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**To cite this Article:** Paasonen, J. Santonen, T., (2016), The Functionality of Private Security Regulation in Finland. A Practitioners Perspective, Tidskrift utgiven av Juridiska Föreningen i Finland, (1-2), 150-178. ISSN: 0040-6953, Suomen Lainopillinen Yhdistys Ry.

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# The Functionality of Private Security Regulation in Finland – A Practitioner Perspective

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**Abstract:** Globally, the private security industry is in transition since the traditional tasks of security authorities have been outsourced to the private sector in growing numbers. However, at the same time the regulation seems to keep falling behind of the transition progress, forcing the private industry to operate without proper judicial status. Therefore, in this study we will analyze the private security sector operators' views on the functionality of the regulation regarding guarding services, security check operations and maintenance of public order in Finland. As a result, the Finnish regulation does not fully measure up to today's requirements and there is a need to clarify and unify regulation. The approach of all private security industry regulations under one common law was perceived as an alternative to improve the existing situation.

**Keywords:** private security services, regulation, Finland

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## 1 Introduction

Nowadays more and more tasks which have traditionally belonged to security authorities are provided by private operators (Wakefield 2003; Crawford et al. 2005; Sarre and Prenzler 2009). As a matter of fact, in many countries there are more people working in the field of private security than there are security authorities (de Waard 1999; van Steden and Sarre 2007). In practice, this had led to a situation where private security actors are operating in various domains without proper judicial status (Button 2002, and Johnston 2000). Interestingly, so far the legal research on the private security sector has been scarce (Button 2007), although many empirical studies on private security personnel have been conducted (Rikagos 2002; Wakefield 2003; Crawford and Lister 2004; Joh 2005). Moreover, even if research and knowledge about the private security sector has increased, it still lags behind when compared to research conducted on security authorities (van Steden 2007). Rare existing studies with a national focus emphasize a need to improve the regulation on private security sector (e.g., Prenzler and Milroy 2012; Santonen and Paasonen 2014). Regulation and the closely related political environment are also identified as key demand and change factors within the private security sector by leading security management researchers (Santonen 2014). We argue that these observations strengthen the eminent need to fill the identified research gap relating to the regulative aspect of private security.

A recent study by Santonen and Paasonen (2014) analyzed private security officers' views on current legislation that regulates "guarding services", "security check services" and "maintenance of public order" in Finland. Their study identified a need to 1) clarify and expand the private security officers' powers, 2) improve criminal liability and criminal law protection issues, and 3) enhance supervision and co-operation between the private security industry and public authorities. In this study, we also focus on the

industrial actors' point of view to regulation. On a daily basis, industry actors are conducting operational activities, which are influenced by regulations. As a result they are constantly facing possible regulation-related challenges, which make them important informants in generating regulation development ideas. We argue that more in-depth analyses are needed especially to uncover 1) why private security officers find current regulation inadequate, and 2) what kind of solutions they propose to overcome the identified problems.

Methodologically, this study uses a triangulation approach (Smith 1975), which can be defined as "the combination of methodologies in the study of the same phenomenon" (Denzin 1978). Various types of triangulation have been presented, including *data triangulation* – using multiple data sources – *investigator triangulation* – using more than one investigator – *theory triangulation* – using multiple theoretical approaches to interpret the phenomenon – and *methodological triangulation* – using multiple quantitative or qualitative factors or combining them (Downward and Mearman, 2007). Basically, in this study we evaluate similar datasets as Santonen and Paasonen (2014), but instead of a pure quantitative approach, we use a qualitative approach and combine qualitative and quantitative approaches in the same study as suggested by Creswell and Clark (2007).

## **2 Introducing Private Security Regulation in Europe and Finland**

### *2.1 Private security regulations in European countries*

From a historical perspective, private security regulation in European countries has been country-specific, resulting in a heterogeneous set of legislations across Europe (CoESS 2011). However, as a result of the freedom of the movement of goods and services agreements within the European Union (EU) and the flow of trade to other countries outside of the EU, there has been a suggestion to also increasingly involve security services (e.g. Van Steden and Sarre 2007). This will put more pressure on the coordination and integration of European-wide regulation, which has, so far, gained little attention (Paasonen et al. 2012). There is a need to take into account the direction of policies signed by private security actors on the European Union level. These directions are intended to provide help in the development and harmonization of the legislation (Button 2008). Interestingly, recently the European Commission (2012) has made a proposal for the creation of true internal markets to benefit European companies, which are currently frontrunners in most operational areas of the global security industry. Favorable internal markets play a significant role in maintaining the lead in expertise, which in the long run could also strengthen the position of the European security industry in new international markets.

In practice, the goals of the European Union for harmonizing the private security regulation will be very difficult to realize. Previously it has been suggested that not even individual countries such as the United States, Canada or Australia have been able to standardize the regulation of the field (Hakala 2007). When comparing the international regulation of private security services to our focus country Finland, we must take Finland's progressive regulation into consideration. Kerttula (2010) has highlighted that many of the internationally discussed flaws of the field have already been decreed in

Finland, while the regulation of the field is still completely missing in several other European states. Thus, an empirical evaluation of the functionality of Finnish private security regulation will provide valuable information especially to countries that have not yet regulated the private security field, but are planning to do so. On the other hand, for the countries where regulation is similar to Finland, this study will offer a useful opportunity for comparison.

It is noteworthy that at the moment, Finland is undergoing an overall reform and legislation update concerning the private security sector. This reform has been created out of the need to update and clarify private security regulation (Ministry of the Interior 2008). Originally, an essential goal of the reform was the widening of the public order maintenance area, as defined by the Public Order Act (612/2003), to health care and social welfare offices as well as to airports and harbors. However, the objectives were reset by the Ministry of the Interior (2011) and the goal of the project is no longer an actual overall reform but updating the legislation of the field. Currently, the main goal is to clarify the work distribution between private security services and the police as well as the tasks and jurisdictions of guards and persons maintaining public order. The Parliament approved the legislative reform of the private security sector in March 2015. The legislative reform will enter into force in the beginning of 2017.

## *2.2 Finland as a private security service market*

According to the Global Competitiveness Report 2012-2013 (Schwab and Sala-i-Martin 2012), besides being one of most innovative countries in the world, Finland also ranks third in terms of the institutional environment. Regarding the report's definition, institutional environment includes a legal and administrative framework within which individuals, firms, and governments interact to generate wealth. In practice, the report consists of 22 different measurements such as juridical independence, burden of governmental regulation, transparency of governmental policymaking, and reliability of police services. Thus, the high ranking is based on a comprehensive view of the legal atmosphere of the country.

