

CASH

SCOPE OF ANALYSIS IN VIEW
OF THE COMPARATIVE STUDY OF
CASH IN TRANSIT LEGISLATION
WITHIN 25 EU MEMBER STATES



OVERVIEW OF THE LEGISLATIONS GOVERNING
CASH IN TRANSIT (PRIVATE SECURITY)
IN 10 NEW EU MEMBER STATES WHO JOINED
EU ON 1ST MAY 2004

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CIT

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**SCOPE OF ANALYSIS IN VIEW OF THE COMPARATIVE
STUDY OF CIT LEGISLATION WITHIN
25 EU MEMBER STATES**

CIT

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INTRODUCTION

BACKGROUND AND OBJECTIVES

A former survey 'A comparative overview of the legislations governing Cash in Transit private industry in 15 EU Member States' has already been conducted in 2004 by European social partners for the industry of 'private security', UNI-Europa (for trade unions) and CoESS (for employers) with the financial support from European Commission - DG Employment, Social Affairs and Equal Opportunities. The present report contains final summary of the follow-up study on above-mentioned report and is consequently entitled: "A comparative overview of the legislations governing Cash in Transit private industry in 25 EU Member States".

What can we expect to find?

As a follow-up study, this report focuses on the regulation with respect to CIT in 10 Member States that have joined EU on 1st May 2004. All participants of 15 EU Member States studied in the first CIT survey, were invited to update their respective country data.

It must be made clear that the present survey, as the first one, solely aims at providing an overview of the existing regulations in 25 EU Member States


- Legislation on a national, regional and local level;
- Social regulations (collective agreements);
- Current practices with respect to CIT and valuables transport in 25 EU Member States.

No attempt to interpret the responses given has indicated that this was not included in the objectives of this study.

Main areas of interest

Since this report is a continuation study of the survey that was conducted in 2004, it is safe to state that the main areas of interests have not changed since. The survey thus addresses:

- existence of a formal concept for CIT operations in the EU Member States;

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- access requirements;
 - conditions for executing CIT operations;
 - execution modes with respect to transported goods, vehicles and itineraries;
 - social and psychological supportive steps after incidents.


■ METHODOLOGY

The main objective of this survey was to develop a catalogue of the regulative framework for the CIT sector in ten countries who became member of the European Union on 1st May 2004, in the same way as it was done earlier in 2004 for 15 “old” EU Member States. At the same time it has been an excellent opportunity to make an update of the legal framework in these earlier 15 EU Member States.

Based upon the experiences drawn from the previous survey, it was decided to organise the information gathering process for this survey in a slightly different way. However, there was no need to modify the content of the questionnaire that was used in 2004 survey.

- 1) The contact persons (essentially the national member federations of UNI-Europa and CoESS) in the 10 ‘new’ EU Member States have been invited to use an electronic version of the questionnaire, which was available through a specific dedicated website (www.citsurvey.be). Copies of the online survey (in both PDF and WORD formats) as well as an English version and a version in the official language of each Member State, were attached to the invitation. This approach had an objective to maximize the response rate by eliminating as many potential practical obstacles as possible.
- 2)) With respect to the contact persons in the 15 ‘old’ EU Member States who had collaborated in the first CIT survey, it was decided not to unnecessarily increase their workload by making them undergo the whole process again. It was, therefore, rather suggested to them to limit their replies to those changes that had taken place in their Member State since the publication of the first report in 2004.

The present study was again carried out within the framework of the European Sectoral Social Dialogue in the private security sector in close consultation with the secretariats of both CoESS and UNI-Europa, and the secretariat of ESTA, the European Security Transport Association and a corresponding member of CoESS.



The information provided in this report has been reviewed by CoESS and UNI-Europa. Any remaining gaps or inaccuracies have, therefore, contributed to the difficulties in obtaining responses, within the available period of time, provided by individuals having sufficient amount of expertise in the Member States.

