

Santeri Kauppi

SUPERVISION OF PRIVATE SECURITY SERVICES

Is Supervision of Private Security Services Sufficient
in Finland?

Faculty of Management and Business
Master's Thesis of SAFERS Master's Programme
April 2021
Supervisor Sirpa Virta

ABSTRACT

Santeri Kauppi: Supervision of Private Security Services
Master Thesis
Tampere University
Master's Programme in Security and Safety Management – Security Governance
January 2021

The private security sector is a very topical issue in many ways. The industry and its role as a social actor is currently being discussed in several countries. Traditional security authority tasks are being outsourced around the world. Outsourcing has sparked a debate over whether state sovereignty is going to weaken as more and more public actors begin to perform public authority functions. The line between the private security sector and the security authorities has become blurred, leading to a debate on how the private security sector operates and how it should be supervised.

There has been a lot of research into private security services in recent years. Several studies indicate that private security services actors exercise public authority in their work when they have a de facto legal right to interfere with people's fundamental rights. Once actors are given such broad legal competence, they must be aware of their own legal competence and status. For this reason, attention should be paid to the supervision of private security services and the actors performing the supervision, and the accuracy of supervision in this area should be reviewed. Indeed, some studies and at least one legal dissertation have been conducted on security supervision.

This study examines the structure, actors, and supervision of private security services. The accuracy of supervision has been clarified through interviews, which complement the information provided by various sources on supervision in the field. The information obtained from the literature and other sources does not provide very clear and concrete examples of the supervision measures carried out, so interviewing industry players is crucial for this study.

The study has been carried out as a qualitative study. The study has utilized the literature, legislation and regulations issued by the authorities in the field. The study has been supplemented by interviews aimed at producing empirical information on the supervision of private security services. The aim of the study is to produce qualitative information on the supervision of the private security services.

The purpose of this study is to clarify the supervision of private security services. The results of the study are freely available to the sector, supervisors and authorities. It is desirable that the results will be of benefit to private security operators and especially those carrying out supervision.

Keywords: Private Security Services, Supervision

The originality of this thesis has been checked using the Turnitin OriginalityCheck service.

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1 Introduction

The importance of private services as promoters and maintainers of order and security has grown rapidly. They are increasingly complementary to public authority security services, and changes in public administration structures have contributed to blurring the distinction between public and private. Developments have led to legislative revisions and reforms in the private security sector and services and the emergence of new security professional titles and areas of expertise. Timo Kerttula (2010, 35-51) has listed the reasons for the growth of the security industry in his dissertation. The need has been increased by, for example, rising security awareness, changes in legislation, an increase in cross-border crime, the outsourcing and privatization of security functions by companies and public entities, and the internationalization of business. At the same time, the same factors will also facilitate the expansion of private security services, increasing job opportunities in the sector. The growth of the security sector is forcing more attention to be paid to the supervision of the sector. For this reason, this study has been carried out and will hopefully serve the industry as well as the supervisors.

The Finnish Broadcasting Corporation YLE recently published an article dealing with crimes committed by employees of private security services in the course of their work. According to YLE's journalist, the police can withdraw their approval as a security guard and security steward because of this violence. According to the reporter, there are clear shortcomings in supervision. (YLE 2020). A similar statement was also made by Helsingin-Sanomat in 2019. The article shows that police departments interpret their supervisory responsibilities in different ways. There are regional differences in supervision. The Police Board has issued general guidance, but it is up to the licensing authority to make the approval on a case-by-case basis. The article interviews a private security researcher and the Police Board's Inspector General of Police. According to the Chief Police Inspector, the reason for the regional differences is not in the interpretation of the instructions, but at the supervisory level. (Helsingin-Sanomat 2019).

According to the articles and statements, the supervision of private security services needs to be researched and clarified. This master thesis reviews the role and structure of private security services and presents supervision on them.

1.1 Delimitation of the research subject

This study focuses on private security services and the supervision of private security services in Finland. The study also seeks empirical information on control measures and means taken by police authorities. The study presents those actors in private security services for whom the legislators have designated the Police Board as well as police departments as supervisory authorities. In addition, the study also addresses private security training, as it is one of the key players in the private security industry, although it is not defined by law as private security services.

The study defines private security service actors as security guards, security stewards, security officers, security business licensee, managers, use of force trainers, security steward trainers, security guard firearm trainers, and security guard training providers.

The purpose of the interviews is to obtain information on the actual supervision measures applied to the operators. These actual supervision measures and means are provided only at a general level in the legislation and do not contain the actual written information and content. The interviewees have been selected on the basis of their professional skills and job responsibilities. The interviewees work in various jobs in the private security service sector and also have a number of different licenses to apply for from the police and the police government to perform various duties and professions as defined in the Private Security Act.

1.2 Objective of the study and the research problem

The purpose of the study is to go through the private security services from the perspective of its actors and the supervision of the sector. In the study, I aim to find out about the supervision of private security services and to obtain experience-based information on the supervision measures against private security services. The aim of the study is to produce qualitative information on the control of the private security services in the name of one's own experience in the field.

The aim is also to answer the research question which is: Are the current means of supervision up to date?

1.3 Research structure

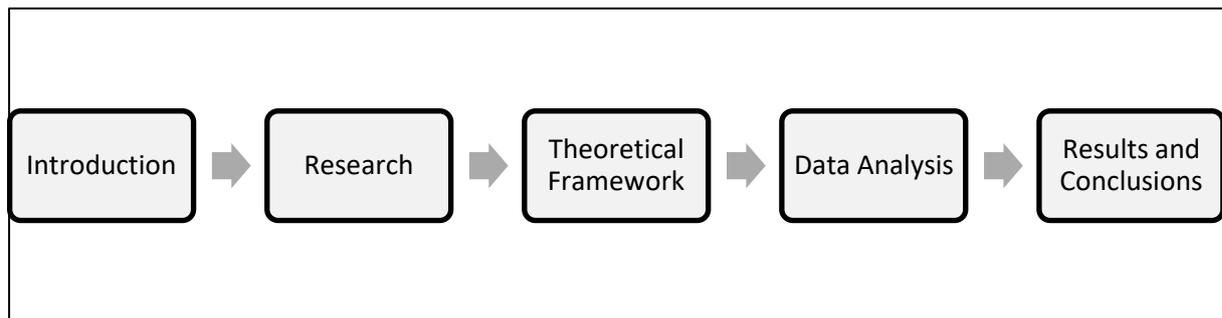


Figure 1: Progress of Study

Figure 1 illustrates the progress of the study and this report. In the first chapter of the research, in the introduction, I discuss the background, aim and research problem of the research, as well as the structure of this written work. In the second chapter, I discuss research methods and conducting research. I also justify the methods used here for this study.

In the third chapter, I deal with the private security sector. I also identify the relevant actors in the field for this study. In this chapter, I present the private security industry internationally and the industry in Finland. I identify the relevant actors in the study, which are security guards, security stewards, managers and trainers of the private security sector. I will also talk about degrees in the private security sector.

In the fourth chapter, I discuss about supervision of private security services. I break down the structure of supervision from the perspective of private security legislation.

In the fifth chapter, I illustrate the matter with the help of the material obtained through the interview research. In the sixth chapter, I present the conclusions of the study.

1.4 Literature review

The growth of the private security sector has been very extensive internationally. The private security sector also plays a significant and major role in everyday life. Indeed, several different studies show that private security actors have taken a quantitative majority when comparing to local police forces (Abrahamsen & Williams 2011, 19-21; Waard 1999).

Abrahamsen & Williams (2011, 22) have identified the view of criminologist Ian Loader on the privatization of security as necessary when considering the changing nature of modern security. Loader (2000, 323) has said:

" We are living in the midst of a potentially far-reaching Transformation in the means by which order and security are maintained in Liberal democratic societies, one that is giving rise to the fragmentation and diversification of policing provision, and ushering in a plethora of agencies and agents, each with particular kinds of responsibility for the delivery of policing and security services and technologies. What we might call a shift from police to policing has seen the Sovereign state– hitherto considered focal to both provision and accountability in this field– reconfigured as but one node of a broader, more diverse 'network of power'. "

Indeed, Abrahamsen & Williams (2011, 22-23) have pointed out that the growth of the private security sector has also led to negligence. The growth of the private security sector is also causing significant changes in society and politics. According to Abrahamsen & Williams (2011, 58), these changes are visible at the local and national levels, but are also strongly linked to the international debate.

The development of the private security sector, and in particular the development of supervision in the sector, has also emerged outside Finland. Representatives of the Portuguese government considered in 2017 that the activities of the sector should be reviewed and controls in the sector should be developed. (Mena report 2017). At the international level, private security activities should certainly be monitored much more closely. 2008 In Australia, a

person died in a prisoner transport, provided by the international listed company G4S (Baldino, Drumm & Wyatt 2010). The ongoing development of the private security sector and the privatization of government functions have also been studied in New Zealand. This study has also highlighted the fact that cooperation and lack of regulation between the private sector and public authorities have led to inaccurate information and hampered operational development. (Bradley & Sedgwick 2009). Steden & Sarre (2007) have also studied the growth and supervision of private security services in the EU. In their article, Steden and Sarre highlight the prediction of the future. In their view, researchers should conduct international comparisons with the dimensions of the private security sector and begin to develop a comprehensive picture of how private security services are supervised and regulated. In their view, the debate between researchers and professionals in the field should be stepped up on issues of equality, professionalism and accountability. One interesting aspect of the reliability of the private security sector has been presented by Waard (1999) as the scarcity and absence of facts and figures. Waard has also expressed the view that there would be a strong demand for precisely this information. According to one study, private security services in Bulgaria have highlighted huge structural problems. Gounev (2006) has cited corruption, organized crime and a lack of control as problems. In fact, Gounev's view is in favor of these privately owned companies and the security services they provide being subject to oversight from a wide range of sources in order to avoid the problems mentioned above.

There are many such examples from international studies. Although states regulate their own laws themselves and the powers of private security services vary from country to country, their operation and purpose are similar. In addition, the research also gives the feeling that the huge developments in the field have not been met at the level of social responsibility. Those responsible for the operation have been designated, but the actual person responsible for the operation may not be clear.

Could this also be the possibility that security and private security services are being sold out of fear? There are many studies around the world that show, for example, that the benefits of camera surveillance are relatively small in terms of crime prevention. Why, then, are these cameras being quantified everywhere? Another thing to note well is that security and safety services may be purchased on the whim of even a moment. In Vantaa, Finland, violent school

bullying took place in the school yard. As a first reaction, the institution was hiring a security guard for the school. How does a guard eliminate violent school bullying?

Where does the limit of liability go in the activities of private security companies when these tasks, which were previously assigned to public authorities, are carried out by private security staff and not by public authorities?

Domestic research in the private security sector is relatively limited and recent by international comparison. A few active private security researchers in Finland take and guide actors in the field forward. Jyri Paasonen, known as a researcher in the private security sector, has stated in his lecture that the private security sector has developed by country and has grown strongly as security guards, security stewards and security officers play an increasingly prominent role. Indeed, the role of the sector and its role as a social actor is currently being debated in several countries. Traditional security authority tasks are outsourced around the world. Outsourcing has sparked a debate over whether state sovereignty will weaken as more and more public actors take over public authority functions. This has placed private security actors in diverse and fragmented types of tasks that lack legal status.

The line between the private security sector and the security authorities has become blurred, leading to a debate on how the private security sector works and how it should be monitored. With the growth of the private security sector, states have had to develop and reform the regulation of the sector. In the debate on the private security sector, it has been typical that not enough reliable scientific information on the industry has been available. (Paasonen 2021). Paasonen and Ellonen (2019) have conducted a survey on the supervision of private security services in Finland. In their results, they have indicated that industry players would like more control over the industry. With this increase in control, we would be able to limit the excesses mentioned by Abrahamsen and Williams.

With the help of the literature review, we are able to make a clear summary of both domestic and international research. As private security services have grown, they have introduced new security services and functions to the market, which have even replaced the tasks previously held by the authorities. In addition, security is sold to service buyers, even if there may not be an actual need for additional security. In the light of research, ideas and views on the

supervision, regulation and responsibilities of private security services have also arisen. However, are these things clear enough within states?

2 Research Methods

Sirkka Hirsjärvi has mentioned that doing research is fascinating and interesting, but at the same time problematic in many ways. Society presents new challenges to research. (Hirsjärvi, Remes & Sajavaara 2010). I have also experienced quite a new kind of challenge for the research, particularly the conclusion of this thesis. I've had to combine what I have learned the rest on scientific knowledge and to apply it. My goal is to eventually produce something new myself.

Harisalo, Keski-Petäjä and Talkkari (2003, 5-6) have defined the criteria for good research. The first criterion for good research is systematicity, which means that the researcher must be systematic in data acquisition, data processing, and reporting. Another criterion for good research is the general validity of the research. Universal competence means that the researcher seeks and wants to produce information that could be applied not only to his or her own organization but also to other organizations. The third criterion mentioned by Harisalo, Keski-Petäjä and Talkkari is the economics of the research. The fourth and most challenging criterion for good research is the objectivity of the research. Objectivity is used to identify factors influencing the results that jeopardize the systematic nature of the study. The fifth and final criterion is the usability of the research results. I try to follow these criteria of good research in this study, because my intention is precisely to keep the research systematic and to obtain useful research results.

The research task and the research problem setting affect which research strategy and research method or methods are chosen to be used (Hirsjärvi, Remes & Sajavaara 2010, 132). What the research wants to find out at any given time guides in the choice of research method and material needed in the research (Koivula, Suihko & Tyrvänäinen 2002, 22).

The aim of the study was to gain an understanding of private security supervision and to gather empirical information on supervisory experiences. Based on the nature of the study, a

qualitative study was selected as the research method. Qualitative research is suitable when trying to describe the object as comprehensively as possible. Qualitative research aims to find or reveal facts, explain the factors involved in the phenomenon and the relationships between them and to understand and interpret activities. (Koivula, Suihko & Tyrvänäinen 2002, 31; Hirsjärvi, Remes & Sarajärvi 2010, 161.)