Previous studies (e.g., Ottens et al. 1999; van Outrive 1999; van Steden and Huberts 2005; Jones and Newburn 2006) have indicated that the definitions and statistics regarding the private security service industry have been blurry for a long time and there has not been a significant development to correct this defect. This makes generalizability and cross-country comparisons difficult in any study focused on private security services. One of the rare attempts to statistically classify the private security service market at the European level includes a recent publication by the Confederation of European Security Services (2011), which presents various statistical facts about private security services in Europe. In the report, *EU legislative mapping*, variable reflects the level of strictness of national-level private security legislations across Europe, ranging from non-existing to very strict. According to this classification, Finland has strict national-level private security legislations like in the case of half of the other 34 European countries.

Furthermore, from the private security service market viewpoint, Finland has one of the lowest ratios regarding security force / population (5<sup>th</sup> lowest among the 34 European countries) and police force / population (2<sup>nd</sup> lowest). In addition, the combined market share of the top three private security companies is 65 per cent, which makes Finland the

first country above the median value of 58 per cent. All except one European country regulate the private security industry with specific laws, just like Finland does (CoESS 2011).

## *2.2 Background of the regulation*

Changes in the society and the progress of private security services have been considered to have a significant impact on the regulation and its development needs. The special nature of the field has been seen in the background of private security regulation, which cannot be controlled merely by the operations of the markets (Button 2008). In addition, public authority can be used under special provisions of the field. By using jurisdictions, we can restrictively interfere with basic rights; so all operations must be based on law. The significance of basic rights has grown essentially stronger in the recent past. The control of basic rights has become essentially condensed also in legislative operations (Lämsineva 2004).. As a result, the number of bills to be inspected by the Constitutional Law Committee has grown strongly. Moreover, the Constitutional Law Committee has had several comments on the regulation projects related to private security services (e.g. PeVL 48/2005 and PeVL 1/2008).

Constitutional issues have been crucial in developing the private security regulation. Public interests, such as supervising the field and allocation of responsibility, can also be seen in the background of the regulation in addition to professional demands, such as setting quality-related minimum requirements for the field. Furthermore, requirements for the quality of the field have been highlighted from the viewpoint of citizens and the state, whose interests include maintaining safety in the society (Cukier, Quickley and Susla 2003).

The operators in private security services also have an exceptional opportunity for committing crimes, since confidential information of the employer is received via performed tasks. Therefore, there is a need to set requirements for more specific licensing-based regulation, which would allow checking the suitability of persons for the field. Hoogenboom (2010) highlights the private security service operators' possibility for committing opportunistic behavior crimes against the employer, as evidenced by the valuable goods robberies in Sweden (e.g. Lindström 2009). In Hoogenboom's view, the field should be regulated according to the same premises as security authorities so that operations would become as transparent and responsible as possible. There are requirements related especially to ethical and moral issues, which aim to prevent various kinds of malpractices.

The most common arguments used as the basis of private security regulation can be divided into three classes. The first class consists of arguments aiming at preventing criminals working in the field. The second class highlights the special character of the field, due to which quality standards are demanded by the operators for maintaining safety and preventing crimes. The third class consists of responsibility issues and duties in assignments and tasks that very closely resemble the tasks of security authorities (George and Button 2000).

### *2.3 The long tradition of regulation in Finland*

Private security regulation has a long tradition in Finland. The first provisions date back to 1924, when the order was given on public entertainments in the countryside. This decreed the tasks and jurisdictions of a bouncer. Regulations concerning bouncers were achieved on a legal level with the law given on bouncers of entertainment events decreed in 1930. The jurisdictions of bouncers were extended by the law set in the purpose of enhancing order and security in 1933. Both of these laws were rescinded by the law given on public entertainment events in 1969. The first regulations concerning security companies came into effect in 1944, when the order on security companies and the order on the occupation of a private detective were made. Security companies were decreed on a legal level with the Guarding Services Act (237/1987) that came into effect in 1983 and rescinded the old order. (Paasonen 2014)

The first overall reform of private security regulation was realized in the beginning of the 21<sup>st</sup> century. Along with this, the Private Security Services Act (282/2002) came into effect in 2002. The need for an overall reform had been discussed in the field already for a long time, since the regulation was outdated and no longer corresponded with the situation in the society. Furthermore, there had been a lot of regulation with provisions on the same level as decrees. The law reform can be considered as a certain kind of a turning point that has had an effect on the development of the field. The goal of the law reform has been to improve the legal protection of persons that are the targets of security measures and the consumer protection of customers who buy the services. In addition, the aim has been to enhance guidance and monitoring of the field by creating a security services surveillance unit. The goal has also been to clarify work distribution between public authority and private security services as well as to increase cooperation between security authorities and private security services with the founding of a security services advisory board.

The development of private security service regulation has been characterized by the need to regulate guarding services, private detectives, maintenance of public order and security check operations as these the areas in which public authority can be exercised under special provisions. The Finnish definitions and regulation of the above mentioned areas of private security services will be briefly discussed below.

**Defining guarding services.** The Private Security Services Act, which rescinded the Guarding Services Act, refers to for-profit security tasks based on client contracts. The same Act defines a guarding task to be the guarding of belongings, protecting individual's inviolability, revealing of crimes aimed at the employer or target of guarding, and the supervision of these activities. Practicing guarding services is classified as an industrial and commercial activity requiring a license with the intent to make a profit, so the law is not applied to guarding that is performed voluntarily without remuneration. The requirement of being based on a client contract excludes private guarding outside the guarding services. Moreover, the Act includes legislation for private detectives, who are considered as guards and are required to hold a guarding services

license if performing crime-uncovering operations. In practice, however, private detectives can perform most of their work without having this license.

**Maintenance of public order** is decreed in the law from 1999. The law included the concept of a bouncer but overall it did not fully correspond with operational and qualitative needs, which were presented in the operations of maintaining public order. This lack of correspondence led to a reform in 2007. The aim of the reform was to update the legal regulation, especially relating to targets of security measures, to enhance official supervision, to eliminate partly overlapping regulation of maintaining public order and guarding services, as well as to make the boundaries clear between official and private maintenance of public order.

