RECOMMENDATIONS FOR PRIVATE SECURITY AGENT CAPACITY BUILDING IN PERU

POLICY PAPER

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Recommendations for private security agent capacity building in Peru

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First digital edition: June 2022

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INTRODUCTION

This paper is part of the study carried out by the Institute of Democracy and Human Rights of the Pontifical Catholic University of Peru (IDEHPUCP), with the support of Voluntary Principles on Security and Human Rights (VPI), between end of 2020 and beginning of 2022. Its objective was to explore and analyze human rights training in the private security sector in Peru. Thus, recommendations presented here are a continuation of the previous diagnosis document[1]. Therefrom, some lines or content proposals are established that should be considered to strengthen the public policy of training in human rights, whose impact is not only limited to the actors directly involved in the sector, but also involves all users and civil society that interact with it on a daily basis.

Taking into account the importance of strengthening knowledge and capacities related to of human rights protection among the people in charge of private security in Peru, the need arises to contribute to the plans and strategies that incorporate the human rights approach in training courses for staff in this area. A diagnostic document was first prepared with this objective. Three information collection methodologies were used for it: bibliographic review, legislative analysis and fieldwork consisting of nineteen interviews conducted between December 2020 and February 2021 with various actors pertaining to the State, the private sector and civil society. After the diagnosis was prepared, it was presented to seven actors (who represent the three previously mentioned instances) in four validation and feedback sessions, between December 2021 and February 2022, so as to collect their impressions and recommendations regarding the findings and problems that are made visible in the study.

This paper with recommendations was prepared based on this dialogue and exchange of ideas and opinions, together with inputs generated during research. Although it seeks to strengthen the human rights approach in security agent training, it also addresses other aspects that are part of the policy and processes that make training possible. Undoubtedly, these also require attention and analysis, since they affect the development of competencies that should include due protection of people's human rights.

In addition, this paper does not focus on the human rights content that the curriculum should have — that is, the Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights— since there are already studies that take care of that, as is the case with the VPI manual[2].

In this line, five areas for improvement have been identified within the training policy: the study plan, the pedagogical materials, the accreditation of instructors, the supervision and follow-up mechanisms, and the violations of labor rights and the insufficient psychological support for the agents. For each topic, the findings and problems that must be addressed will be briefly presented, a good practice by the private sector, a regional case that allows us to approach the topic in a broader way and a general recommendation followed by some more specific ones to improve and strengthen training policy as a whole.

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1   Barnaby Rubio, B. (coord.) (2022). *Capacitación en derechos humanos para agentes de seguridad privada en el Perú: características, ámbitos de mejora y su relación con los derechos humanos.* IDEHPUCP.

2   See https://www.voluntaryprinciples.org/resource/voluntary-principles-on-security-and-human-rights-training-course/

Although this paper and its recommendations are mainly addressed the supervisory entity of private security in Peru -National Control Superintendence of Security Services, Weapons, Ammunition and Explosives for Civil Use (SUCAMEC)- the problems and implications exposed here should be made visible and discussed by different actors that are part of the private security industry: private security companies, companies, State institutions that hire security services and civil society. In short, the efforts and contributions of all the groups that interact with security services are required for improvement and professionalization of an industry involved in human rights issues.

AREAS TO IMPROVE

1. SUCAMEC TRAINING PLAN

1.1. PROBLEMS TO ADDRESS

Private security agent training is divided into basic training courses, considered introductory and aimed at anyone who wants to be a private security agent; and improvement courses, aimed at agents who are continuously developing their work, aiming at regularly updating and strengthening their capacities in the industry.

The study plans of both courses have been approved by SUCAMEC, through Guideline 006-2018-SUCAMEC[3]. They contain module design, course name, academic hours, subjects and objectives to be met in each of them.

The first problem that comes up is the lack of content and structure adaptation of both plans to different private security service modalities established in Legislative Decree 1213. Training adaptability is a characteristic that would allow responding to threats that each modality might generate regarding the exercise of human rights.