Qualitative research requires a strong theoretical foundation (Koivula, Suihko & Tyrvänäinen 2002, 31). The research began with the collection and structuring of theoretical background information. Information was collected on the private security sector and services, as well as on the supervision exercised by the Police Board and police departments. The theoretical background information of the study has been formed by legislation concerning the private security sector, regulations and decrees of various parties, regulations and instructions of the Police Board and the Police University College, literature in the field and various studies in the field.

In addition to getting acquainted with the theoretical information, an interview study was conducted. It is suitable for qualitative research material acquisition from taking into account the research topic and its content. The interview was rated the best as an appropriate data collection method when the directions of the responses were not known in advance and were expected to be complex. (Hirsjärvi, Remes & Sajavaara 2010, 205). The interviews provided information on the research topic based on the interviewees' subjective experiences and the knowledge they gained, as well as on the interpretations formed about the issues (Hirsjärvi & Hurme 2008, 47–48).

2.1 Qualitative Research

Research methods are needed in research. The method is a technique used to collect, analyze and interpret data. The methods can be roughly divided into two groups. Research methods include qualitative and quantitative research. The research method can generally also be chosen according to the research problem. Qualitative research is usually chosen for use when it is desired to elucidate some new phenomenon. Research can be used to produce a comprehensible and accurate description of the phenomena being studied. When a researcher wants information

about the deeper meaning of a phenomenon and how people experience the phenomenon, qualitative research is more appropriate. (Kananen 2008, 18-27.)

A qualitative study is characterized by an attempt to describe the research topic holistically, which is reflected in this study primarily as a description of various observations emerging from the data, and not as a detailed assessment of individual variables. Qualitative research is based on describing real life. Reality is seen as a diverse whole that is constantly shaped by the events that interact with each other. Therefore, qualitative research seeks to look at the subject as holistically as possible. (Hirsjärvi, Remes & Sajavaara 2010, 157-159).

The qualitative research method was selected for this study for the above reasons. There have been a few studies on the supervision of private security services, but these have been mainly quantitative. This master thesis study specifically seeks to provide qualitative information that could potentially be used in the development of the industry and supervision.

The empirical material of the study consists of interviews. The interviewees are experienced professionals in the private security sector and services. The interviews were conducted as semi-structured thematic interviews, ie themes but also specific questions have been considered for the interview. Thus, some aspects of the interview have been locked in, but not all (Hirsjärvi, Remes & Sajavaara 2010, 208). In this case, answers are given to exactly what you want, but still in such a way that the interviewees are able to say it in their own words to tell things without being unnecessarily under the control of the interviewer (Koskinen, Alasuutari & Peltonen 2005, 104–105).

The interview study was selected as the method because of the above considerations. The purpose of the interviews is to obtain and utilize experience-based information. Experience-based knowledge of supervision of private security services is very important so that we know if oversight is up to date.

Interviews for this study were conducted in January 2021. The first three interviews were conducted using the Microsoft teams application, in which the interviews are also stored. The last interview was conducted as a live interview, which is saved in the phone recorder. The

material of all the interviewees is at the request of the author. Interviewees appear anonymous in this study.

Four interviewees were selected for the study to supplement other material. The interviewees were selected from a variety of actors representing the widest possible field of private security. Due to the nature of the research, the interviewees are required to have a broad understanding and knowledge of the tasks in the field. Each interviewee has valid private security licenses as well as other industry approvals. The interviewees are of different ages, and the interviewees represent Finland all over our country.

The number of interviewees seemed sufficient, as during the four interviews the same themes emerged, indicating that the interviewees agree with the content of the case. Other interviewees were set aside for the study if there were huge differences of opinion.

In addition to the interviews, the material consisted of research in the field, literature, instructions and regulations, and various statistics. The statistics presented in this study are from the Security Sector Supervision Unit of the Police Board. The statistics may differ from the others presented, as the new licensing system of the National Board of Police was introduced in May 2015, so according to the National Board of Police, it still has limited reporting features. A total of ten separate documents became statistical data, so the statistics presented in this study have been compiled on the basis of these documents. Statistics available via email on 13.1.2021,

The statistics and figures have been intended to illustrate the private security sector as a phenomenon and to describe the field of phenomena as accurately and accurately as possible.

2.2 Concepts

This section describes and introduces the most important concepts and actors for the study. The purpose of the introduction of the concepts is to clarify for the reader the actors presented in this study.

As we begin to define the concept of private security, we will have to travel back in history. The concept of private security in its current form has been influenced throughout history by many different events such as evolution, need and emotion, and various wars and conflicts. Nemeth (2011) has highlighted the growth of the commercial sector, the expansion of society, and the changes of the 19th century in the United States as the most significant factors in the development of private security. At the time, in the United States, public safety authorities were unable to meet security needs. It can therefore be said that the current state of private security has been shaped by many different factors that have affected the security of society. Perhaps the best known and oldest private security player was Allan Pinkerton. The success of his time has helped shape the concept of the private security industry to this day.

Finland's The Security Committee has defined security as a state where threats and risks can be managed (The Security Committee 2017). The definition is also acceptable for this study. According to various sources, the definition of a private concept is well-established, not intended for the public. Taken into account in their entirety, these definitions give us a preliminary idea of what private security means. When we connect a private security service provider to it, the definition could be a private service produced by a private service provider that is sold where risks and threats are observable. The concept of private security today varies from research to research. However, as a general rule, private security can be easily determined: "A state actor, ie a private service provider, does not provide private security."

Supervision as well as security is a concept that is quite multidimensional and difficult to define exhaustively. Supervision usually involves judicial institutions and actors such as the police and other authorities who carry out supervision in their specific capacity. Supervision thus belongs to the authority, but on the other hand, individuals also supervise themselves and each other, in which case it is sometimes possible to speak of a supervisory and observation society (Kuusela & Ylönen 2015, 5). The content of the concept of supervision depends on the object of supervision and on the perspective and context in which supervision is considered. In common parlance, supervision is most often understood as the actual activities performed by the police or other public authority and private security personnel. In organizations, supervision refers to the monitoring and evaluation of administrative activities and, if necessary, intervening in activities that conflict with the given objectives (Johansson 1999, 203).

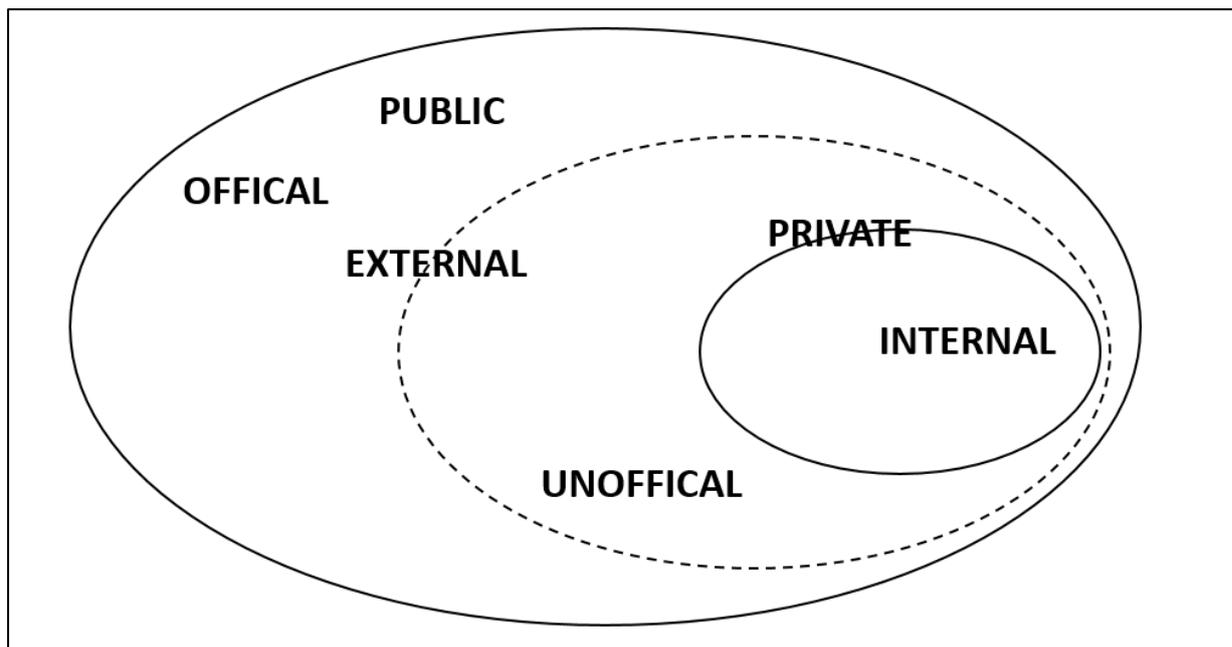


Figure 2: Dimension of supervision of private security services (Applied from Hautamäki 2016)

In her own research, Hautamäki (2016) has described the control concept as very diverse. Figure 2 illustrates Hautamäki's (2016, 58) view of the dimensions of supervision. The figure reflects well the principles of the rule of law and the various supervision bodies. Although law has given the responsibility for the supervision of the private security sector to the National Police Board, according to Figure 2, many other parties also participate in the supervision. These bodies use various means of supervision, which are legality supervision, inspection, guidance, civil supervision, administrative power, consumer protection and expediency supervision (Hautamäki 2016).

Here, the most important terms of Finnish private security services are clarified, which play a key role in this study. Going through the terms is important because of the perception of the whole, the industry, and supervision.

Private Security Sector refers to service and design, installation, training and expert tasks referred to by private service providers. (National Board of Education 2020b)

Private Security Services refers to the security guard business, security steward business and activities and security officer activities. The Private Security Act (Laki yksityisistä turvallisuuspalveluista 1085/2015) regulates the activities of private security services.

Private Security Business License. A company providing private security services must have a private security business license issued by the Police Board (Laki yksityisistä turvallisuuspalveluista 1085/2015).

Manager. In general, the manager means a person employed by the holder of a security business license who is responsible for ensuring that the licensee's activities or business are managed in accordance with the provisions of the Private Security Services Act (Laki yksityisistä turvallisuuspalveluista 1085/2015).

Security Guard means a person who performs guard duties in the service of the holder of a security business license. It is the duty of the guard to perform the security guard task assigned to him in his own guard area. (Laki yksityisistä turvallisuuspalveluista 1085/2015).

Security Steward means a person whose task is in the service of the holder of a security business license or otherwise to perform security steward tasks. The task of the security steward is maintaining law, order, security and preventing crime, and accidents in the area of security steward. (Laki yksityisistä turvallisuuspalveluista 1085/2015).

Security Officer means a person responsible for the design, installation, repair or modification of structural protection or electronic control systems and for the design of other security arrangements (Laki yksityisistä turvallisuuspalveluista 1085/2015).

Trainers in the private security sector means use of force trainers, security steward trainers and firearm trainers approved by the Police Board who train the training specified by law.

Teachers of educational institution refers to vocational qualification teachers whose qualifications are regulated by the Regulation (Asetus opetustoimen henkilöstön kelpoisuusvaatimuksista 986/1998).

Supervision of private security services. The general guidance and supervision of private security services, use of force trainers, firearm trainers, security steward training providers and security steward trainers is the responsibility of the Police Board (Laki yksityisistä turvallisuuspalveluista 1085/2015).

2.3 Theretical Framework

The security guards and security stewards of the private security services exercise public authority in the performance of their duties in accordance with Article 124 of the Constitution (Constitution 31/1999). When public authorities exercise public authority, Article 22 of the Constitution, fundamental rights, official responsibility and the principles of good administration, binds it. When a task involving the exercise of public authority has been entrusted to a private individual under the Constitution, it is bound by the requirements of legal certainty and good administration laid down in the Administrative Procedure Act (Administrative Law 434/2003). According to the Constitution, tasks involving a significant exercise of public authority cannot be performed by anyone other than an authority. Since Article 22 of the Constitution obliges public authorities to ensure the realization of fundamental and human rights, the obligation of public authorities to ensure that they are also realized when a private company providing security services exercises public power can be deduced from it. The more the exercise of public power can interfere with the status of the individual, the more necessary control must be considered.

The most important fundamental rights for private security service providers are freedoms. These measures often concern the individual's right to personal security, liberty and integrity, freedom of movement and protection of property. Personal integrity is also closely linked to the protection of privacy, which includes the right to dictate oneself and one's body. (Hautamäki 2016, 10-12; Kerttula 2010, 1-6 & 150-156)

Security guards and security stewards do not have the status of so-called administrative officials. They work in an employment relationship and are not considered officials or public authorities in the sense in which they are generally referred to. Nevertheless, security guards and security stewards are acting with criminal liability. This therefore means that the provisions

of chapter 40 of the Criminal law (39/1889) on official offenses may apply to security guards and security stewards. Their criminal liability is due to the fact that they exercise public authority in their office. Above all, the provision on official responsibility is intended to emphasize that if non-public authorities are entrusted with tasks involving the exercise of official authority, the exercise of that power must be accompanied by a special responsibility. (Kerttula, Huttunen & Ojala 2008, 126-129)

In the field of supervision of the private security sector, the statutory task of public authorities is to ensure that the public administration tasks entrusted to the sector are carried out in accordance with the principle of the rule of law. The key then is to identify when the privatization and performance of tasks transcends legal boundaries and threatens the fulfillment of fundamental rights, legal protection and good governance. When a security service is procured as a purchasing service (through an assignment agreement) and the parties are private, such as a shopping center and a security business licensee, supervision of the activity is transferred in part beyond the control of the public authorities. Disputes concerning the contract and the tasks agreed in it are subject to civil and consumer remedies. Legislation must ensure that the main elements that threaten the fulfillment of fundamental rights, the rule of law and the requirements of good administration in the operation of the private security sector remain under the control of public authorities. (Hautamäki 2016, 162-164)

The second important and essential theoretical theme of this study is accountability. Accountability is essential as a theme, as it allows us to reflect on the nature of supervision. From scientific research, we know that private security has several responsibilities, both formal and informal. Assumptions that private security may not have public accountability and / or is held to be less accountable than the public police have been largely questioned. Berg & Shearing (2019) have raised the issue of responsibility in their own research. The study has specifically sought to understand the nature of accountability in the private security sector. In the study, responsibility is clearly defined:

By accountability, we simply mean having the obligation to answer (to another entity) for one's activities - this includes both those activities that have happened and that will happen. It also means being transparent – allowing one's activities to be accessible to others.