The latest reform of the maintenance of public order, i.e. the 1<sup>st</sup> phase, came into effect in 2010 and it opened up the legal operating areas to healthcare and welfare offices, airports and harbors. Previously, these places were taken care of by guarding service companies' workforce operating under the license of a guard. Maintaining public order does not require a separate trade license but only guarding service companies can receive maintenance tasks, as stated in the Public Order Act. Persons maintaining public order can be ordered based on one of the many Acts, such as the Assembly Act (530/1999), Outdoor Recreation Act (606/1973), Seamen's Act (756/2011), Public Order Act, or the Act on Accommodation and Catering (308/2006).

**Security check operations.** The regulation of security check operations originates from airports, where provisions were scattered in part on the law on securing air traffic or special decree on security measures performed by the Civil Aviation Administration. Since the resources of police and Civil Aviation Administration were not sufficient to perform airport security checks, guarding service companies replaced them, which in turn aroused questions on the legality of this arrangement. The new law in 1994 corrected the discrepancy and finally the overall reform of the Aviation Act 2006 gave the Civil Aviation Administration rights to develop security training and grant licenses. The Act also states that security checks can be performed by a person who has carried out training and been approved as a security officer by the Finnish Transport Safety Agency.

Other places where security checks are needed and performed include courts and harbors. The law regarding security checks in courts came into effect in 2000, stating that checks can be performed by a police or a person employed by the court, who is specifically trained for the task. Courts can acquire security checks as purchased services but the police must give an approval for the use of a security officer. In the case of harbors, security checks were decreed in 2004 and the revised law came into effect in 2007. The Act on the Security Measures of Certain Ships and Harbors Serving Them and Surveillance of the Security Measures states (69/2007) that security checks can only be performed by the Police, Frontier Guards or Customs officers, or persons maintaining public order who have received proper training and been approved for the task by the police.

### **3 Defining and Comparing the Powers of Action**

#### *3.1 Generic boundary conditions*

According to Section 124 of the Constitution of Finland (731/1999), a public administrative task can only be delegated to other than public authorities if it is necessary for the appropriate performance of the task and if basic rights, legal remedies and other requirements of good governance are not endangered. Private security jurisdiction authorizes the interference with the right to life, personal liberty and integrity as defined in Section 7 of the Constitution as well as freedom of movement defined in Section 9.

The Criminal Code (39/1889) does not contain specific authority power to take actions on provisions concerning the use of force. In the Criminal Code, a basic solution has been adopted, which considers authority powers first and foremost on the basis of special provisions. This has been a practical solution because the operating situations of forcible measures relating to authority rules are so manifold. The Criminal Code regulates the outer limits of the use of force; therefore, the penal point of view becomes significant when the powers given by special provisions have been exceeded.

#### *3.2 Power of action within guarding services*

Guards' authority powers are decreed in the Private Security Services Act. Guards have the right to remove a person from the area under guarding if the person to be removed refuses to obey a request to leave made by the owner or holder of the area under guarding or by the owner's or holder's representative or if it is obvious that the person to be removed has no right to be in the area under guarding and the guard has requested the person in question to leave.

In carrying out guarding assignments, guards have the right to apprehend an offender caught in the act of committing an offence or in the process of escape if the offence may result in imprisonment or if, for example, the crime is a petty assault or theft. Persons apprehended shall be surrendered to the police without delay. In exercising their right of apprehension, guards are entitled to frisk persons apprehended and any goods they are carrying, in order to ensure that they are not carrying any objects or substances that they might use to pose a danger to themselves or others.

If a person to be removed, apprehended or searched for security reasons resists such a removal, apprehension, or security check in order to avoid it, guards have the right to resort to such forcible means as are necessary to remove, apprehend, or search such a person and that can be considered justifiable in view of the person's behavior and other circumstances.

### *3.3 Power of action within maintenance of public order*

Maintenance of public order jurisdictions are decreed in the Security Stewards Act (533/1999). Security stewards shall prevent from entering their area of operation any persons who, on account of their intoxication, behavior or equipment, can on reasonable grounds be suspected of endangering order or security there or who do not meet the age requirement for entry. Security stewards also have the right to prevent from entering their area of operation any persons who, on the basis of their earlier behavior, can with reason be suspected of endangering order or security there. An entrance can also be prevented from persons who do not meet the requirements for entry imposed by the event organizer or site proprietor or can with reason be suspected of possessing objects or substances whose possession at the site is prohibited by law or by the conditions imposed by the event organizer or the police.

Security stewards have the right to remove from their area of operation any persons who in an intoxicated state or in a threatening manner by being noisy or acting violently are disturbing order or endangering security there. A person can also be removed if despite being warned, they fail to obey an essential order issued to maintain order or security.

If removal from the site is evidently insufficient and the disturbance or danger cannot otherwise be eliminated, security stewards have the right to apprehend the person, provided that apprehension is necessary in order to combat a serious danger to other people or to property. The apprehended person shall be handed over to the police without delay. If an apprehended person cannot be handed over to the police without delay, security stewards have the right, provided that they obtain the consent of the police and comply with instructions issued by the Ministry of the Interior, to keep the person in custody for up to four hours after the apprehension, but in any case only up to the time the event has ended and the public has dispersed or the reason for the apprehension has otherwise ceased to be valid.

Security stewards have the right to frisk with the aid of a metal detector or other such technical device anyone seeking to enter their area of operation or anyone inside the area, for the purpose of ensuring that they have no objects or substances on their person or with them that could endanger order or security, or whose possession within the area of operation is prohibited by law or the provisions issued under the law. Security stewards have the right in connection with apprehensions to frisk apprehended persons to ensure that they are not in possession of any objects or substances that they could use to jeopardize the custody arrangements or cause danger to themselves or to others. Security stewards have the right to take away any dangerous or illegal objects or substances.

In discharging their duties, security stewards have the right to use such forcible means that are necessary and can be considered justifiable for the purpose of preventing the entry of persons, removing persons from the site, apprehending persons, frisking apprehended persons or preventing their getaway, taking away objects or substances or removing an obstacle.

Public Order Act appointed security stewards' jurisdictions are decreed based on the Security Stewards Act. Public Order Act appointed security stewards' do not have the

right to prevent an entry or remove a person from the guarding area who, despite of notification, does not obey the order given to maintain public order and security. Public Order Act appointed security stewards do not have the right to keep the person in custody or the right to frisk other than the captured person. Other than these divergencies, the jurisdictions are similar.

### *3.4 Power of action within security checking*

Security check personnel has, according to the jurisdictions regarding ports and courts, a right to frisk with the aid of a metal detector or other such technical device an incoming and outgoing person and this person's belongings for the purpose of ensuring that they have no objects or substances with them that could endanger order or security, or which could be used to cause harm to the property.

