

THIRD READING

Bill No: SB 1203
Author: Smallwood-Cuevas (D)
Amended: 4/9/26
Vote: 21

SENATE BUS., PROF. & ECON. DEV. COMMITTEE: 6-0, 4/13/26
AYES: Wahab, Archuleta, Arreguín, Caballero, Grayson, Smallwood-Cuevas
NO VOTE RECORDED: Choi, Menjivar, Niello, Strickland, Umberg

SENATE PUBLIC SAFETY COMMITTEE: 4-1, 4/21/26
AYES: Arreguín, Cortese, Pérez, Wiener
NOES: Seyarto
NO VOTE RECORDED: Caballero

SENATE APPROPRIATIONS COMMITTEE: 5-2, 5/14/26
AYES: Cervantes, Cabaldon, Grayson, Richardson, Wahab
NOES: Seyarto, Dahle

SUBJECT: Security services

SOURCE: SEIU California

DIGEST: This bill 1) prohibits Proprietary Private Security (PPS) and Private Patrol Operator (PPO) licensees from providing security officer skills training to registered security guards and officers unless the licensee enters into a collective bargaining agreement, as specified; 2) increases mandated hours of security skills training by two hours to accommodate required training on workers' rights to be instructed by a union organization upon request; and 3) makes additional numerous changes to security officer training as required by the practice acts administered by the Bureau of Security and Investigative Services (Bureau or BSIS) and increases maximum fines for various violations of those acts.

ANALYSIS:

Existing law:

- 1) Establishes the Proprietary Security Services Act, administered by the Bureau to license and regulate PPS employers and security officers. (Business and Professions Code (BPC) §§ 7574, et seq.)
- 2) Requires PPS security officers to complete training in security officer skills, which includes Power to Arrest and Appropriate Use of Force, within six months from the date registration is issued, or within six months of their employment with a proprietary private security employer. (BPC § 7574.18(a))
- 3) Requires BSIS to develop and establish by regulation a standard course and curriculum, which shall include a minimum number of hours of instruction, for the skills training required by 2) above to promote and protect the safety of persons and the security of property, which may be administered, tested, and certified by any PPS employer, organization, or school approved by the Bureau. (BPC § 7474.18(d))
- 4) Authorizes the Bureau to approve any PPS employer, organization, or school to teach the course required by 2). (BPC § 7474.18(e))
- 5) Requires each PPS employer to annually provide each registered employee with specifically dedicated review or practice of the security officer skills prescribed in 2) above. Requires the Bureau to adopt by regulation the minimum number of hours required for annual review. (BPC § 7474.18(f)(1))
- 6) Requires a PPS employer to maintain at the principal place of business or branch office a record verifying completion of the review or practice training for a period of not less than two years and make the records available for inspection by the Bureau upon request. (BPC § 7474.18(f)(2))
- 7) Provides that a PPS employer shall not do certain acts, including failing to properly maintain an accurate and current record of proof of completion by each proprietary private security officer of the trainings training required by BPC § 7574.18. (BPC § 7474.38 (b))
- 8) Establishes the Private Security Services Act, administered by the Bureau, to provide for regulation of Private Patrol Operators (PPOs) that employ security guards and patrolpersons. (BPC §§ 7580, et seq.)

- 9) Defines a PPO as a person who agrees to furnish, or furnishes, a watchman, guard, patrolperson, or other person to protect persons or property or to prevent the theft, unlawful taking, loss, embezzlement, misappropriation, or concealment of any goods, wares, merchandise, money, bonds, stocks, notes, documents, papers, or property of any kind; or performs the service of a watchman, guard, patrolperson, or other person, for any of these purposes. (BPC § 7582.1(a))
- 10) Requires a PPO to submit a written report describing circumstances surrounding the discharge of any firearm or physical altercation with a member of the public while on duty, by a licensee or any officer, partner, or employee of a licensee while acting within the course and scope of their employment within seven business days after the qualifying incident, as specified. (BPC § 7583.2(f))
- 11) Requires each applicant for a security guard registration to complete a course in the exercise of the power to arrest and the appropriate use of force as a condition for the issuance of the registration. The training shall be administered and certified by a single course provider and completed within six months preceding the date of application to the Bureau. (BPC § 7583.6(a))
- 12) Requires a PPO security guard registrant to complete 32 hours of security officer skills within six months from the date an initial registration is issued, including 16 of the 32 hours within 30 days from the date of registration. (BPC § 7583.6(b))
- 13) Requires PPO security guard registrants to annually complete eight hours of specifically dedicated review or practice of security officer skills, as specified. (BPC § 7583.6(e))
- 14) Authorizes the training in 11) to be administered, tested, and certified by: 1) any licensee; 2) any certified training facility; or 3) any organization or school approved by BSIS so long as BSIS approves any instructor who will administer the trainings to ensure the organization or school complies with the Proprietary Security Services Act, and applicable regulations. (BPC § 7583.6(f))
- 15) Requires each licensee to maintain at the principal place of business or branch office a record for each of its registrant employees verifying completion of the training required by BPC § 7583.6 for the duration of the registrant's employment and to make the records available for inspection by the Bureau upon request. (BPC § 7583.6(g)(2))