According to said regulation, there are up to seven private security modalities: private surveillance, personal protection, money and valuables transport services, security technology services, independent protection service, personal security individual services and individual security services for personal property. Despite the differences between them, all agents follow the same curriculum, both in the basic training program and in the improvement program[4].

The information collected from the interviews shows that this lack of adaptability to service questions the practical usefulness of training and generates limitations when applying the knowledge when they operate.

Compared to other regional experiences, although private security supervisory entities in the four countries analyzed (Chile, Colombia, Guatemala and Argentina) charge training to private entities such as institutes, schools, training centers or departments like in Peru, these organizations do provide more detailed regulations in accordance with the different modalities and realities in which the private security industry in the region operates.

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3   In April 2022, this was replaced by the new guideline, PM02.04/GSSP/DIR/47.01, "Guideline that regulates basic and advanced training activities for security candidates and personnel, and establishes the study plan," approved through Superintendence Resolution 1145-2021-SUCAMEC. However, this new regulation is not being considered because the change was made after the investigation was closed.

4   The new guideline has established a training plan for security personnel who provide services at shows, competitions and conventions, which shows the need for more specific and differentiated training. However, it is suggested that the training be adapted to service modalities already established by SUCAMEC in its regulations.

Regional cases: Argentina, Colombia and Guatemala

One characteristic shared by these three countries' training proposals is that they establish variations in their study plans according to different types of private security service required by the supervisory entities. These specificities are already present in the so-called basic or general courses. In the case of Argentina, its first training course establishes certain subjects according to the agent's specialization. In turn, in Colombia, the number of hours in the initial course varies according to the type of security service to be provided. On the other hand, the Guatemala's supervisory entity has established different study plan proposals according to the type of security agent[5].

A second element to improve regarding study plans is the high discretion attributed to the instructor in determining emphasis and time distribution for each subject within each of the courses.

This is evidenced above all in the strengthening of the contents on human rights included in the Constitution and Human Rights course, which consists of six (6) academic hours and includes subjects such as State structure, judicial guarantees, procedural issues on the protection of rights, international human rights law and the content of some fundamental rights —the rights to life, integrity, liberty and security, for example—.

In this way, the instructor is responsible for determining thematic weights of subjects within the academic hours and of contents offered in each course. The negative effect of this policy design shows in the interviews with security agents: in matters related to human rights, these are addressed in a fairly general way or, in some cases, they are not even mentioned.

The time that instructors dedicate to human rights issues and the importance they give them in this course —and in training plans in general— could be partly evidenced by their absence in the knowledge test that is part of the accreditation process. Among the SUCAMEC questions in the knowledge evaluation, only one of the thirty that correspond to the section «Constitution and Human Rights» links security and personal freedoms issues.

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5   See Barnaby (2022, p. 19, paragraph 4.3).

1.2. IMPROVEMENT RECOMMENDATIONS

> **General recommendation 1: training curricula restructuring so as to respond to the complexity and needs of the private security industry today.**

- **Specific recommendation 1:** Regarding basic and advanced training curricula, differentiated versions must be created so that certain topics, courses and content are addressed according to the needs of each private security type. In this sense, it is suggested that at least a third of the sixty academic hours in the basic training plan be adaptable to the specific modality in which the agent works. On the other hand, most of the study plan at the improvement stage should be aimed to consolidate, deepen and update the knowledge linked to the specialization in the previous training.

- **Specific recommendation 2:** It is suggested that the Constitution and Human Rights course in the basic training curriculum be divided into two, so that adequate minimum time can be guaranteed for contents related to each of the topics in at least three academic hours each. The new human rights course should include subjects and notions referring to the use of force.

- **Specific recommendation 3:** An additional section should be incorporated within the training plan scheme contained in guideline 006-2018-SUCAMEC, which should specify the resources and regulatory base that instructors should be mandated to included and develop in class sessions, so that some key contents can be transversally guaranteed.