Power always brings with it responsibility - is an old saying. This accountability theme is an important and significant part of this research as well. Accountability for the legitimacy of action is an essential theme that emerges in many studies of private-public relations. This also provides an important basis for the supervision-theme of this study.

Security guards and security stewards in private security services therefore have an important role to play as a provider of security services. Actors have rights and obligations enshrined in law. They also have responsibilities. With these factors, the actions of private security services must be supervised.

3 Private Security Sector

This section introduces the private security industry as a whole. Private security services are just one part of the private security industry. The Private Security Services Act (1085/2015) regulates private security services and the actors under it in Finland.

The actors of private security services are defined at the legal level. These definitions are in part somewhat incomplete, and an unfamiliar person may not get an accurate picture of the actors. For this reason, other sources and materials have also been used to describe the actors.

The actors in the private security services presented in this paragraph, as well as a few other actors in the private security sector, are subject to the control of the police administration presented in this study.

The private security sector has grown strongly internationally over the past thirty years. One reason for the strong growth is that the private security sector is increasingly carrying out fewer tasks previously held by the police. (Waard 1999). In addition, services in the sector have been able to meet the security needs of businesses and private households, where government action has not traditionally played a key role (Paasonen & Ellonen 2017, 13).

Worldwide, the commercial private security market is valued at over 139 billion dollar in 2011. The growth of private security companies is enormous. In many countries the number of employees of private security companies is many times higher than amount of police officers. In the UK, private security personnel have outnumbered the police officers by a ratio of nearly two to one. Total security personnel growth between 1951 and 2001 is from 66 950 to 161 013 in UK. Whereas in the USA the ratio between public police officers and private security employees is three to one. South Africa is home to the largest private security market in the world measured as a percentage of GDP, with over 6,000 companies employing 375,000 active private security officers. It is no surprise that the G4S is by some estimates the largest single private employer on the continent, with a total of 106 605 employees in twenty-nine African countries. (Abrahamsen & Williams 2011, 19-22).

The growth of private security sector can also be seen in practice. Shopping malls, subways or large open city blocks are much more likely to run into a security guard or security steward than the police (Bayley & Shearing 2001, 17). The total number of security guards and security stewards has grown much faster than, for example, the number of police officers. Employees of private security services may also have to deal with it in contexts other than their role as security guards or security stewards. Security companies often carry out security inspections of air traffic, ports and courts, although other parties in accordance with the relevant laws may also perform their duties. (Kerttula 2010, 2).

According to Paasonen & Paasonen (2012) with its growth, the private security sector has become an increasingly visible and significant player in society. It has grown its customer base from traditional trade and industry to new sectors. Many industries have wanted to focus on core operations, as a result of which security operations have been outsourced. The private security sector has also moved to operate more and more in public places. The growing role has blurred the line between the public and private sectors, which is still affected by the resources of security authorities.

Table 1: Actors of the private security sector and services (Applied from sources: Santonen & Paasonen 2015, Laki yksityisistä turvallisuuspalveluista 1085/2015)

Private Security Sector	Private Security Services in Finland (Laki yksityisistä turvallisuuspalveluista 1085/2015)
<ul style="list-style-type: none"> • Private Security Services • Security Experts • Other training services • Information / Cyber Security services and actors • PMSCs 	<ul style="list-style-type: none"> • Security guard business • Security steward business • Security officer activities

Santonen and Paasonen (2015) have compared the private security sector to an iceberg where only a small part is visible. These visible functions make up only a very small part of the whole industry. Very often, private security services are divided into security services, private detectives, public order and security inspections, where authorities can be used under special provisions. In addition, protective security is now highly visible as the area has become increasingly associated with security technology where use has grown strongly. However, most of the iceberg is invisible beneath the surface. As a whole, the sector also consists of many other services and products that may not be considered part of the sector. Examples of these are various security expert and training services, as well as actors that produce information security technologies and security systems. In addition, producers of private military services have often been considered part of the industry. Today, these services are increasingly responsible for security sector reform in many countries, such as Afghanistan and Iraq. These activities can be considered to be part of the iceberg that remains underwater, however, it is a significant part of the part that consists of private security services. Table 1 clarifies the distinction between the private security sector and private security services.

Paasonen and Santonen's description of the private security sector at the top of the iceberg is apt and well descriptive of the entire sector. The scope and functions of the private security industry are challenging and diverse. In Finland, the private security sector is comparable to

other European countries. In Finland, as in many other European countries, the structuring of the sector according to Table 1 is very common. (Paasonen & Santonen 2015). In many cases, private security services are sold as a whole, which includes both activities under the private security business license and activities outside the business license, including training and consulting. In order to achieve the best quality and result, the best solution would be to combine these functions in Table 1 into functional, customized and individual functions and services.

My own experiences of defining the field and its scope also support the views of Paasonen and Santonen (2015). The exact number of people working in the private security sector cannot be determined either, because there is a lot of turnover in the sector and some of the jobs and employees in the industry work only part-time. The part-time theme then has a major impact on the numbers in the sector, which in turn is reflected in the high levels of approval for security guards and security stewards.

According to researchers (Santonen & Paasonen 2015) It is difficult to obtain reliable statistics on private security services in the Finnish and international markets. Studies have been done and various market reports have been prepared, but only very limited conclusions can be drawn from these results. For example, based on Statistics Finland's skill classification, only a very limited picture is obtained in Finland. Most companies have other businesses in addition to security services, which in turn allows these companies to classify themselves into other industries, as they often do. (Santonen & Paasonen 2015).

3.1 Business of Private Security Services in Finland

Finland's internal security is the responsibility of the internal security authorities, which include the police, customs and the border guard. Not all businesses or households have the desire or resources to protect their property or the people associated with it. In order to ensure their security or to supplement the security services they produce themselves and those provided by society, companies, communities and households can buy security services themselves. (Paasonen & Ellonen 2017, 19).

The private security sector covers a wide range of players, which makes it difficult to define the sector in simple and clear-cut terms. Operators most commonly referred to as the private security sector include private security companies, security guards, security stewards, persons conducting security checks and security officers. (Poliisi 2020b). Traditional security check activities at airports, ports and courthouses are not a function defined in the Private Security Sector Act (1085/2015), so the law does not directly consider it to be a private security services activity either. Security guards and security stewards can be assigned to security inspection tasks, but in that case the competence comes from other legislation (Korhonen 2016, 49). Section 1 (1) of the Private Security Services Act (1085/2015) defines private security services as an entity consisting of security guard business, security steward business and security officer activities. It is therefore important to define the sector and the services separately, as the services are strictly regulated by act (1085/2015).

Table 2: Private security services actors, tasks and legal competence (Laki yksityisistä turvallisuuspalveluista 1085/2015)

Actor	Task	Legal Competence
Security Business License	Prerequisite to engage in security guard business security steward business and security officer activities	Practice security business
Manager	Responsible for ensuring that the licensee's activities or business are managed in accordance with the provisions of the Private Security Services Act	Internal supervision of company
Security Guard	Security of property, protection of the integrity of the person, detecting offenses against the principal and overseeing these tasks.	Introduced in section 3.2
Security Steward	Maintaining law and order and preventing crime and accidents in the area of security steward	Introduced in section 3.3
Security Officer	Design, installation, repair or modification of structural protection or electronic control systems and design of other safety and security arrangements.	Performing security officer tasks
Trainers	Training of security guards and security stewards in the use of force, training of security stewards and training of security guard firearm training	The right to train such training

Table 2 illustrates the actors, tasks and legal competence of private security services. As we can see from the table, the key roles of actors in private security services are diverse. Indeed, there is often a situation where the average citizen is not separated from the guard and the steward. This is also often noticed in news about the sector and operators, where the names of the operators are presented incorrectly. Whether this has any significance from the point of view of the citizen is another matter, but it only well reflects the fact that the regulation of actors is not entirely clear from the point of view of the citizen. In Finland, there has been a debate within the industry as to whether we actually need so many different actors. Could the tasks be combined so that we have only one security officer instead of many actors and licenses?

A certain degree of ambiguity in the sector is also reflected in the fact that not every police officer has a clear knowledge and understanding of the actors, legal competence or tasks of private security services. This issue and theme has also come to the fore in this research as well as in the research interviews. This is easy to compare with the tasks and powers of the police as defined in the Police Act (Police Act 872/2011). The police act as police, whether the job was with the police, whether it was a special activity or a criminal investigation. In the private security sector, work tasks vary, which means that competencies, work clothes and the task enshrined in law also change.

The private security sector is a specially regulated industry in Finland. The private security sector is controlled and supervised by the National Police Board and local police departments. (Paasonen 2018). A company providing private security services must have a private security business license issued by the Police Board. In addition, the company must have at least one responsible manager, whose activities are described in more detail in chapter 3.5. Other actors of the private security services has shown in the table 2. Approval for various tasks in the field must be sought from either the local police department or the police board. (Laki yksityisistä turvallisuuksipalveluista 1085/2015, HE42/2016). On December 23, 2020, there is an updated file on the national police website, according to which there were a total of 899 companies in Finland that had received a security business license at that time (Poliisi 2020c). Most of the permits are limited to security officer activities only (security technology). The approvals of security guards and security stewards and other are shown in Table 3.

Table 3: Valid approvals in Private Security in 2017-2021 (Poliisihallitus 2021)

	Security Steward	Temporary Security Steward	Security Officer	Security Guard	Temporary Security Guard	Firearm Trainer	Security Steward Trainer	Use of Force Trainer	Private Security Business Licence	Security Guard Business Licence (old)	Manager	Temporary Manager	Deputy Manager
2021	46 143	263	7 093	16 960	182	40	302	332	826	-	912	10	110
2020	42 802	242	7 004	16 887	259	46	305	344	885	-	983	11	110
2019	47 850	292	6 864	16 943	189	41	298	327	662	-	764	7	100
2018	47 263	888	6 776	16 259	495	45	338	290	153	126	353	3	82
2017	37 475	888	4 470	11 896	495	45	338	290	153	126	353	3	82

Table 3 divides the number of different approvals in the private security sector from 2017 to 2021 in accordance with the data of the National Board of Police. As a rule, the readings are also similar in number from their previous samples (Hautamäki 2016). An important consideration in the statistics is the explosive growth of business licenses in the private security sector. The increase is due to a legislative reform in the industry, which came into force in 2017. Until 2017, the security business was the only activity that required an old-fashioned security guard business license. The number of business permits has also clearly affected the number of caregivers, as the law requires that there be at least one caregiver in the company. A person unfamiliar with the field may be interested in the large number difference in the number of approvals as security guards and security stewards.

There are several reasons for the multiple number of security stewards. The main reasons are the extent of the training (40 lessons), part-time work, voluntary unpaid work and, in general, the nature of the work. Forty lessons of training is quite limited, which is sure to attract participants to the training. Trainings are also frequent and relatively inexpensive. In principle,

anyone can also act as the organizer of the training, as long as the trainer is a person approved for it. A large number of persons who act voluntarily and do not receive financial compensation for their duties also performs the duties of a security stewards. In addition, tens of thousands of different public events are organized in Finland every year, for which law enforcement officers are not hired at all, but the tasks are performed by a person who has received approval without compensation. There is no exact number of full-time security stewards, but I would think it is roughly equal to the number of security guards.

The statistics are also affected by the fact that a large number of actors in the field may be approved as security guards and security stewards. In addition to these, one person may have a security business license and approval to act as a manager in their company. In addition to these, a person may still have the approval to work as a private security trainer. This above information should be taken into account when looking at statistics. The figures shown in Table 3 are therefore only the approval of the authorities for different tasks, and not statistics on how many people work in different tasks in the sector. According to various sources, the private security sector employs an estimated 10,000 to 20,000 people full-time (Varmuuden vuoksi 2021).

The Act on Private Security Services (1085/2015) entered into force on 1 January 2017. With regard to the private security sector, this is a major legislative reform that has had an impact on both operators and clients. With the reform of the law, the business license was expanded when security stewards and security offices activities became partially subject to the business license, as the security business has been in the past. (Paasonen & Ellonen 2019).

According to the Act (Laki yksityisistä turvallisuuspalveluista 1085/2015) on Private Security Services, the private security sector can be divided into:

- security guard business,
- security steward business and
- security officer activities.

Only security business license holders may conduct security guard business. Private security business refers to the performance of security guard tasks performed for gainful purposes and

based on an assignment agreement. In other words, the security company must receive financial compensation for the work it performs from the customer of the security service, ie the client. The security company and the client must also enter into a written assignment agreement for the performance of security tasks. The assignment agreement defines the financial compensation to be charged for security duties. (Korhonen 2016, 4).

Security stewarding refers to appointing security stewards for duty areas and hiring security stewards. The tasks of a security steward include maintaining security, safety law and order and prevention of crime and accidents. In a public event or public meeting, security steward tasks can be carried out without a business licence. Also the so-called self-stewarding can be carried out without a business licence. In self-stewarding situations, security stewards are employed by the domain (for example, the restaurant) for which they exercise security stewarding. Otherwise, security steward business is almost similar to security guard business and requires a security business licence. (Poliisi 2020; Paasonen & Ellonen 2017, 53-56).

The security officer tasks referred to in the Private Security Services Act are: installation, repair or modification of electrical and mechanical locking systems, burglar alarm systems and access control systems, with the exception of the cabling work involved.

