



FederSicurezza report 2008:
players and scenarios
in private Italian surveillance
at a European level

Presentation and introduction to the **research**



Preface by the **Chairman of Confcommercio,** **Carlo Sangalli**

I feel particularly honoured to be able to present this crucial research; it is the first of its kind and is a milestone in guiding us towards understanding the sector (a sector which was liberalised with effect from 1 April, changing a law that dated back to 1931 with a law decree that acknowledged the indications provided by the EU court).

The project is the brainchild of FederSicurezza, the Federation for the Surveillance and Private Security Sector, established three years ago to bring together the associations involved in the complementary security field: Assvigilanza, Univ, Assovalori and Anssat.

Without doubt, the Federation is the largest organisation in this sector. In fact it is an umbrella organisation for no less than 65% of the Surveillance Institutes and Valuables Transporters operating in the national market, along with over 85% of Italian satellite radio-localisation companies, making for a total of around 350 companies (over 70% of which comprise Private Surveillance Institutes). Together they employ around 30,000 individuals (of which around 75% in Surveillance), with an annual turnover which totals around 3 billion Euro.

These are figures that need updating virtually on a daily basis: in fact growth in the sector is continual, as demonstrated by the increase in turnover, which is around 5% a year. The most significant fact is that almost half of the companies have been established since 2001. Evidently it is a boom resulting from the shockwave sent out around the world by the terrorist attack on New York's Twin Towers.

Today, Surveillance Institutes no longer protect just companies, industrial areas, tourist resorts, shops, banks and vaults. The companies belonging to FederSicurezza number clients that include town councils, schools, ministries, airports, local health authorities, not to mention barracks, munitions deposits and even NATO bases.

In the light of this, a report such as the one promoted by FederSicurezza, which can rightly call itself the first "snapshot" of the field, acquires particular importance. It is research that is well timed, which not only summarises the state of the sector but also poses the new government a series of questions. Because whilst the growth in the field is beyond question, it is also true that 47% of its companies are in the red. The main burden remains the Regional Tax on production activities. If the tariffs of the national contract are applied, on average a security guard costs between 18 and 20 Euro per hour. If we add to this the various expenses and parameters of additional contracts, an employee can easily cost over 40 thousand Euro a year. The importance of this research does not just lie in the fact that it is the first of its kind ever carried out. It is rendered even more valid by the survey method used. In addition to the questionnaires sent out through the member associations of FederSicurezza with an end to ensuring the study was extended to embrace the entire sector, the report also examines the results of its own databanks and those that are open for public consultation. A sample of around 100 companies and 15 groups, of significance in terms of size, activities and geographical location, was then identified. An analysis of the budgets and other public figures pertaining to these was then carried out. The exhaustive nature of the research convinces both myself and our friends at FederSicurezza that this report represents and will continue to represent a key starting block for anyone who, from this point onwards, wishes to examine the issues of complementary Security.



Carlo Sangalli
Chairman of Confcommercio

Presentation by the **Chairman** of **Federsicurezza**, lawyer **Luigi Gabriele**

When we decided to stage this initiative, which has now become reality, we knew we would come up against a varied and complex sphere, albeit not a particularly large one.

It is no longer a fledgling sector, if one looks at the set of standards and rules that determine its everyday existence. Nor is it an obsolete sector, if one looks carefully at the increase in demand for the services provided by the sector's companies.

The "historical figures" supplied put a date to the establishment of Surveillance activities in their traditional form, whilst the accounts from the world of Security provide a snapshot of the present-day situation.

Ours is a young federal system, with ambitious plans, perhaps too much so bearing in mind just how recently we came into being ...

But the sector's Associations have supported us and placed faith in us, along with time-honoured Organisations that are well-known for their professional standing. We have also received votes of confidence from the Confederation of which we are proud members, Confcommercio (the General Federation of Italian Commerce).

The presence of Chairman Sangalli bears witness, not least politically, to the credibility this initiative won when Confcommercio decided to contribute to it and determine its successful outcome.

The process took one year, and we are now in a position to be able to publicise the work done to study, analyse, elaborate and assess the figures we collected. There can be no doubting that it is the first initiative of its kind undertaken in this sector; perhaps, to date, the only one.

Whilst coming up with the idea was easy, planning it and carrying it out was less so. We wanted to embark on this project to gain a better understanding of who the operators in our Federation are, whether entrepreneurs or workers or better still both, in the essential, overall and integrated collaboration between the respective roles. In addition, we wanted to find out if, as we firmly believe and intend to show our market, institutional and foreign counterparts, these individuals and the service the companies provide are a complementary facet to the tireless work done by the public Forces of Law and Order. First amongst these being the Carabinieri and the State Police force, along with the specialised Finance Guards, who are also involved in policing the country.

The change in relations between citizen and society, with the need and perception of safety, is the result of the fatal events of 9/11, a date so tragically impressed upon the minds of the public that it can be quoted without even mentioning the year in question...

Yet not much time has elapsed since that year.

A great deal of time, however, has passed (too much even) since our sector – that of private surveillance, escorts and transportation of valuables and technologies used to reinforce safety of public and private property (that of individuals is the responsibility of the State, as we are well aware) and to give users and citizens greater peace of mind- has been looking for a precise connotation, fitting regulations and suitable rules for managing its integrated presence in society.

Given the lack or rather the inevitably slow pace of State intervention, our sector along with others, has received somewhat heavy-handed attention from Europe (which is not always in tune with the issues facing its member States and Nations). It is a much-needed Europe but one which still takes pains to reaffirm, at times somewhat tautologically, its own convictions. Our sector and its institutional counterparts have done their best to keep up with the European process- at times truly challenging- and have



now begun to experiment with a rational process of bringing the various positions towards common ground.

For our part, at the same time we decided to take as clear a snapshot as possible of who we are, how many of us there are, how and where we operate, how much importance an apparent niche activity can have, and to do so in a modest and unassuming manner. Perhaps our sector can be defined as a niche market if we compare it with a traditional industrial sector, although in actual fact it is of primary importance in the private sphere, and second only to the role played by the State in the sphere of security. What we are presenting here is the result of the vast amount of work carried out. It is offered up to be used and if necessary criticised, though we hope in a constructive manner.

What we hope is that above all it will be read as a way of understanding the fact that our Sector is no small entity, and that it deserves to receive the due attention and the acknowledgements of its socially essential usefulness and professionalism. Not to mention that it complements the work done by the public forces of law and order.

At present we are involved in a Law Decree which will usher in no small amount of change, unfortunately by means of revocations dictated by the need to implement sentences passed outside Italy.

It is a decree which changes the parts of the Consolidating Act of the laws of Public Security which regulate us, and which will, once converted, be accompanied by implementation changes contained in the Decree of the President of the Republic. Once the opinion of the State Council has been heard, this will add to the reappraisal of our regulations.

In truth we need something more if we are to be able to fulfil the tasks we have always been and continue to be called upon to perform, and if we want to meet the expectations that the users, namely Society as a whole, bases on our active and effective participation in building better security, perceived, used and seen in its being and its daily growth.

We truly need a different and recognised speciality that rewards the work done and its constant professionalism, even in compliance with the dictates of an invasive market economy that we cannot fail to follow.

This is the reason why we are embarking on this study, from today and for the near future, to give a clear and unequivocal picture of “what” we are.

We leave this report in the hands of those wishing to place us under the magnifying glass, and we look forward to meeting again for the next report.

*Lawyer Luigi Gabriele
Chairman of Federsicurezza*



Contribution of **Prefect Cazzella**

THE ATTEMPTS FOR REFORM IN 2003 AND 2007

Shortly after the infringement proceedings initiated by European Commission against Italy for having broken national regulations governing private surveillance and provisions set out in the EC Treaty, in 2002 the Home Office analysed a far-reaching reform of the sector, and asked me to draft a regulatory project. The project was drafted bearing in mind those already in parliament, the applications made by the trade Associations and the needs noted by the Administration. It was completed in June 2003 as draft law A.C. 4209 (XIV Legislature).

In Parliament it was combined with ten other parliamentary proposals; what emerged was a unified text, which was somewhat wordy and excessively detailed, but nonetheless complete and rather innovative. Whilst it was still not completely suited to meeting the challenges posed by Europe in the meantime it was motivated with a precise and meticulous "reasoned opinion". I should recall that it was Parliament itself that raised considerable doubts as to the appropriateness of the solutions adopted with regard to EC principles, through the conditioned response of the XIV Permanent Commission of the Chamber of Deputies (Policies of the European Union).

The favourable opinion expressed by the Parliamentary Commission was actually subjected to the largely binding "condition" to further regulate private security businesses. This made it legal for companies established in another EU member state to operate in Italy, thereby rendering it possible without further administrative and financial expenses. It also "invited" (less binding but nonetheless demanding) those involved to assess the compatibility of other forecasts of the draft law with the regulations of the EC Treaty as interpreted in case law precedents of the Court of Justice. It was not possible to further alter this text because, after being examined by the Assembly on 12 September 2005, it was not able to get any further than the second hearing (18 October 2005) and remained undiscussed until the term of office expired.

Moreover, in the same period, the European Commission, which was already dissatisfied with the contents of the government draft law and the progress of works in parliament all round, had continued the dispute proceedings, presenting an action at the Court of Justice on 23 December 2005 (case no. C-465/05: Commission vs. Italian Republic).

Following this action, a great deal of time was needlessly wasted relentlessly defending national legislation in the Court of Justice in vain, whilst the Department of Public Safety was already in favour of combining revenue defence with a number of compromise proposals, and a number of trade Associations were starting to understand the perspective which could be gleaned in the rulings of the Court of Justice, with decisions already adopted against other countries (Belgium, Spain, Portugal, etc.)