Current scheme:

[Module name]	
Courses and academic hours	**Objective:**
[Course name] **(number of hours)**	**Subjects:**

Scheme proposal:

[Module name]		
Courses and academic hours	**Objective:**	
[Course name] **(number of hours)**	**Subjects:**	**Resources and regulatory base**

2. PEDAGOGIC MATERIALS

2.1. PROBLEMS TO BE ADDRESSED

As previously mentioned, design and preparation of training courses aimed at private security agents are directly charged to the instructor of each module. They are the ones who must propose the syllabus and determine what the structure and prioritized contents of each of the subjects contained in the study plans encompass.

Although this was mentioned in the previous point as a problem to ensure the presence and adaptation of some key content on human rights in training on different industry modalities, a problem instructors face is the lack of additional materials or added content that would facilitate their work. To date, available manuals that SUCAMEC has prepared are aimed at guiding different actors partake in the private security industry —instructors, agents and companies— in navigating and using different services and procedures offered by the entity on its website and on digital platforms[6].

In this way, although SUCAMEC establishes the subjects that must be developed and approves the guidelines to report on offered services, such regulatory and action framework does not include the adoption of guidelines, guides or methodologies that ensure standardized quality teaching of the modules, courses and subjects in the study plans. Thus, course contents are subject to the instructors' discretion in course design, to their research capabilities and prior knowledge.

This was highlighted by several interviewed instructors, who emphasized the lack of State-prepared didactic and pedagogical materials on private security. They also mentioned that they prepared their own materials (in many cases, Power Point presentations) or resorted to educational materials from other countries (for example, videos made in Spain), which were not adapted to Peru's particular needs.

This contrasts with some practices observed in other countries —in Guatemala, for example—[7], or with some best practices gathered in the dialog with key companies in the industry.

Regional case: Guatemala

In addition to establishing study plans for each type of private security agent —a document similar to SUCAMEC study plans in Peru— Guatemala's General Directorate of Private Security Services (DIGESSP) has prepared manuals that develop the curriculum content and the basic notions of the areas in which training is structured to facilitate stakeholders' learning and accreditation. In this sense, there are four curricula for each type of agent (bodyguard, guard,

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6   See https://www.gob.pe/institucion/sucamec/informes-publicaciones/1712415-manuales-sobre-servicios-a-traves-de-la-plataforma-sucamec-en-linea-sel-servicios-de-seguridad-privada

7   See: https://digessp.gob.gt/manuales-y-su-respectivo-pensum/

security guard and private investigator), with their respective manual, so that there are eight materials produced by the State that strengthen the private security training policy.

Private sector best practice:

The representatives of a security company mentioned the development of specific action protocols for private security agents. This arose as a response to the need to provide an orientation and guidance instrument on issues such as non-discrimination or proper use of force in different scenarios in which agents operate. In this line, these protocols and their training are provided and adjusted to the specificities of the contracting company economic activity (mining, fishing, trade/retail, among others).

In addition, they highlighted that the application of these protocols is decisive in critical situations, emergencies or social tension, since they prevent or reduce the impact of possible contingencies that might result in sanctions for the involved security company, contracting company and security agents.

Private sector best practice:

Some large private security companies are involved in designing and developing course processes together with the instructors. Since classes are aimed at an adult audience, the methodologies are intended to be participatory and take into account experiences for preparing cases or role-playing.

However, since these companies represent only part of the formal private security sector, the initiative seems to be applied only to a small group of agents compared to the large number of people who work in the informal sector or in companies that present irregularities in the hiring of their workers.

On the other hand, regarding the methodologies used for training within the industry, as per the interviews with security agents, theoretical-practical methodologies, or those linked to a participatory approach, were applied differently, according to modules and subjects. Until before the COVID-19 pandemic, there was a practical approach thanks to face-to-face training, the development of first aid training and the use of fire extinguishers or customer service.

However, in contents related to human rights, these were addressed only theoretically, with an emphasis on regulations and their contents, but without specific application. Likewise, agents highlighted that greater access to notions related to human rights could help them to be more informed about their own fundamental and labor rights, so that they could put them into practice to avoid situations of violation or abuse towards them.

