

**IN THE MATTER OF**

An application by **DUBBLE H SECURITY LIMITED** for a company licence under the Private Security Personnel and Private Investigators Act 2010

**AND**

A complaint against **LOUISE CREELMAN** under s 74 of the Private Security Personnel and Private Investigators Act 2010

**DECISION**

[1] Dubble H Security Limited (Dubble H) has applied for a company licence in the classes of crowd controller, property guard, and personal guard. The sole director of Dubble H is Louise Creelman.

[2] For Dubble H to be eligible for a company licence, Ms Creelman needs to provide evidence that she has completed the required training and that she has had at least 12 months experience in each of the classes for which a company licence is sought within the last 5 years. Ms Creelman has provided a copy of her record of achievement to show she has completed the required training. She has also held a certificate of approval in the guarding classes since 16 March 2020.

[3] However, in January 2023 I found that Ms Creelman had breached the Act and was therefore guilty of misconduct by carrying on business as a crowd controller both as an individual and through Dubble H Security without holding a security licence. I also found she had breached the Act by engaging people to work as crowd controllers without the required certificates.

[4] As Ms Creelman's breaches of the Act were ongoing I:

- suspended Ms Creelman's certificate of approval from 24 January 2023, and
- referred the complaint back to the Complaints Investigation and Prosecution Unit (CIPU) to investigate whether Ms Creelman and Dubble H Security were continuing to provide security services without a licence.

[5] After receiving Dubble H's application for a company licence on I also asked CIPU to investigate whether Ms Creelman had the required 12 months experience for Dubble H to be eligible for a licence and whether Ms Creelman and Dubble H were suitable to carry on business in the classes for which they had applied for a licence.

[6] CIPU have completed their investigation and issued a further report. Mr Kumar, the CIPU investigator, says that Ms Creelman had been unable to provide the required evidence of 12 months experience in the classes for which Dubble H had applied for a licence. In addition, he found that Ms Creelman had disregarded the warning she had previously been given and continued to provide crowd controller services without a licence.

[7] Mr Kumar concluded Ms Creelman's offending was deliberate and undermined the purposes of the Act. He further concluded that the nature and circumstances of Ms Creelman's offending, together with her inability to provide evidence of experience, shows that Ms Creelman is not suitable to operate a security business.

[8] Ms Creelman was sent a copy of CIPU's second report and given a further opportunity to respond and provide evidence of the required 12 months experience. In response Ms Creelman says she has worked at bars in Te Awamutu for a period of between 6 months and 3 years and that all locals have respect for her. She also states that she has talked to the bars, and they advise they want her to continue providing security.

[9] Ms Creelman has provided no evidence to support her claims of experience or any other supporting evidence from the bars for whom she has worked or provided security services.

[10] Ms Creelman was given a verbal warning on 1 August 2022 that that she should not continue running a security business until she obtained a security licence This was followed up by an email. Ms Creelman responded that she understood and gave an undertaking that she would seek legal advice and take steps to remedy the breach.

[11] Ms Creelman registered Dubble H Security as a company on 20 September 2022 but did not apply for a company licence until 22 February 2023. She received the first CIPU report in late 2022 but failed to attend the disciplinary hearing held on 17 January 2023.

[12] Ms Creelman has continued to breach the Act by providing security guards to bars and licensed premises in the Te Awamutu area either in her own name or through Dubble H Security. She has also breached the Act by engaging people to work as crowd controllers who do not hold a COA.

[13] Ms Creelman has continuously ignored advice she was given and demonstrated little understanding of her responsibilities as a security business owner. She had provided no evidence of competence in running a security business and insufficient evidence that she has the required 12 months experience in the last five years in the classes for which Dubble H has applied for a licence.

[14] After considering all the information before me, I conclude that Ms Creelman and Dubble H are not suitable to be carry on business as a crowd controller, property guard and personal guard. I also consider it is appropriate to extend the suspension of Ms Creelman's COA until 16 March 2025.

[15] Ms Creelman can apply to have her suspension lifted but only to be employed or engaged by a reputable licenced security company. To do so she will need to provide confirmation from her prospective employer that they are willing to employ Ms Creelman if her COA is reinstated and provide a copy of her contract of employment or engagement.

## **Orders**

[16] I make the following orders:

- a) Dubble H Security Limited's application for a company licence is declined.

- b) Ms Creelman's certificate of approval is suspended until 16 March 2025.
- c) Ms Creelman is given a final formal warning that if she continues to provide security services without a licence or work in security while her COA is suspended, I will ask for her to be prosecuted for offences under the Act.

**DATED** at Wellington this 26<sup>th</sup> day May 2023

The seal is circular with a blue border containing the text "THE PRIVATE SECURITY PERSONNEL LICENSING AUTHORITY". Inside the border is a central emblem featuring a crown atop a shield, which is supported by two figures. The shield is divided into four quadrants, each containing a different heraldic symbol.

P A McConnell  
**Private Security Personnel Licensing Authority**