- 16) Requires the course of training in the exercise of the power to arrest and the appropriate use of force to be administered, tested, and certified by any licensee or by any organization or school approved by DCA. The course of training is required to be approximately eight hours in length and cover specified topics, including de-escalation. (BPC § 7583.7(a))
- 17) Requires the PPO skills training to be taught by means of verbal instruction where the instructor is physically present with students in a classroom for a minimum of 50 percent of the course and is available at all times, including during instruction provided through distance learning or remote platforms, to answer students' questions while providing the required training. (BPC § 7583.7(b))
- 18) Exempts the development, adoption, amendment, or repeal of the Power to Arrest and Appropriate Use of Force Manual from the Administrative Procedure Act. (BPC § 7583.7(c))
- 19) Authorizes BSIS to issue a citation to a licensee for a violation of BPC §§ 7583.2, 7583.3, 7583.37, 7585.19, 7587.2, or 7587.14 that may contain an administrative fine that shall in no event exceed \$2,500. (BPC § 7587.7)
- 20) Requires on or before February 1, 2026, and annually thereafter, an employer to provide a stand-alone written notice to each current employee, and each new employee upon hire, in a manner the employer normally uses to communicate employment-related information, whether by personal service, email, or text message, to include a description of specified workers' rights, including the right to organize a union or engage in concerted activity in the workplace. (Labor Code (LAB) § 1553(a))

This bill:

- 1) Makes legislative findings and declarations regarding the role of security officers and their historical status as low-wage workers.
- 2) Codifies PPS officer requirements to complete training in power to arrest and use of force training and requirements to issue a certificate of completion to the PPS officer upon completion of training.
- 3) Requires PPS officers to complete eight hours of training dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or a person certified by an organization, that employs evidence-based, trauma-informed techniques and

strategies in their training, in addition to the de-escalation training currently required.

- 4) Increases maximum fines that may be issued for a violation of BPC § 7574.38, subdivisions (a), (b), or (e) from \$500 to \$1,000, establishes that failing to ensure that the PPS training occurs as required by this bill is a violation and subject to a fine of up to \$10,000 per violation, and establishes that failing to compensate a PPS employee for completing officer skills training and de-escalation training is a violation and authorizes a fine of up to \$10,000 per violation.
- 5) Requires the written report describing an incident describing a physical altercation to include those that include a security officer requiring first aid or other medical attention, the race and gender of the member of the public, and whether the security officer involved received all required training at the time of the incident.
- 6) Requires the Bureau to release an annual report containing specified incident report data by county and comparative analysis with previous years' data.
- 7) Requires the Bureau to develop through regulation a standard course and curriculum that shall include a minimum number of hours of instruction for training individuals on the role of implicit and explicit bias on racial profiling and the use of firearms in commercial, entertainment, government property, urban street, and residential settings in addition to any other training.
- 8) Allows the de-escalation training required by this bill to be provided by a separate provider than approved training providers.
- 9) Increases PPO security officer skills training from 32 to 34 hours that must be taken within six months of registration and increases the number of hours that must be completed within 30 days of registration from 16 to 18 hours.
- 10) Requires PPO security officer skills training to be conducted through traditional classroom instruction and prohibits the training from being completed while on duty.
- 11) Requires two hours of PPO security officer skills training to be dedicated to training employees on rights contained in a notice outlined in the Labor Code.
- 12) Increases PPO security guard registrant annual training from eight to 16 hours, with eight hours dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or

a person certified by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training.