▶ STRUCTURE OF THE REPORT

The report covers the CIT sector in the 25 Member States of the European Union (listed alphabetically) and is structured around four main chapters:

- I. Conditions for entering into CIT profession, both for individuals and for companies
- II. Conditions for executing CIT operations.
- III. Execution modes of CIT operations
- IV. Incidents during CIT operations

CHAPTER ONE attempts to collect information on established conditions to guarantee a minimal level of professionalism and relating to stability of the company and professional skills of those responsible for organizing and/or executing CIT activities.

A first point of interest is that the CIT activity can be recognised by the Member State as an 'independent' professional activity, or can be considered as a part of the more general economic activity, namely the transport activity or the private security activity at large.

Moreover, major attention is being paid to training requirements and moral standards of the individual's activities in the sector: Is there a minimal academic or professional entrance level for the managerial staff and/or for the employees? Is (mandatory) training available? Who organizes the training? Is training a permanent, continuous program or is it limited to an introductory course? What is the content of the training program? Is training inclined more towards practical vocational training or is it rather theoretical in its approach? Are training programs certified?

Possible restrictions regarding certain age limits for being able to be active in CIT business are also being considered.

In case firearms are allowed in CIT, what are the conditions related to the type of weapons used and what are the conditions for possession, carrying and usage of a weapon, what are the conditions for obtaining a firearms licence?

CHAPTER TWO investigates the means and methods related to actual performance of CIT activities. The chapter, therefore, covers the conditions relating to the nature of transported goods and cash, legal conditions for running specialised CIT services, equipments in CIT vehicle (compartments, armouring type and level), crew (number of guards and individual/collective equipments), usage of a neutralisation system, conditions imposed on the client, (audio) communication and tracking system, escorts (private or police), conditions relating to CIT company, including storing and loading of vehicles, monitoring of the premises, relations with the police, etc.

Furthermore, considerable attention is being paid to the legal conditions developed within the individual Member States for intra EU CIT traffic, establishing a distinction between EU Member States and non EU Member States.

CHAPTER THREE looks into the psychological and social supportive steps after the incidents occurred during execution of the job.

To what extent do legal conditions or social agreements protecting physical or psychological trauma exist? Does a company policy provide (minimal) support in case of an incident?

CHAPTER FOUR reviews the national controlling authorities and the sanctions imposed in case of non-compliance with binding regulations or prescribed methods for executing CIT activities.

RESPONSE RATE

Taking into consideration complexity of this survey (both with respect to extent and details to be provided) as well as the language barriers, the overall response rate can be considered satisfactory. All 25 EU Member States have been covered, even those EU Member States where CoESS and/or UNI-Europa do not have a national member representation, have been covered. It is only correct and justified to mention the active support received from ESTA (European Security Transport Association and corresponding member of CoESS) and its individual members who have provided significant support to the replies to the questionnaire.

ENTRY CONDITIONS FOR MANAGERS, EMPLOYEES AND COMPANIES

The conditions for entry into the CIT profession are a fundamental and pre-condition to guarantee a permanent professionalism in this specific private security branch. The entry conditions are characterized by topics such as financial guarantees, necessary professional skills and ethics of the individuals. The existence of a licensing system allows only those companies/persons into the CIT business who comply with the defined conditions, and, therefore, is an important element for providing necessary professionalism in the sector.

Legal definition of CIT

Except Austria and Germany, CIT transport is generally considered by the national authorities as part of the overall private security business.

Today, most of 25 EU Member States have an independent set of rules and regulations for private security industry in general, with incorporation of the CIT sector as a sub-activity of the private security sector. It is, therefore, not surprising that in over 60 % of 25 EU Member States, there is no 'legal' definition available for CIT, as such.

If a specific definition of CIT exists, various characteristics of CIT are used to identify this specific security activity, ranging from a description of the nature of transport, means by which the transportation takes place or even the availability of armed guards. Belgium, France, Italy, Lithuania, Slovenia, Spain, the Grand Duchy of Luxembourg and the Netherlands, all provide a specific CIT definition in their legislative framework.