2.2. IMPROVEMENT RECOMMENDATIONS

General recommendation 2: preparation of educational materials by SUCAMEC aimed at guiding teaching to instructors and at supporting the learning process of both security candidates and agents.

- **Specific recommendation 4:** It is suggested to develop two instruments: a guide for the instructor and a learning manual for the security candidate or agent. Both documents must be designed according to the subjects within each course and be separated by each module of the basic and advanced training curricula.

  The instructor's guide will establish the module's objectives and guidelines, as well as the courses that make it up, the methodology and some indications and recommendations that promote student participation and learning.

  On the other hand, the learning manual aims to develop basic concepts and notions that must be addressed during the module and to present practical cases and hypothetical situations that allow for application and understanding of the impact of contents taught in classes. It is suggested that, the legal module of the basic training curriculum be prioritized for implementation.

  Both resources must adequately coordinate the theoretical content and its practical application. To do so, the diversity of scenarios and situations in which agents operate must be considered; a perspective with gender and intercultural approaches must also be included.

- **Specific recommendation 5:** It is recommended to prepare other resources that facilitate didactic teaching and learning of contents, such as primers, posters and videos that address application of knowledge imparted in classes in a practical and concise way.

- **Specific recommendation 6:** interviewed security agents pointed out that they had experience in using e-learning platforms for additional training. Therefore, it is suggested that SUCAMEC implement a complementary virtual training platform that encourages content updating or reports on changes related to the sector.

  As they are publicly accessible documents, these materials may be used during training sessions or at any time that is appropriate to remind or reinforce knowledge for correct application at work.

3. INSTRUCTOR ACCREDITATION

3.1. PROBLEMS TO ADDRESS

The accreditation process for instructors has two stages: curricular evaluation and knowledge exam. This process is aimed at verifying that applicants meet certain requirements and have basic knowledge to teach the courses; however, this does not allow verifying if the applicant has skills related to pedagogy or soft skills necessary to transmit said knowledge to students.

These selection filters do not value either if the aspiring instructor has experience in the private security sector, an aspect that could contribute to a more dynamic application of knowledge in the work routine of agents. Thus, mastery and empirical application of themes can favor a better agent development. For example, in the case of human rights content, this becomes more important in scenarios in which agents have to interact with civil society in situations of conflict —for example, in extractive projects in rural areas of Peru—.

In this sense, several interviewed people pointed out that instructor accreditation is not designed to guarantee the suitability of the person who must train and private security candidates and agents.

In addition, the accreditation process becomes very cumbersome because many of the requested procedures take longer than necessary. For example, instructors have to go through the same evaluations required to be accredited for renewing the accreditation form, which must be done periodically. They need to submit documentation (with a copy included) that certifies their knowledge to be able to give the courses and take a knowledge test.

3.2. IMPROVEMENT RECOMMENDATIONS

General recommendation 3: Update the requirements and procedures established by SU-CAMEC to grant accreditation to instructors.

■ **Specific recommendation 7:** In order to guarantee that candidates have a minimum knowledge of human rights, it is suggested to include at least one question that addresses human rights or the use of force in the list of questions included in knowledge evaluation.

■ **Specific recommendation 8:** mastery of resources and skills related to pedagogy should be prioritized. Therefore, proof of having taken at least one course, program or diploma that certifies that the person has this type of knowledge and methodologies must be requested. Likewise, evaluation

mechanisms could be implemented that incorporate performance in "pilot classes" to learn about and provide feedback on instructors' methodologies.

- **Specific recommendation 9:** documentation that certifies academic knowledge of instructor candidates should be linked to the course or courses that they intend to teach. For example, in the case of the Constitution and human rights course in the basic training plan, it is suggested that instructor candidates have some certification on human rights issues, in particular, on Guiding Principles and Voluntary Principles.

- **Specific recommendation 10:** Previous experience in the private security industry can be a factor that contributes to better learning among security agents and to a more effective application of knowledge in the work environment. Therefore, it would be ideal to require instructor candidates to have experience in the sector or in the particular topic that they are going to teach. Likewise, this should be emphasized in the study plan improvement, since it is expected that practice and previous knowledge in a certain area can provide agents with a better specialization.