It was only with effect from September 2006 that a new partnership between the Administration and the parties involved got underway with an end to setting out a reform that would at least regulate the sector¹, the urgency of which could be sensed.

A far-reaching survey of the surveillance institutes carried out by the Administration in 2004, frequent reports made by prefects and police chiefs along with those made by trade union Associations and Organisations and the more qualified clientele (such as ABI), along with the intervention of the Italian Authority for fair competition and the market (see report S 802 dated 29 May 2007), clearly showed the weaknesses of the sector from at least three standpoints:



- the lack of protection of the work performed by the security guards;
- the frequent organisational inadequacy of institutes, and the often questionable quality of the services;
- the lack of attempts to safeguard competition and the market, also with regard to aspects of EC law.

A regulatory act largely responding to the commitment document, which in the meantime had been sent by the Italian Government to the European Commission, was then drafted and distributed in November 2007, with the aim of overhauling the relevant administrative rules, according to the guidelines already illustrated by the Commission:

a) concerning employment of staff:

- improvement of the professional qualification of private security guards;
- ensuring that contribution, welfare and insurance obligations are completely respected, using the instruments stipulated by national contracts for this sector in full (certifications of the "bilateral association") or by relevant legislation (the DURC – Single Document for Regularity of Contributions), also with an end to relieving police forces of the burden of carrying out checks for which they should not be responsible;
- expanding trade union protection concerning the new hypotheses of company mobility as stipulated in the act;
- easier re-employment of guards that are unemployed, within the deadline imposed by the appointment order, by listing them in a register held by the prefectures, available to employers, thereby avoiding needless repetition of checking procedures for subjective requisites;

b) concerning the functionality and controllability of the Surveillance institutes:

- exceeding of the provincial licensing limit, with an end to promoting a wider and more qualified range of services, leaving it to the companies themselves to decide on their territorial limits in a framework of rules that are uniform in terms of type of service and the size of the areas which they intend serving;
- the resultant revision of the control systems, favouring the link between authorities and responsible police forces in the area;
- pursuing a higher degree of organisational and operative quality of services, also involving suitably accredited independent certification bodies where necessary and leaving checks regarding the safety of the services and their compliance with laws in force to the State;

c) with regard to competitiveness of tariffs:

- abandonment of the principle of inviolability of the tariffs. In line with the majority of rulings passed by the State Council (of the most recent, see sentence no. 180/2006 of 23 January 2006), these shall only be given as an "evaluation parameter" useful for simplifying cost assessment procedures, without restricting any possible changes;
- adhesion for tariff cuts to the assessment criteria in force in the field of public tenders, evaluating any tariffs offered which are lower than the generally accepted ones in line with so-called "anomalous offers" and adopting the same exclusion criteria (with particular attention to "respecting provisions regarding protection and work conditions")²;



¹ Based on the preference stated by the Government for regulatory solutions that differ to the draft laws (see Prime Ministerial Directive no. 2869/2-6.4.1/5/07 dated 11 April 2007) and an assessment according to which many of the critical areas found by the European Commission might be resolved by altering the execution regulations of the T.U.L.P.S.

² The basic ideas are those taken from the European directives governing public tenders (see art. 57 of the Directive issued by the European Parliament and the Council, no. 2004/17/EC dated 31 March 2004), with particular reference to the burden of justifying reductions and the unjustifiable nature of reductions on salaries, tax and welfare contributions and security.

d) lastly, regarding “opening up to Europe”:

- concerning the “right to establishment”, equality in the treatment given to businesses established in European Community countries, with flexibility in organisational, dimensional and tariff issues indicated above, bearing in mind the expenses already paid in the country where the company is established;
- concerning “free provision of services”, the possibility to provide occasional and temporary or trans-border services without the need to set up premises within the Republic.

The regulatory intervention was clearly geared towards the need to develop the private security sector, as was highlighted in the EC and “antitrust”. Nonetheless these were offset by forecasts that set out:

a) to guarantee, on the one hand, stricter protection, including that of the trade unions, for employees

b) and, on the other hand, to guarantee more effective checks (public and private), not least to safeguard appointments to “third parties” concerning the qualification of the sector’s businesses and the effectiveness of the services, in close connection with the public interest implied in the state regulation of private surveillance.

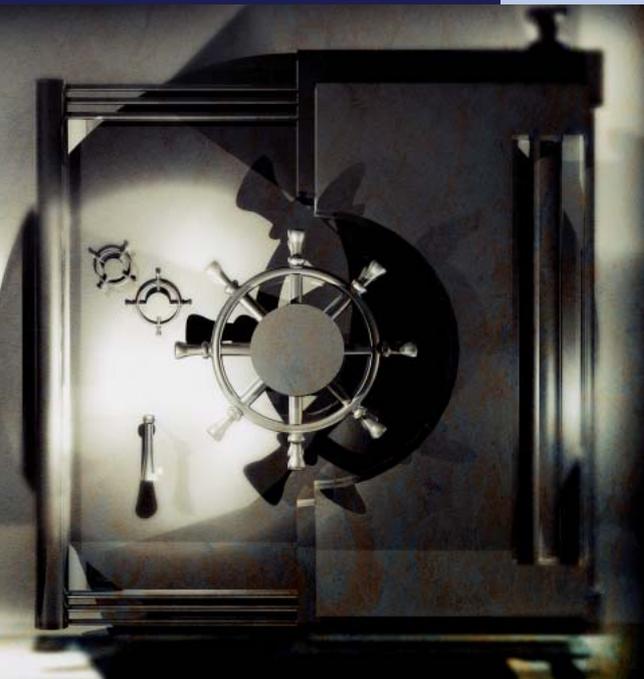
The sentence of the Court of Justice and the opinion expressed by the Italian Authority for fair competition and the market

The sentence passed by the Court of Justice on 13 December 2007 combined with other factors (chief amongst which was the opinion expressed by the Italian authority for fair competition and the market on 15 January 2008 and the Government crisis) have actually interrupted the reform draft, of which traces remain in the “interim intervention” of ministerial memorandum 557/PAS/2731/10089.D(1) dated 29 February 2008, and has triggered a third “propeller” for reform, the guidelines of which can basically be made out in two regulatory initiatives which to date are still incomplete:

1. the new regulatory framework, considerably changed in the light of the aforementioned European sentence and, above all, the aforementioned opinion expressed by the anti-trust authority;
2. article 4 of the law decree dated 8 April 2008, no. 59, which partly anticipates the new regulatory standards.

The fact that stands out most of all is that, whilst the new regulations which tend to promote and guarantee the “quality” and safety of the services have yet to be enforced, the provision which until now has enabled public control of the tariffs, albeit minimal, has been repealed. The “system” today is seriously exposed to the absence of regulations and the commercial “assault” of many unscrupulous companies, with the risk of creating damages to security as a whole in a way that will render it difficult to put to rights at a later date.

*Giulio Cazzella
Prefect of the Republic, Ex-director of the General Administration Office
of the Department for Public Safety (up to 10 January 2008)*



Letter of **Prefect Linardi**



Dear Chairman,

I am writing in response to your e-mail, in which you invite me to the Conference to be held next 28 May by FederSicurezza and sponsored by Confcommercio, during which the first national report on the private surveillance sector will be presented. The conference comes at a particularly significant time for the private surveillance sector as a whole, as well as for the Internal Administration and the Department for Public Safety.

It is a well known fact that, as part of the round table held in the Home Office, private surveillance businesses, bona fide security guard companies and the Department of Public Safety participated in a frank exchange of views as part of a delicate process to review the national private surveillance system, rendered even more pressing by the need to comply with the sentence passed by the EU law courts on 13 December 2007. I can assure you that at no time has the urgency of the matter clouded the goal of the project, which was and is still to reaffirm the vitality of a sector where reforms have long been hoped for. The regulatory adaptation imposed by the EU court has therefore been grasped as an opportunity for tackling and trying to resolve critical areas of the sector. These have gradually come to light not merely as a result of surveys conducted by the Internal Administration and by notifications made by prefects and police chiefs, but also from qualified and significant observations made by the Associations of Entrepreneurs, trade union organisations and the Associations of the main clientele groups.

In order to repair the demolishing effect of the sentence passed by the law courts, the system's weaknesses have been used as a starting point, attempting to ensure that the reforming project provides a suitable regulatory framework within which businesses can actively develop. They can therefore improve quality of services at the same time as increasing the professional protection and qualification of their security guards, ensuring they look towards Europe on an even footing. The commitment made involved ensuring that the institutional mission of the Internal Administration and the sector's development needs all focused on one common goal. It is to be hoped that the relationship that has been established with all the members of the private surveillance sector shall continue and be heightened further still in what continues to be a delicate phase for implementing the reform which, I hope, will soon become a state-issued law and regulation.

I feel confident of this point.

Last 28 April, in the Department of Community Policies of the Prime Minister's Office, a productive meeting was held with the head of the General Direction for the Domestic Market of the European Commission, the outcome of which would seem promising. It also transpired that on 21 April, the State Council examined the draft of the Presidential Decree containing changes to the rules for executing the consolidating act on public safety laws. This would reinforce the belief that formalisation of High Assembly's ruling is imminent. It would seem that arrangements for regulating the private surveillance sector are not far off.

It is therefore necessary to persevere with the conviction that a truthful and proper exchange with all those involved in private surveillance, combined with the attention that the Home Office has always dedicated to the problems involved in this delicate and complex business sector, will be of help for the institutional mission of the public safety Administration, and that it will serve to propel this ambitious project which goes by the name of complementary security towards completion. It is already underway in some areas, and from it we can expect to see it contributing towards the country's sense of safety.