Generally speaking, CIT is considered to be 'a professional activity on behalf of a third party with respect to transportation of high value goods'.

Types of licensing

Three main types of license can be distinguished: a license based on commercial law, a license based on transport law and a license based on private security law.

COMMERCIAL LEGISLATION

A legal definition of the CIT transport activity usually implies that this sector is subject to some sort of regulation. In this respect, it can be observed that in most EU Member States a commercial registration is required for CIT as for any other type of commercial activity. In those systems, any CIT company must be enrolled in a relevant Register of Commerce before being allowed to perform business activities.

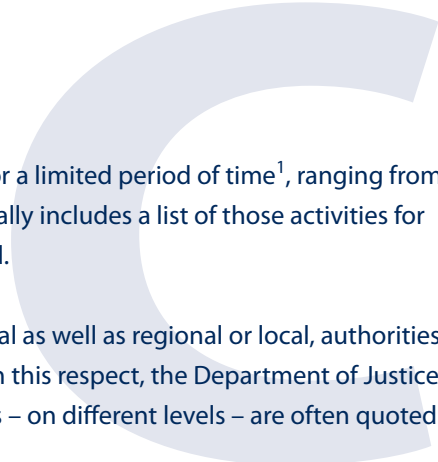
TRANSPORT LEGISLATION

In approximately 50 % of the EU Member States, CIT transport activity is considered to be a regular transport activity and is, therefore, subjected to the application of the general transport regulation such as enrolment in a specific transport register, certification and compliance to certain rules. Additionally, some Member States require a specific transport licence, mostly related to international transport.

PRIVATE SECURITY LEGISLATION

Because of the special nature of the private security activity, in most EU Member States – except Austria, Cyprus and Germany – a specific ‘private security’ license must be obtained before any private security activity can be legally carried out. Moreover, in Member States such as, e.g., Belgium, France, the Grand Duchy of Luxembourg, Slovenia and Spain, a specific set of rules for CIT and valuables transportation exist as such.

Licensing takes place at three levels: company level, managerial/company head level and at employee level.



Company licenses are generally issued for a limited period of time¹, ranging from one to five years. This type of license usually includes a list of those activities for which an authorisation has been granted.

Depending on the Member State, national as well as regional or local, authorities are empowered to issue these licenses. In this respect, the Department of Justice, the Home Office or the Police Authorities – on different levels – are often quoted as the competent licensing department.

In order to obtain a license, a CIT company must send a written application to the competent authority. This application must include all necessary information relating to, for instance, the financial status of the company, the professional skills and the moral integrity of the staff (both management and employees). Availability of sufficient infrastructure, equipment and operational procedures of the applicant-company are sometimes determining factors, as well.

Non-compliance with these requirements can result in administrative and/or penal sanctions.

In most of 25 EU Member States, an additional license or certificate for management and employees is requested. These type of licenses aim at imposing minimal standards relating to the integrity of the staff and the quality of the services provided. Licensing/certification is usually preceded by a background verification or “screening” (i.e. an inquiry into the possible criminal history of a person), by establishing additional guarantees in terms of dependability and integrity, and by specific vocational training requirements (see *infra*) or adequate prior experience in either a private or public management function.

¹ Except for: Czech Republic – indefinitely, Poland – 50 years, Slovakia - ten years.

▶ Training

Vocational training and continuous improvement of job related skills are an essential element in a contemporary professional environment. This pre-condition is also a vital characteristic of the modern private security industry: CIT activities increasingly gain complexity and situational or environmental factors often demand a high flexibility of the person's activity in private security.

REGULATIONS RELATED TO CIT TRAINING

Official regulations with respect to CIT training are non-existent in most of EU Member States. Therefore, the training of CIT security staff (both management and employees) largely depends on the initiative of the company.