- **Specific recommendation 11:** Regarding accreditation renewal processes, it is suggested that documentation be submitted that is strictly necessary to prove updating of established requirements or when it has not been previously delivered to the entity.

4. OVERSIGHT AND MONITORING MECHANISMS

4.1. PROBLEMS TO BE ADDRESSED

Oversight and monitoring mechanisms are instruments that allow measuring the quality of service offered in each training, as well as those that facilitate transparent access to information by any citizen.

The public policy for training security candidates and agents includes an inspection report, a monitoring and evaluation tool used by SUCAMEC that is prepared when officials make an unexpected visit to the class, either in person or virtually (this last modality began with the pandemic).

Record of this inspection is designed to verify that the basic requirements for registering the course in the SUCAMEC system are being met. Its objective is to verify the identity of the instructor who will teach the course, that the number of students per class is respected, that people not included on the list previously submitted to SUCAMEC do not show up, that students have their camera activated and attend virtual sessions, that grades are assigned, among others. In this way, it is limited to verifying formal training aspects, but not course content, compliance with the study plan or level of learning and satisfaction of the security candidates or agents with respect to received classes.

Private sector best practice:

An instructor interviewed for the diagnostic document mentioned that, following an initiative of some security companies, surveys are applied to security candidates and agents to get feedback regarding instructors and classes at the end of the courses. However, the questions, focus and results of these surveys remain inside the company.

On the other hand, an official stated that inspection records are uploaded to SUCAMEC's documentary management system, but they are not systematized and the public cannot access them.

On the contrary, a tool that is publicly accessible is the SUCAMEC database of accredited instructors throughout the country. However, the portal design and its user interface do not allow for a quick and precise search for information. For example, instructors with valid accreditation and those with expired accreditation are grouped together, which makes it impossible to differentiate who could be contacted to teach courses. In addition, the database only has two filter categories: personal data (name and identity document) and the courses taught by the person, so other important information, such as their location or address, is not included. This is particularly relevant for those security companies that operate outside of Lima and that are looking for instructors in their own regions.

4.2. IMPROVEMENT RECOMMENDATIONS

General recommendation 4: design and implementation of feedback and evaluation surveys at the end of courses, and redesign of the instructor datababase.

- **Specific recommendation 12:** We propose to create and implement virtual feedback surveys at the end of each course to encourage professionalization in the industry and the monitoring of training. Security candidates and agents will thus be able to evaluate the instructor on the basis of certain criteria related to the level of learning, contents, methodologies, concept application, among others.

  This survey should be designed by SUCAMEC and be on its web page, in such a way that data processing and systematization would be less cumbersome. In addition, evaluation of results would be grouped into a category that may also be visible in the instructors' modified database.

- **Specific recommendation 13:** The entry of new information on the instructor profile requires at the same time a tool that organizes and systematizes it, in such a way that security companies that seek to hire them and civil society can evaluate these people based on data shown by SUCAMEC. In this sense, it is suggested to modify the SUCAMEC instructors' database and add new information categories. It is also important that this platform only shows instructors with current accreditation as well as the region in which they are located.

- **Specific recommendation 14:** In line with previous recommendations, it is suggested to add a category that specifies the instructor's field or specialization in the private security industry, so that security companies can hire those who are more in tune with their customer needs.

5. LABOR RIGHTS VIOLATIONS AND INSUFFICIENT PSYCHOLOGICAL SUPPORT FOR AGENTS

5.1. PROBLEMS TO BE ADDRESSED

An important aspect that emerged during the preparation of the diagnostic document was the identification of situations that violate the rights of private security personnel. Discrimination and verbal aggression —by civil society—, harassment, breach of contract and exposure to poor working conditions —by private security companies— are some of the cases described by the agents in the interviews. They also pointed out that these situations have repercussions on their physical and mental health.