Security check personnel also possess other means to frisk the person's belongings. If there is a justified reason to believe a person is carrying an object or substance mentioned above, the person can be frisked for the purpose of finding the object or substance. Security check personnel has the right to take away an object or substance, the possession of which has been forbidden by the law or by the regulation given based on the law, found by conducting frisk or in any other way. Removed objects and substances must be handed over to the Police or, if not prevented by the law, given back to the frisked person when leaving the court.

The security check personnel working in the court also has a right to remove a person who refuses the personal security check measure. When it comes to aviation, the security check personnels' jurisdictions have not been decreed in the law. The national law only refers to the international aviation regulation, which only requires that security checks have to be made.

### *3.5 Summary and comparison of powers of action*

So far, private security related regulation has been studied in Finland only on a theoretical level (Paasonen 2014). Internationally the topic has not aroused great interest, either, (Button 2007) although the private security sector is playing an ever-increasing role in the society (e.g. Crawford and Lister 2004, and Joh 2005). In Finland, the regulation regarding the private security sector has come into effect in the course of different decades and it has been a subject to reforms several times during the last years (Paasonen 2014). In several cases, the operations have been in the grey area of the law long before the legislator has intervened in the situation (Kerttula 2010) resulting, in practice, in a scattered legislation. Therefore, an overall reform and legislation update concerning the private security sector was started (Ministry of the Interior 2008), although it was recently diminished to a lesser update focus (Ministry of the Interior 2011).

In Finland, the regulation of guarding services, maintenance of public order and security check operations is uneven and these three business areas all possess different jurisdiction approaches (Paasonen 2008). *First*, within guarding services, the 'under one law approach' is applied. *Second*, on the contrary in the case of security checking,

jurisdictions depend on the location, and thus for harbors, courts and aviation own regulation has been defined. *Third*, maintenance of public order regulation has yet another approach. Even if it is defined by a separate law like guarding services, multiple other laws are actually defining where and under what conditions a ground controller can be appointed to a task. Nightclubs, shopping centers and public events, to name a few locations as an example, are following different regulation, which is likely to cause understanding challenges for practitioners.

When jurisdictions are compared among the three defined business areas, the maintenance of public order holds the most extensive jurisdiction. Interestingly, in aviation the security inspector's jurisdictions have not, in turn, been regulated at all. In practice, the jurisdiction does not always cover all the operations performed in different tasks within the defined business areas. This leads to the use of everyman's rights, thus equating security employees to the common man. Since maintenance of public order includes the most extensive jurisdiction, it is assumed that the need to expand the powers of actions is the smallest. In the case of guarding services, the need is assumed to be greatest, because the guard's jurisdictions are much more limited than that of the maintenance of public order. In all, it appears that the structure of private security regulation is rather complex due to a mixed set of frameworks and the difficulty to unambiguously determine under which law one is operating.

## **4 Criminal Liability and Criminal Law Protection**

### *4.1 Criminal liability*

The Criminal Code of Finland legislates that a person exercising public authority refers to a person who functions on the basis of an act or decree including issuing orders that oblige another or deciding on the interest, rights or duties of another, or who on the basis of an act or decree in question in his or her duties intervenes in the benefits or rights of another. Criminal liability of an official for the legality of his actions means an extended responsibility for the personnel who possess a special status due to his work in which he makes a misdemeanor (Rautio 2002). Criminal liability of a legal official is applied also to the operators of the private security field, since they have been given exceptional powers of action, which are normally only given to official authorities, such as the police.

However, criminal liability is limited to performed tasks and applied only when special powers are in use. Thus, criminal liability does not apply when individual rights for the use of force are exercised. There has been discussion going on in legal sciences about a police official using the right of self-defense, but so far this has not been looked at from the private security sector's point of view. The Supreme Court of Finland came to the conclusion (KKO 2004:75) that a police officer is not officially liable in the event of self-defense. Interestingly, legal scholars have criticized this solution and argued that the police should always hold a criminal liability when operating, since their powers of actions are so extensive and even a self-defense event cannot be an exception (e.g. Nuotio 2005).

Along with this, a so called double standard requirement, which came into effect in 2014, was decreed in Article 17(2) of the Police Law (872/2011) in context with the Police Law Reform. According to the regulation, during public service a police officer also has the right to self-defense, as decreed in Paragraph 4 of Chapter 4 of the criminal law. During such self-defense, the police officer has liability. When assessing the defendability of self-defense, the requirements set for the police officer based on his or her training and experience must be taken into consideration. On the other hand, in the private security sector the situation is the opposite. As the grounds for jurisdiction do not, in many cases, fit the situations, this forces a repeated use of self-defense rights among private security activities.

In practice, the criminal liability of a legal official is quite unsuitable for the private security sector, even if the basic criteria set by the law itself are the same within guarding services, security check operations and maintenance of public order. *First*, since the legal official liability legislator has, above all, wanted to emphasize responsibility related to the use of powers, this alignment has an interesting outcome within the private sector. As a result, the criminal liability is not dependent on the job activities as such, but related to the granted powers of actions. As presented in the powers of action section, the maintenance of public order holds the most extensive jurisdiction. This should lead to the use of everyman's rights less often and at the same time subject the activities more often under the criminal liability decree. On the contrary, e.g. in aviation, the security inspector's jurisdictions have not been regulated at all, therefore leaving the operators fully without the official criminal liability responsibility. Therefore, it is interesting to evaluate what kind of a linkage (if any) there is between the perception of the functionality of powers of action and criminal liability due to significant variation within the powers of action. *Second*, at the moment the laws have been formulated in a way that it is difficult for the operator to commit all the offenses in the office, which fulfill all the essential elements of malfeasances even though some constituent elements are fulfilled. *Finally*, although the Criminal Code has been applied to the private sector in theory, there have not been many prosecutions for offenses in the office. Thus, the significance of the liability of legal official provisions for the private sector has remained quite minor at present.

#### *4.2 Criminal law protection*

According to the Criminal Code of Finland, resistance of a person maintaining public order is punishable by law regardless of whether the official is acting within the business area of guarding services, security checking or maintenance of public order. A person, who employs or threatens violence in order to prevent or attempt to prevent a person maintaining public order from performing a duty laid down in an Act or Decree or otherwise makes it more difficult to carry out a given task, shall be sentenced. A person who is found guilty of such a crime shall be convicted to a fine or imprisonment for a maximum of six months, unless a more severe penalty for the act is laid down elsewhere in the law (Majanen 2002). Significantly, the penal protection adapted to the private security field is narrower compared to the provision of the violent opposition of the public official. For example, the regulation does not criminalize violence, which takes place as revenge related to the maintenance of the order. Instead, the general assault and offence against personal provisions are applied to retaliation events.