In those EU Member States where professional CIT training is mandatory, either by law or by a professional code of conduct, a so-called 'Professional Qualification Exam' at the end of the training period is required.

TRAINING LEVEL

The existing mandatory CIT training is essentially an initial training. Mandatory refresher courses for CIT are rather uncommon and tend to focus on reviewing and updating previously acquired skills. CIT training is often complementary with the basic private security training module.

ORGANISATION AND CERTIFICATION OF THE TRAINING

Training programs for CIT personnel can be developed by the company, by the government or by private training centers.

An independent technical body, often controlled by the competent authority (i.e. the police or the Ministry of Internal Affairs or the Ministry of Education), usually certifies the training programs.

REIMBURSEMENT OF THE TRAINING COST

Vocational training can be reimbursed directly or indirectly by the company. In some cases, the candidate has to cover himself the costs related to training before employment. Sometimes, initial training is co-financed by the public authorities. Refresher courses are generally always financed by the CIT company.

DURATION OF THE TRAINING

The duration of the CIT training programs for management as well as for employees differs from one Member State to another, ranging from less than a day to over 300 hours.

TRAINING CONTENT

Considerable differences can also be observed with regard to training contents

At the managerial level

CIT training programs generally cover legal and technical aspects of the CIT business.

In those Member States where a minimum training standard has been developed, different qualifications are included. In some Member States, development of general all-purpose business and managerial qualifications is being stressed whereas in others the importance of a specific security know-how prevails.

At the employee level

Training requirements with respect to the employees are equally dissimilar.

Most existing training modules are a combination of theoretical and of practical courses and can vary in duration from one day to more than 300 hours.

Training courses are normally to be completed prior to employment or must take place at the beginning of employment.

▀ **Conditions related to age**

Generally, no legal limit is set with respect to the minimum and/or maximum age limit of either management or employees. In most Member States a reference is being made to the general legal minimum age. However, in some Member States, an explicit requirement related to a minimum age limit exists, which varies between 18 and 21 years.

▀ **Sanctions**

WITHDRAWAL OF THE LICENSE

Non-observance of the rules and regulations generally results in withdrawal or loss of the license, for the CIT company and/or its personnel. Depending on the gravity of the infraction, this sanction can be either temporary or permanent. Appeal against the decision imposing a sanction is usually possible.

OTHER SANCTIONS

Alternatively, non-observance of the regulations can lead to sanctions other than withdrawal of the license, such as a warning, a fine or even an imprisonment.

▀ **Possession and the carrying of firearms**

LEGAL REQUIREMENTS

Little over one third² of EU Member States explicitly prohibit the possession and carrying of firearms while less than one fourth³ of the EU Member States require, by law or by collective labour agreement (CLA), possession and carrying of a firearm during CIT transportation. All other EU Member States allow for the possession and carrying of firearms during the CIT activities.

² Cyprus, Denmark, Greece, Ireland, Malta, Portugal, Sweden, the Netherlands and the UK

³ Germany, France, Italy, the Grand Duchy of Luxembourg, Spain and Belgium (by Collective Labour Agreement).

TYPE OF FIREARMS THAT CAN BE CARRIED DURING CIT TRANSPORTATION

In most Member States where firearms during CIT transportation are either required or allowed, handguns are preferred.

PERMISSIONS

In all the Member States where firearms during CIT transportation are required or allowed, a special license must be obtained. A license is usually issued at two levels:

- a permit to possess a firearm. This permit can be issued to the CIT company or to the individual security agent.
- a personal permit to carry a firearm. This permit is issued to the individual security agent. The permit to carry a firearm is generally granted for five years but is usually limited to the working hours.

The firearms permit is revoked or terminated when the individual security agent leaves the CIT company.

AUTHORITY COMPETENT FOR ISSUING FIREARMS LICENSES

Authorities competent for issuing a firearms license are generally the police (on a local level), the Minister of Internal Affairs, the Minister of Justice, or local authorities.