3.2 Security Guard

According to the act (Laki yksityisistä turvallisuuspalveluista 1085/2015), a security guard means a person who performs guard duties in the service of the holder of a security business license. It is the duty of the guard to perform the security guard task assigned to him in his own guard area. According to the Private Security Services Act, a guard duty means the following tasks:

- security of property
- protection of the integrity of the person
- detecting offenses against the principal
- and overseeing these tasks.

According to Paasonen and Ellonen, security guard duties are diverse. If the task is in the slightest part of the guard duties, it must be regarded as a security function in its entirety. Many of the tasks of the service include security tasks to a small extent, the set of security tasks is wide and varied. For example, many people who work in the lobbies of companies or work in property maintenance tasks are also security guards. The share of security guard tasks in the overall work image of employees can therefore vary in many respects. Some companies place more emphasis on multi-service functions and some companies focus more on security guard tasks. Some companies focus on one or a few more specific security guard tasks. These tasks include, for example, value transport, bodyguarding, private detective work, or alert center operations. The guard's work can thus be divided into multi-service tasks and tasks in which so-called multi-service tasks are not performed. (Paasonen & Ellonen 2017, 22-23)

A person who is known to be honest and trustworthy and who has personal qualities suitable for the duties of a security guard can be accepted as a guard. Honesty and reliability means that a person does not have a criminal record and no cases have come to the attention of the police that could affect the person's reliability. Personal characteristics mean that the guard does not have, for example, a serious injury or illness that would prevent him or her from acting as a guard. In addition, an applicant for a guard is required to be at least 18 years old but less than 68 years old. He must have successfully completed the basic training (120 lessons) of a security guard. The police department gives approval as a security guard. The approval is valid for a maximum of five years at a time, but not longer than until the guard reaches the age of 68. The police may also impose conditions and restrictions on admission as a guard. Such conditions and restrictions may relate to the personal characteristics, training or other similar aspects of the security guard and may be temporal, regional or security-related. (Laki yksityisistä turvallisuuksipalveluista 1085/2015, Korhonen 2016, 5-12)

The police may also accept as a temporary guard for a maximum of four months a person who has not completed basic security guard training (120 lessons). A temporary guard is otherwise required to do the same things as a guard, but there are differences in training requirements. The temporary security guard must have completed the training of a temporary security guard (40 lessons) prior to approval. Approval as a temporary guard is also granted by the police, and may be subject to similar conditions and restrictions as approval as a guard. (Laki yksityisistä turvallisuuksipalveluista 1085/2015, Korhonen 2016, 5-12)

The Act on Private Security Services (1085/2015) gives the security guard a number of legal competence that are only available in the security guard's duties and, in principle, in the guard's areas of operation, the area to be guarded. The legal competence of the security guard include:

- The guard has the right to prevent a person from entering the guard area and to remove a person already there under certain conditions.
- The guard has the right to arrest the person under certain conditions in his or her guard duty.
- When exercising the right of arrest, the guard has the right to inspect the arrested and accompanying goods. The security check shall ensure that the detainee is not in possession of objects or substances with which he or she may endanger himself or herself or others.
- In the performance of his or her security duties and in the exercise of his or her powers, the guard shall also have the right to use approved and necessary means of use of force which may be considered defensible. Force majeure may be used if the person subject to the guard's action attempts to avoid blocking, removing, arresting or performing a security check by resisting, or is fleeing arrest.

(Laki yksityisistä turvallisuuspalveluista 1085/2015, Korhonen 2016, 15-19)

3.3 Security Steward

According to the act (Laki yksityisistä turvallisuuspalveluista 1085/2015), a security steward means a person whose task is in the service of the holder of a security business license or otherwise to perform security steward tasks. The task of the security steward is maintaining law, order, security and preventing crime, and accidents in the area of security steward.

Paasonen and Ellonen (2017, 57) emphasize understanding the definition of the task of a steward. They think it is a good idea to divide the definition and explain what the parts of the definition mean. Maintaining law and order means maintaining a normal state. Normal state, on the other hand, is defined in such a way that no one disturbs the peace more than is appropriate to the nature of the event or place. It is important to note that the security steward must not

maintain public order but only order that is substantially the same in its area of responsibility. Security means that people can exercise their fundamental rights in the area of policing without fear and without being hindered by others. The security steward should prevent various crimes in work and in area of responsibility. Accident prevention refers to an unforeseen event that can result in property damage, destruction, death, injury, or damage.

According to the act (1085/2015) the police can accept a person as a security steward who:

- has turned 18 years old
- is known to be honest and trustworthy and has personal qualities appropriate to the task
- has passed the basic training of a security steward (40 Lessons)
- has passed the refresher training (8 lessons) of a security steward who meets the requirements specified by the Police Board no earlier than six months before applying for a new approval.

Temporary security stewards can often be present at various public events and meetings.

Temporary security stewards are not required to have security steward training. A police officer may accept as an untrained person who is at least 18 years of age and meets the requirements of honesty, trustworthiness, and personal qualities. Temporary security steward has narrower legal competence than ordinary security steward.

The security steward may be appointed to the places referred to in section 26 of the Act (1085/2015). Such places are:

- General meeting and public event
- Private event
- Camping area
- Passenger ship
- Accommodation and catering business
- University and University of Applied Sciences

(Laki yksityisistä turvallisuuspalveluista 1085/2015, Järjestyksenvalvojan koulutusmateriaali 2018, 23-30)

According to section 28 of the Act (Laki yksityisistä turvallisuuspalveluista 1085/2015), In addition to traditional security steward, a security steward can be set up to assist the police and border guards. If the maintenance of law, order and security is not otherwise appropriate and the maintenance of law, order and security so requires for a justified reason, the police department may also authorize the appointment of security stewards to assist the police or border guard. The police's own conditions for safeguarding the law, order and security of the area must be taken into account, ie the police must always consider the existence of their own conditions on a case-by-case basis. In addition, the act (1085/2015) requires that there be a valid reason to appoint security stewards in the area. According to Paasonen and Ellonen (2017, 71) the reasons for this may be the number of business premises located in the area as well as the crimes and other disturbances that have taken place in the area. In these situations, the applicant must provide sufficient grounds for security stewards. Such places are:

- Health and social work offices
- Social Insurance Institution of Finland
- Work and Economic Development Office
- Shopping centre
- Traffic station
- Port
- Airport
- Public transport vehicle
- Reception Center (Finnish Immigration Service)

Security steward duties assigned to assist the police and border guards may only be performed by the holder of a security business license or a person employed by him or her who has not reached the age of 68 and who has successfully completed security guard training (120 lessons) and is validly approved as a security steward.

(Laki yksityisistä turvallisuuspalveluista 1085/2015, Järjestyksenvalvojan koulutusmateriaali 2018, 32-33)

The legal competences of the security steward (Laki yksityisistä turvallisuuspalveluista 1085/2015 41, 42, 43, 45, 46, 47, 48 §):

- The security steward has the right to prevent a person from entering the security steward area under certain conditions.
- The security steward has the right to remove a person already in the security steward area under certain conditions
- The security steward has right to retention people on board and at public meetings under certain conditions
- The security steward has the right to arrest the person under certain conditions in his or her security steward duty
- The security steward has right to performing a security check under certain conditions
- The security steward has right to removal of prohibited articles and substances under certain conditions
- The security steward has right to use of force under certain conditions

3.4 Manager

The Private Security Services Act defines the manager in the Act. In general, the manager means a person employed by the holder of a security business license who is responsible for ensuring that the licensee's activities or business are managed in accordance with the provisions of the Private Security Services Act; a natural person holding a security business license is also considered to be employed. The holder of a security business license must have one or more equivalent managers with a valid approval issued by the Police Board as the corresponding manager of that security license. The Police Board determines the number of responsible managers based on the scope of activities that require a permit, the number and location of locations, and other similar factors. The Police Board also determines the responsibilities of the responsible managers. (Laki yksityisistä turvallisuuspalveluista 1085/2015).

The statutory task of the manager is provided for in section 76 of the Act (1085/2015):

- the use of force equipment's in duties by assignment
- keeping the dog in guard duties on a commission basis
- the use of non-guard attire by assignment
- the use of the guard's uniform for purposes other than guard duties

According to Paasonen & Ellonen, the understanding of the managers's competence is too narrow when interpreting the above-mentioned regulation on the managers's competence. According to the act (1085/2015), by definition, the managers is responsible for ensuring that the activities of the holder of a private security business license are conducted in accordance with private security law and regulations. (Paasonen & Ellonen 2017, 126-127). In that case, the law could be interpreted as meaning that the manager employed by the security business license is fully responsible and supervises the activities of the company from the point of view of private security legislation.

The Private Security Services Act (1085/2015) does not in any way stipulate that the job of the manager should be full-time work. The explanatory memorandum to the law (HE 22/2014), on the other hand, states that the manager usually also performs other tasks and that acting as the manager is an ancillary task. It's also good to note that a manager doesn't have to be in any kind of managerial position.

The act (Laki yksityisistä turvallisuuspalveluista 1085/2015) also clearly defines the circumstances in which a person may be accepted as a manager. The first condition is an absolute age of at least 18 years. The second condition is the education of the manager as defined by act. The training required is a Specialist Vocational Qualification for Security Officers. In addition to these, the manager is known to be honest and trustworthy and is personally suited to be a manager. This means that the Police Board uses its discretion when making a decision on seal of approval to manager.

3.5 Trainers in the Private Security Sector

Private security trainers can be divided into four different categories:

- Use of force trainers
- Security Steward trainers
- Guards firearm trainers
- (Teachers of educational institutions)

The training of trainers is the responsibility of the Police University College. After the approved training, the person can apply for approval as a trainer from the Police Board. Only trainers approved by the Police Board are entitled to train the trainings mentioned in Table 4. The exception is educational institutions and police departments that are licensed to provide security stewards training. The teachers of educational institutions and police departments does not need a security steward trainer approved by the Police Board. (Laki yksityisistä turvallisuuspalveluista 1085/2015 & Järjestyksenvalvojan koulutusmateriaali 2018, 10-11).

Trainers approved by the Police Board must comply very closely with private security legislation and acts, supplemented by regulations issued by the Police Board. The most binding regulations are the Police Board Regulation on the content of security guard training (POL-2017-579), which precisely defines the teaching content of security guard and temporary security guard training as well as the structure and hour distributions of the training. Another very binding set of regulations is the Police Board's order on the use of force training in security guards and security stewards (POL-2017-1340). The order contains instructions related to use of force training, which in turn obliges the trainer to follow them very closely. The regulation also includes 19 appendices, which specify the training content of the use of force. The Police University College, on the other hand, has drawn up the training cards included in the order, in which the training content has been specified very precisely. Trainers are required to follow these regulations and instructions issued by the authority.

Table 4: Private security training for which trainers have the right to train (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015, Sisäministeriön asetus 878/2016)

	Basic training of a security steward (at least 40 Lessons)	Refresher training of security stewards (at least 8 lessons)	Basic training of a security guard (at least 120 lessons)	Basic training in the use of force (at least 6 lessons)	OC sprayer training (at least 5 lessons)	Telescopic baton training (at least 5 lessons)	Refresh training of use of force (at least 8 lessons)	Additional use of force training of security steward (at least 16 lessons)	Security guard firearm training (at least 24 lessons)	Refresh firearm training of security guards (at least 8 lessons)
Use of Force trainer				X	X	X	X	X		
Security Steward trainer	X	X								
Guards firearm trainer									X	X
Teachers of educational institutions	X	X	X							

Table 4 simply shows the training defined in private security legislation that requires a trainer approved by the Police Board. Training can be distributed according to the permit conditions of the trainer license, as in the table above, but equally training could be distributed based on their temporal location. The first is the basic training of a security guard and a security steward, which includes studying the basics of the use of force. OC sprayer and telescopic baton trainings can be taken as part of the basic trainings, or later as separate training packages. Completion of these trainings is a prerequisite for access to the firearms training of the guard as well as additional training in the use of force by the security steward. Once these trainings have been completed, the competence must be maintained and annual defined refresher trainings must be completed. These training mentioned above constitute the minimum training for private security services.

The duration of the use of force trainer training is at least 56 lessons. Upon request, the Police Board may accept an applicant as a use of force trainer who:

- has reached the age of 18 but not 68
- has successfully completed use of force trainer training less than six months prior to applying for approval
- is known to be honest and trustworthy and is fit for his personal qualities.

The duration of the security steward trainer training is at least 40 lessons. Upon request, the Police Board may accept an applicant as a security steward trainer who:

- has turned 18 years old
- has passed the basic training of a security steward
- has successfully completed a basic course as a security steward instructor less than six months prior to applying for accreditation
- is known to be honest and trustworthy and is fit for his personal qualities

Pursuant to section 40 of the Act (1085/2015), the police department and the organizer of training who have a permit for the organization of degrees and training for a vocational degree in security or a Further vocational qualification in security by the Ministry of Education and Culture referred to in the Vocational Education Act (Laki ammatillisesta koulutuksesta 531/2017) are excluded from the regulation of security steward trainer training.

The duration of the firearm trainer training is at least 80 lessons. Upon request, the Police Board may accept an applicant as a firearm trainer who:

- has reached the age of 18 but not 68
- has successfully completed use of force trainer training
- has satisfactorily completed training as a firearm trainer less than six months before applying for approval
- is known to be honest and trustworthy and is fit for his personal qualities.

(Sisäministeriön asetus voimankäyttö-, ase- ja järjestyksenvalvojakouluttajien koulutuksesta 876/2016)

In addition to trainers approved by the Police Board, there is another category of trainers. This category includes educational institutions providing security guard training and teachers who

teach this. The training of a security guard is qualified to be given by a person whose requirements can be found in the decree (Asetus opetustoimen henkilöstön kelpoisuusvaatimuksista 986/1998). A person is required to have a university degree suitable for the teaching task, pedagogical studies of at least 60 ECTS credits and at least three years of practical work experience in positions corresponding to the content of the teaching task, as decided by the education provider. The requirement for a suitable university degree may be waived if the university education system does not have the appropriate university degree required by the teaching task decided by the education provider or if the teaching task decided by the education provider requires particularly strong or specialized practical skills. In this case, the teacher must have a special vocational qualification suitable for the teaching task decided by the education provider or, if there is no suitable special professional qualification in the degree structure, other appropriate degree or education, the teacher's pedagogical studies and at least five years of practical work experience. The guard training teacher is therefore not required to have separate approval from the police board. More information about this in chapter 3.6. Teachers also do not need a security steward trainer approved by the Police Board.

