

Coroner ME Hassell Senior Coroner

21 October 2025

REGULATION 28: REPORT TO PREVENT FUTURE DEATHS IN THE MATTER OF MISS GABRIELLA JAIYESIMI

We are writing in response to the Prevention of Future Deaths Report regarding the death of Gabriella Omolabake Torisheju Jaiyesimi, addressed to Tesco PLC, Total Security Services Limited ("TSS"), a security company and the Security Industry Authority ("SIA"). This response comprises the formal response of the SIA to that report.

We extend our deepest sympathies to the family of Gabriella Omolabake Torisheju Jaiyesimi, whose sad death in February 2025 was the subject of the coroner's inquest.

On receipt of the Prevention of Future Death Report on Friday, 29 August 2025 we were made aware of the involvement of a security operative in these proceedings. On 24 September 2025 we obtained and subsequently listened to the recording of the inquest proceedings to fully understand the circumstances.

We welcome the opportunity to respond to the matters that you have raised in the Report relating to the conduct of the security operative, as set out at paragraph 5 of your Prevention of Future Death Report under the heading 'the SIA'.

Recognising that the SIA was not called as a professional witness or listed as an Interested Person, we have set out an explanation of the role of the SIA, and details of the existing standards of training and expectations of security operatives that apply and are relevant in this matter.

We then address in turn the matters listed for the SIA's attention and explain what actions we have taken or asked others to take, where it is their responsibility.

Background Information

- 1. The Security Industry Authority ("SIA") is responsible for the licensing of the private security industry in the United Kingdom. It was established by the Private Security Industry Act 2001 ("the Act").
- 2. Individuals who undertake 'manned guarding' (the term used in the legislation) are one of the types of persons who are required to hold an SIA licence. Manned guarding includes security guarding, door supervision, close protection, guarding cash and valuables in transit and public space surveillance using CCTV. Where an individual carries out licensable conduct, they are committing an offence of engaging in licensable conduct without a licence.
- 3. Where security guarding activities are performed by an operative contracted by a business from a security provider, then that individual needs to have a security guarding licence. This is the situation in retail settings such as Tesco.



4. The door supervision licence also allows security operatives to perform the activities of a "security guard", or a separate licence is required to carry out that activity.

The nature of the employment in private security

5. A security officer can be employed in several ways: directly by the premises owner or operator, through a contracted security company, or on a temporary basis at various locations to fill short-term or last-minute vacancies, with or without the use of labour providers. As such the SIA's role is not to record where security operatives are working and it can never know where, or for whom, an individual security operative is working. Similarly the SIA will never know the specific nature of activity they are deployed for or the setting an operative will be working in, or the risks associated with an individual's deployment.

The Role of the SIA

- 6. The SIA has been in operation since 1 April 2003.¹ The functions of the SIA are set out in section 1(2) of the Act. They include responsibility for licensing individuals who are undertaking the regulated activities of a security operative and for setting and approving standards of conduct and training.
- 7. The regulatory regime which is operated by the SIA is UK-wide.
- 8. The legislation requires the licensing of individuals by the SIA, not the security businesses. However, the SIA is also authorised to run, a voluntary quality scheme for security businesses, called the "approved contractor scheme". TSS is a member of that scheme.

The licensing criteria

- 9. The purpose of licensing individuals is to ensure at the time they apply for or renew a licence, usually every three years, the individual is fit and proper to hold it, having met criteria and obtained the relevant entry level qualifications. That knowledge and skill is confirmed as met through the security operative having obtained the relevant licence-linked qualification for the sector that they intend to work in. The qualifications are provided, approved and regulated by other bodies.
- 10. To qualify for a licence to work in any front-line licensable activity, an applicant must:
 - be aged 18 or over
 - pass an identity check
 - pass a criminal record check
 - have the right to work in the UK; and
 - have the appropriate and relevant, licence-linked qualification.

