



30 January 2024

Paul Howes & Julian Batchelor
Stop Co Governance
julian@stopcogov.kiwi

Dear Mr Howes & Mr Batchelor

Security provided for Stop Co Governance Tour Meeting in Christchurch on 6 July 2023

As you have previously been advised the Private Security Personnel Licensing Authority received a complaint about unlicensed people working as security guards at the Stop Co Governance meeting held at the Scottish Society Hall in St Albans Christchurch on 6 July 2023. I referred the complaint to the Complaints Investigation and Prosecution Unit (CIPU) to investigate.

CIPU's investigation has established that security for the Christchurch meeting was arranged by your organisation and was provided by Kyle Chapman and others who did not hold certificates of approval. While Mr Chapman advised he was acting as a peacekeeper he was acted in the role of a crowd controller by screening entry, keeping order, and removing persons.

If Mr Chapman and the other security personnel were engaged purely as volunteers, they most likely would not fit within the definition of crowd controller employees as set out in s 19 of the Private Security Personnel and Private Investigators Act (PSPPI Act). However, it is contrary to PSPLA guidelines to engage volunteers in restricted security roles unless they hold a security certificate or licence. Please find attached a copy of those guidelines.

I also bring to your attention s 45(2) of the PSPPI Act which states that it is an offence for any person to employ, engage as a contractor, or permit to act as a crowd controller employee, any person who does not hold a security certificate in that class. Anyone who contravenes s 45(2) is liable on conviction to a fine of up to \$20,000.

From the available information it is probable that you engaged Mr Chapman, and possibly others, to act as crowd controller employees although they did not hold certificates of approval or in that class. While CIPU will not be prosecuting you for this event any future similar breaches could result in prosecution action under s 45(2) of the PSPPI Act.

Yours faithfully

Patricia McConnell
Private Security Personnel Licensing Authority



PSPLA Guidelines for Volunteers

- People without a COA should not carry out restricted security work even as a volunteer, which would otherwise require a certificate of approval or licence.
- A person is not a volunteer if they are being paid in kind, eg bar and meal tab, cash under the table.
- Volunteers working in security related roles should not wear security uniforms or badged clothing but wear clothing that easily distinguishes them from other security workers.

Volunteers working at pubs and clubs

- Volunteers should not work in security at pubs and clubs in any role other than purely observing, ticket collection and very short-term work experience or orientation.
- Volunteers working to gain work experience must work under the direct supervision of a COA holder and wear clothing that distinguishes them from security workers. They should primarily be observing and not be involved in keeping order or removing people.

Volunteers working at events

- Volunteers at events should only undertake duties for which a COA is not required such as hosting, ticket collection, and parking.
- Volunteers must be easily distinguishable from COA holders e.g. wearing different colour vest / uniform from COA holders, with host or volunteer on it rather than security
- Volunteers must not be involved in keeping order, removing people from venue, or searching bags etc