to the fact that he/she has no PSiRA identity card, as a result of not being actively employed and thus linked to a particular PSC. This means that the potential employer is unable to verify the security officer's identity. PSiRA regulation 9(5) and (6) state that all private security officers must carry their PSiRA identification cards at all times. The regulations further posit that it is an offence for a security officer to be found on duty not carrying his/ her PSiRA identity card. In addition, regulations regarding uniforms at special events are needed as currently this is decided by the client.

PSiRA law enforcement representatives further stressed that even when a PSC is charged for deploying security officers who are either not in possession of the PSiRA identity cards, or not specifically trained in special events, a contract still binds the security officer and he/she must still work at the event. This is because inspections are in most cases carried out on the day of the event. This presents a risk for the safety and security of the event as a whole. In addition, most events go over 12 -16 hours, and the question was posed whether it was prudent to expect a person to perform optimally for 16 hours while standing. The opinion was expressed that the issue of working hours for security personnel should be re-evaluated.

154 Interview anonymous respondent, 26 September 2016.

155 Lieutenant Colonel G.F. Kraemer, SAPS Booyens, 31 August 2016.

156 Ibid.

157 Ibid.

158 Workshop contributions, 10 February 2017.



6. RECOMMENDATIONS

In view of the above research findings, this report recommends the following:

6.1 ALIGNING SASREA AND PSiRA

The Authority may choose to request a written response from the Department of Sports and Recreation stating the reasons why the section dedicated to the deployment of private security service providers was not included in the final version of the Safety at Sports and Recreational Events Act No. 2 of 2010. More critical engagement concerning the future of SASREA regulations, and how this affects private security regulation is needed.

6.2 CRITERIA FOR LETTER OF GOOD STANDING

PSiRA should make it a requirement that all event organisers provide a PSiRA 'letter of good standing' as part of the documentation that needs to be submitted and approved before an event can be authorised. This would foment good practices with regard to safety at special events, particularly as it pertains to the role of private security providers.

6.3 ADAPTING REGULATIONS

PSiRA should intensify its regulatory approach to ensure that training providers offering special events training are adequately placed to do so. This may best be executed through PSiRA's law enforcement and legal departments. The former may continue random inspections at both large and small special events security service providers, and help eliminate the view that 'PSiRA only regulates the big boys, many small PSCs recruit guys from the street with no training.'

It may help to introduce electronic scanning devices to verify security officers' identity, among other things, during inspections for this sector and the private security industry as a whole. In particular, the 'morpho touch' device could help in the elimination of fraud. Consulting the SAPS in order to encourage its members to conduct inspections of private security personnel during the special events they attend must be considered as a supplementary strategy.

The latter may increase significantly, the fines levied on PSCs found to be floundering on the requirements of the Principle Act in the context of being registered and appropriately trained for this environment. As part of the Authority's tough stance on non-compliance, fines should at the minimum match the cost associated with the inspection, and a more intolerant approach must be demonstrated. The ethos of presiding officers should be such that any financial penalty for the suspension of prosecution should act as a deterrent for future non-compliance.

6.4 FIT FOR PURPOSE TRAINING

PSCs operating in the special events environment are specifically trained to do so. Hence, more is needed in terms of the direction in which this training is going. The current PSiRA training for special events has been derided as not being sufficient for the task, and the alternative is for PSCs to develop and train security officers according to their own standards, not accredited by PSiRA. Training should rather focus on event-specific safety issues such as incident management, emergency evacuation procedures, emergency drills, how to deal with assemblies and public relations, incorporating aspects of the legislation, and eliminating open book tests for scenario training that is fit for purpose.

The Authority's primary object is to exercise effective control over the practice of the occupation of security service providers in the public and national interest, and the interest of the private security industry itself. Failure to articulate how to address the 'enormous white elephant' of training within the private security industry in general, and for the special events sector, in particular will continue to limit the Authority's legitimacy and ability to regulate the industry over which its authority is founded.

6.5 ELIMINATING FRAUD IN THE APPOINTMENT PROCESS

Event organisers and or stadium managers should indicate to PSiRA their desire to host an event, prior to the date of said event and within an agreed upon timeframe, and ensure that the security officers that will be contracted to work on the day of the event are present. This would be in order for PSiRA inspectors to carry out pre-inspections and ensure that all service providers are issued with PSiRA

identity cards. This will minimise identity fraud and curtail the deployment of untrained security officers.

6.6 IMPLEMENT SELF-INSPECTIONS

The use of self-inspections should be introduced and include a disclaimer that would lead to a stricter fine for those found to be submitting false information. In the case that an incident occurs, a criminal case to be answerable by the event organisers should also form part of the disclaimer. This would be particularly helpful for the special events sector, as PSiRA has an inadequate number of inspectors to conduct physical inspections at the same pace that special events occur.

6.7 PSiRA RE-CERTIFICATION PROCESS

Since December 1, 2014, PSiRA has embarked on a renewal of the certificate process, which encourages all registered security officers and security businesses to visit PSiRA offices in order to receive their new certificates. Thus far 255,125 individual certificates and 2,691 business certificates have been renewed.¹⁵⁹ Indeed, there are merits to this process, namely the fact that the new certificates have expiry dates. However, this only serves as a stop-gap measure, until the renewal of registration of all persons active in the private security industry has been conducted. Once all private security actors have been re-registered, met the necessary requirements and deemed fit to remain active in the industry, they can be issued with a new certificate. Notwithstanding this, PSiRA should institute a binding regulation, as opposed to circulars which are not binding, that outlines a cut-off date for the use of older PSiRA certificates, which do not have expiry dates.