PROCEDURE TO OBTAIN A FIREARMS LICENSE

The firearms license is issued when all legal requirements (including specific training, safe storage, moral aptitude of the concerned person, availability of regular shooting sessions and a labour contract with the requesting CIT company...) have been met by the applicant company and/or by the applicant individual security agent.

Most Member States require the arms to be stored in a secure and safe way on the CIT companies' premises.

TRAINING

Firearms' training is both theoretical and practical. Important elements of the firearms' training are the legal regulations related to possession, carrying and use of firearms, and practical matters such as maintenance and handling of firearms. Firearms' training is considered to be an ongoing training and in most Member States several practical shooting sessions a year are imposed.

SANCTIONS IN CASE OF NON-OBSERVANCE OF THE REQUIREMENTS

Failure to comply with the legal provisions may lead to withdrawal or revocation of the license to possess and to carry a firearm.

MODALITIES FOR EXECUTION OF CIT OPERATIONS

▶ Modalities related to nature of the transported goods

- In all 25 EU Member States, a similar description of the content is given when asked about the nature of the CIT transportation namely: banknotes, coins, gold, jewels, documents, art, etc...
- In 5 EU Member States, execution modalities vary according to the legal definition of transported goods. This definition refers in essence to the:
 - associated risk factor of the freight;
 - armouring level of the vehicle, or
 - value of the transported goods.

▶ Technical specifications of the vehicles

Armoured vehicles are commonly used during CIT transportation in all EU Member States. Intelligent Banknotes Neutralisation Systems (IBNS) are also used to a certain extent.

Nevertheless, regulation with respect to protection of armoured vehicles widely varies between the EU Member States.

Certification from an officially recognized technical institute as well as prior approval by a competent authority is often required before the armoured vehicles can be used for CIT.

▶ Tracking system

In 17 EU Member States a tracking system, such as GPS (Global Positioning System) is imposed. Tracking systems are usually directly linked to the control room of the CIT company and allow a permanent positioning of every CIT vehicle. Unusual behaviour in and around the CIT vehicle can also be detected through a tracking system.

▴ Means of communication

A dedicated communication system between the CIT vehicle and the control room of the CIT company is being used in all EU Member States. This communication is established by radio or by mobile phone.

In most cases, a communication procedure between the vehicle and the police has been developed through the control room of the CIT company.

▴ Signalling

CIT vehicles usually carry distinct signals on all sides of the vehicles in order to allow fast identification from a distance (even from the air).

The signalling includes the ID-number and logo of the CIT company and, in some cases, orange beacon lights.

In 7 Member States a formal set of regulations related to signalling on CIT vehicles exist. In most cases these regulations relate to the size of signals, their visibility and their reference to the content of the transport, as well as to their position on the vehicle (front, back, lateral and top).

▴ IBNS (Intelligent Banknotes Neutralisation System)

IBNS can be defined as 'an end-to-end intelligent neutralization system that prevents unauthorized attempts to open the container by permanently neutralizing its content'.

While IBNS is used in only a limited number of EU Member States, cross-pavement neutralisation systems are very common in most EU Member States.

IBNS is regulated in only 4 EU Member States. These legal constraints mainly refer to technical aspects of the neutralisation systems, their content, their neutralisation level and the amount of the transported valuables. The IBNS system needs to be approved by either an official certification body or by the responsible authority. Most IBNS technologies are only certified for a limited period of time.

▀ Firearms

Firearms are usually stored at the CIT companies' premises where an appointed employee keeps a register of all movements of the firearms.

The firearms license is generally limited to handguns. Riot guns are seldom allowed and, if allowed, are to be seen only as part of the collective equipment inside the CIT vehicle.

The number of firearms inside the CIT vehicle averages from one to three firearms. Their use is only justified under extreme conditions or threats, such as in a situation of self-defence.

▀ Security guards

WORKING TIME

Rules imposed by transport law

In most EU Member States, regulations with respect to the driving and working time apply to CIT.