*Giuseppe Linardi
Head of the Office for the General Administration,
Department of Public Safety, the Home Office".*

FederSicurezza report 2008



1870-2008 the **history** of **private Italian surveillance**

The first Private Italian Surveillance Institute was established by initiative of former-Garibaldi supporter Giuseppe Lombardi in 1870 in Padua. With just a handful of men, Lombardi started providing an urban surveillance service with the support of then Prefect of Padua Luigi Berti (who went on to become the chief of Police). As a result of its success the initiative was extended to Venice, then Milan, Genoa and Turin where the Institute was named "Cittadini dell'Ordine" (Citizens of Order) and became part of the AllSystem group. It continues to operate in many of the Piedmont and Lombard provinces. The above expansion process involved overcoming no small amount of initial hurdles; indeed the fact that precise regulations governing the sector did not exist meant that Giuseppe Lombardi was taken to court twice with the accusation of "usurping public powers" and "gathering men and weapons without permission of the Governing Authorities", although he was always acquitted and eventually saw his initiative obtain recognition and regulations issued with precise provisions. In years to come, Lombardi's experience was followed by similar organisations and in the years immediately after the First World War, Surveillance Institutes were set up by the National Institutes under the aegis of the National Association of Servicemen and Veterans, created to give employment to former servicemen from the Great War in almost all Italy's cities. Article 45 of a law approved on 21 December 1890 provided an initial framework for regulations governing Security Guards. The law stated that "Town councils, moral bodies and private citizens may destine custody of their property to security guards. The private guards must possess the requisites determined by the regulations, be approved by the Prefect and swear an oath before the magistrate. Reports drafted whilst performing the services to which they are destined shall be used in court in the absence of proof to the contrary".

The same provisions but with subsequent modifications and clarifications





(chiefly made in the period between the two world wars) governed the legal relations and day-to-day running of the Modern Private Italian Surveillance Institutes and Security Guards with the following laws up until the intervention of EC organisations:

- Consolidating Act of the Laws of Public Safety, approved with a Royal Decree issued on 18 June 1931, in articles 133 to 141 inclusive;
- Regulations for executing the Consolidating Act of the Laws of Public Safety, approved with a Royal Decree issued on 6 May 1940, in articles 249 to 260 inclusive;
- Royal Law Decree issued on 26 September 1935, articles 1 to 6 inclusive;
- Royal Law Decree issued on 12 November 1936, articles 1 to 6 inclusive.

The changes were dictated by the need to adapt the laws to the transformation undergone by the sector, both on a social level and with regard to the development of the means and technologies that Security Guards use to provide their services. An interview taken from the “Subsidiary Police Magazine” proves emblematic in these aspects. The interviewee is Giordano Lacasella, 61 years old, no less than 33 of which dedicated to surveillance services; to follow is an extract. “We went from pockets full of phone tokens so that in case of need we could run to the closest phone box to call headquarters or the forces of law and order, to the two-way radio; in the minds of the public we were “Metronotte” (name of an Italian surveillance company) alone at night, and all we had to help us were a bicycle and an electric torch. Nowadays services are provided with the help of advanced technologies such as remote surveillance, satellite surveillance, count rooms, escorts and transportation of valuables.”

The services most often requested of surveillance institutes nowadays are as follows:

Standing guard: consists of the permanent surveillance of an objective by one or more armed Security Guards in uniform, equipped with bullet-proof protection and constantly linked to the Operations Headquarters: the companies, public organisations, banking institutes and private homes at which this service is aimed are thus protected by a constant presence, even round the clock, so as to prevent and discourage criminal acts.

Escorting and transportation of valuables: service for transporting and, if required, counting, handling and depositing bank notes and coins in vaults, guaranteed by the use of armoured vehicles connected via radio/satellite to the Operations Headquarters and an escort of armed security guards given suitable training. Added to these are complementary services as well as many services currently undergoing expansion, featuring extensive use of new technologies such as **remote alarms, rapid intervention, video surveillance** and **satellite localisation**, as well as the most qualifying airport and port services introduced as a result of the need for protection following the threat of international terrorism.

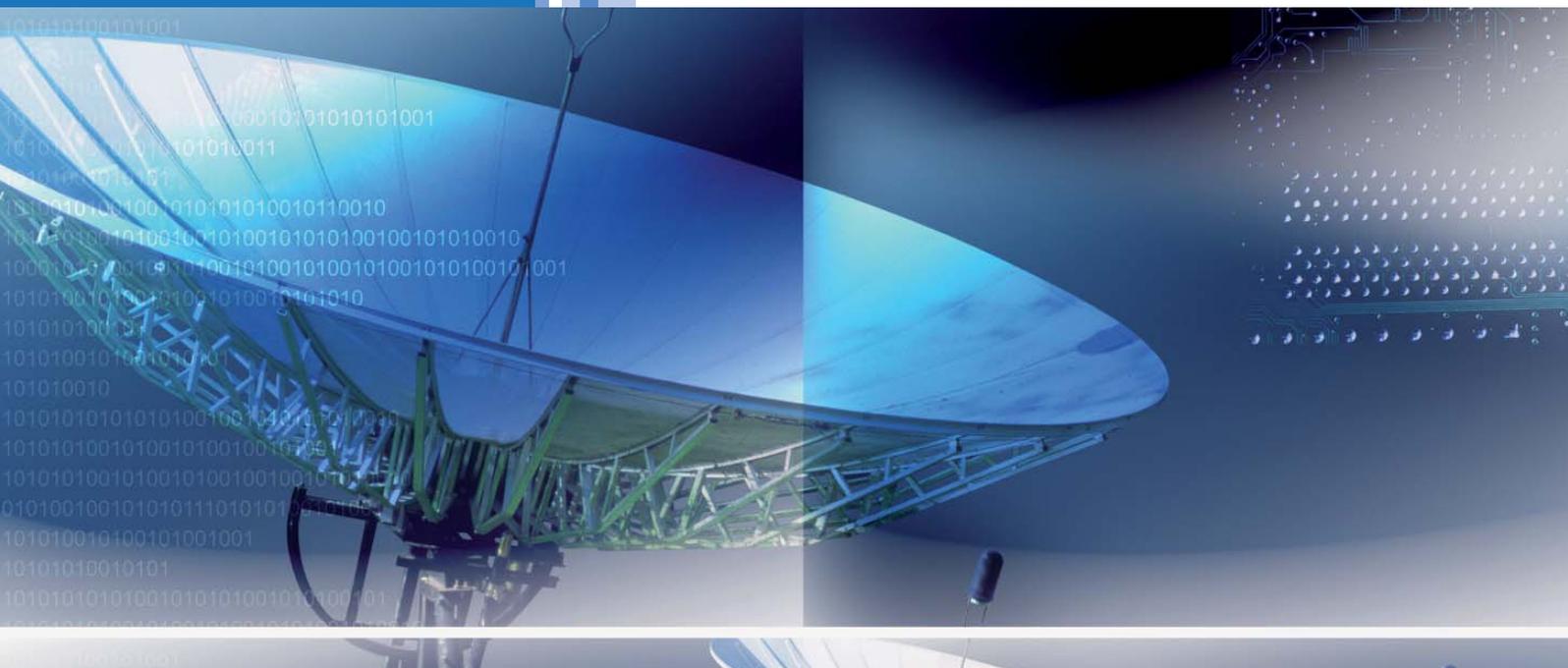
On 13 December 2007 an infringement trial which started with proceedings for breach as per article 226 EC, advanced on 23 December 2005, drew to a close with a sentence passed by the European Court of Justice. The dispute arose from various restrictions that limited access to the Italian market: the obligation to have a business licence and a deposit bond, regardless of the conditions already met in the company’s member state, the territorial limitation of the authorisation to each province, the requirements imposed with regard to the number of permanent employees and administrative control of prices, along with the obligation

to swear an oath of loyalty to the Italian Republic, even for temporary services. The Commission and then the Court ruled that this prevented any service provider legally established in another member state from proposing its private Surveillance services, respecting the fundamental freedom to establish and move services from one place to another. The sentence cleared the way for a reappraisal of the so-called Bolkestein directive planned for 2010, from which the private surveillance sector was excluded in the second instance. Whilst it soon adapted itself to the measures that were taken following the sentence to avoid fines, the Institutions seem to move in the opposite direction. Thus they reinforced the concept whereby the private surveillance service does not fall within general financial activities, introducing the concept of training as a fundamental requisite for those providing the institutes' services, in strong contrast to the dismantlement of the tariffs as imposed by the aforementioned sentence, which in turn is buffered by the national consolidating tables of salaries and security costs. The act which the state council is currently examining contains the modifications to the regulations for implementing the TULPS and considerably extends article 257, regarding requisites for operating at company level.

Article 134-bis, last paragraph of the law decree on preventing infractions which is currently awaiting approval of parliament, introduces a new element in this sense. It appoints security guards for performing a public service, bringing them closer to police headquarters and prefectures and giving a new lease of life to arguments already supported before the European Court in an attempt to prove the contribution and special nature of the service in safeguarding public order.

There can be no doubting that the intervention at European level has stirred the synergies at play in the sector, which until today has featured a great deal of protectionism and remained at a standstill since the legislative provisions of the '30s, opening it up to new development potential.

*Giuseppe Gabriele
FederSicurezza Researcher*



Present-day situation of **private Italian surveillance**

Notes on the methodology

Work to draft the report got underway in March 2007. The collection of information and the investigative survey concerned businesses operating in the “Surveillance Services” sector, members of FederSicurezza, or with the ATECO code for prevailing activity 74601, in possession of authorisation as per art. 134 of the TULPS (Consolidated Act of Private Safety Laws) issued by the relevant Prefecture or Police Headquarters. The decision was taken to focus on companies that supply services to third parties. As a result, entities authorised as per article 133 TULPS were not taken into consideration. Nor were consortia working exclusively for their own consortium members or companies that, whilst having a separate legal identity, provide services within an industrial group or a specific service.