In practice, the criminal law protection is strongly linked to the use of granted powers of action vs. use of everyman's rights dilemma, as described above. If criminal liability issues are perceived as unclear, then we should identify challenges also on the level of criminal law protection. Criminal liability protection could, e.g., be determined similar to public officers because in the private security sector public authority can be exercised under the special provisions. In any case, more attention should be paid to the criminal law protection issue because, at the moment, the official liability is open to interpretations regarding when it should and should not be applied.

## **5 The Regulatory Control and Co-operation**

Guarding services, maintenance of public order, and security checking operations differ in terms of regulatory control conducted by public authorities as follows.

**Guarding services** are the only business area, which requires a trade license. In addition, guarding service companies must have a responsible manager, who is responsible for ensuring that the business is managed in accordance with the provisions applicable to guarding services suppliers. Supervision of guarding service suppliers is decreed in Section 42 of the Private Security Services Act. The Police Board is responsible for the general guidance and supervision. Police Departments are in charge of supervision in their respective districts and they have to check the places of business at least every two years. The record made of the check is delivered to the Police Board. According to Section 17a of the Criminal Code, violation of guarding services is punishable by at the most six months' imprisonment. Operators of guarding services, responsible managers and guards can also be sentenced to a fine for the violation of guarding services in accordance with Section 56 of Chapter 6 of the Private Security Services Act.

**Maintaining public order** does not require a separate trade license like guarding services, but only guarding service companies can receive maintenance tasks as stated in the Public Order Act. The Police Board is responsible for the general guidance and supervision of the maintenance of public order. Police Departments, on the other hand, are in charge of the operations of the private security sector in their respective districts. With regard to the tasks laid down in the Public Order Act, supervision is similar to the supervision of guarding services. Violation of public order maintenance can lead to fines. Both guarding services and maintenance of public order have been decreed in a way that the police, customers, or border control personnel cannot participate in the operations. Furthermore, the operations regarding maintenance of public order cannot complicate the operations of official public authorities.

**The security check operation** does not require a trade license. The security check operations performed in various fields of business have legislation regarding cooperation with the police. For example, a person carrying out a frisk is obligated to inform Customs or Border Guards of any meaningful discoveries. The security check operation on behalf of Aviation and Ports belongs to the supervision of the Finnish Transport Safety Agency. On the other hand, the Ministry of Justice is responsible for the security checks in court.

In the first overall renewal of the private security sector's legislation, an attempt has been made to emphasize supervision by establishing a supervision unit for the private security sector, operating under the Police Board. This unit is responsible for the national official supervision and guidance. The unit consists of five employees, of which two are license administration secretaries. Therefore, the resources are extremely scarce. Jurisdictional district's police departments are responsible for the supervision of the activities in their respective areas. According to the legislation, authorities who carry out supervision have a right to receive the necessary information from private security sector operators.

The legislator has attempted to increase the co-operation of safety and security authorities and the actors in the private security sector by establishing, among other things, an Advisory Board for Security as imposed by the law in 2003. The Advisory Board covers the central branches of administration, commerce, employers, employees and consumers. The members of the Board are appointed by the Ministry of the Interior. The Advisory Board includes a Chairman and a Vice-Chairman as well as a maximum of 19 other members, who are appointed by the Police Board for the duration of three years. The goal of the Advisory Board is to enhance cooperation between the authorities and private security actors; lay down overall guidelines for the field; follow and promote international cooperation in the safety and security field; develop, educate and carry out research of the field, as well as to create directions and be responsible for the communication of information. In addition, the activities include the creation of initiatives and giving statements regarding the field. In practice, the operational activities of the Advisory Board have been minimal and invisible.

In summary, we can conclude that on behalf of the private security sector, the authority supervision is incoherent because a trade license is only required in guarding services. The extension and standardization of the trade license regarding the maintenance of public order would be justified, because the personnel maintaining public order has broader powers of action than guards. Some companies operate security checks in various industries on top of their guarding and maintenance of public order services. For this reason, supervision should be standardized also regarding guarding services. In addition, supervision is a field where co-operation could be further developed.

## **6 Research Methodology**

### *6.1 Research objectives*

Previous studies have empirically evaluated the private security officers' views on current legislation that regulates guarding services, security check services and maintenance of public order in Finland and concluded that the existing Finnish regulation does not adequately address the requirements of the private security industry (Santonen and Paasonen 2014). It appears that there is a need to clarify and expand the private security officers' powers, improve criminal liability and criminal law protection issues, as well as enhance supervision and co-operation between the private security industry and public authorities. By following the suggestions of the above authors (Ibid.) more in-depth analyses are needed to uncover why private security officers find current regulation inadequate, and what kind of suggestions they propose in order to overcome the identified problems. As a result, the main objective of this study is to gain more in-depth understanding on how private security services should, in practice, be regulated, especially in Finland. The following research questions are defined to aggregate private security officers' improvement suggestions:

*R1) How should the guarding services business area be regulated?*

*RQ2) How should the security checking business area be regulated?*

*RQ3) How should the maintenance of public order business area be regulated?*

### *6.2 Data collection and response*

In total, our questionnaire included 141 statements covering various business areas and topics. The entire 141-item questionnaire was pre-tested and finalized over several interviews with selected specialists from the private security industry, to make sure that all our questions and statements were semantically precise and understandable. After a few iterations, the final version of the online survey instrument was published and known actors within the Finnish security sector were contacted by email during our answering period between March and May 2011. However, according to our research objectives, in this study we are only focusing on the previously defined three open-ended questions: how the business areas of guarding services, security checking and maintenance of public order should be regulated?

We received a total of 330 anonymous responses. According to the demographic profile, 87 respondents had less than 2 years of working experience in the private security industry. Since answering our research questions required a comprehensive understanding of private security services, these 87 answers were omitted from the final analysis. Thus, the final number of respondents in this study was 243. According to a recent study (Santonen and Paasonen 2014), on the average the sample size in empirical studies published in the Security Journal – a peer-reviewed international journal for

researchers and practitioners focusing on the security management research – is 802 respondents, while the median is significantly lower with 161 respondents and standard deviation rather high with 2,193 respondents. As a result we argue that our sample size (N=243) is more than adequate when compared to previous empirical studies focusing on the private security industry.