In most cases, the driving time is limited to eight-hour or ten-hour shifts. In some instances, a mandatory safety break of 45 minutes must be included in the driving time. Working time can range from 35 hours a week to over 40 hours a week, mostly determined by CLA's.

Rules imposed by specific regulations with regard to CIT transport

In most EU Member States, CIT transportation is allowed during night. In only one fifth of the EU Member States, CIT transportation during night (between 22.00 pm and 06.00 am) is explicitly forbidden

- Individual equipment

The individual equipment of the CIT crew generally consists of a uniform and a bullet-proof vest. Additionally, gas masks can also be a part of the equipment.

In some cases the CIT crew is armed (see supra).

COLLECTIVE EQUIPMENT

The availability of collective equipment in the CIT vehicle remains largely unregulated in EU Member States. Companies decide whether to provide the CIT vehicles with collective equipment. The available collective equipment varies from radios and walkie-talkies to additional firearms such as handguns or riot guns.

COMPOSITION OF THE CREW

The composition of the crew during CIT transportation depends mainly on the type of transport and varies from one to three members per CIT vehicle. In some instances, the CIT transport is backed up by an escort (see below).

The composition of the crew, as well as the escort, is largely dependant on the amount and the type of the transported valuables.

ESCORT

Mandatory escort of a CIT transport widely varies between the EU Member States. In 5 EU Member States legal requirements stipulating escorted CIT transportation, have been developed. In some cases, this escort is organised by the police.

▴ Obligations to be fulfilled by the customer

Within the CIT itinerary, the customer of CIT services plays an important security role; the customer is therefore obliged to take certain security measures as to co-manage the risk at pick-up and at collection points.

FITTING OF THE PICK UP AND DELIVERY POINTS

In most EU Member States, minimal standards with respect to fitting of the pick up and the delivery points do not exist. These standards are generally negotiated between the CIT company and the customer.

In those EU Member States where obligations are being imposed on the customer,

these relate mainly to the presence of an isolated zone or area (often outside the view of the public) where the (un-)loading must take place.

Frequently used methods are implementation of technical and/or construction measures (such as vaults, airlocks, hatches, cameras, alarm systems, access control, CCTV etc.) or organisational and procedural policies (secure areas, identification of the crew, isolation from public, removal of possible obstacles, short walkways, predefined delivery schedules, handling to take place within a certain period of time upon arrival, etc.).

▲ Highway Code

Secure CIT operations rely heavily on a swift and uninterrupted passage through traffic. In most EU Member States, waivers from the traffic code for CIT transport are not allowed.

In those Member States where specific regulations for CIT transport exist, focus is rendered on a quick and safe passage of CIT vehicle(s).

In some cases, special authorisations or exceptions related to parking or stopping on a public place are required.

It is generally understood that the whole process of CIT transportation should be as fast and safe as possible and that regular traffic (bus lanes) or the general public (public pathways) must not suffer too many inconveniences from this special type of transport.

▲ Premises of CIT companies

In most EU Member States, this issue is not regulated in a general way but is being left to the discretionary powers of the local authorities or the Central Bank.

In some EU Member States however, specific security standards such as availability of strong rooms, secured areas, secured parking lots, air lock entrances and passive defence systems are imposed.

► **Obligations towards the police**

Generally, CIT companies collaborate with the police, on a voluntary basis. This collaboration is mainly informal and is not the result of a predefined set of guidelines. The information communicated to the (local) police is generally organised through a set of formal procedures and mainly involves itineraries and identification of the crew

In some Member States, CIT companies have special obligations towards the police; these obligations may relate to identification, communicating itineraries, verification of transport registers, etc...

► **Specific national rules**

ORGANISATION OF ITINERARIES

The organisation of itineraries remains confined largely to the discretion of the CIT company and is mainly tailored to the client's needs.