- 13) States that, upon request, a Bureau-approved labor organization that represents security officers is entitled to provide the two-hour training on rights contained in the employee rights notice to the licensee's security officers and specifies that it is a violation of the Act to fail to ensure compliance.
- 14) Requires the Bureau to approve a labor organization as a provider for the two-hour training within 30 days of the labor organization's written request if the request identifies the names of the trainers and certifies that the trainers are qualified to provide the training.
- 15) Effective July 1, 2028, requires the course of training in the exercise of power to arrest and the appropriate use of force to be administered, tested, and certified by any organization that is *not* a licensee except under 18).
- 16) Effective July 1, 2028, allows a licensee to provide power to arrest and use of force training if expressly agreed to in a valid collective bargaining agreement that provides for hours of work, working conditions of employees, final and binding arbitration of disputes concerning any training provisions, premium wage rates for all overtime hours worked and regular hourly rate of pay of not less than 30 percent more than the state minimum wage.
- 17) Effective July 1, 2028, requires 100 percent of the training in exercise of power to arrest and the appropriate use of force to be in-person.
- 18) Requires the Bureau to develop emergency regulations establishing the criteria the Bureau to use in evaluating whether any organization is a qualifying organization to provide the de-escalation training required by this bill.
- 19) Requires BSIS to amend the Power to Arrest and Appropriate Use of Force Manual (Manual) to include material on de-escalation skills and techniques and to consult with approved organizations when otherwise developing, adopting, amending, or repealing the Manual.
- 20) Increases maximum fines that may be issued for various violations of the Private Security Services Act from \$2,500 to \$10,000 per violation.
- 21) Requires the Commission to issue a wage order specific to employees employed in the "property services industry," as defined, by June 30, 2028, and meet every two years, to evaluate the adequacy of the minimum wage.

Background

BSIS and Private Security Approved Training Providers. BSIS currently licenses approximately 3,000 PPOs and registers approximately 313,000 security guards who are employed by the PPOs. The Proprietary Security Services Act requires any security guard applicant to complete an eight-hour course in the exercise of Powers to Arrest and the Appropriate Use of Force as a requirement of registration. Within six months of registering, the security guard must complete an additional 32 hours of security guard skills training, for a total of 40 hours of training.

To provide training to security guard and security officer applicants and registrants, the organization or school must be approved by BSIS (BPC § 7583.6). To obtain approval, organizations and schools must submit a letter to the Bureau with a request to this effect and include the name of the organization or school; the location where the training will take place; the location where all training records will be maintained; and the names and resumes for all related instructors.

PPOs that provide the required security guard training to their own employees are not required to obtain approval. PPOs are required to maintain at the principal place of business or branch office a record for each of its registrant employees verifying completion of the Powers to Arrest and Appropriate Use of Force training for the duration of the registrant's employment. The Bureau may inspect the records of any PPO to ensure compliance.

Required training, including power to arrest, appropriate use of force, de-escalation, and explicit and implicit bias training. Applicants must complete the full eight-hour Power to Arrest and Appropriate Use of Force training to qualify for a license. AB 229 (Holden, Chapter 697, Statutes of 2021) increased training requirements for security guard applicants and mandated that 50 percent of the appropriate use of force training be provided through traditional classroom instruction. Extensive regulations implementing AB 229 were adopted by the Bureau, effective December 1, 2023.

Power to Arrest and Appropriate Use of Force are required to be taken within six months preceding application to the Bureau for registration as a security guard or officer. Power to Arrest includes the following subject matter: responsibilities and ethics in citizen arrest; relationship between a security guard and a peace officer in making an arrest; limitations on security guard power to arrest; restrictions on searches and seizures; criminal and civil liabilities, including personal liability and employer liability; trespass law; ethics and communications; emergency situation response, including response to medical emergencies; and security officer safety.

Appropriate Use of Force is required to include the following: legal standards for use of force; duty to intercede; the use of objectively reasonable force; supervisory responsibilities; use of force review and analysis; deescalation and interpersonal communication training, including tactical methods that use time, distance, cover, and concealment, to avoid escalating situations that lead to violence; implicit and explicit bias and cultural competency; skills, including deescalation techniques, to effectively, safely, and respectfully interact with people with disabilities or behavioral health issues; use of force scenario training, including simulations of low-frequency, high-risk situations and calls for service, shoot-or-don't-shoot situations, and real-time force option decision-making; mental health and policing, including bias and stigma; and active shooter situations.

Comments

Comprehensive sunset review oversight for the Bureau was just undertaken by the Legislature and raised the issue of training but stakeholders did not participate and did not ask that topics in this bill be considered. The Bureau underwent sunset review oversight in 2024, during which the Bureau proposed increasing the amount of training for security guards in its sunset report (see New Issue #7). In response, this Committee raised training as *Issue #4: Security Guard Training Requirements* in its background paper and asked the question, “Are current security guard training requirements rigorous enough to be effective in reducing inappropriate use of force and protecting the public from unnecessary violent incidents involving security guards?” A sunset hearing was held on March 11, 2024, and public comment allowed for stakeholders to provide input on these issues. Additionally, increased training was included in this Committee’s bill analysis for the sunset extension vehicle, SB 1454 (Ashby, Chapter 484, Statutes of 2024), as a potential reform for consideration (item d). Each of the three policy hearings for SB 1454 also allowed opportunity for public comment.