Another exclusion involved the so-called “networks” whose activity consists of acquiring orders and distributing them to a number of service providers and, where possible, turnover resulting from so-called “correspondence” contracts between companies which otherwise generate a duplication.

As far as the services are concerned, to follow is a brief outlined of those taken into consideration:

- standing guard, night watch, anti-theft
- patrolling and inspections
- remote alarm and prompt intervention
- transport, escort, custody and handling of valuables
- satellite localisation
- video surveillance

and all those which, although generally suitable for including in the list of “private security services”, are not taken into consideration:

- investigation and consultancy
- installation and maintenance of security systems
- porter and receptionist work

In autumn 2007, through the associations belonging to FederSicurezza, over 200 questionnaires were sent out. At the same time, around 20 interviews were structured and conducted with stakeholders.

For the purposes of extending the study’s validity to the entire sector, without limiting itself to companies belonging to FederSicurezza, the report also based itself on the results of its own databanks and on figures that can be consulted publicly; for the purposes of the latter, a sample of around 100 companies and 15 groups, of significance in terms of size, activities and geographical location, was then identified. An analysis of the budgets and other public figures pertaining to these was then carried out. Unless otherwise specified, all the figures expressed in the report refer to the year 2006.

The figures

On the eve of important changes which will doubtless be imposed by changes in regulations and the market, the snapshot of the sector reveals **965 active** companies with a total of **49,166 employees** and revenue slightly over **2,400 million euro**.

It follows that the averages per company are **51 employees** and **2.5 million euro** in revenue.

In *figure-1* we can see the subdivision region by region of the number of companies and employees, and the average number of employees per company.



REGION	Number of Companies	Number of Employees	Average Employees
Abruzzo	28	677	24
Basilicata	13	704	54
Calabria	28	943	34
Campania	102	5705	56
Emilia Romagna	63	3727	59
Friuli Venezia Giulia	21	593	28
Lazio	124	8066	65
Liguria	27	1421	53
Lombardy	154	8191	53
Marche	17	481	28
Molise	4	139	35
Piedmont - Valle d'Aosta	47	1917	41
Puglia	107	3630	34
Sardinia	35	2290	65
Sicily	70	4293	61
Tuscany	49	3257	66
Trentino South Tyrol	9	250	28
Umbria	14	580	41
Veneto	53	2302	43
NORTH	374	18401	49
CENTRE	236	13200	56
SOUTH	355	17565	49
TOTAL	965	49166	51

figures 1-2



In *figure-2* the same figures are expressed per macro-region. The tables show how there are no major differences in size depending on the geographical area examined.

If we continue the analysis of companies, just **over 50 groups of companies** are active in the sector, with one dozen of these consolidating the budget.

In *figure-3* the various company forms are expressed in terms of percentage. Here the clear predominance of limited responsibility companies can be seen and, confirming the modest average sizes that continue to prevail amongst the sector's companies and the low number of joint stock companies.

Figure-4 shows the subdivision by date of registration of the businesses in the Chamber of Commerce.

Even considering the distorting elements linked to corporate events such as mergers or transformations, this indicator bears witness to how a large number of companies have joined the field in recent years, as almost half those operating enrolled between 2001 and the present.

Figure-5 shows the percentage subdivision per turnover categories of the companies.

Figure-6 and *figure-7*, on the other hand, respectively show the profit (or loss) made by companies in national and macro-regional terms, again in the 2006 business year.

Of particular relevance is the percentage of companies that closed the business year with a loss, namely 47% and which, contrary to any simplistic theories, is a statistic which does not feature any significant variations according to geographical area. If we analyse the percentage of businesses that declare losses before tax, this figure would instead stop at 23%. Above and beyond the obvious consideration that the sector is not doing brilliantly in terms of profitability, and that it is not enjoying a particularly positive moment, 2 elements are worth bearing in mind. These are:

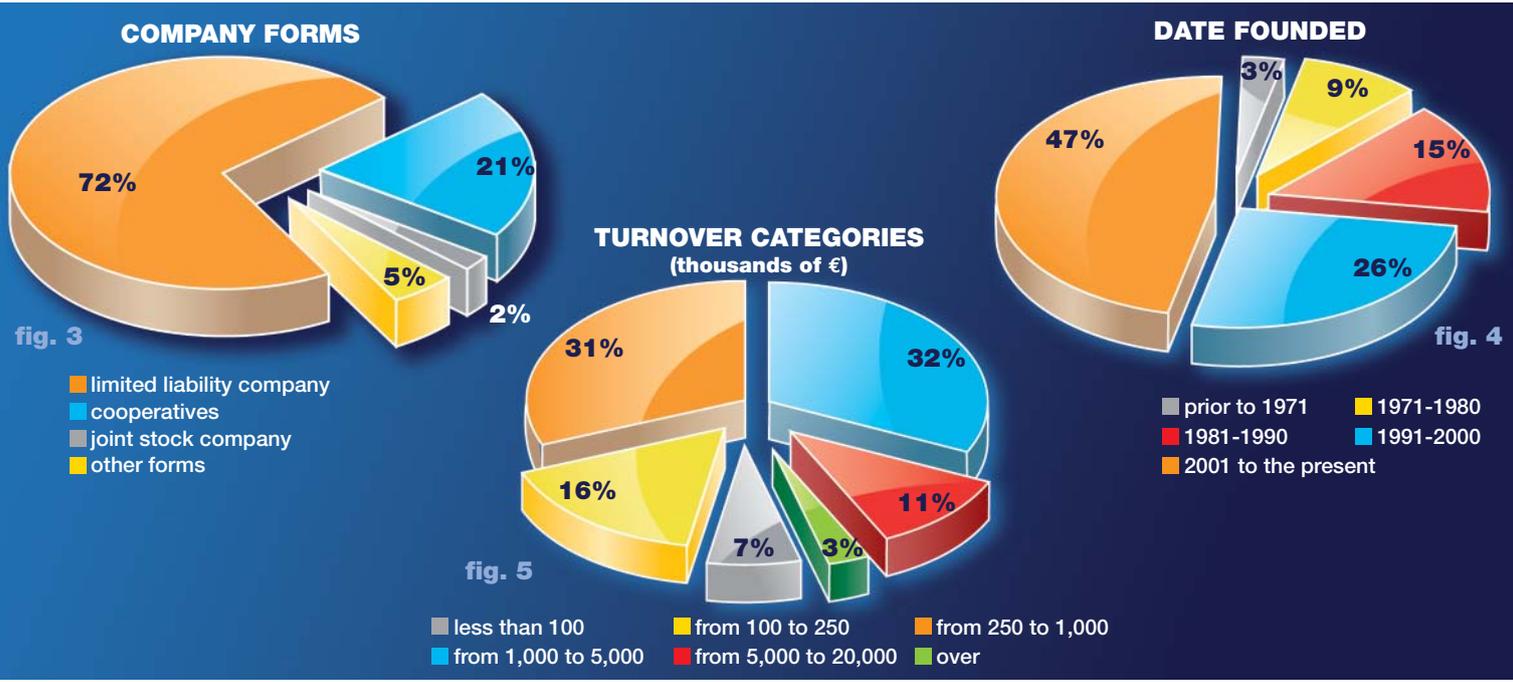


figure 3

figure 5

figure 4

- taxes are a heavy burden on the sector, particularly due to the effect of IRAP (Regional tax on productive activities) the taxable basis of which is largely influenced by the cost of the manpower itself. In fact within the sector the cost of manpower represents well over 60% of operative costs. As if that were not enough, in 2006 some regions raised the rate from 4.25% to 5.25% to boost regional health care budgets.
- in 2006 the effects of the renewed national collective contract were felt, weighing in at between 6% and 7% of the cost of labour.

The turnover trend is fairly positive and in recent two years has settled around 5-6% a year, without any neutralizations owing to inflation. The figures obtained from financial statement statistics, on the other hand, are difficult to use for this area as considerable upheaval is making it impossible to compare figures from one year to the next, particularly in the most representative companies.

Figure-8 draws the examination of size-related figures to a close by making a subdivision of employees according to category; this finds that most companies employ up to 15 people.

The organisation

The organisational layout of the companies reflects the highly “territorial” set-up involved in authorising permits. The premises, comprising headquarters, local units and detachments, amount to around 1,500, with 600 operations headquarters that are capable of receiving alarm signals, 6,600 vehicles and 1,500 armoured vans or vehicles for transportation of valuables. The employees not directly involved in operations on average account for 5% of staff overall, whilst the annual turnover of staff was around 10% nationally but with considerable variations between north, south and central Italy. Generally speaking, the turnover is far higher in the north, although there is no shortage of low turnover areas there too, often caused by the presence of companies or sectors experiencing financial difficulties in that area.