¹ The Private Security Industry Act 2001 (Commencement No. 1) Order 2002

- 11. The licence currently costs the applicant £184 and is valid for 3 years. Further details of the licensing criteria and how the SIA assesses and licenses an individual as well as the criteria for renewal of the licence are set out in the SIA publication *Get Licensed*. A copy of the current *Get Licensed* criteria (version February 2025) is attached to this response as **SIA/1**.
- 12. Other 'Information' may be taken into account as set out in Get Licensed at page 63 either as part of applying for a licence or during the period of the licence if it suggests the person may not be a fit and proper person to hold or continue to hold a licence. If there are serious concerns that a threat to public safety could exist or if it is otherwise in the public interest to do so, the SIA has the power to suspend a licence that has been granted under s10 of the Act to allow us time to look into an issue and make a decision on whether the licence holder should continue to hold a licence. If the SIA decides that it is necessary to suspend someone's licence it will write to them. The licence holder will be invited to make representations before a decision is taken to revoke their licence. The licence holder has a right of appeal to the Magistrates Court and has 21 days to exercise this right of appeal.

Explanation of the Existing Regulatory Standards Set - Qualifications and Training Requirements

- 13. The SIA's role is to set and/or approve standards which set out the skills and knowledge that security operatives require.
- 14. It does so by creating and publishing "Specifications for Learning and Qualifications". The SIA reviews the specification requirements every five years. These specifications are used as the basis for qualifications and associated assessments, by awarding organisations such as Highfield Qualifications, Laser Learning Awards, Pearson, Qualifications Network, SFJ Awards and other approved awarding organisations. These awarding organisations, who are themselves regulated, take the specifications and make them into nationally recognised qualifications. They also approve and monitor training providers who deliver the training and assessment.
- 15. Using government regulated qualifications is a well-established model that is used in numerous other sectors in the UK. Regulation of qualifications required for a licence or licence renewal is the Office of the Qualifications and Examinations Regulator, OfQual in England, Wales and Northern Ireland and Scottish Qualifications Authority, SQA in Scotland. They approve and regulate Independent Awarding Organisations responsible for creating, overseeing and awarding the qualifications obtained. The Awarding Organisations in turn, approve individual training providers and centres.
- 16. There are over 650 training providers approved by the Awarding Organisations to deliver SIA licence linked qualifications across the UK. There is no government training inspectorate for adult education (Ofsted's remit and reach does not extend to this) so this falls to a combination of the supervision by the qualifications regulators and oversight, monitoring and auditing by the Awarding Organisations over the training providers. In this case the relevant Awarding Organisation is Pearson.
- 17. The qualification content provides for entry level knowledge. Once an SIA licence has been obtained, it is the employer's responsibility to provide ongoing professional training, job-specific development, and to ensure that each operative is properly briefed and supported in their specific deployment.

The Introduction of First-Aid Training Requirements for Licences

- 18. In April 2021 the SIA imposed a new requirement that before attending training leading to a licence linked qualification for Door Supervision or Security Guarding, an individual needed to present evidence that they were competent in First Aid or Emergency First Aid at Work. This extended to individuals as a pre-requisite to the training required before an individual could renew a licence. Later in the year the SIA also required individuals seeking to renew a Door Supervision or Security Guarding licence, to present a valid first aid certificate as a pre-requisite to their top up or refresher training.
- 19. The rules surrounding first aid certificates are set out by the Health and Safety Executive ("HSE") ad have to meet the requirements of the Health and Safety (First Aid) Regulations 1981. This is usually achieved by the training centres being required to confirm to the Awarding Organisation that each learner was sufficiently qualified in First Aid or Emergency First Aid at Work. Sometimes the first aid course is included as an extra day in the security training. Alternatively, learners can arrange their own first aid training and certificate, or they may already have a valid one that meets the requirements.
- 20. Learners must present a current relevant first aid qualification certificate that is valid at the time of taking the training for at least a further 12 months, before they are able to take licence linked training for either a first time or refresher course. The SIA expects licence holders to keep their first aid certificates up to date.
- 21. A training centre should only accept a first aid qualification from a learner if all the following statements are true:
 - It meets the requirements of Appendix 2, 'Content of an emergency first aid at work (EFAW) course' of Selecting a first-aid training provider: A guide for employers.
 - It is valid for at least another 12 months from the start of the licence-linked training.
 - The trainer has made reasonable efforts to confirm that it complies with all other requirements of Selecting a first-aid training provider: A guide for employers, particularly those listed in paragraph 14.
 - They have made reasonable efforts to confirm that the practical elements of training were delivered and assessed face to face.
- 22. I attach as **SIA/2** a copy of the HSE First aid at work: The Health and Safety (First-Aid) Regulations 1981, Guide on Regulations. Appendix 6, page 36 details the minimum training content required for a L2 Emergency First Aid at Work qualification. On completion of training, successful candidates should be able to:
 - understand the role of the first-aider, including reference to: the importance of preventing cross infection;