 On many occasions, security agents are the first people who must respond and deal with critical and tense situations until the arrival of the public force. Therefore, their mental health must be a matter of interest for companies and for the entity supervising this service. Many of the interviewed agents recognize the importance of mental health and highlight that, sometimes, it is difficult for them to prevent family and private matters from affecting their work routine —and vice versa—, for which they consider it necessary to provide workshops or training related with management of emotions and soft skills.

Private sector best practice:

One security company representative commented that psychological monitoring is carried out on security personnel who handle firearms. The company has a team of psychologists who make follow-up calls and, if an alert is identified, an established procedure is followed so that the person receives more support.

Additionally, she commented that all the personnel that work in the security company and their families can access an emergency line when they need help or advice. She mentioned that the use of this line increased during the pandemic.

On the other hand, several interviewed agents mentioned that very little or nothing is discussed about legal issues in the legal training modules related to labor rights and to which instances or instruments they can resort in case of abuse or violation of their rights —whether in modules requested by SUCA-MEC or in those additionally provided by large security companies—.

5.2. IMPROVEMENT RECOMMENDATIONS

General recommendation 5: setting up an aid and psychological guidance emergency line for security agents and their families.

- **Specific recommendation 15:** Taking into account that the effects on mental health could be linked to mistreatment or poor working conditions, when there is an alert in this emergency telephone line, besides providing support and psychological guidance, the case should be reported to the National Labor Inspection Superintendence (SUNAFIL) so they advise the affected worker on labor issues. To do so this, it will be necessary to promote and strengthen inter-institutional work between these two entities —SUCAMEC and SUNAFIL— since, according to the investigation, there is a large percentage of private security workers who work in irregular conditions.

- **Specific recommendation 16:** It is proposed that SUCAMEC implement monthly online workshops or talks, with a preventive approach, that address issues related to mental health, managing emotions, managing stressful situations, and soft skills; likewise, that they give recommendations for adequate family conflict management. It is also suggested that issues of labor legislation and mechanisms and instances that can help them when their rights are violated be addressed.

SUMMARY CHART

Improvement area	Problems	Recommendation
SUCAMEC training plan	• Although there are seven private security service types, all agents follow the same study plan. • High discretion for instructors in time distribution for content.	1. Creating differentiated study plans 2. Separating Constitution and Human Rights course into two courses with three hours for each 3. Incorporating a section within the study plan structure that specifies resources and the mandatory regulatory base for each course
Pedagogic materials	• Lack of educational materials for instructor and security agent training.	4. Preparing a guide for the instructor and a manual for the candidate and agent, for each module in each study plan 5. Preparing additional resources (booklets, posters, videos) that address the issues in a practical way 6. Implementing e-learning platform to update topics related to the private security industry
Instructor accreditation	• The instructor accreditation process does not guarantee that the person has the knowledge and skills related to teaching and the course he or she plans to teach. • Cumbersome procedures during the accreditation process and accreditation renewal.	7. Including at least one question on human rights or the use of force in the knowledge test that applicants must take. 8. Request from the aspiring instructor a certificate that certifies the management of knowledge and pedagogical methodologies 9. Request documentation from the aspiring instructor that supports a mastery of topics related to the course that he intends to dictate. 10. Require that the aspiring instructor has previous experience in the private security sector 11. That the presentation of documentation for the accreditation and its renewal is strictly necessary
Oversight and monitoring mechanisms	• Lack of mechanisms and tools that assess the level of satisfaction and learning in relation to instructor and courses. • SUCAMEC's database of instructors does not allow a quick and accurate search for information.	12. Implementing virtual feedback surveys at the end of each course, whose score will be published in the SUCAMEC database. 13. Updating and modifying the SUCAMEC database that includes new information, such as the region in which the instructor is located. 14. Adding a new category in the database that specifies the instructor's specialization within the private security industry
Labor rights violations and insufficient psychological support for agents	• Situations of violation of private security personnel rights by civil society and security companies.	15. Creating an emergency telephone line that provides support and psychological guidance -and, if necessary, advice on labor issues- to agents and their families 16. Implementing monthly online workshops and talks that address issues related to managing emotions, handling stressful situations, soft skills, and recommendations for proper handling of family conflicts

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