Finally, the respondent’s demographic profile presented in Appendix 1, Table 1, was carefully compared to available statistic sources of the private security service industry, such as the Confederation of European Security Services’ recent report, *Private security services in Europe* (2011), the Strom et al. (2010) report from the United States market, and the Finnish registered security association’s industry report (2011) from Finland, as well as some additional statistics from the Ministry of Education in Finland. Based on this comparison, we were convinced that our data set was adequate and heterogeneous enough to look for answers to our research questions, even if the number of women in the dataset was fewer than their average market share would indicate (in our dataset, 6% vs. the Finnish average 25%). The detailed response rate analysis for open-ended questions is presented in Table

**Table 1.** Open ended- questions response rate comparison between selected business areas (N=243).

	OQ1 Guarding services	OQ2 Security checking	OQ3 Maintenance of public order
Open-ended written comment count (freq.)	110	56	83
Response rate	45%	23%	34%

The response rates for open-ended questions varied between the three business areas. *Guarding services* had the highest response rate and we identified 110 different responses resulting in 45 per cent response rate among our 243 respondents. *Maintenance of public order* had the second highest response with 83 different responses resulting in 34 per cent rate. As a result of the 56 different responses, the *security checking* business area had the lowest response rate of 23 per cent.

## 7 Results

### 7.1 Number of viewpoints per comment

In the first phase of our analysis, the two researchers independently capsulized all open-ended responses and created classification on the basis of the longer written answer. Next, possible conflicts between the researchers’ interpretations regarding observations were identified and clarified. Then, the final set of capsulized observations was fixed and the number of observations for each item was calculated. According to our classification schema (Table 2), some comments could be capsulized into one viewpoint, while some other open-ended comments included up to four different viewpoints.

**Table 2.** Open ended- questions response rate comparison between business areas (N=243).

	OQ1 Guarding services	OQ2 Security checking	OQ3 Maintenance of public order
Number of viewpoints in comments (freq.)	165	78	140
Average viewpoints per individual comment	1.50	1.39	1.69

Due to the highest comment count, *guarding services* also had the highest number of different viewpoints (165), although on average this business area included 1.5 viewpoints per response, which was the second best average. *Maintenance of public order* had the highest average (1.69) for viewpoints per comments, but as a result of the lower response rate, it included 140 different viewpoints, resulting in second best rank. *Security checking* business area had the lowest average of 1.39 and the weakest number of different viewpoints (78).

### 7.2 Identifying key topics

In table 3 we have presented our open ended-questions response frequency comparison between the different business areas in the case of capsulized items. In the same table we have also presented the relative distribution of different viewpoints within each business area.

**Table 3.** Open ended -questions response frequency comparison between different business areas (N=243).

	Guarding services		Security checking		Maintenance of public order		Sum
	Freq.	%	Freq.	%	Freq.	%	Freq.
Clarify regulation	46	28	11	14	39	28	96
Various comments*	45	27	6	8	12	9	63
Increase supervision	20	12	7	9	26	19	53
All activities under one law	13	8	10	13	29	21	52
Existing model is working adequately	20	12	6	8	10	7	36
Develop education	13	8	6	8	16	11	35
Expand powers of action	8	5	9	12	7	5	24
Unite with guarding services			23	29	1	1	24
Sum	165		78		140		383

\*) *various comments* – item counting all the remaining comments, which did not fit into the other classes.

**Clarifying regulation.** *The need to clarify regulation* item was most frequently mentioned among our respondents. Responses included comments such as:

*”Regulation should be clarified and unified. The current regulation reminds me of a patchwork quilt.”*

*”Clearer licensing system and harmonization of the regulation as widely as possible under one law.”*

*”There should be a clear regulation about security checking, it should be subject to authorization and the education should be mandatory.”*

In all, item frequency was 96, which is about every fifth of all the viewpoints. Interestingly, the frequency varied between the business areas. When the total number of different viewpoints per business area was used as a baseline, nearly 28 per cent of the guarding services and maintenance of public order viewpoints argued that there is a need to clarify regulations in that particular business area. In the case of security checking, only 14 per cent did the same. This observation is not fully in line with previous findings, which suggest that the maintenance of public order was found to have the clearest defined powers of action (Santonen and Paasonen 2014). However, besides just powers of action, regulation in general also includes criminal responsibility, penal protection and official supervision topics. Therefore, we argue that the larger scope could partially explain this conflicting observation and some of the clarifying regulation viewpoints could also be related to supervision or other regulation items instead of clearness of the powers of action. Moreover, a non-response analysis revealed higher values for security checking, which could also partially explain the above observation.

**Adequacy of supervision.** The third frequent item with 53 viewpoints was *the need to increase supervision*. Responses included comments such as:

*“There should be more supervision, especially ground control and not only filling the annual information form. That way we could get valuable information about what really happens in the field and how it should be regulated.”*

*“Supervision would be streamlined if the business license was coherent throughout the industry.”*

*”The supervisory authority should have a more active role and the supervision should be handled by authorities who know the industry. The regular police authorities do not know the industry sufficiently.”*

*”The National Police Board needs more resources, so that the industry could improve.”*

As much as 19 per cent of the viewpoints in the maintenance of public order business area suggested that supervision should be increased. In guarding services, 12 per cent and in security checking 9 per cent argued the same, indicating the lesser need on those business areas. Thus, this finding gave more support to previous observations regarding the greater need to increase supervision, especially in the maintenance of public order (Santonen and Paasonen 2014).

**Unifying regulation.** Our two other items *all activities under one law* and *unite with guarding services* are also strongly related to the clarification need, yet in them, more accurate development suggestions are presented. Responses included comments such as:

*"Should be united with guarding services and make one law in which different security checking tasks are separately regulated."*

*"Security checking should be under guarding services so that the quality can be ensured with international standards."*

*"One law to security sector."*

*"Security checking should be regulated under the same law and the whole regulation of the security sector should be unified concerning authorization and powers of action."*

*"There should be one law that would cover all the security sector's 'field assignments', i.e. maintenance of public order, guarding and security checking."*

*"All activities should be under one law that would be specified with regulation."*

Evidently, many respondents would like to combine security checking and guarding services regulation, since 29 per cent of viewpoints in the security checking business area supported this viewpoint. Moreover, 13 per cent of the security checking viewpoints also argued that there should only be one law. Clarifying regulation, one law and unite guarding services items in all suggested that 56 per cent of the security checking viewpoints somehow support regulation clarification either by unifying them or by some other method. Also in the case of maintenance of public order, there was clear support for the one law approach due to the fact that 21 per cent of the viewpoints included this category. Like in the case of security checking, nearly half (49 per cent) of all the viewpoints supported the clarification need in the maintenance of public order business area, if clarify regulation, one law and unite with guarding services items frequencies are summed together.