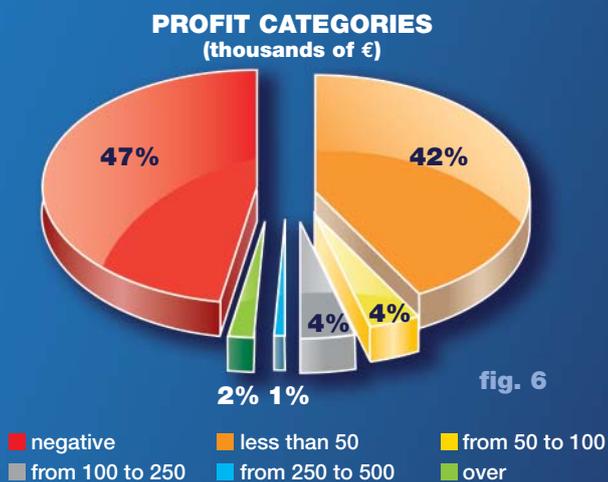


figure 6

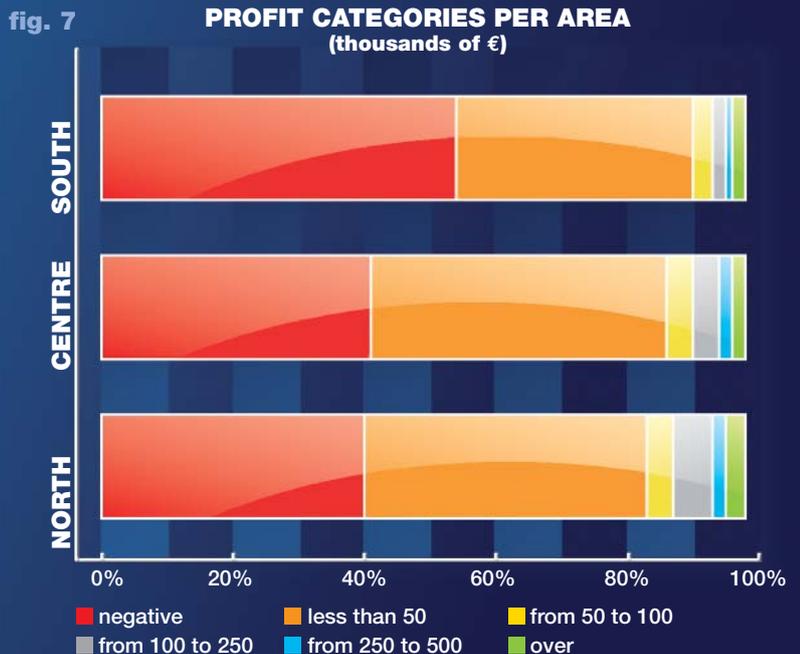


figure 7

The services

Companies operating in the sector continue to demonstrate a “generalised” approach to the market, in that the range of services offered is wide ranging, with very few companies specialising exclusively in “vertical” sectors. This is true for surveillance, whilst little more than 20% of companies work in the valuable transportation field, with just a few notable examples of specialisation.

For the remainder, most of the companies offer guarding, anti-theft, inspections, remote alarm, prompt intervention, video surveillance services and more besides, in varying percentages.

Figure-9 shows, in terms of turnover, the average mix between the various service elements of companies on a national level.

The clients

No precise statistics for the clientele are available. Yet it is interesting to note how private residential users account for no more than 5% of the total number of customers. A significant increase in organisations and authorities that entrust services to Surveillance Institutes is also worth noting. Some estimates put the total number of clients at around 1,200,000. The number of services provided, on the other hand, is far higher if we consider the fact that certain clients use more than one service for the same site or more than one sites, with a factor of around 1.4 – 1.5. Lastly, around 600,000 services of connection to the operations headquarters are operative, using remote alarms, video surveillance, satellite localisation and state-of-the-art technologies.

The private equity phenomenon

Closed property investment funds have recently made their appearance in the private security sector, with acquisitions that have mostly involved some of the main “time-honoured” groups in surveillance, these being the only ones able to offer the necessary critical mass. The most significant operations have involved **BS Investments SGR**, which in 2004 took

CATEGORIES OF WORKERS

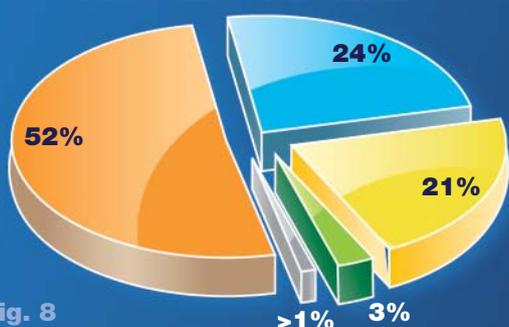


fig. 8

- less than 15
- from 16 to 50
- from 51 to 250
- from 251 to 1,000
- over

TURNOVER PER TYPE OF SERVICE

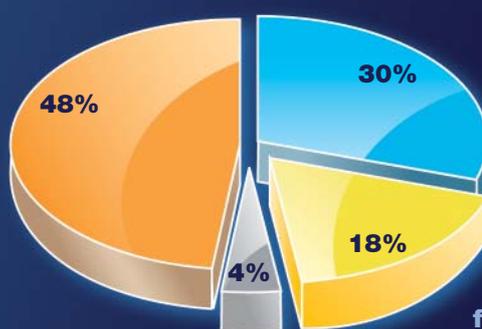


fig. 9

- standing guard
- area Guarding and Electronic Surveillance
- valuable Transportation
- other

figure 8

figure 9

over the reins of the “Sicurglobal” group, and **21 Partners SGR** (Benetton group) which in 2006 secured its control of the “IVRI” group. Over the course of this year, IVRI has reached an agreement with the Spanish company “Prosegur” to acquire part of its share capital, whilst at the same time acquiring a number of Prosegur activities in Italy; Sicurglobal on the other hand is currently carrying out a “secondary buy out” with the English fund **Stirling Square**.

In line with the normal strategies of closed-end investment funds, a complete overhaul of company structure and set-up is underway in these groups, with an end to optimising resources, and expansion which is mainly concentrated along external lines through a programme to acquire further companies.

At present, the 2 groups are on equal footing, settling at around 150 million **euro** turnover each. In this way they represent an overall market share of around 12%.

Another operation worth noting concerns the minority share of **Synergo SGR** within the Allsystem group, an operator that has attained consolidated profits of around 100 million **euro**.

In spite of the fact that two IPOs have been presented in the last 2 years, to date no Italian company has been floated on the stock exchange.

Private Security and the authorities

In recent years, the sector has found itself dealing with new “regulators” who have joined the institutions that have always dictated the relevant regulations in the past, first and foremost amongst which is the Home Office.

In detail, the above mentioned entrance of “private equity” has made it necessary for many of the acquisition operations carried out by them to obtain authorisation from the **Italian Authority for fair competition and the market**. Often clearance was given without the need for preparatory inquiries. By the same token, over the last year, some requests have been rejected wholly or partially as the preparatory inquiry phase of proceedings found that there might potentially be an excessive



concentration of companies. Up until now, these have had to be analysed in a strictly provincial context.

Only one judgement was passed concerning abuse of the competition standards, whilst the work of the Italian Authority for fair competition and the market has also focused on a number of reports and opinions surrounding establishment of “regulated tariffs”.

The **Personal Data Protection Authority**, on the other hand, has provided the guidelines to be observed concerning video surveillance, and has drafted an initial handbook which was followed by the adoption of general measures.

Private security and standards

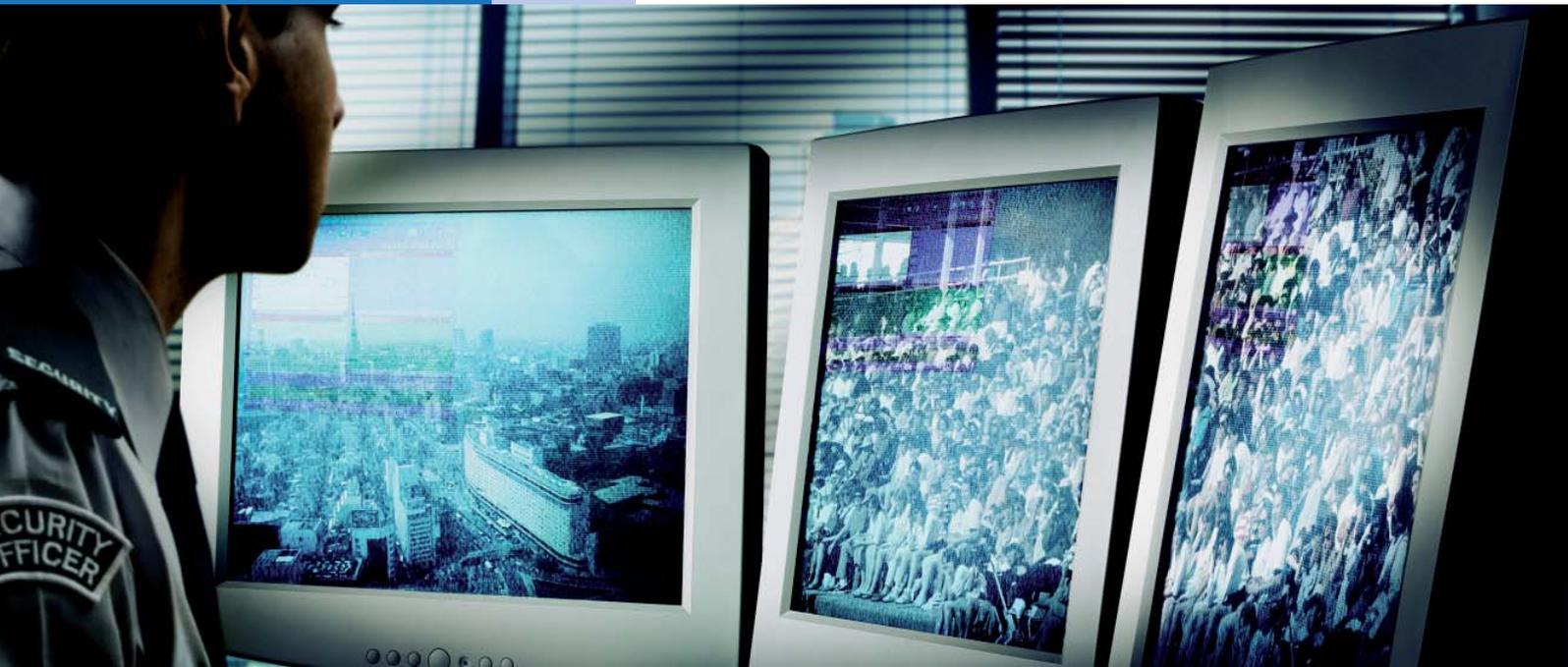
This is an up-and-coming area both in Europe and, as a result, in Italy. In the midterm it will influence the activities of companies and strategic choices considerably. A great deal of work is underway in the various standardisation bodies. The most important and relevant standards published in Italy are:

- UNI10891 Private Surveillance Institute Services– Requisites
- UNI11068 Remote Surveillance Headquarters – procedural, structural and control characteristics
- UNI 15213 Telematics for transportation and road traffic- Systems for identification of vehicles after theft
- EN 15602 Private security services - terminology, to be adopted imminently in Italian

In addition to the latter, the voluntary standard adopted by member companies of ANSSAT, a member of Federsicurezza, is worth mentioning. It involves satellite localisation services and is called “levels of service”.