3.6 Training of Private Security Actors

The private security education system has developed strongly in recent years. Over time, training has become more and more concentrated in educational establishments licensed to hold degrees. (Paasonen & Paasonen 2012). The organization of vocational degrees and education requires a permit for the organization of degrees and education issued by the Ministry of Education and Culture. A permit to organize can be granted on application to a municipality, association of municipalities, registered association or foundation. (Opetus- ja kulttuuriministeriö 2020). The Ministry of Education and Culture grants permission to organize professional degrees in the security field as well as parts of the degree. The training of a security guard is thus a regulated part of the degree, which may be taught only by licensed educational establishments.

There are three professional degrees in the field of security (Opetushallitus 2020):

- Vocational upper secondary qualification of security and safety
- Further vocational qualification of security and safety

- Specialist vocational qualification of security officer

In the first two degrees, guard training is one part of the degree to be completed (Opetushallitus 2020b, 2020c). The Police Board, for its part, has issued a precise regulation (POL-2017-579) on the content of guard training, which is based on a decree of the Ministry of the Interior (878/2016). The degrees also include the basic training of security stewards and training in the use of force, but these require the trainers referred to in chapter 3.5.

Table 5: Basic training in the field of private security (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015, Sisäministeriön asetus 878/2016)

** Refresher training is required if 5 years have elapsed since approval as a security steward (Sisäministeriön asetus vartijan ja järjestyksenvalvojan koulutuksesta 878/2016)*

Title	Temporary training of security guard (at least 40 lessons)	The basic training of security guard (at least 80 lessons)	The basic training of a security	No training	Specialist Vocational Qualification for Security Officers	Refresher training of security stewards (at least 8 lessons)
Security Guard	X	X				
Temporary Security Guard	X					
Security Steward			X			X*
Temporary Security Steward				X		
Security Steward appointed to assist the police and border guards	X	X	X			
Manager					X	

Table 5 distinguishes between the basic training of private security service operators (excluding trainers). The table details the training of a security guard, temporary security guard, security steward, temporary security steward and manager. Security Steward appointed to assist the police and border guards the training requirement is the training of a security guard and a law enforcement officer. By law, the training of a temporary security guard alone can work for three months of the year. The training of security guard consists of two courses, temporary security guard training (40 lessons) and basic training of security guard (80 lessons). Approved completion of these courses allows a person to apply for five years of approval as a security guard. No training requirements have been set for the temporary security steward. The training requirement for a police officer and a law enforcement officer is the training of a guard (40 + 80 Lessons) and a law enforcement officer (40 Lessons). Table 5 details the minimum training for private security actors. It can be noted from the table that the training of security guards and security stewards is rather limited. The same has been stated by Vântär (2005, 55) in his own research.

Table 6: Use of force training in the private security sector (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015, Sisäministeriön asetus 878/2016))

**Included in the basic training of the security guard and security steward.*

*** If a person carries use of force equipmnets, they must undergo annual refresher training.*

(Sisäministeriön asetus vartijan ja järjestyksenvalvojan koulutuksesta 878/2016)

Title	Basic training in the use of force (at least 6 lessons)*	OC sprayer training (at least 5 lessons)	Telescopic baton training (at least 5 lessons)	Additional use of force training of security steward (at least 16 lessons)	Security guard firearm training (at least 24 lessons)	Refresh training of use of force (at least 8 lessons)
Security Guard	X*	X	X		X	X**
Temporary Security Guard						
Security Steward	X*	X	X	X		X**
Temporary Security Steward						

Table 6 details the use of force training in the private security sector. It can be seen from the table that temporary security guards and security stewards are not trained in basic training in the use of force. Basic training in the use of force is included in the basic training for security guards and security stewards. The training covers a minimum of 6 lessons. As additional training, security guards and security stewards can perform OC sprayer and telescopic baton training. In addition to these, security stewards can study additional training in the use of force for security stewards. Guard firearm training is organized regularly around Finland. No statistics were available on the number of graduates, but the number of graduates can be considered quite high in relation to work tasks.

According to Väsentär (2005, 53-56), one of the biggest shortcomings in the training of the use of force in the private security sector is the lack of qualified trainers and the trainer system.

According to Väsentär, training gives the ability to understand the risks associated with work.

The skills required for the use of force are not learned in the prescribed number of hours in security guard and security steward training and in separate use of force training. Only through regular training will the skillful structuring phase be achieved, which can be considered a minimum requirement in relation to the needs of the use of force. The training will only bring real, albeit insufficient, benefits in terms of OC sprayer training. *(The study was carried out in 2005, where the legislation was different and the education system have changed and the teaching of the use of force and trainers has been increased.)*

Vocational upper secondary qualification of security and safety produces a wide range of basic professional skills for various tasks in the field. In addition, the student acquires skills that are more specialized and professional skills required in working life in at least one area of working life. The aim of the degree is that the graduate has a broad basic knowledge and ability to work, specialize or further educate himself in all areas of the security sector, which include technical work, logistics work, environmental work, service work and private security work. Vocational upper secondary qualification of security and safety provides basic skills for professional development. The graduate is reliable, quality-conscious, self-initiated and customer service and cooperative. The graduate is able to apply the acquired skills and knowledge in various working life situations in the service of different employers or as a self-employed person. The graduate is able to see his / her work as part of larger tasks and is able to take into account the work tasks of the partners in their own work. A security supervisor who has vocational upper secondary qualification in security may specialize in security guarding and stewarding, rescue and safety or security officer activities. (Opetushallitus 2020b).

The person who has completed a further vocational qualification of security and safety knows the tasks and services of the private security services and the rights and obligations related to their performance, as well as, where necessary, the legislation related to security tasks.

Graduate is familiar with public authority organizations that are ancillary to work in the private security sector, their core tasks and the areas of corporate security. Graduate is also aware of the risks and the most common anomalies associated with work in the private security sector and is able to act in the way required by occupational safety. Graduate is also familiar with the

impact of different environments on the nature of the activities to be performed, the situation and the legislation. A graduate of a further vocational qualification of security and safety may work in the service of a holder of a security business license, for example as a security guard, receptionist, security steward, bodyguard, value carriers or a private detective. (Opetushallitus 2020c).

The person who has completed a Specialist vocational qualification of security officer has completed knowledge of private security tasks and services and the rights and obligations associated with their performance, and, where applicable, legislation relating to security tasks. He is familiar with public authority organizations that are ancillary to work in the private security sector, their core tasks and the areas of corporate security. He is also aware of the risks and the most common anomalies associated with work in the private security sector and is able to act in the way required by occupational safety. He is also familiar with the impact of different environments on the nature of operations in terms of the situation as well as legislation. A person who has completed the degree may act as a manager in the private security sector. In addition to the private security sector, a person may also be employed by business or government organizations as a supervisor and in expert positions. (Opetushallitus 2020d).

4 Supervision of Private Security Services

In the world, several different parties supervise different activities. The supervision of operations aims to ensure the functionality, legality and quality of the services. The principles of supervision of security services can be applied to the supervision model described in the theoretical framework of this study. In Finland, official supervision in the private security sector is the responsibility of the police board and police departments (Act on Private Security Services 1085/2015). The purpose of supervision is to ensure that private security actors act as required by law. Failure by a private security operator to do so will result in a penalty.

Regulatory supervision also includes general guidance and advice by the authorities, mainly the Police Board. In my view, this general guidance is, to a certain extent, an even more important and significant theme of control than the investigation of omissions. The operation of the

private security sector is regulated in many sources of law, so perceiving the entities can often be challenging. In addition, this importance of general guidance and counseling is emphasized by the purpose of the law enshrined in the Private Security Act (1085/2015):

" The purpose of this Act is to ensure the quality and reliability of private security services and to promote co-operation between public authorities and private security services. "

The aim is precisely to ensure quality and to promote cooperation. This has also been well highlighted in the preliminary works of the law. The draft law therefore sets out concrete measures to promote co-operation. On the other hand, the descriptions of co-operation given in the preamble to the law are ones which, in my view, are self-evident for those involved in the sector. The preliminary work of the law has not taken a position on other types of co-operation, such as training, information exchange and feedback. However, I would consider the latter to be important, both in terms of supervision and cooperation in this area. Indeed, scholars have noted that private security services are subject to a statutory prohibition on accepting an assignment that commits to maintaining public order and security, which, however, may not be as back as it is enshrined in law. Law enforcement officers assisting the police and border guards have been cited as one such factor, which researchers say is a substitute for scarce authority resources in their work. Indeed, it has been apparent in certain assignments that a private actor acts as a substitute for the police and is responsible for public order and security in his or her area of responsibility.

The private security services and related operators set out in Section 3 must strictly comply with the relevant legislation. These actors are subject to various supervision measures by authorities such as the Police Board and local police departments. Actors under private security services may commit crimes by neglecting their duties and tasks. The punitive provisions for private security services are set out in more detail in Chapter 9 of the Act (1085/2015). Penalty provisions tell actors how, at least, they cannot act while performing tasks. In addition, supervision has a precautionary purpose. (Paasonen 2017, 153)

Private security services are a specially regulated industry in Finland. The operations must comply with the Act on Private Security Services and other legislation in force in Finland. It

should be noted that the Private Security Services Act explicitly provides for the performance of security-related tasks. Failure to carry out self-supervision may result in regulatory oversight measures (Paasonen & Ellonen 2017, 127). The performance of the so-called ancillary tasks does not extend to the supervisory responsibility under the Private Security Services Act, they may be subject to other applicable legislation. (Paasonen & Ellonen 2019). The police play a key role in supervising the private security sector. The police board directs public guidance of the supervision of private security services. Police departments in their areas are responsible for supervising security services and licensing employees in the field. (Laki yksityisistä turvallisuuspalveluista 1085/2015).

The supervision of private security services is regulated in Chapter 7 of the Act (1085/2015). Article 84 defines the sector as supervisory authorities for general guidance The Police Board and the police departments in their respective areas of responsibility. Pursuant to section 85 of the Act (1085/2015), the Police Board and police departments have the right to receive information from the objects of supervision that is necessary for supervision. In addition, police departments have the right to inspect the locations of security business license holders located in their area of responsibility. The report prepared for the inspection shall be submitted to the Police Board. According to Kohronen (2016, 32) Supervision by the police board and police departments includes private security services, use of force trainers, firearm trainers, security stewards trainers and security steward training providers, security guards and security stewards, security officers and managers. The police have the right to carry out inspections at the premises of security business license holders located in their area of jurisdiction. In connection with the official inspection, the holder of the business license shall provide all the information required by the inspectors. The subject of the audit is the company's operations, personnel, financial position and other matters related to the operation of the business. The Police Board and the police departments also have the right to receive all necessary information on the performance of security guarding, security stewarding tasks, as well as on the organization of training for security guards and security stewards. The police also maintain records of security guards, use of force trainers, firearm trainers, security stewards, security officers, security steward trainers, security business license holders, and their managers and responsible persons. (Kohronen 2016, 32)

4.1 Division of Supervision

Supervision of the private security sector can be divided according to the performer of supervision, the subject of supervision and the timing of supervision. This framework can also be seen in the context of the provisions of the Private Security Services Act. The division can be seen not only in the substance of the provisions but also in the structure of the law. When looking at the supervision of private security services on the basis of the person performing the supervision, a rough division can be made into official supervision by the police and self-supervision. Table 7 illustrates the subjects of private security services supervision, the persons performing the supervision, and the right of access to information and inspection. According to Paasonen & Ellonen (2019; 2017, 122), the supervision of private security services can be divided in the following ways, for example:

1. Performer of the supervision
 - a. Official supervision by the authorities
 - b. Self-supervision
2. The subject of supervision
 - a. Employee
 - b. Employer
 - c. Manager
 - d. Trainers
3. Timing of supervision
 - a. Proactive supervision
 - b. Up-to-date supervision
 - c. Afterwards supervision

(Laki yksityisistä turvallisuuspalveluista 1085/2015; Paasonen & Ellonen 2019; 2017,122).

Table 7: Parties involved in supervision (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015)

The Object of Supervision	Police Departments	National Police Board for Public Guidance and Supervision	Right of Inspection (Police Departments)	The right to obtain the information necessary for supervision (Police Departments and National Police Board)
Security Guard and Temporary Security Guards	X	X		X
Security Stewards and Temporary Security Stewards	X	X		X
Security Officer	X	X		X
Security Business License holder	X	X	X	X
Manager	X	X		X
Use of Force Trainer	X	X		X
Security Steward Trainer	X	X		X
Security Steward Training Providers	X	X		X
Guards Firearm Trainer	X	X		X
Security Guard Training Providers	X*	X*		X*

* *Exceptions to supervision Parties involved in supervision*

Table 7 illustrates supervision under private security services by defining the objects of supervision and the persons / authorities performing the supervision. The table lists all the

actors whose supervision is regulated by private security act. It is clear from the table that the National Board of Police is responsible for the overall guidance and supervision of all actors. Local police departments handle approval and revocation decisions for security guards and security stewards. The Police Board, for its part, approves other business license and trainer matters specified in the list.

It should also be noted that private security services are also supervised by other authorities. The Parliamentary Ombudsman and the Chancellor of Justice of the Government also supervise actors when their duties include tasks equivalent to public administration. If either party considers in its statement that there is a point of contention in the operator's policy, the operator must change its approach in accordance with the opinion. (Paasonen & Ellonen 2017, 127-128).