Finally, when all the above clarification-related viewpoints within our three business areas are summed together, nearly half (45 per cent) of all the open-ended viewpoints were somehow related to regulation clarification. Therefore we argue that among our respondents there is a need to clear up the private security regulation, and one united law would be a most potential approach for proceeding.

**Other observations.** Our summary item -- *various comments* -- had the second highest frequency rank. It included 63 viewpoints, which were mainly focused on the guarding services business area. Summarizing item included various diverse viewpoints, but the most commonly mentioned were occupational safety issues, improving collaboration and details regarding the preparation of law.

*"The occupational safety of a guard should be taken into consideration better."*

*"Active collaboration by the supervisory authority."*

*"So that the small and medium-sized players would be heard and not only the multinational companies."*

The need to expand powers of action item also gained a few hits. However, the item's frequency compared to different clarification need items was more modest. In total, the expanding powers of action viewpoint had 24 hits, which is only about 6 per cent of all the viewpoint hits.

*"Law is too complex and guard's powers of action are minimal, tasks are executed daily in the so-called gray zone in public places."*

*"If we don't get firearms back, there should be at least electroshock weapons available in the private sector. Baton and gas spray are not enough in demanding tasks."*

*"Security check personnel should have powers of action in airports or in other socially important places."*

Development of education item collected a bit more support with 35 hits (9 per cent of all viewpoints). Suggestions such as longer mandatory education and higher education requirements were included in this item.

*"Increase education and job orientation."*

*"Increase education and differentiate education to those who do it professionally (wider) and to those who do only minor tasks (children's discos etc.)."*

Besides giving critique via open-ended answers, 36 viewpoints (9 per cent) stated that respondents are satisfied with the existing regulation model.

*"The current model is pretty OK."*

*"The current state and development are fully acceptable."*

## **8 Discussion**

One in five of the all open-ended viewpoints argued that there is a need to clarify regulation, while only 9 per cent of the open-ended viewpoints indicated satisfaction with the existing regulatory model. Therefore, the clarity of private security regulation cannot be considered a great success in Finland. To sum up, we argue that there is an obvious need to clear up the private security regulation in Finland and/or increase the education relating to regulation and ensure that actors in the field genuinely understand the boundary conditions of regulation. According to the respondents, *all under one law* or, in the case of security checking, *unite with guarding services* are the most desired development paths. Although, extending mandatory education and higher education

requirements received random support, which might indicate that unclear regulation is a greater problem than insufficient education.

On the basis of the open-end questions, *the need to expand powers of action* gained only about 6 per cent of all viewpoint hits, indicating lesser need in comparison to the need of clarification. Interestingly, in the open-ended answers the criminal law protection issues were not emphasized. The previous research showed more pronouncedly that the market actors are urging for more powers of action and also more criminal law protection in Finland. (Santonen & Paasonen 2014). In this research this matter did not emerge as strongly from the data.

If these desires are fulfilled by the legislator, in practice it would bring the private sector actors closer to the authorities and formalize their status. However, this kind of a development request should not be taken lightly. A greater amount of powers of action and criminal law protection also set a bigger need for supervision. Without effective supervision there is a higher likelihood for misdemeanors.

Open-ended analysis revealed a tendency to require more intensive regulatory control especially in the case of maintenance of public order. As a result, we suggest more resources for the supervision of the private security sector. For example, at the moment the insufficiencies in the authorities' registers are causing problems, which can have a significant ripple effect on the security industry. When the police report an offence in Finland, the system does not notify that the person is working in the private security sector. In addition, the police do not have a direct access to the Criminal Records, held by the Legal Register Centre operating under the Ministry of Justice, in relation to judgments. This complicates and makes it hard for the police to receive information on the person's previous sanctions. As Hoogenboom (2010) noted, to reduce the threat of private security service operators committing crimes against the employer, it would be important to create a link between these registers and lower the working possibilities of criminals or unsuitable persons.

Moreover, in open-ended answers some of the respondents argued that supervision could be rationalized if maintaining public order and security check operations would require a trade license like guarding services do at the moment. However, this extension of the trade license requirement divided the respondents' opinions. Finally, the cooperation between the private security sector and the authorities seems to work a little better comparing to supervision, since cooperation was commented on less.

In all, regarding supervision and collaboration the resources of the authorities are very limited. From the whole society's point of view, this could be a serious risk, especially if the volume and complexity of the tasks executed by the private sector increase more and more as has happened during the past years. Therefore, regulatory authorities should note that privatization without successful and appropriate supervision could actually lead to decreased security.

## 9 Conclusions

In this study we evaluated the private security sector operators' views on the functionality of regulation regarding guarding services, security check operations, and maintenance of public order. According to our research findings, the Finnish regulation does not fully measure up to the practical needs of the private sector. Significantly, a notably large proportion of the respondents were not able to form an opinion to our regulation-related open-ended statements. The questionnaire was long, which can partly explain the matter.

This observation indicated problems relating to the clarity of the private security regulation and, indeed, a need to clarify the ambiguity of the power of actions was identified among the practitioners with the help of a series of empirical analyses. Moreover there is a need to get something done such as improving supervision and co-operation between the private sector and public authorities.

Along with the legislative reform approved by the Parliament in 2015, a new Act (1085/2015) that replaces the current Act with the same name is decreed on private security services. Along with this, legislation concerning the private security sector is concentrated into one Act. The Act covers regulations related to guards, persons maintaining public order, as well as security protection officers, which is why the Act on persons maintaining public order and regulations related to persons maintaining public order decreed in other Acts are repealed. At the same time, changes are also decreed to the Act related to the treatment of persons in custody of the police as well as some other Acts (841/2006).

The legislator has appropriately begun to improve the structure of legislation related to the private security sector by repealing the scattered regulation and concentrating the regulations into one Act. Reducing the amount of regulation can improve the understanding of different operators related to the contents of the regulations. However, the problem is that the legislative reform does not take all job descriptions, such as security check operations, of the private security sector into consideration in the regulation. This might be considered as a slight shortcoming since operators in the private security sector manage security checks, alongside assignments related to guarding and maintenance of public order, in several targets.