The Services Directive

The Services Directive (so-called “Bolkenstein” directive) was adopted on 12 December 2006. The directive’s text states (under article 2.2) that



security services have been excluded, albeit temporarily, from application. In spite of this, the directive stipulates that the Commission will assess the possibility of presenting harmonising proposals for private security and cash and valuables transportation services by 28 December 2010.

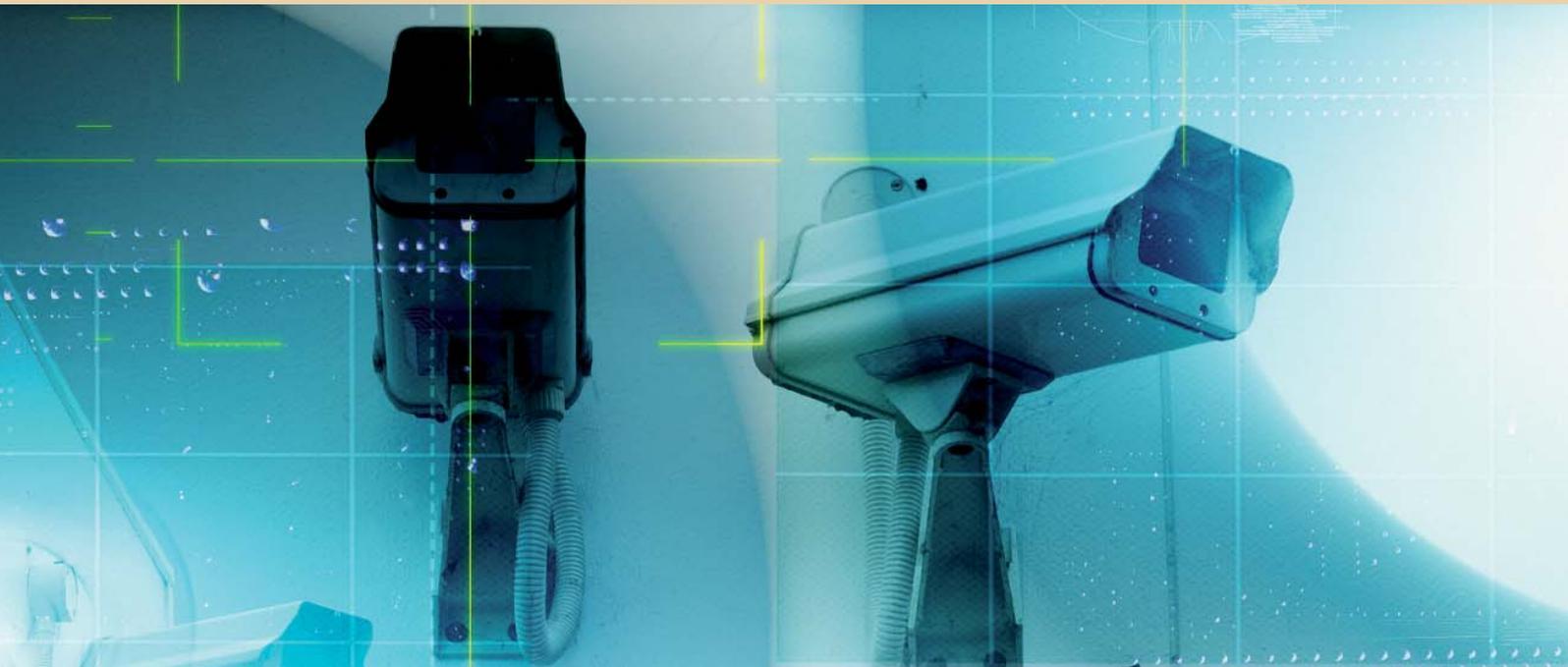
Looking to Europe

To follow is a table with a number of figures taken from the annual report of CoESS, which have been compared against the results of this report. We have also included 2 indicators; the number of inhabitants per worker and the turnover per worker. It is immediately clear that national situations vary greatly, and cannot therefore be compared properly, if not for small groups of similar types. In fact the situation in figures reflects the overall picture perfectly, as standards, the way the work is divided, even the actual confines and meaning of “private security” vary from country to country. If we were to make a couple of observations though, we might say that the number of workers in this field in Italy, namely the number of security guards, is extremely low when compared to population figures. Conversely, the average turnover per employee is amongst the highest. This is a clear indicator, if we consider the profits that companies are recording, of just how high manpower costs are running.

*Antonello Villa
Project Coordinator*

CoESS member states	Population	Num. of companies	Num. of Employees	Market turnover (mil. €)	Habitants per worker (1/n)	Turnover per worker
Austria	8,213,947	203	6,790	200	1210	29,455
Belgium	10,509,694	177	13,000	530	808	40,769
Bosnia & Herzegovina	4,552,198	65	5,000	25	910	5,000
Bulgaria	7,679,290	1,112	54,910	172,7	140	3,145
Cyprus	971,391	48	1,500	20	648	13,333
Croatia	4,493,312	20	15,000		300	
Czech Rep,	10,209,643	2,210	30,030	198	340	6,593
Denmark	5,447,120	338	5,250	250	1038	47,619
Estonia	1,315,912	70	6,000	40	219	6,667
Finland	5,238,460	230	7,000	1000	748	142,857
France	63,713,926	4,700	148,000	3300	430	22,297
Germany	82,310,000	3,280	173,000	4300	476	24,855
Greece	10,706,290	830	28,000	231	382	8,250
Ireland	4,109,086	273	10,900	331	377	30,367
Italy	59,131,287	965	49,166	2400	1203	48,814
Luxemburg	459	16	2,500			
Norway	4,640,219	257	70,000	625	66	8,929
Holland	16,570,613	818	30,000	1290	552	43,000
Poland	38,190,000	4,500	165,000	1000	231	6,061
UK	58,800,000	3,000	300,000	8860	196	29,533
Romania	21,673,328	1,029	79,900	29	271	363
Slovakia	5,447,502	1,730	20,839		261	
Slovenia	2,009,056	97	6,157		326	
Spain	44,708,964	783	87,000	3123	514	35,897
Sweden	9,082,955	280	11,500	660	790	57,391
Switzerland	7,554,661	407	12,882	765	586	59,385
Turkey	71,158,647	486	138,000	1200	516	8,696
Hungary	10,076,581	6,000	74,000	480	136	6,486

Analysis and **conclusions**



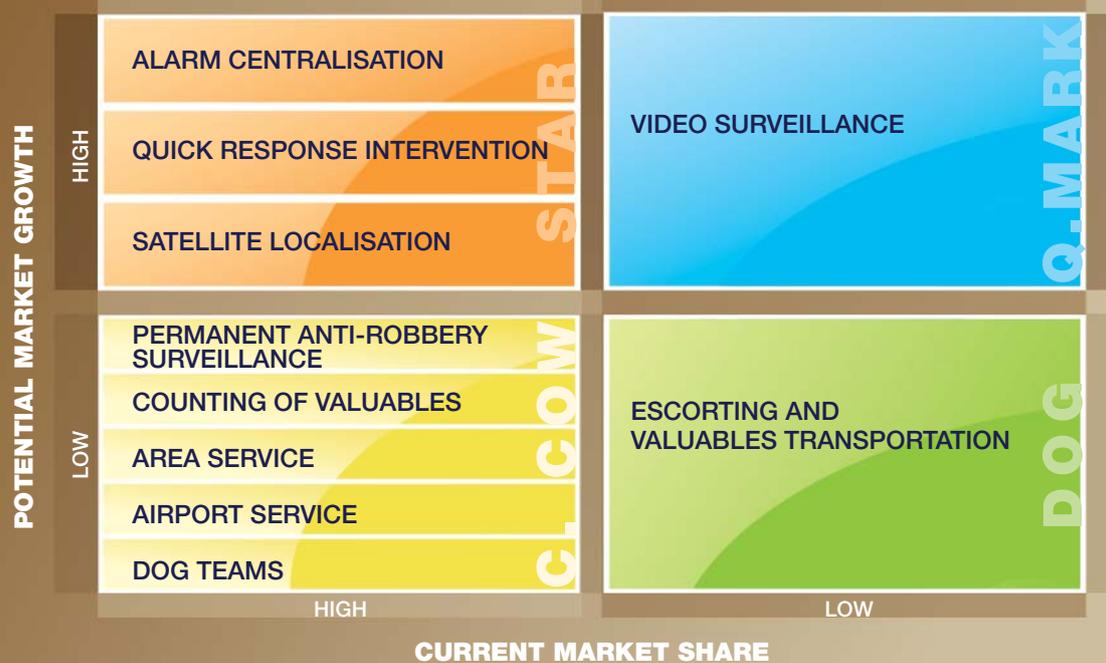
The **competitive** scenario of the **“private surveillance”** sector