Absent stakeholder and Committee member interest in augmenting training requirements, and because major reforms were so recently adopted and implemented (AB 229 training was effective December 1, 2023), consideration was given to allow time for the new training requirements to take hold and demonstrate whether they are effective in improving public safety before making more changes. Therefore, this topic was not included in the final legislation, but because training was an issue in the Committee’s background paper, it will be revisited as a prior issue during the Bureau’s next sunset review in 2028.

Training authority and collective bargaining. This bill would tie eligibility for a licensee to offer training to its employees to whether it enters into collective

bargaining with its employees and dictates the stipulations that must be met. Placing this provision into the Bureau's practice acts does two things: 1) communicates that question of whether licensees provide adequate training is *not* the issue and 2) places enforcement of wages under the jurisdiction of the Bureau, an entity within the DCA, which has the role of ensuring California's minimum professional standards are met. Although enforcing wages falls within the Department of Industrial Relations, this bill would place a substantial workload on the Bureau, a special fund agency, which is 100 percent funded by licensee fees, to ensure licensees only provide training if they have a bargaining agreement in place.

Effective October 1, 2025, BSIS increased license fees to offset a structural imbalance. This bill would add workload and costs that do not fall within the Bureau's consumer protection mandate, which all BSIS licensees would be required to pay. Perhaps most significantly, the Bureau administers four additional practice acts – those that regulate alarm companies, locksmiths, repossessioners, and private investigators – and the funds for those practice acts were merged into one by Senate Bill 609 (Glazer, Chapter 377, Statutes of 2019) effective July 1, 2020. Consequently, implementing this bill would result in an unprecedented misuse of fees from licensees of six practice acts – four of which would otherwise not be impacted by this legislation.

Reverses course on recent policy regarding security guard training. SB 652 (Richardson, Chapter 94, Statutes of 2025) allows a Proprietary Security Services licensee to provide required training so long as the training is to their applicants for employment and direct employees. This bill would prohibit a licensee from training their employees. Additionally, SB 652 requires the power to arrest and appropriate use of force to be provided by a single provider. This amendment was enacted because some online providers were not interested in providing the required in-person segment of the required training. This bill would reverse the single provider policy by singling out the de-escalation portion of the training and allowing that portion to be provided by a separate provider and requiring training on workers' rights to be provided by yet another provider.

Additionally, AB 229 (Holden, Chapter 697, Statutes of 2021) makes significant changes to the private security training standards, including expanding Power to Arrest training to include Appropriate Use of Force topics, including de-escalation. AB 229 mandates that 50 percent of the appropriate use of force training be provided through traditional classroom instruction. This Committee recommended that consideration should be given to unintended consequences related to lack of access to training in certain regions throughout the state. Despite the policy

consideration behind allowing 50 percent of the training to be taken online, this bill would require 100 percent in class training.

Requiring duplicative or unnecessary training for PPS and PPO Officers places undue burdens on industry and registrants. This bill adds two hours to the required training for security officers as necessary skills training. However, the newly added hours of the “skills” training is to be dedicated to training employees on the rights contained in a notice that is required to be given to employees as required by Labor Code § 1553(a). To comply with this notification requirement today, an employer is only required to provide written notice to each current employee and newly hired employee of their rights in a manner the employer normally uses to communicate employment-related information. Adding two hours of training does not comply with the Labor Code provisions and imposes an undue burden on employers who have not been proven to be out of compliance with this law.

This bill requires each PPS officer to annually complete a minimum of eight hours of training dedicated to practicing de-escalation skills through in-person role-play and interactive training methods administered by an organization, or a person certified by an organization, that employs evidence-based, trauma-informed techniques and strategies in their training. This training is *in addition to training already required in regulation*. Bureau regulations require PPS officers to complete in-person de-escalation and interpersonal communication training, including tactical methods that use time, distance, cover, and concealment, to avoid escalating situations that lead to violence; and skills, including de-escalation techniques, to effectively, safely, and respectfully interact with people with disabilities or behavioral health issues. (16 California Code of Regulations § 643 Appendix)