6.8 IMPROVED SERVICE DELIVERY

In order to address some of these challenges, what is required are improved internal measures from PSiRA to ensure that cohesive and efficient systems are in place to serve the private security industry, and thus regulate it better. This is in reference to regular complaints by private security service providers of visiting PSiRA offices in order to get new certificates or PSiRA cards and discovering that the

printer cannot print the certificate, or that the cards are not available. This particularly affects already marginalised and poorer persons working in the private security industry.

6.9 PSiRA RE-REGISTRATION

State intelligence services have a role to play when it comes to the safety and security of special events in the country. This is particularly true for major events, and is done through the submission of a verification list to PSiRA of the security officers that have been earmarked to take part in the provision of security services on the day of a special event. Verification lists do not amount to much in terms of verifying whether a security officer is a risk for a special event, due to the gaps in PSiRA's own database, which is limited in its ability to conclusively ascertain whether a security officer is a fit and proper person. This is attributed to the one-time registration that still enshrines a database of persons that have never been regularly scrutinised regarding their fitness to be active members of the South African private security industry. PSiRA's re-registration process is critical to further entrenching the credibility of the Authority and must be budgeted for and movement towards its implementation pragmatically sought.

6.10 SPECIAL EVENTS ACCREDITATION SYSTEM

Identity fraud is exacerbated by the prevalence and ease of buying a PSiRA certificate. Even if PSiRA were to vet, register and train a person, there is still a significant amount of risk that exists within the special events sector. One suggestion for addressing this is to develop a 'special events accreditation system,' that enables a security officer to gain points for his/her familiarity with a particular stadium, venue and technique. This would be in relation to the number of times they have been successfully deployed for a special event. This would ensure that the event organiser is more certain of the security officer's familiarity with the venue and its evacuation and emergency requirements and thus contribute to a safer event. This recommendation bears merit but requires further consultation and is dependent on the future direction regarding a coherent policy between all relevant stakeholders. This is in order to ensure that accreditation does not limit small PSCs that do not get contracts in stadiums.

159 PSiRA Annual Report, 2016/2016, p 50.

6.11 GREATER VIGILANCE TO PRE-EMPT A TERRORIST ATTACK

The threat of a terrorist attack was raised, owing to the gaps that exist in verifying the identity of persons that take part in the special events security sector. This is made worse by the fact that training standards have been called into question, particularly their role in effective evacuation and emergency procedures. The lack of a pre-emptive regulatory approach, in terms of training standards and verification done in

conjunction with relevant stakeholders, may in future emerge as a threat to the safety and security of special events hosted in the country. In the case that a potential threat materialises, the accountability of PSiRA as the regulator will be in sharp focus, so this is an issue that needs to be raised with other state agencies in an effort to ensure readiness for any eventuality. This should be done as part of greater cooperation with State intelligence agencies. Notwithstanding this, no imminent threat currently exists in this regard.

7. CONCLUSION

The evolution of the South African special events sector and improvements to the security approach can arguably be traced to the failure to avert the 2001 Ellis Park disaster. The failure to have effective measures in place to plan and coordinate that event led to a realisation of the importance of safety and security at special events and subsequently to the development of legislation designed to ensure this. The successful hosting of the 2010 FIFA World Cup demonstrated how far the country had leap-frogged in terms of enacting and adhering to policies to guarantee and entrench safety and security at special events.

The SASREA sets out to ensure the safety of people attending events. Checks and balances that permeate the enforcement of this law translate to a concise role for the SAPS, which is the first port of call, without whom no event may be organised unless a risk categorization has been made. Requirements for event organisers to have public liability insurance in place for the event and the critical role that local authorities play as key stakeholders cannot be overstated. This contributes to a congruent application of the law and therefore an assurance that sports and recreational events are held within a secure environment.

There already exist effective measures in place for the special events environment. This includes presentations by event organisers at each respective City JOC in front of a panel of representatives of the local authorities regarding the nature of the event. More specific questions regarding the PSC and what their role is, if the security personnel are in possession of PSiRA special events training, and the company's PSiRA registration, should be raised. Despite the steady progress made since the 2001 Ellis Park disaster in terms of creating a chain of command and control measures for safety and security, private security's role in this equation and their regulation is in need of greater improvement.

It can be argued that the role of the private security industry in the safety and security of special events exhibits certain strengths and weaknesses. The former relate to the reliance on private security as a key component in most if not all special events held in the country. Special events training and requirements for registration call into question whether current PSiRA regulations are sufficiently responsive to this sector of the private security industry. This is due to shortcomings in practical training that present a lapse in the trust that should be accorded to private security personnel at special events. Training standards for special events security must be re-evaluated. This further points to the need for a more thorough and comprehensive approach from PSiRA law enforcement, concerning this sector, and the approach to conducting inspections. Internal measures within the Authority must be implemented, with an assured specificity to the needs of this sector of the private security industry, in particular efforts to curb the identity fraud pervasive in the industry.

A promising development is the interaction with the local stakeholder at the JOC in clarifying requirements for private security company's involvement in special events. Enhancing training in order to be more conscious of the dynamic environment that private security operates in generally, and for special events in particular, would go a long way in solidifying the gains already made in the special events security approach. Indeed, legislation related to safety and security at special events should have a component on the role played by private security, and regulations be amended where necessary and promulgated in order to be applicable. PSiRA's regulatory and enforcement mandate is nevertheless implemented and applied vigorously, and this approach underpins the value of the Authority in contributing to safety and security at special events in South Africa.



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