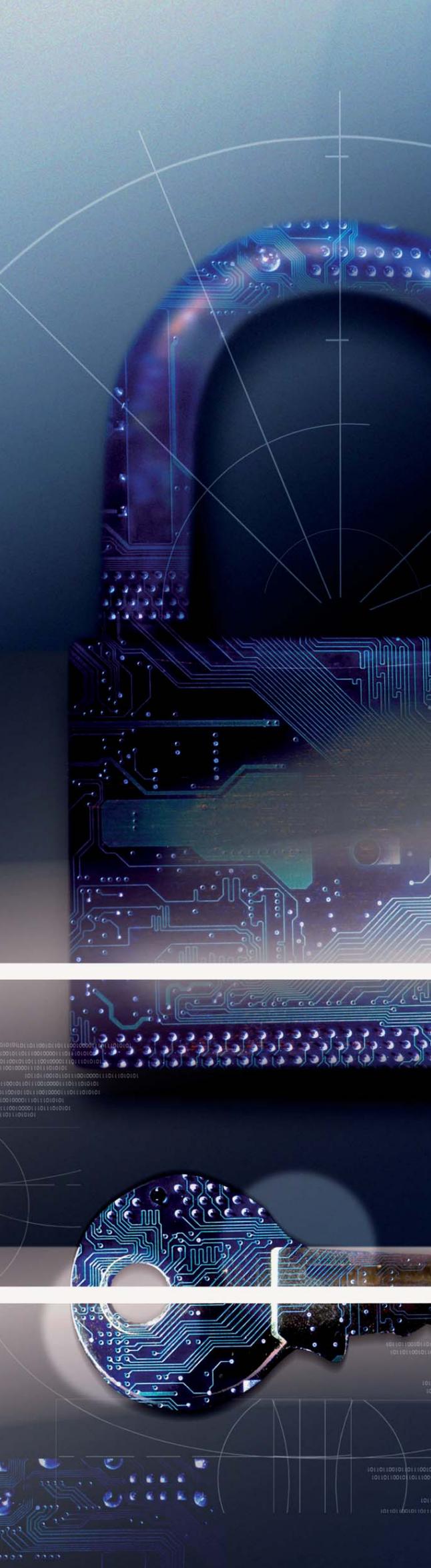
One of the most useful tools for assessing development potential of a company or sector is the growth/market share matrix. This matrix is based on the supposition that the potential and growth rate values of a product on any given market are important variables for identifying and assessing competitors in the short term. The matrix makes it possible to classify the products and services provided by companies into four large groups: star product/services, cash cow product/services, dog product/services and question mark product/services.

In a similar manner, the same tool used in a corporate sphere for constructing the positioning matrix shown below basically involved two variables: the need to make investments to finance growth, and the potential for each type of service to make its mark and consolidate its position.

The positioning matrix of the products shows how the services provided by the sector are for the most part “cash cow products”. This means that, unless there are interventions from outside, the near future does not look set to see particularly significant growth rates, but at the same time as they generate high turnover they can provide that safety net that might allow investments for developing innovative services.

A type of product defined as “video surveillance” has been entered under the question mark group. There is no doubt that this is a type of service with considerable development potential which may give rise to sizeable revenue. Yet this product can suffer negative influences and erosion of market shares also triggered by telephone companies which are now advertising similar surveillance services operated using the phone network. “Prompt intervention” services along with “satellite localisation” and “centralisation of alarms”, last of all, can be identified as products with a great deal of development potential but which, at present, require considerable investment in advanced technologies if they are to make their





mark. They therefore have the potential to express themselves as leading or star products for the sector, but their ability to carve out a niche will suffer, albeit less than video surveillance, from the need to promote the added value of a service provided by suitably organised and trained professionals on the market, and certain conditions, such as, for example with the prompt intervention service, the social acceptance and legal acknowledgement of the role SGs play in supporting the forces of law and order.

ANALYSIS OF THE SECTOR'S SWOT

The analysis of the sector paints a clear picture of the factors that can have a bearing on the overall position and operativity of private surveillance companies.

To sum up, the factors can be summed up as follows:

STRENGTHS

● Degree of maturity of the products

Technically speaking, this cannot be viewed as a real strength but needs to be interpreted in the light of the overall situation within the field. The maturity of the products, given that they are services provided on location, is in itself a barrier that prevents new competitors from making an entrance, owing to the so-called experience curve which companies on the market have managed to maximise over the course of time, and makes it possible to maintain turnover levels and scale economies that provide good profitability margins. All of this ensures that the sector remains in the upward trajectory of the lifecycle of the individual products supplied, without ever getting into an actual phase of decline, apart from cyclical and/or contingent situations arising. Nonetheless, this situation has been made possible thanks to the presence of regulatory barriers that have until now prevented a real opening of the market.

● Glocalisation and cultural factors

The strength in question is determined by a broad interpretation of the concept of glocalisation. In fact the private surveillance institutes are based on the loyal nature of customer relations; its rooting in the local area then, more than a cultural factor, should be interpreted as the possibility or need for constant dialogue between both parties. In addition, another interesting and no less important factor should be evaluated, namely the fact that the lay of the Italian peninsula as well as certain regional features can make it more complicated for certain types of services to be provided by companies not located within the area itself. This factor becomes more crucial if one bears in mind the potential for new competition from foreign companies to enter, with the abolition of the regulatory constraints in force in Italy up until now.

WEAKNESSES

● Perception of the “quality” factor.

With respect to the individual service categories, the distinguishing elements of quality are relatively few and far between. As a result, the main shortfall is linked to the lack of elements and above all the price.

● Competition on the price.

In relation to the point made in the paragraph above, competition focusing almost exclusively on prices (particularly when participating in calls for public tenders) drastically reduces or eliminates the possibility for the private surveillance institutes to invest in equipment and staff. This creates a vicious circle which reinforces the image of surveillance services as being “low added value” services.

THREATS

● Economic downturn.

The global economic situation is immediately reflected on the private surveillance sector as it is perceived as being outside the client's value chain. Thus in a situation with poor prospects, cuts in companies as well as amongst private individuals are making themselves felt on the surveillance market.

● Changes to the criteria used for issuing the prefectural authorisation.

The abolition of the discretionary nature by means of which authorisation to exercise private surveillance activities was awarded has led to a reduction of the barriers posed to those wishing to enter the sector: this changes its "protected" characteristic.

● Possibility of foreign competitors.

The recently applied regulatory changes which are still being assessed as well as the natural process of market globalization will of course result in competition becoming harsher.

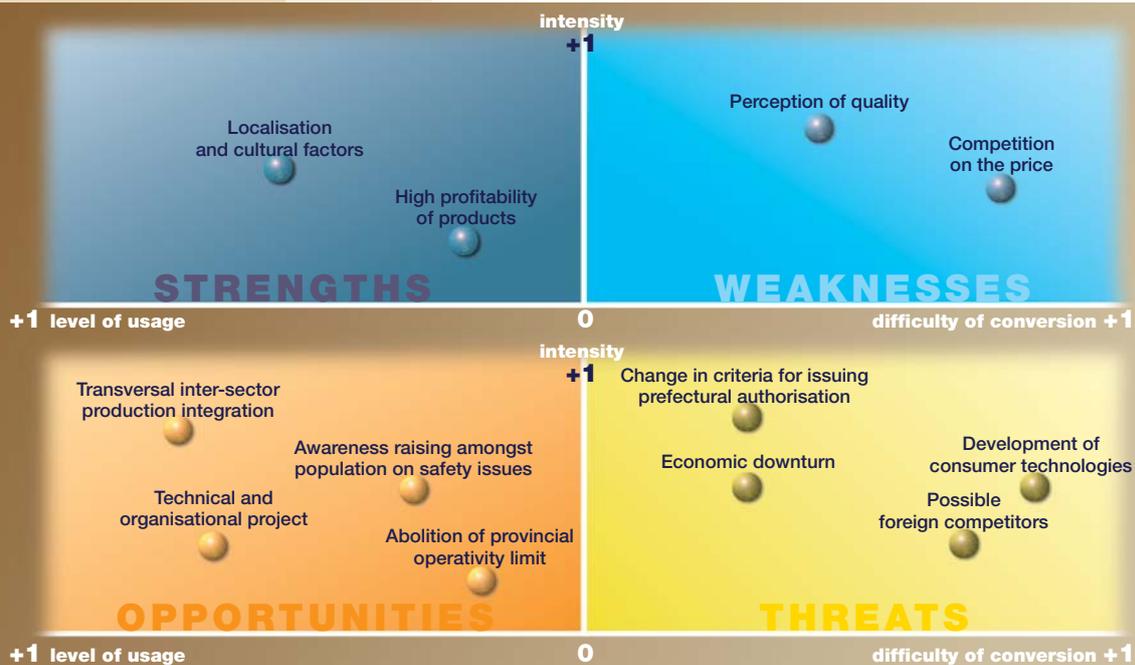
● Auto-development of consumer technologies.

The perfection of technologies that are accessible to small-scale consumers poses the real risk of a move towards "DIY Surveillance". In order to limit this threat, the only possibility is to render the value of the specialisation, experience and professionalism of those working in the field for some time already as clear as possible.

OPPORTUNITIES

● Awareness of issues involving safety.

The heightened awareness amongst the population of the need for safety may translate into interesting market opportunities, as long as the private surveillance institutes manage to move closer to end consumers by offering new services gauged even to suit the needs and pockets of small-scale users.



● **Inter-sector transversal production integration.**

The potential for integration is favoured by the abolition of the provincial authorisation. Above and beyond this point, organising full services requires an overall improvement in the way surveillance services are perceived; it is a fledgling opportunity which, in order to mature, requires the surveillance companies that are potentially more interested in these strategies to create their own driving force against producers of other services.

● **Abolition of the provincial operativity limit.**

Clearly this represents an opportunity for the private surveillance institutes which have until now limited their sphere of action to the provincial areas for which they had obtained authorisation from the prefecture. This opens up the way to optimising the use of resources and the possibility to invest in new services and technologies.