For PPO security officers, this bill requires the Bureau to develop and establish implicit and explicit bias on racial profiling and the use of firearms in commercial, entertainment, government property, urban street, and residential settings, *in addition to any other required training*. Existing training includes implicit and explicit bias and cultural competency, making implicit an explicit bias training requirement duplicative. It is not clear why specialized training in urban street, residential settings, and government property is necessary as a matter of minimum standards for security guards statewide. Presumably, these are topics that are better suited to be determined on the employee’s individual job site.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: Yes

According to the Senate Committee on Appropriations, “The Bureau reports significant costs, ranging in the millions of dollars, for the expansion of its

responsibilities to develop standards for power to arrest and use of force curricula, and to ensure licensee compliance with CBAs (Private Security Services Fund). The Bureau's estimate accounts for additional personnel to handle various functions, such as reviewing applications, developing a standard guidebook, and approving schools and unlicensed persons seeking to provide training. The Bureau will also need staff resources to research and approve labor organizations as training providers within 30 days of an organization's request to provide employee rights training.

Unknown, potentially significant fiscal impact, likely ranging from the high hundreds of thousands to low millions of dollars for the Industrial Welfare Commission (Commission) to convene and issue a wage order for the property services industry. Staff notes that the Commission has remained non-operational since 2004. Although the Budget Act of 2023 initially allocated \$3 million to restart the Commission, this funding was subsequently repealed. To the extent the Commission requires resources comparable to those proposed in 2023, General Fund costs may range into the millions of dollars."

SUPPORT: (Verified 5/15/26)

SEIU California (Source)
California Federal of Labor Unions, AFL-CIO

OPPOSITION: (Verified 5/15/26)

Allied Universal
California Association of Licensed Security Agencies, Guards & Associates
California Chamber of Commerce
County of Kern
Securitas

ARGUMENTS IN SUPPORT: SEIU California writes in support, "Security officers deserve the tools to protect themselves and the communities they serve. SB 1203 takes an important step forward by strengthening training standards, requiring meaningful, in-person de-escalation training, ensuring workers are paid for required training, and improving oversight of wages and working conditions."

The California Federal of Labor Unions writes, "Security officers report that training does not adequately prepare officers to respond to various situations that are part of their job. The lack of appropriate training puts security officers in dangerous situations without preparation, increasing the likelihood of injury or harm. To make sure security officers are well-equipped and trained, SB 1203

increases the overall total number of hours required to be licensed as a security officer and ensures the delivery of additional interactive, in-person de-escalation training.”

ARGUMENTS IN OPPOSITION: Allied Universal writes, “California currently faces high rates of retail theft and property crime. By making lawful, regulated security services significantly more expensive, struggling retail operators may be forced to forgo professional security services entirely. Furthermore, the intense cost pressures will incentivize unethical, unregulated providers to skip licensing requirements and operate under alternative titles like "Event Staff" or "Ushers". This proliferation of underground, unregulated personnel will jeopardize public safety during a time of heightened risk. This is especially concerning given the additional security needs for upcoming global events in California, including the 2026 FIFA World Cup, Super Bowl LXI, and the LA 2028 Summer Olympics.”

The California Association of Licensed Security Agencies, Guards & Associates (CALSAGA) opposed this bill, writing, “SB 1203 will immediately make it more expensive and more difficult to employ security guards, resulting in an even greater shortage and delayed deployment of the exact individuals the bill seeks as necessary to provide protection to California citizens and visitors, especially in light of the upcoming world-wide events coming to California. SB 1203 will eliminate jobs making companies that seek to automate security functions more competitive thereby displacing the very people the bill intends to help.”

The California Chamber of Commerce writes, “We are concerned that labor organizations do not necessarily have the expertise to provide the kind of training required by this bill. However, in proposed Business and Professions Code section 7583.6(f)(4), the bureau would be required to approve a labor organization’s request to be a training provider based solely on self-certification. All the labor organization needs to do is provide the names of the trainers and self-certify they are qualified.”

The Kern County Board of Supervisors writes, “SB 1203 will reduce flexibility, strain public budgets, and may even discourage firms from bidding on public security contracts, particularly in rural counties like ours. These increasingly rigid and costly mandates risk making contracted security services financially impractical, effectively steering counties toward public-sector staffing models and weakening our ability to choose the most efficient and cost-effective method of providing security at county facilities.”

Securitas writes, “A top priority for Securitas is to keep our employees safe and out of harm’s way; SB 1203 proposes that officers become more exposed to potential

danger and violence. Security officers should not be confused with police or law enforcement officials. Security officers are not and cannot be guarantors of public safety. But that is the theme of SB 1203: more officer engagement and responsibility for safety.”

Prepared by: Yeaphana La Marr / B., P. & E.D. /
5/16/26 10:45:06

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