The National Board of Education supervises degree training in the field (Paasonen & Ellonen 2017, 128). Thus, the supervisory responsibility of the police board and the police departments is not exactly the same as that of the educational institutions that provides the training of the security guard. The National Board of Education appoints the working life committees to support the quality assurance of vocational education. (Opetushallitus 2019). The National Board of Education decides on the degree-specific division of labor in the working life committees. In addition to the skills and competences to be demonstrated in vocational degrees, the division of labor by degree must take into account the number and scope of individual degrees and the number of training providers and graduates. (Laki ammatillisesta koulutuksesta 531/2017). According to a publication (Opetushallitus 2019) by the National Board of Education and the vocational training act section 120 (531/2017), the tasks of the working life committees are:

- Ensuring quality by participating in quality assurance of the implementation of competence demonstration and competence assessment,
- Development of education and degree structure and
- Address the Vocational Training Act (531/2017) requests for rectification of the competence of a degree student referred to in section 55.

Other education authorities and education supervisors are presented on the Board of Education's website. These authorities include the Ministry of Education and Culture, the

Regional State Administrative Agency, provincial associations and municipalities. (Opetushallitus 2020e).

When interpreting legislation related to education, private security legislation and guidelines must be taken into account, as well as legislation, guidelines and regulations on vocational training. Interpreting the two sources of law, it could be stated that the supervision of the guard's training is the responsibility of the training provider as well as the working life committees set by the Board of Education, Police Board and police departments. The right of the Working Life Committee to access information is provided for in section 108 of the Vocational Training Act (531/2017). Section 108 therefore applies to all training that is part of vocational training.

The Private Security Services Act regulates the right of the police board and police departments to access information. Section 85 (3) of the Act (1085/2017) provides that the Police Board and police departments have the right to receive information on guard training. However, the section of the law does not specify that the guard training provider should provide this information. The disclosure of information is identified to the following parties: security guard, security steward, the provider of security steward training, security steward trainer, use of force trainer and guards firearm trainer. With reference to the content of the section 85 (3) of the Act (1085/2015), only the trainer of the basics of the use of force included in the training of a guard would have the right to provide information related to the guards training. Of course, this is also a bit unclear for the time being, as the law on vocational education again defines the access to information in degree education by those who do not mention the police and the police government. However, the police have the right to inspect and supervise training in the use of force, as provided for in the Private Security Services Act (1085/2015).

4.2 Timing of Supervision

According to the content of the law, decrees and memos of the private security services the timing of supervision can be determined in three ways. Paasonen & Ellonen (2019, 5-8) have also used this breakdown model:

- Proactive supervision
- Up-to-date supervision
- Afterwards supervision

Table 8: Private security licenses and licensing authorities (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015)

	The National Police Board and its Security Sector Supervision unit	Police Departments
Company specific permit	Security Business License	
Personal approvals	Manager Temporary Manager Security Steward Trainer Use of Force Trainer Guards Firearm Trainer	Security Guard Temporary Security Guard Security Steward Temporary Security Steward Security Officer (technology)

Table 8 clarifies the data in Table 7. Table 8 distinguishes between personal approvals for individuals and approvals for business licenses. Here, it is good to draw attention to the fact that only a security business license and approval as a responsible manager are linked to the company specified in the license conditions. The other permits listed in the table are personal and do not impose any conditions or restrictions that would be incorporated as part of the business. This means that the personal permissions of others can be used to serve multiple companies, entities, or organizations (exception security officer). All personal approvals are united by the fact that the person who has received the approval is responsible for his or her own activities and compliance with the permit conditions, both during work and leisure.

The first step in the regulatory supervision of the holder of a business license in the security sector is the licensing procedure related to the granting of a business license, which is provided for in section 71 of the Private Security Services Act (1085/2015). The purpose of the authorization procedure is to ensure that only reliable and honest operators who are otherwise suitable for the sector, who also have sufficient financial capacity to carry out the tasks, become operators in the sector. Proactive supervision is essential given the limited resources of the police. If all those willing to join the sector were to be accepted, significantly more

resources would have to be allocated to up-to-date supervision (Paasonen & Ellonen 2019, 5). Table 5 details the permits for the private security sector and the licensing authorities dealing with them.

Proactive supervision by the managers, security guards / temporary security guards, security stewards / temporary security stewards, security officers and trainers in the field includes personal approvals, a kind of written license, the physical identifier of which is a decision of the authority or a card. Personal approvals are provided for in sections 10, 12, 35, 37, 54, 56, 58, 61, 77 and 79 of the Private Security Services Act (1085/2015).

Periodic renewals of approvals, generally every five years, can be considered as proactive but also as an up-to-date supervision. The procedure ensures that the police at least check the registration data of operators in the sector when renewing the approval. Renewal of approvals requires continuity of the operator's integrity and reliability, as well as suitability for the industry.

Table 9: Withdrawals of approvals and warnings (Poliisihallitus 2021)

	2010	2011	2012	2013	2014	2015	2016
Security Stewards	440	454	359	358	413	473	356
Temporary Security Steward	*	*	*	*	*	1	-
Security Guards	108	146	113	124	121	133	95
Temporary Security Guard	*	*	*	*	*	1	3
Security Officer	*	*	*	*	*	24	34
Security Steward Trainer	*	*	*	*	*	-	6
Use Of Force trainer	*	*	*	*	*	5	2
Firearm Trainer	*	*	*	*	*		4
Security Guard Business License (old)	*	*	*	*	*	12	21
Private Security Business License	*	*	*	*	*	-	-
Manager	*	*	*	*	*	44	-
Temporary Manager	*	*	*	*	*	3	1
Deputy Manager	*	*	*	*	*	9	19

**No information*

Table 9 distinguishes the number of withdrawals and warnings of approvals of controlled items from 2010 to 2016. The statistics are partly incomplete due to the information provided by the Police Board. Not all information was available from the records of the Police Board. The reasons for cancellations or warnings are not considered in this table.

In order to enable an up-to-date supervisory task, the police departments and the Police Board have been granted certain rights related to supervision. The rights may be divided into the right to inspect establishments and the right of access to information, which are provided for in section 85 of the Private Security Services Act (1085/2015). By decision of any police department, the location of the holder of a security business license in Finland can be inspected.

An audit may be carried out, for example, to determine whether an operator is performing its assignments in accordance with the provisions of the Private Security Services Act. According to the draft law (22/2014), police inspections may cover, for example, the legality of assignment agreements, the existence and content of operating instructions, compliance with the provisions on temporary security guards and any registers of persons subject to measures kept by the security business license holder.

A good example of up-to-date supervision is the obligation of use of force trainers to prepare a prior notice of a training event. The use of force training instructor must therefore take into account that all use of force training events must be notified in advance to the police board. It is the responsibility of either the event organizer or the force trainer to make the advance notice. Based on the notifications received, the National Board of Police, together with the police departments, may, if necessary, direct supervision visits to training events in the use of force. Supervision visits are above all guiding and interactive. (Niemi 2018).

In order for controls and inspections to be carried out effectively in general, the police must have the right to obtain from the operators in the sector the information needed for controls. The right of the police to investigate matters necessary for supervision extends from business owners to the effective management of companies and all the way to the executive staircase, security guards, security stewards, managers and security officers. The right of access to information is not restricted except that the information must be necessary for the police's supervisory task. The police direct their requests for information to an actor they deem appropriate, such as a manager. The security guard may have to report, for example, on the boundaries of his guard area, the instructions he has received for his activities, or the permits he has received to carry use of force equipment.

Table 10: Criteria pursuant to section 88 of the Act on Private Security Services (1085/2015), on the basis of which the Police Board may revoke a security business licence.

Reasons related to the authorization holder of a security business license	Reasons related to activities requiring a business license
<ul style="list-style-type: none"> • Licensee's request. • The licensee no longer meets the conditions provided for in section 1, subsection 1 or 2 of the Act on the Right to Do Business (122/1919). • The licensee no longer meets the conditions laid down in the Act on Private Security Services and may not have remedied the deficiency within the set deadline. • The licensee has materially violated the key conditions or restrictions attached to the security business license. • The licensee fails to submit the annual report within the time limit and thereafter, despite the request, does not submit it within a reasonable time period set by the Police Board. 	<ul style="list-style-type: none"> • Activities requiring a business license have been discontinued. • Activities requiring a business license have been suspended for more than three months. • The holder of security business license or person in charge of the activity requiring a business license has been convicted by a final judgment of an offense which proves that he or she is unfit for his or her duties, or has intentionally acted in a materially incorrect manner.

Table 10, in turn, distinguishes the reasons for revoking a security business license. The information comes from the law on private security services. A further distinction has been made between whether the applicant for revocation is an authority or the holder of a security business license.

Table 11: Grounds for revoking individual permits (Applied from sources: Laki yksityisistä turvallisuuspalveluista 1085/2015)

Criteria for withdrawal	
<ul style="list-style-type: none"> • Manager • Temporary Manager • Security Steward Trainer • Use of Force Trainer • Guards Firearm Trainer • Security Guard • Temporary Security Guard • Security Steward • Temporary Security Steward • Security Officer (technology) 	<ul style="list-style-type: none"> • Person's own request (<i>In the case of the manager, also the request of the security business license holder</i>) • The person no longer meets the conditions for admission under the Private Security Act. • A person has been convicted by a final judgment of an offense which shows that he or she is unfit for his or her duties or has intentionally acted in a materially erroneous manner in his or her duties. • The person has materially violated the terms and restrictions attached to the acceptance.

Table 11 presents the statutory reasons for revoking personal approvals. Withdrawal of individual licenses applies to all approvals in the field except the business license. The point to note is that approval as a security guard or security steward will not be revoked separately if the person allows the approval to expire. The same rule can be applied to other personal permits for which time limits have been set. In this case, the statistical information is only visible when looking at the number of personal approvals.

In accordance with the Private Security Act (1085/2015), revocations of permits in accordance with Table 5 can be considered as afterward supervision. The table specifies the permits as well as the permit issuer, which is also the same as which permit can be revoked. The purpose of revoking a security business license is to prevent a security company from being exploited in a criminal or other misconduct that is materially inappropriate for the industry, or that a crime or

misconduct that has already been committed is repeated. The Police Board may issue a warning instead of revoking or suspending the security business license. Several warnings or temporary cancellations will lead according to Paasonen and Ellonen (2019, 7) likely to revoke the license completely. Section 88 of the Act (1085/2015) provides for the revocation of a business license in the security sector in more detail which are shown in the table 6 above. Afterward supervision also include the suspension or withdrawal of personal approvals or the issuance of written warnings. The revocation of personal approvals is provided for in sections 89-92 of the Private Security Services Act (1085/2015) which are shown in the table 7 above.

4.3 Self-Supervision

Holders of security business licenses are responsible for the general conditions of operation. The manager is responsible for the legality of the activities at the company level and on the part of the employer in connection with the provisions of the Act on Private Security Services. At the same time, it is a question of the statutory organization of self-supervision in the field. According to the explanatory memorandum of the Board's proposal (HE 42/2016), the main task of the manager is to act as a liaison to the supervisory authorities, ie to act as a link between self-supervision and official supervision by the police. (Paasonen & Ellonen 2019, 3).

The guards and security stewards are responsible for their own actions. Improper actions or, for example, exaggerating the use of force may result in the revocation of personal approvals. This is primarily a customer service task. Because duties can interfere with other people's fundamental rights, security guards and security stewards need to have a clear control over their words and actions. It is also often overlooked that, for example, violent behavior also in leisure time can lead to the withdrawal of personal approvals required for the job. (Paasonen 2018). Trainers approved by the Police Board and trainers in educational institutions are also responsible for their own actions. Various regulations binding on trainers are listed earlier in this dissertation. Failure to comply with acts, decrees, regulations and guidelines may, in the worst case, result in the withdrawal of the instructor approval. Instructors must comply with the regulations and carry out the necessary tasks related to self-supervision.

Self-supervision is organized in the Private Security Services Act (1085/2015) into three different sets of tasks. The same has been said by Paasonen & Ellonen (2017, 125):

- Liability has been imposed on the holder of a security business license (Employer).
- The manager has clearly defined tasks and legal competence.
- Security guards, security stewards and trainers are personally responsible for their own actions (Employees).

According to Paasonen and Ellonen (2017, 125), the position of responsibility of persons exercising the right to manage work, employed by the holder of a business license and in a supervisory position is mainly organized on the basis of general labor law provisions. Holders of a security business license are responsible for the general conditions of operation. They are responsible for, among other things, financial management, the general obligations of the employer, the registers, the correctness and timeliness of the instructions, the assignment agreements and the exercise of the management rights belonging to the employer. The manager appointed to the position and approved by the Police Board is responsible for the legality of operations at the company level and on the employer's side. Security guards, security stewards and trainers are personally responsible for their own actions. Improperly performed actions may result in revocation of personal approvals. They also have statutory obligations, failure to do so is punishable. (Paasonen & Ellonen, 2017, 126).

According to the Private Security Services Act (1085/2015 87 §) holders of security business licenses must submit an annual report to the National Board of Police for each calendar year. Its purpose is to enable and improve regulatory supervision of security companies and to increase the transparency and openness of operations. The annual declaration shall be submitted by the end of March of the following year and shall include the following information:

- number of assignments
- the number of sites, the addresses of the sites and the number of staff
- information on the managers, security guards and temporary guards, security stewards and security officers employed by the security company during the previous calendar year, broken down by location

- information on firearms licenses and pepper-spray licenses for security business license holders and security guards
- information on assignments in which the security guard has carried a firearm, carried a dog or used a non-guard suit
- information on situations in which the security guard has used a firearm, pepper-spray or dog as a means of use of force
- information on pepper-spray permits for security stewards
- information on assignments in which the security steward has carried a dog
- information on situations where the security steward has used a pepper-spray or a dog as a means of using a force.