- the need for recording incidents and actions;
- use of available equipment;
- assess the situation and circumstances in order to act safely, promptly and effectively in an emergency;
- administer first aid to a casualty who is unconscious (including seizure);
- administer cardiopulmonary resuscitation and use an automated external defibrillator;
- administer first aid to a casualty who is choking;
- administer first aid to a casualty who is wounded and bleeding;
- administer first aid to a casualty who is suffering from shock;
- provide appropriate first aid for minor injuries (including small cuts, grazes and bruises, minor burns and scalds, small splinters).
- 23. The first aid requirements are not a tick box exercise and were introduced as it was felt that there was a reasonable expectation by the public that security operatives would help during first aid emergencies.
- 24. From October 2024 the SIA required first aid courses to explicitly cover how to respond to life-threatening bleeding.

Action taken following receipt of the Prevention of Future Death Report

- 25. The SIA's specialist team that carries out the work on setting the requirements and standards for qualifications has considered the Prevention of Future Death Report and has been provided with a briefing on the audio recording of the inquest proceedings to understand further the context and concerns raised.
- 26. The SIA is of the view that the existing L2 Emergency First Aid at Work requirement contains appropriate content to equip a security operative with the skills required to administer emergency first aid. The current specification content includes training on dealing with someone who is potentially unconscious and having a seizure including:
 - how to check for breathing and a pulse;
 - how to use a defibrillator; and
 - how to place someone in the recovery position.
- 27. The SIA is of the view that further changes to the specification requirements for licensed-linked qualifications are not necessary as the L2 Emergency First Aid at Work qualification already provides licence holders with the right level of first aid training to assist members of the public in an emergency. If the Coroner or Chief Coroner disagrees with this position, having read the additional information provided in this response, we would be happy to discuss further.
- 28. The SIA has gone on to consider whether or not in this particular case there is any regulatory action that we should take in respect of or Total Security Services Limited given the

circumstances that have been brought to our attention through the Prevention of Future Death Report. 29. The following actions have been taken in relation to: Regulatory action taken in respect of 30. 31. 32. Investigation by the Awarding Organisation Into the Qualification Obtained 33. Given the potential for issues with the validity or efficacy of the training, the SIA's Compliance and Inspections Team immediately followed this up with the Awarding Organisation 34.

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37. If there are serious concerns about the quality of the trainer or training provided at either the Door Supervision course and the first aid training, the Awarding Organisation will be required to consider further compliance action.

<u>Investigation into Total Security Services Limited</u>



40. The outcome of those enquiries will clearly impact on whether there are any issues that need to be followed up with TSS. The Approved Contractor Scheme have a number of administrative sanctions that can be imposed. I attach at **SIA3** a copy of the ACS Sanctions Framework.

Other steps

- 41. The SIA wrote to the Chief Coroner on 30 April 2021 to set out its regulatory interest in inquests involving private security and the circumstances in which it would invite a Coroners Court to provide the SIA Interested Person status and/or provide other expert witness assistance if helpful in some cases.
- 42. We will make contact with the current Chief Coroner to ask and offer this and work with her on how this might be more widely communicated to ensure we are able to assist the Coroner's Court at and during relevant inquests in the future.

The SIA's expert leads in these areas would be happy to respond to any further queries or questions that arise as a result of this response.

Yours sincerely,



Chief Executive
Security Industry Authority