CONDITIONS UNDER WHICH THE CREW CAN LEAVE THE VEHICLE

Generally, this issue is not regulated in the Member States. Rules and practices with respect to leaving the vehicle, therefore, vary. As a rule, abandonment of the vehicle is not accepted.

► **Specific national rules allowing the crossing of territory by a foreign CIT vehicle (EU member or not)**

Due to the very specific national regulations, existing regulations relating to cross-border CIT are based on the COD (country of destination) principle. A specific authorisation to cross the national territory- usually through a simplified procedure - must be granted by the responsible authority of the country of destination.

INCIDENTS DURING CIT OPERATIONS

Psychological follow-up

Regulations related to the psychological follow-up after incidents are virtually non-existent in European Union. Only Belgium, Denmark, France, Germany and Hungary have a formal policy through CLA's or social insurance schemes. Psychological follow-up is in essence organised by the CIT company.

Social protection

Social protection programmes enjoy a slightly higher legal basis (legislation and/or CLA's) and concentrate mainly on a guaranteed income for a certain period of time for the victim or a financial compensation for the family in case of death.

In the absence of a legal basis, it is sometimes the company that provides those guarantees.

CONTROL AND SANCTIONS

Control bodies

The national controlling authorities in EU Member States are the Home Office, the Ministry of Justice or the police. On a local level, it is usually the police authority who is responsible for controlling the CIT companies and their operations. This does not mean that those authorities are automatically invested with the power to impose sanctions on non-complying companies. In some cases they have this power, but more often than not they are not allowed to impose sanctions.

The right to submit an appeal against a decision imposing a sanction is not always formalized or available to the concerned CIT company.

Nature of sanctions

WITHDRAWAL OF LICENSE

Non-observance of the CIT rules and regulations generally results in withdrawal or loss of license for the CIT company and/or for its personnel. Depending on the gravity of the infraction, this sanction can be temporary or permanent. Appeal against this decision is usually possible.

OTHER SANCTIONS

Alternatively, non-observance of the regulations can lead to sanctions other than withdrawal of the license, namely a warning, a fine or even imprisonment.

Loss of the license

Loss of a license occurs in most instances when CIT companies fail to comply with the existing legislation. Licenses of the company, management and employees may be revoked.

SUMMARY AND FINAL CONCLUSIONS

To a certain extent, the CIT sector is regulated through private security law, commercial law or transport law. However, the nature of regulation and content vary immensely from one EU Member State to another.

Most EU Member States have developed a general private security legislation that is also applicable to CIT. However, CIT transport is also often perceived as a general commercial or transport activity.

In EU, there is a general tendency to regulate the CIT business more strictly.

Each EU Member State has its own particular approach towards the CIT sector and clearly puts its own emphasis.

In this survey it is inevitable to compare the 'old' 15 EU Member States with the 10 Member States who have joined the EU on 1st May 2004. It appears from the survey that CIT within the 10 new EU Member States is clearly much more unregulated in comparison to 15 EU Member States of period prior to 1st May 2004. Furthermore, there appears to be less common ground between the 15 EU Member States of period prior to May 1st 2004 and the 10 new EU Member States than between the 'old' Member States compared to each other and the 'new' Member States compared to each other.

Collecting data has not been easy. The topic is not self-explanatory and the survey required 'expert knowledge'. Furthermore, the language barrier has proven to be a major challenge and has sometimes led to interesting interpretations.

Considering everything, it might be concluded that the objectives of the study have been achieved. It is therefore strongly hoped that this survey will be a valuable tool for many concerned parties and stakeholders.

Finally, the researcher would like to thank all persons who have been so kind and generous to contribute to her survey, on the top of all, the European Commission - DG Employment, Social Affairs and Equal Opportunities – for co-funding the project. A sincere thanks also goes to the European social partners for the private security industry, CoESS and UNI-Europa, and their members at national level, for having contributed many valuable efforts to activate all information sources. ESTA deserves a special thanks for the time and efforts made available. Last but not the least, sincere thanks also to everyone who has put time and efforts into answering the survey.

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