5 Interview Research

A total of four representatives of the private security services were interviewed for the interview study. Each of the interviewees has several years of work experience in various private security jobs. All interviewees have valid approvals as a guard and security steward. In addition, the interviewees have instructor permits approved by the Police Board. Some of the interviewees also act as security business license holders and managers. For the purposes of this study, the interviewees represent a wide range of private security service providers. The interviewees act as representatives of working life, employees, trainers, teachers in educational institutions and employers.

The first interviewee has almost 40 years of experience in the private security industry. The person has held a variety of jobs in the private security industry. For the last 30 years, the person has been working as a security entrepreneur. The interviewee is approved as a security guard, security steward, security officer and air traffic security inspector. In addition to these, he works as a manager in his own company. He has been approved by the Police Board as an use of force instructor, security steward instructor and firearm instructor.

The second interviewee has worked in the private security industry for over 10 years. The person has diverse work experience as a security guard and security steward and as an instructor. Currently, the person works as a teacher of security. He has been approved by the

Police Board as an use of force instructor and security steward instructor. The interviewee has BBA degree in field of security management.

The third interviewee has worked in the private security industry for more than 10 years. Currently, the person is working as an entrepreneur and as a manager. In addition to these, the person has valid approvals as a security guard, security steward, use of force trainer, and security steward trainer.

The fourth interviewee has seen and experienced a change and worked in the industry in five decades. The person has acted as an entrepreneur, manager, security guard and security steward. Currently person is working as a lecturer of security and as a use of fore trainer and security steward trainer. In addition, the interviewee has a Master Degree in the field of security.

The framework of the interview included seven topics guiding the interviews:

1. Does the current legislation meet the practical needs of private security supervision?
2. What differences have you experienced in the guidelines and supervision measures of the Police Board and local police departments?
3. Is the self-supervision of operators in the sector adequately regulated and does it meet the needs of working life?
4. Do individual field police officers have a sufficient understanding and competence of the operation, rights and responsibilities of private security services?
5. How have you experienced the change in control in this area with the reform of the legislation?
6. In what direction and in what way should controls in the sector to be taken and developed?
7. Is private security services supervision up to date?

5.1 Timeliness of Legislation

The study has shown that existing legislation may not be sufficient or that the intention of legislators may not be understood by industry. In addition, less clear guidance has been provided on the regulation of supervision in the sector.

All interviewees were of the opinion that the current legislation is sufficient. However, this adequacy or inadequacy of the legislation was not a matter of concern to the interviewees. Indeed, the interviewees were of the opinion that the effectiveness of supervision comes through the ways in which the various parties operate. The duty of supervision is imposed on different parties, so the challenge is how to ensure that the measures covered by the duty of supervision are carried out by different parties.

The authorities have sufficient legislative competence to carry out supervision. Rather, the way in which the authorities operate determines the supervision measures they take. For example, when the authorities check the valid approvals from security guards and security stewards. (Interview 2)

The legislation is equivalent and sufficient, but whether the various parties actually comply with the legislation. Are police resources sufficient for this? (Interview 4)

Another point that emerged from the interviews was that the supervision process is mainly limited to monitoring and reporting on approvals, permits and deadlines. This study has already shown in the past that, as a general rule, all tasks of private security services require different permits and approvals from the authorities. In addition to these, companies also have to supervise and report on these, which has been perceived as frustrating by the interviewees.

Supervision is mainly the monitoring and reporting of various approvals and other deadlines for both authorities and companies' self-supervision. Self-supervision by companies is employable when the same deadlines are followed as by the authorities. (Interview 1)

With regard to event security, security steward business, actions, and supervision of those are, by default, stricter, as, as a general rule, security steward approval information is provided in advance to the police and / or event organizer. Are the lists provided actually up-to-date and does the authority check the lists or is the measure purely formal? (Interview 2)

It also emerged from the interviews that the inspections carried out by the authority are generally carried out only at the company's own request. In addition, the additional control requests made by the authorities are, as a general rule, exactly the same as the company's annual report to the police board. The most recent issue that emerged from the interviews was the supervision of private security training. Training inspections by the authorities are very rare. Advance training notifications are mainly formal and were not considered significant for control purposes. In addition, interviewees were concerned that the authorities did not have a completely certain idea of who they could target

Supervisory inspections of companies operate mainly at the companies' own request. Very few random inspections. (Interview 1)

With regard to the themes that have emerged, we can summarize a few points worth noting. Interviewees wanted more concrete supervision of the industry. Respondents also considered it important that more supervision and inspection visits be made. The measure itself does not necessarily need to be notified in advance, as this would deprive effective supervision of its meaning. The legislation was perceived to work as a whole. There would be a need for consistent guidelines and operating culture.

5.2 Differences in Regulatory Supervision

The co-operation between the police board and local police departments from the point of view of the supervision and guidance of private security services was very varied. All interviewees expressed concerns about whether the Police Board actually understands the business of private

security services. Over the years, the Police Board has drawn up policies that have been in conflict with legislators and legislation.

The police board is like a limiter and the local police are the enabler and developer. That's the difference. One prevents that movement and the other promotes. The understanding of doing fieldwork has been completely missing from the police board. (Interview 1)

There are no uniform guidelines between the Police Board and local police departments. In this case, local police departments make more of their own interpretations and policies. As the guiding and leading supervisory authority the police board, it generally makes guidelines only when someone asks something. (Interview 2)

The Police Board answers questions in a circular manner and is also unaware of the activities in the field. (Interview 3)

The discussion in the interviews was also sparked by the fact that people working with the licensing processes of local police departments are not sufficiently familiar with licensing practices in the field. Following this, it was considered whether the Police Board would provide sufficient guidance to the local police.

Local police departments are unaware of the terms of licensing processes in the industry and other regulated matters. Adding training labels to security guard and security steward cards has been challenging and difficult because police departments don't know enough about them. (Interview 3)

All interviewers agreed that the guidelines issued by the Police Board should be developed. The police board often gives instructions on request and often by telephone, making it difficult to verify the information a posteriori. In this case, the guidance given by the supervisory authority is also more difficult to utilize in problem situations.

Trainers and training providers receive some of the instructions of the Police Board orally or by telephone. Then it is difficult to rely on them afterwards. Guidelines should be obtained in writing. Another problem with oral alignment is that there is not a clear enough memory mark. (Interview 2)

In addition, the co-operation of the Police Board between other actors in the field was unclear based on the interviews. The police board would not have a clear enough picture from the point of view of training in the field.

Cooperation between educational institutions and the authorities on supervision is unclear for the parties. Neither knows who is responsible for supervision. One can see the differences between the actors in the field in the two different ministries. (Interview 4)

Even at this stage, co-operation between different actors and authorities emerges as an important theme. Cooperation should be developed and increased between the Police Board and local police departments and the private security sector. It would also be important to harmonize the functions of the supervisory authorities. Not all actors are treated in the same way in different police stations. Training in private security matters, actors and supervision should also be provided in the police organization. In addition to all this, the Police Board is expected to provide more guidance and assistance from the perspective of actors in the field. The resources of the authorities should also be increased.

5.3 Regulation of Self-Supervision

Self-supervision plays a very important role in the lighting of private security services, so all actors in the field should understand the importance of self-supervision as well as their own responsibilities.

Self-supervision by private security services and other actors in the sector is regulated in a sufficiently clear and comprehensive manner. The operating models of corporate self-

supervision differ because companies can perform self-supervision at a much higher level than required by law.

The self-supervision of the company and other actors is built voluntarily above the statutory requirements. In certain assignments, approval as a security guard and security steward is always checked before the start of the shift. (Interview 2)

The role of the manager is clear and has not been felt to need change. However, the manager has a great deal of responsibility for the operation of the entire company, so it is worth considering the division of possible responsibility. The realization of self-supervision is something that is much more challenging to verify. Although self-supervision is provided for, sufficient work ethic is a prerequisite for its implementation.

Work ethic of the company and actors plays a key role. Some will certainly do as required, but there are other factors as well. Recruitment and in-service training of actors is crucial. (Interview 4)

Self-supervision has also been seen as ensuring the competence of employees. Respondents agree that statutory training in the field is far too short and partly inadequate. Companies' resources for in-house training vary. It would therefore be important to strengthen employees' skills beyond statutory obligations by developing degree training in the field and developing cooperation between companies and educational institutions.

Private security training requirements are what they are. Training is probably sufficient for certain tasks (eg lobby service), this depends on the person being trained. Certain assignments are those for which a requirement for additional training would be justified. The level of education in educational institutions varies, which partly indicates a lack of supervision. (Interview 1)

Disclosing information subject to self-supervision to the police board has been perceived as employment and partly frustrating. The annual report is prepared every year, and there are relatively few concrete changes. The annual notification process could be developed.

What is the meaning and purpose of the annex to the annual declaration made by the holder of the security business license, specifying the employees of the establishment? Does the Police Board actually check the annual reports, or are they just a formal annual document? (Interview 2)

The annual report and the company's random inspection were carried out in a short period of time. What are the benefits of these? One by the Police Board and the other by the local police. Where is the co-operation between the Police Board and the local police department? (Interview 4)

The theme of self-supervision was one from which a lot of converging views emerged. The first theme was that the functioning of self-supervision is very case-specific and the authority may not very well verify supervision. Self-supervision is provided for, but many actors carry out self-supervision much more extensively than required by the legislator.

Another important theme is the training of private security actors, the scope and amount of training. The inevitable fact is that statutory training in the private security sector is limited, to some extent even too limited. There is also no sufficient emphasis on degree training in the field. These could potentially be developed so that those involved in the sector have greater knowledge through training. What is worrying about degree training is that the level of education varies very much from one institution to another. In addition, the supervision of the Police Board is not maintained at a sufficient level for the operation of educational institutions. Supervision of educational institutions was also not perceived to be effective for other supervisors.

5.4 Authority's Expertise in the Private Security Services

Based on the interviews, the field police of the local police departments may not have sufficient understanding and knowledge of the actors of private security services and their legal competence and duties. There is variation, though. It was important for the interviewees to train police officers in the knowledge of private security actors. However, the field police are similarly a supervisory authority, so they should have better knowledge of the field. The

interviewees considered it important that private security training be provided to police officers already in basic training as well as in-service training as the career develops. Now, the police's expertise in the private security industry is based on personal issues, such as work experience in the industry or expertise acquired in other ways.

Basic police training does not provide sufficient capacity for the competencies and activities of private security actors. The personal interest and / or competence of the police is often a decisive factor. For example, police officers may have work experience in different tasks in the field, through which they have expertise in the field. Other authorities also have difficulty understanding the legal competence and duties of private actors. For example, an emergency center attendant has asked a security guard to arrest a person, even if the security guard does not have the legal competence to take action. Police have also asked the security guard to release the detainee on wrong grounds. (Interview 2)

The police do not know the differences between a security guard, a security steward and a security steward set up to assist the police and the border guard. (Interview 3)

There is a lack of knowledge about the sector's expertise and practices, and the potential and professionalism of the sector may not be noticed. Among other things, the police did not know that the guard could carry the dog with him in the same way as the police. If the police recognized and knew better the potential of the sector and the activities of individual companies, cooperation between public authorities and private security services would also be better. Once again, the familiar themes already mentioned come to the fore. Cooperation between the private security sector and the police is insufficient and should be increased. In addition, it was felt that the police did not have sufficient skills and knowledge of private security actors, even though they acted as a supervisory authority in their work. So there could be one point for developing co-operation, which means that actors in the sector could train police officers.

5.5 Legislative Reform

The reform of private security legislation has partly increased the workload for those interviewed. The workload has increased for security steward and security officer activities, as they are now partly the responsibility of the security business license holder. This is also reflected in the increase in costs and bureaucracy.

For the other operators, supervision as such did not change. The most significant issues raised by all interviewees were the increase in the number of subject to supervision and the limited resources of the authorities. Respondents felt that supervision by the authorities was already weak and limited before the change in the law, so how weak and limited supervision is now that the number of sites to be supervised has multiplied. The number of security business licenses and managers has multiplied, which means a multiple workload for the authorities. When the workload has increased about radically in a short period of time, have the resources of the authorities been increased with the same formula?

At the practical level, supervision did not change with the change in the law. Only the objects supervised on behalf of the Police Board increased when security officer activities and security steward activities became partially subject to a permit. This is reflected in the statistics, both in the number of business permits and in the number of managers. Have the resources of the Police Board also increased to the same extent? Is it possible in practice to exercise real supervision? (Interview 2)

If in the past under the old legislation the authority could not adequately supervise the sector, then how can the authorities supervise, instruct and assist when the number of permits and operators multiplied. (Interview 3)

In addition, the respondents felt that the legislative reform had taken too long. The process also included inadequate information and guidance from the authorities.

The time for change was stretched and stretched. Legislative reform took an unnecessarily long time. There are still companies in the sector that do not have a business license or are in the process of doing so. However, the transition period ended at the end of 2017. The information and instructions of the authorities were incomplete and provided incorrect information regarding the change in the law.
(Interview 4)

The interviewees were really concerned about the resources of the authorities. With regard to the legislative reform on the private security sector, the workload of the supervisory authority has multiplied due to the increase in the permit requirement. This was also perceived as something that takes even the last resources away from actual practical supervision and inspections. In addition, the previously mentioned theme of the authority's role as a guide and advisory body re-emerged. There are not enough guidelines and they often have points of interpretation.

5.6 Development of Supervision

Legislation and society is constantly evolving and changing, so this is essential information to get from interviewees as well. All interviewees were of the opinion that there should be room for improvement and development in private security supervision. Areas for development would be:

- control processes,
- a clear division of responsibilities between local police departments and police board,
- training of trainers,
- increasing the resources of public authorities,
- cooperation between private security actors and authorities.

All interviewees were of the opinion that the supervision of private security companies should be the responsibility of the local police department of the company's domicile, not the Police Board. Local police departments are familiar with local entrepreneurs, which could enhance supervision as well as develop co-operation between actors.