● **Technical-organisational project.**

If correctly interpreted, the new obligation for issuing authorisation may provide the launch pad for developing the entire sector, forcing businesses to a more careful analysis of its strengths and a thorough definition of strategies and operative methods for a market that may be in a dynamic state of change, both with regards to competitiveness and the service's clients and users.

SCENARIO

The set of analyses carried out and subsequent interviews with key figures has made it possible to outline the potential situation of the sector in the midterm. It is, however, necessary to highlight the fact that creating a scenario does not in itself guarantee that the forecasted events will actually take place if not supported by strategies, investments and activities to bring them about, along with the construction of an ongoing monitoring system that makes it possible to control it and adopt any corrective measures at the same time.





The processing of the figures and the information gathered to date makes it possible to hypothesise a potential competitive context featuring positive areas and pitfalls, and above all in the midterm, to state that there will be no shortage of growth potential for businesses and for them to make their mark whilst underscoring the importance of the work they do. This value can also be expressed in terms of recognisability and importance of the objective “value” produced. The prospects are there for a potential increase in the culture of Surveillance and Security which at present in our country seems almost entirely entrusted to the forces of law and order. In spite of the large numbers of staff in the Italian forces of law and order, the State may not of course dismiss the request for surveillance and security in terms of a “private” service which is aimed at satisfying specific needs of a private citizen. At the same time as growth is occurring in the surveillance sector, it will be able to focus more effectively and efficiently on the needs and requirements of the public. An initial characteristic of the scenario which is taking shape is therefore of a positive nature for companies in the sector, although it is necessary to highlight the need to define socially accepted and agreed rules which identify the “duties” of the State and legitimate conduct of those involved in security. This definition will provide the basis on which to build the surveillance sector in years to come. Yet it is a sector that must still do a great deal of work to build on the image that the Italian people have of it. Indeed it is a field of work whose contents, potential value and operative intervention methods are a complete unknown to the public at large. To sum up, we might say that it is an unpromoted sector, namely one that has never dedicated attention to its own public image, aside from advertising the services proposed individually by the private surveillance institutes.

A suitable strategy for promoting the sector then is a fundamental requisite for opening and widening the market for productive ends as well as for ensuring that the social role of these companies is correctly assessed and accepted. Opening up would allow advertising carried out by private surveillance institutes to find fertile terrain ready to receive the real nature of the services provided, against a competitive backdrop undergoing fast moving transformation.

The adaptation of Italian legislation to bring it into line with the sentence passed by the Court of Justice will in fact lead to an initial phase where competition (above all from within Italy) will increase as well as from foreign companies that may take advantage of the abolition of the structural and economic requirements in force in Italy to enter a sector from which they have up until now been excluded. This increase in competition, along with the abolition of tariffs of legality but thanks also to the reduction of the structure of fixed costs posed by present-day restrictions (staff numbers, provincial operations headquarters etc.), may result in competition based on “cost leadership” strategies and therefore a probable price war. This may lead to marginal companies being eliminated. Paradoxically then, a situation featuring an increase in competition would not end up creating any real advantage for the users in terms of increased quality and promptness of the service. At a later time though it is foreseeable that any “poor” competition made up of “speculators” should be eliminated by good service providers and the market in general.

At that point, regardless of size, only the best private surveillance institutes will continue to operate; the small-to-medium companies will in all likelihood manage to cut out niche operations on a glocal basis with clientele predominantly of the private kind. These products then are more people-oriented. Their slogan might be “Security more than Surveillance”. Large size companies, on the other hand, will work for state and



institutional clients, as well as for large-scale surveillance customers such as banks, shopping centres, airports etc. And it is precisely with this type of clientele, with its greater spending capacity which is less restricted by geographical and cultural constraints, that foreign companies will probably manage to carve out decent market niches. As a result, Italy's large surveillance institutes, the size of which is still small compared to that of its foreign competitors, will have to encourage agreements and/or partnerships with the foreign companies, offering themselves as a solution that is advantageous from an economic and organisational point of view with regard to the need to create infrastructures and in particular staff which it would otherwise have to hire locally.

GROWTH IN THE SECTOR

The growth in the sector will be affected by a number of factors:

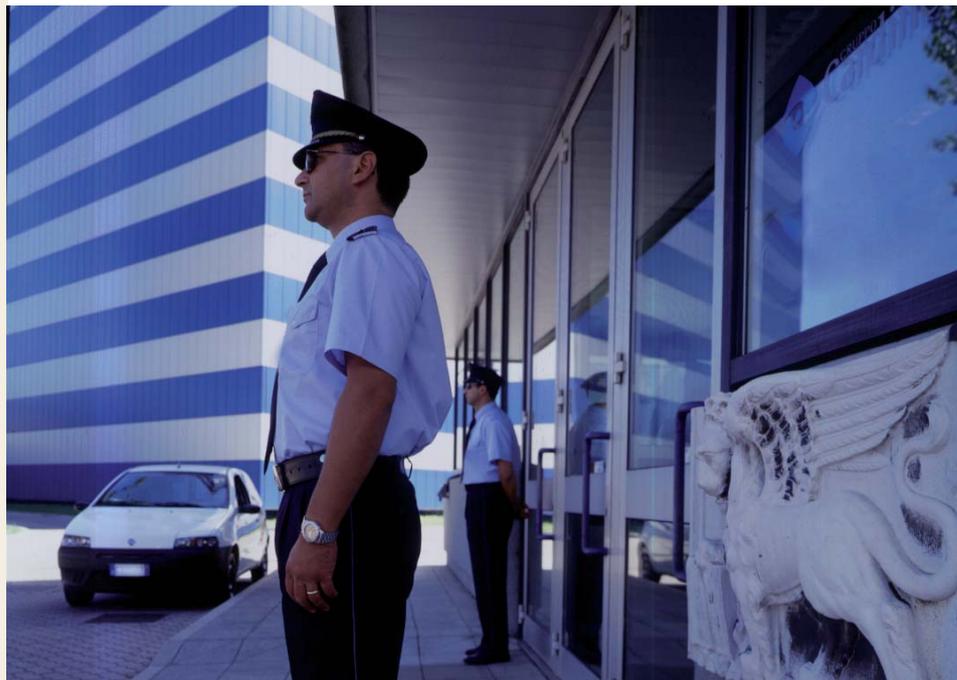
- development and the adoption of policies to increase service quality, based also on the intervention of external certification bodies (Iso Uni standards) which will develop objective parameters agreed upon and shared by the entire sector. At the same time, it will be the task of the private surveillance institutes to help clients grasp the real added value of the services provided with continuity and professionalism as opposed to the "DIY" options which possess neither of these two essential attributes;
- development and improvement of the competences of the human resources through suitable training (both at the start then ongoing) according to the guidelines set out in the handbook "Analysis of the professional and training needs of the Private Surveillance sector" drafted by Sicurservizi, a training and consultancy company for the private surveillance sector, on behalf of the E.Bi.N.Vi.P., the National Bilateral Organisation for Private Surveillance. Training will be an essential condition of the quality policies and, above all, the potential for surveillance companies to remain in a market that has undergone a radical overhaul. For these companies, the human resources represent a production factor which to date (with the exception of certain highly qualifying pilot projects already carried out by Sicurservizi in 2007 and this first part of 2008 with management, middle management and the security guards of regional and national market leader private surveillance institutes) have not been involved in suitable policies aimed at growth and improvement. An innovated market needs the capacity to adapt and be flexible, which only a wealth of shared competences distributed throughout the company can guarantee. Thus the human resource is strategic because it interacts with the outside, it generates quality and is therefore a distinctive resource. In addition, training can encourage companies to adapt the services of companies to change to forecasted or foreseeable market conditions, as well as creating the premise for developing careers which are currently at a standstill, thereby improving motivation of human resources.

Of the many advantages that may result from the introduction of training policies, some particularly qualifying points are possible:

- professional development in terms of improving performance of individuals and the ability to maintain high performance levels through the course of time;
- improving the internal climate within companies by establishing faith and a positive environment where the various levels work together to reach shared objectives;
- increase in motivation throughout: training actually encourages staff members to be accountable for their own responsibilities whilst managers plan and work with the group to increase general motivation of the individual staff members;

- the possibility, which has been limited until now, to create integration networks (vertical, horizontal and diagonal) which might lead to greater financial and organisational efficiency of the private surveillance institutes. Creating common service factors and their integration in the sense of the possessed specialisation is actually the observation and reproposal of what normally happens in other production sectors. To this end, quality certification in terms of the ability to recognise value elements of supplier specialisation areas outside the private surveillance companies is vital for guaranteeing the continuity of the supply chain. This is true both of the company network components and the services' end consumers;
- specifically speaking, the technology must mainly be used as an element for improving the way production processes are organised with an end to increasing efficiency and effectiveness, as a factor for enhancing product/service proposals. In fact it will be necessary to use existing and available technologies to be implemented within private surveillance companies as a benchmark, whilst awaiting new developments, so that the opportunities afforded by the market today but which are not yet exploited are maximised to the full.

Another element whose positive potential should be highlighted is the need to adopt a technical and organisational project to support the request for the Prefectures' opinions for issuing authorisation to operate. It seems clear that if private surveillance businesses view this merely as implementation of a bureaucratic formality, the adoption of a technical and organisational project is destined to fail to provide an element that would help businesses, and the sector with it, grow. If, as is hoped, this requirement will be seen by companies as an opportunity to promote company development, we would have a great opportunity to show how a bureaucratic umbrella-structure can be transformed into a real stimulus for growth. An organisational project that bears in mind the real market conditions whilst at the same time managing to clarify the



objectives, strategies and methods for using the resources cannot fail to become a formidable tool for providing clarity with regard to governance of private surveillance companies. Moreover, it would limit any negative consequences of the period of transition that surveillance companies in Italy are experiencing to an absolute minimum.

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