Along with the legal reform, the current guarding business permit is abandoned. The Act stipulates the trade license of the security sector, which mainly corresponds to the current guarding business permit regulation. A new feature of the trade license is that security supervision operations will mainly be subject to license. Operations occurring in a purpose of earning income and based on a service agreement will be subject to license. Operations based on a service agreement delimit so called self-maintenance of public order outside the requirement of license, similar to self-guarding in guarding business operations. In addition, maintenance of public order in accordance with the Assembly Act will be left outside the scope of the license requirement, i.e. different associations can maintain public order in public events also in future. Expanding the trade license to the operations of maintaining public order and standardizing the license requirements is justified, as a person maintaining order has wider powers of action than a guard. (HE

22/2014) Furthermore, security protection operations necessitating an approval will also be subject to a trade license along with the legal reform.

Several reforms have been made to the powers of action of a guard in the legal reform. The content of a guard's removal right is clarified so that the right of removal is no longer tied to an ineffectual removal suggestion given by a representative of the employer. In addition, a guard will have the right to prevent a person from accessing the guarded area. The requirements for preventing access are coherent with the requirements for removal. A guard's right to detain is also reformed so that if the detainee cannot be handed over to the police within a reasonable period of time, the guard can, with the consent of the police officer and the detainee, release the detainee without further delay. This is possible if the crime can only result in a fine and if the identity of the detainee is known or the detainee agrees to present information necessary to find out his or her identity to the guard. In such situations, the police present the penalty notice requirement to the person afterwards. (HE 22/2014)

The powers of action of a person maintaining order have mainly been kept the same. The duty of a person maintaining order to prevent access to his or her area of responsibility in certain cases is waived. A person maintaining order has the right to prevent a person's access to his or her area of responsibility but no duty to do so. The removal grounds of a person maintaining order are partly specified. A new removal ground for a person maintaining order will be the right to remove a person from the area of responsibility who apparently lingers there without permission. The detention right of a person maintaining order is limited to only cover public events and passenger ships. A new power of action of a person maintaining order will be a similar right to detain a person suspected of a crime as that of a guard, corresponding with the regulation related to the general right to detain of the Coercive Measures Act. The regulation concerning the use of power of a person maintaining order will be changed to correspond with the regulation of the use of force of a guard. (HE 22/2014)

The reform of the powers of action of a person maintaining order partly clarifies the current regulation. In addition, the powers of action are now closer to those of a guard. The operating field of persons maintaining order is extended to universities and polytechnics. Furthermore, persons maintaining order can be placed in private events. The problem with operations of maintaining order is still that there are different kinds of persons maintaining order for different operating fields and their powers of action are not uniform either. Thus, combining the job titles would have been recommendable in context with the legal reform.

The legal reform does not consider the criminal liability or protection of private security sector operators, although several problems, which have also been strongly criticized by operators in the field, are related to them in the current regulation. For instance in Sweden, the protection under criminal law of a guard and a person maintaining order is defined by similar grounds as the protection of a civil servant. This would be a justified solution also in Finland, so liability and protection under criminal law of the private security sector should be placed on the same level as with civil servants, since the arguments used in the grounds of regulation are equally valid for both the private security sector and the authorities.

The legal reform has not made significant changes to regulations related to regulatory

supervision and cooperation either. Supervision is managed by the Police Board together with the police departments with regard to the operations of a guarding company, maintaining order, and security protection. Related to cooperation, a guard in the service of the holder of a security sector trade license can, along with the legal reform, manage the tasks of a guard in the detention premises of the police. According to research results, the authorities would need more resources for supervision, as this was not considered as sufficient in the current state. In practice, there is very little supervision conducted by the police departments in jurisdictional districts. One reason for this is the lack of resources, but lack of knowledge of the private security sector and regulation also influences the supervision. The Police Board's security sector supervision also has very limited resources. Guarding companies also neglect making annual notifications themselves. Furthermore, the registers of the authorities are problematic with regard to supervision, as when the police are making a report of an offence the system does not notify that the person suspected of a crime works in the private security sector. In addition, the police do not have direct access right to the registers of the Department of Justice, so receiving information on a person's earlier penalties is laborious. The Deputy Ombudsman (2010) has also highlighted that the police must invest in the supervision of the private security sector. Along with the legal reform, the trade license will be extended in 2017, and this will have a very significant nationwide impact. The extended trade license will relate to hundreds of companies in the field. This puts a lot of pressure on increasing resources for supervision and developing it.

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**Appendix 1: Table 1 Respondents' profile (N=243)**

Demographic characteristics	Freq.	Valid %	Demographic characteristics	Freq	Valid per cent
Gender			Education		
Male	227	93.4	Basic education	10	4.1
Female	16	6.6	Vocation or Upper secondary school	152	62.6
			Lower university degree	54	22.2
			Higher university degree	27	11.1
Job position/title			Age		
Student	4	1.6	<18	0	0
Employee	115	47.3	18–25	41	16.9
Officer	51	21.0	26–35	102	42.0
Management	37	15.2	36–49	70	28.8
Entrepreneur	25	10.3	>50	30	12.3
Other	11	4.5			
Working experience in security sector			Number of employees in the company		
2 to 5 years	58	23.9	No hired labour	7	2.9
5 to 10 years	59	24.3	Less than 10	23	9.5
Over 10 years	126	51.9	10 to 49 employees	37	15.2
			50 to 249 employees	33	13.6
			Over 250 employees	110	45.3
			Missing	33	13.5
Main lines of business			Number of lines of business		
Guarding	152	62.6	1	163	67.1
Stewarding	78	32.1	2	36	14.8
Security checking	26	10.7	3	19	7.8
Security protection	24	9.9	4	12	4.9
Manufacturing/sales	15	6.2	5	6	2.5
Education	50	20.6	6	2	0.8
Professional services	51	21.0	7	2	0.8
			Missing	3	1.2
Security business turnover			Employees working in security business		
Less than 20 %	76	31.3	Less than 20%	86	35.4
20 to 39 %	16	6.6	20 to 39 %	16	6.6
40 to 59 %	6	2.5	40 to 59 %	3	1.2
60 to 79 %	7	2.9	60 to 79 %	7	2.9
80 or more %	138	56.8	80 or more %	131	53.9
International business turnover					
Less than 20%	186	76.5			
20 to 39 %	13	5.3			
40 to 59 %	12	4.9			
60 to 79 %	8	3.3			
80 or more %	24	9.9			