Supervision could work better at the local level. Building private security supervision around local police departments in the future would better meet practical needs. In that case, the Police Board would only be an administrative actor. Local police are better acquainted with local entrepreneurs, so more attention could be paid to effective supervision rather than to ongoing paper reports, which would still be made. (Interview 1)

Supervision and requirements for training and educators in the field should be tightened. At present, the level of competence of trainers and teachers in educational institutions varies greatly, which is also reflected in the competence of actors in the field.

Supervision of training should be increased and training sessions should be effectively supervised by trained field trainers from the police. The same applies to training provided by educational institutions. (Interview 1)

The professionalism of private security trainers should be increased. Trainer training is easy to get through. Participants in trainer training should be required to have even slightly higher participation criteria than at present. Trainers do not have actual knowledge or practical experience in the field being trained, which is worrying because security guards and security stewards actually exercise public power in their work and have broad rights to interfere with people's fundamental rights. (Interview 2)

Interviewees also hoped for more resources for the authorities. The current resources are far too limited and do not meet the need for supervision in the sector. Increasing resources could also facilitate cooperation and development of the sector between public authorities and private actors.

The resources of the authorities should be increased to carry out supervision measures. (Interview 4)

Authorities should engage more in dialogue with private security actors in order to develop and take the sector forward. How to promote action if the authority does not communicate adequately with actors. How can an activity comply with section 1 of private security act when there is very little actual cooperation.

(Interview 3)

Interviewees had views on how supervision of private security services should be organized. Consistent with these views was the need to develop supervision in the context of other developments in society. Lack of resources has been identified in this case as well, but possibly a reorganization and reorganization of policies could be appropriate in reorganizing controls.

5.7 Timeliness of Supervision

Private security legislation is considered sufficient, but policies and cooperation between public authorities and private actors are insufficient to ensure up-to-date supervision. This also does not serve Section 1 of the Private Security Act (1085/2015).

The resources of the authorities are severely inadequate. Resources should be increased for quantitative activities as well as for the training of authorities.

Focusing supervision on the right actions. From dates to practice, instead of rolling papers, more actual physical control. (Interview 1)

Legislation is adequate and up-to-date, but the models of action between public authorities and private actors are inadequate, old and ineffective. According to the law, the aim is to ensure the quality and reliability of private security services and to promote co-operation between public authorities and private security services. The resources of the authorities are insufficient to carry out effective supervision. Most of the resources of the authorities go to monitoring various approvals and deadlines. (Interview 2)

Not what it should be. In what way does the supervisory authority promote cooperation between the private security sector and the authorities? (Interview 3)

Supervision is not up to date. The education side of the industry is not okay. (Interview 4)

Cooperation and policies should be stepped up to ensure that supervision are fully up-to-date. According to the interviewees, these are supported by the themes that emerged earlier in the interview.

6 Discussion

The aim of this study was to produce qualitative information on the state of supervision of private security services and to find out that are the current means of supervision up to date? The research question was set: Are the current means of supervision up to date?

These goals and the research question have been answered by studying the literature, legislation, regulations and research in the field. The status and timeliness of the supervision has been clarified through interviews, through which the research question can be answered.

6.1 The Qualitative Rigor of the Study

The job description of private security service providers and the security services and service descriptions provided by companies was examined with the literature review. The structure of supervision is also based on information obtained through a literature review. The descriptions of the structure of supervision in Chapter Four are models based on the structure of the legislation of researchers in the field. Efforts have been made to present these models clearly, as it clarifies the control of the private security sector into clear different entities.

Based on the literature, it can be stated that the role of private security services and the supervision of services are very similar at the international level. This argument can be

substantiated through the literature read. However, the private security sector is similar as a service, whether the service took place in Finland or, for example, in Australia. The themes are very similar. The literature also highlighted important administrative and legal themes. Merely understanding the supervision process requires familiarity and understanding from the aforementioned fields of science. An interpretation of the supervision clauses under the common security legislation alone does not provide a sufficiently in-depth understanding of the theme and processes of supervision. Only after these themes can the content of private security services be explored. In Finland, the regulation of the private security sector is not necessarily the clearest for all actors in the sector themselves. If the actors or authorities in the sector do not understand the regulation of the sector, how can the citizen understand them.

The literature review has also provided a lot of important information on the objects of supervision in the field. Section 4.1 highlights the status and role of security training institutions in terms of supervision. There is still no clear answer to this from the industry as to who is actually responsible for supervising the training of the guard. There are a few supervising parties, but no clear description of supervisory responsibilities has been obtained. The police board is not entirely sure, training providers appeal to degree committees. The degree of supervisory responsibility of the degree committee is not enough to supervise education. This same theme has also been amazed by the educators and teachers interviewed.

The interviews have been used to find out about the supervision of private security services and the industry. Four people who actually have knowledge and understanding of their work, authority activities and supervision in the field were selected for interview. The results of the study could have been improved by increasing the number of interviewees, but this was not seen as necessary. The interviewees represent various actors in the field in a very diverse way and they are also geographically distributed fairly evenly throughout Finland.

Interviewees openly shared their own experiences of supervision. The results of the interviews have been extracted into Chapter 5, which has taken direct borrowings from the interviews. Interviewees were positive about the survey and were pleased with the interview request. In addition, they expressed that the conduct and content of the interviews were functional and transparent. Indeed, the interviews are more reminiscent of an open discussion around selected themes, which has given the researcher more opportunities.

6.2 The Scientific Contribution

To summarize the results of this study, a few themes can be raised regarding the supervision of private security services.

The first theme is the concern about the lack of resources in public authorities. The resources of the police board and local police departments are completely inadequate for comprehensive and equitable supervision of private security services. Each interviewee expressed concern in this regard. In addition, a review of the literature makes it possible to state that the resources of the authorities are insufficient.

When we look at the statistics on the number of business licenses in the security sector brought about by the legislative reform in the sector, this means a multiple workload for the Police Board's supervision unit. Researchers in the field have also stated that the resources of the supervisory authority to supervise the private security sector have not increased to the extent that the number of actors to be supervised has increased (Paasonen & Ellonen 2019, 17). A similar study by Paasonen & Ellonen also shows that a lack of knowledge of the private security industry and regulation affects the supervision of the industry. They have also emphasized co-operation between authorities. In his decision (4402/2/10), the Parliamentary Ombudsman stated that the police should invest in supervision of the private security sector. At the end of the statement, it is stated that after the new legislation enters into force, the police must also evaluate their own policies in the light of the new regulations. However, has this been done?

The second important theme that has emerged is supervision measures. Interviewees agreed that the current supervision is almost entirely reported by written documents and information. Interviewees would prefer more effective supervision, physical supervision visits and inspections, rather than the mere production of documents. Interviewees were of the opinion that the sector could develop and gain a new direction if the authorities were able to focus more on supervision.

The form of supervision measures carried out by the authorities is certainly directly proportional to the resources available. This could highlight that cooperation in terms of developing policies. Through the interviews, the fact emerged that the police should also be trained in the field of private security. Who better to provide training than representatives of private security services and the industry.

The third theme that emerged was the state of cooperation between private security services and the authorities. Through the interviews, an issue emerged that we can directly compare to private security legislation. The Private Security Services Act aims to ensure the quality and reliability of private security services and to promote co-operation between public authorities and private security services. As has already been shown, it is somewhat unclear how cooperation between public authorities and private security services will be promoted on a practical level.

At the moment, the interviewees felt that the cooperation was really weak. According to them, even the exchange of information between the Police Board and local police departments is not at a sufficient level.

The fourth theme that has emerged is the lack of training for private security services and various actors in the private security sector. Through the interviews, three points emerged: the low level of training of security guards and security stewards, the low level of training requirements and skills of trainers, and joint training events in the whole field.

Sections 3.5 and 3.6 of this study detail the training of security guards and security stewards. The training is very limited in terms of hours. Expanding the training would therefore be necessary in a number of different tasks and assignments. It is possible for security guards and security stewards to complete security degrees in addition to their work, which could be used to develop the skills of the actors in a more diverse way. These degree programs are completely voluntary. The interviewees would like some change regarding the training requirements in the field.

Another issue that arose was the training requirements of trainers and teachers in the field, their level of competence and their huge spectrum. In general, it can be said that private security

trainers are approved by the Police Board and trained by the Police College. In connection with these trainer trainings, the interviewees would like a change, as currently the training participation and performance requirements are low (excl. Firearms trainer training).

Institutions providing degree training in the private security sector are not under the control of the Police Board. The qualification requirements for teachers in educational institutions come from the aforementioned regulation, which is applied by educational institutions around the country. According to the interviewees, not all educators and teachers in the field have sufficient knowledge and professional skills in the field.

In addition, interviewees wanted more individual and even regular training sessions across the industry. These training opportunities have diminished over the years. The interviewees would welcome the development of co-operation and the involvement of third sector organizations in these trainings.

This study did not set separate evaluation criteria for assessing timeliness, but assessed timeliness as a whole. The assessment of the whole has been influenced by the available information that has been utilized in conducting this study.

Based on the results obtained through these aforementioned themes, literature review, and interviews, we will be able to answer the research question. I asked the same question to each interviewee. For each interviewee, the answer was clear. The means of supervision of the private security services is not up to date.

6.3 Practical Implications

Paasonen & Ellonen (2019, 17) have stated in their own survey on official supervision in the private security sector that more supervision is needed in the sector. They also note that the resources of the supervisory authority to supervise the private security sector have not increased to the extent that the number of business licenses has increased, so the authorities would need more resources for supervision. The reasons for this have been cited by researchers as insufficient resources and a lack of knowledge of the private security and regulation of the

local police department. The resources of the unit of the Police Board responsible for supervision are also limited.

The Deputy Ombudsman for Parliament has also taken a position on supervision in decision (Dnro 4402/2/10, 12 December 2012). In decision is stated that it is necessary to sharpen the supervision and training of the private security sector. The decision also states that it would be important to invest in the supervision of the private security sector. In addition, the Deputy Ombudsman emphasizes that supervision of the private security sector is specifically the responsibility of the police as a whole.

In her research, Tarja Hautamäki has emphasized the role and significance of control exercised by public authorities (Hautamäki 2016, 308). In 2016, Hautamäki emphasized that the current legislation does not take a sufficient position on the dimensions of official responsibility in the competencies in which private security actors perform public tasks. According to Hautamäki, there may be clear problem situations when public authority tasks are entrusted to a private operator and public authority tasks and other tasks are combined.

Private security actors may also have to exercise public authority in their role without legal legitimacy. In certain assignments, security guards and security stewards constantly rely on universal justification in their work. In these situations, Hautamäki (2016, 309) and Kerttula, Huttunen & Ojala (2008, 128-129) have stated that the security guard and the security steward do not exercise public power. Hautamäki (2016, 309) has also pointed out that in the absence of competence provisions entitling the exercise of public power, supervision in the form of the exercise of official responsibility is not possible. Reliance on universal justification cannot be regarded as sufficient for the legal protection of the individual in the context of tasks which may be regarded as permanent, which may involve the exercise of official authority.

7 Conclusion

The purpose of this study was to determine the state of supervision of private security services. The study clearly presents the actors, roles and supervision of private security services. This study has been able to answer an already identified research question.

The study has highlighted the role and numbers of private security services in our society. The growth of the private security sector and the increase in the number of actors bring their own challenges to the maintenance and development of supervision processes. The study has also found that as police resources have dwindled, private security services have come to replace the tasks previously held by the public security authority. According to various sources, there were about 7,000 police officers in Finland in 2018, while in the same year there were 16,000 security guards in the private security sector and about 47,000 security stewards (Police Board 2021, Suomen Poliisijärjestöjen Liitto 2018).

The concept of accountability has been sought to be opened up in this study, as monitoring the legality of private security services is an essential part of this realization. Although in this study supervision is described by only one specific authority organization and self-supervision, it must be remembered that supervision in the private security sector is also performed by many other entities, as outlined in the study. The scope of the activities of other parties involved in supervision has not been taken into account, as it would require its own investigation. A further study for this study could be to find out the results of the activities and supervision of other supervisory bodies. Supervision of private security services is essential to the legality of operations. This is supported by the findings of the study and the mere fact that a private security service provider exercises public authority in the course of its work and may constantly restrict people's fundamental rights in the course of their work.

Personally, I would like to see more transparency and cooperation between private security services and public authorities in the future. In addition, supervision should also be developed to serve all parties involved. Both the person carrying out the supervision, the target of the supervision and the citizens.

Indeed, it is partly worrying that, in the light of the various researches, there has been no increase in effective supervision, despite the need for this by the supreme supervisory bodies. There is always a cause - and - effect relationship, and it is not intended to be answered here. Another worrying issue that has emerged is how the authority will be able to effectively control the private security sector with the current limited resources, as the workload of the authority has multiplied with the change in the law.

As the private security sector grows, the authority must also invest and fulfill its responsibilities with regard to the supervisor. Public authorities must fulfill their duty to monitor the implementation of fundamental constitutional rights. An effective review of supervision would therefore be welcome in order to ensure legal certainty for both private security actors and other citizens and individuals.

The goals set for the research have also been achieved. This study provides qualitative and up-to-date information on the topic under study. The results obtained with the help of the research could be utilized in the development of the field and supervision processes. In addition, the research highlights themes about the state of the industry that many actors in the industry may not have been aware of.

This study complements existing research in the field as well as the topic. In addition, the results of this study highlight the same themes as previous studies on the subject.

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Interview frame and notes

Background:

- Education
 - Work experience in the private security services
 - Current jobs
 - Private security licenses
-
1. Does the current legislation meet the practical needs of private security supervision?
 2. What differences have you experienced in the guidelines and supervision measures of the Police Board and local police departments?
 3. Is the self-supervision of operators in the sector adequately regulated and does it meet the needs of working life?
 4. Do individual field police officers have a sufficient understanding and competence of the operation, rights and responsibilities of private security services?
 5. How have you experienced the change in control in this area with the reform of the legislation?
 6. In what direction and in what way should controls in the sector to be taken and developed?
 7. Is private security services supervision up to date?