

City of Philadelphia



(Bill No. 250646-A)

AN ORDINANCE

Amending Title 9 of The Philadelphia Code, entitled “Regulation of Businesses, Trades and Profession,” by adding a new chapter entitled “Minimum Training For Security Officers.”

THE COUNCIL OF THE CITY OF PHILADELPHIA HEREBY ORDAINS:

Section 1. Title 9 of The Philadelphia Code is hereby amended to add the following Chapter 9-6700 as follows:

TITLE 9. REGULATION OF BUSINESSES, TRADES AND PROFESSIONS

CHAPTER 9-6700. MINIMUM TRAINING FOR SECURITY OFFICERS

§ 9-6701. Purpose.

The purpose of this Chapter is to enhance the safety requirements and standards currently operating in Philadelphia’s private security industry for the benefit of the public by ensuring that buildings are staffed with workers who receive the training necessary to protect its occupants and property.

A prohibition on an untrained security workforce and a comprehensive training program will ensure that security officers are equipped with a range of essential skills including, first aid, use of force and alternatives to force, deescalation techniques, community health and wellness, and coordination with police, fire, and emergency personnel during an emergency.

§ 9-6702. Definitions.

- (1) “Agency” means the Office of Worker Protections.
- (2) “Certification of Training” means written evidence of completion of a full period of training by an individual through a Recognized Security Training Program.
- (3) “Recognized Security Training Program” means a training program designated by the City to furnish the training curriculum required under this Chapter for security employees.
- (4) “Covered Property” means any property, parcel of land or other real estate where any Security Employee is employed, excluding any “Covered Establishment” as defined in subsection 9-3701(2).

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- (5) “Employ” is as defined in 43 P.S. § 333.103(f).
- (6) “Security Employer” means any body, individual, corporation, association, partnership, proprietorship, joint venture, fund, authority, business trust or other business entity, or any group of persons, or a successor thereof, that employs a Security Employee to provide Security Services at a Covered Property within the City of Philadelphia.
- (7) “Security Employee” means any person employed primarily to perform Security Services at a Covered Property as an employee, agency or subcontractor of a Security Employer; but does not include any City, County, State and Federal law enforcement officers; any law enforcement officer pursuant to 22 Pa. C.S.A. § 501; or any person licensed and trained in the use of firearms for private security purposes.
- (8) “Security Services” means any of the following: the protection of individuals and/or property from harm or unlawful or unauthorized activity; or deterrence, observation, detection and/or reporting of incidents in order to prevent or abate any harmful, unlawful or unauthorized activity.
- (9) “College and University” means an education institution providing higher education or specialized professional or vocational training.
- (10) “Hospital” means an institution providing inpatient medical treatment for sick or injured people; a hospital excludes a nursing facility, long-term care facility, rehabilitation center, or any clinic, pharmacy, or retail establishment that provides only routine or non-emergency care.
- (11) “Interactive Instruction” means any teaching method that actively engages learners through in-person or technology-based methods designed to foster deeper understanding and retention of material, such as: scenario-based exercises and branching logic; drag-and-drop or click-to-reveal activities; embedded knowledge checks and quizzes with immediate feedback; multimedia content that requires learner action to advance; controls that prevent fast-forwarding or skipping; automated session time-outs after a period of inactivity; and a Learning Management System (LMS)-based tracking of learner progress, quiz results, and course completion.

§ 9-6703. Training Requirement for Security Officers.

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- (1) No Security Employer shall employ a Security Employee at a Covered Property who has not received the minimum hours of training from a Recognized Security Training Program as set forth in this Section.
- (2) The required training shall include:
 - (a) a minimum of twelve (12) hours of training within ninety (90) days of hire for any Security Employee hired after the effective date of this Chapter, unless the Security Employee has been employed as a police officer in the three (3) years immediately preceding employment with the Security Employer and provides supporting documentation; and
 - (b) a minimum of eight (8) hours of training during the course of each twelve (12) month period following the training required under subsection (a) above.
- (3) The required training for Security Employees employed at a college, university or hospital shall include a minimum of twelve (12) additional hours of training within ninety (90) days of hire for any Security Employee hired after the effective date of this Chapter, unless the Security Employee has been employed as a police officer in the three (3) years immediately preceding employment with the Security Employer and provides supporting documentation.
- (4) Any Security Employee who has received at least twelve (12) hours of training prior to the effective date of this Chapter shall be deemed to satisfy subsection 9-6703(2)(a). Any Security Employee at a college, university or hospital who has received at least twenty-four (24) hours of training prior to the effective date of this Chapter shall be deemed to satisfy subsections 9-6703(2)(a) and 9-6703(3).

§ 9-6704. Designation of a Recognized Security Training Program.

- (1) Only training provided by a Recognized Security Training Program as designated by the Agency pursuant to this Section and any implementing regulations can satisfy the requirements of this Chapter.
- (2) The Agency shall develop a process for designating one or more security training program(s) that involves an application procedure, notice of requisite criteria and qualifications, guidance and other assistance as determined by the Agency.
- (3) The Agency shall only recognize a security training program that satisfies at least one of the following criteria:

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- (a) The Program must be owned or operated by an entity exempt from federal income taxation under section 501(c)(3), 501(c)(4) or 501(c)(5) of the Internal Revenue Code;
 - (b) The Program is a Security Employer as defined by this chapter;
- (4) The Agency shall only recognize a security training program that satisfies the following requirements:
- a. The Program must provide training exclusively through interactive instruction;
 - b. The Program must possess a minimum of five (5) years demonstrated experience providing training related to Security Services.
- (5) Each applicant shall provide the following:
- (a) The name, address, instructor certification (if any), and telephone number of a program director.
 - (b) A copy of its qualifications in a form prescribed by the Agency that shall include, but not be limited to:
 - (.1) The name of the Program;
 - (.2) The location(s) of the Program;
 - (.3) The names of the security instructor(s) and the type of instructor certification(s) held by such instructor;
 - (.4) The name(s) and address(es) of the owner(s) of the Program;
 - (.5) The educational experience and qualifications of the owners and director relevant to operating a security training program;
 - (.6) A chronological listing of curriculum topics, including the date, time and number of hours allotted to each topic;
 - (.7) An affirmation that the owners and director are not delinquent with respect to any City tax, fine, or fee; and
 - (.8) Proof of liability, workers' compensation, and other insurance of the type and in the amount determined by the Agency.

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- (c) Each Program applicant shall pay an application fee as determined by the Agency.
 - (d) The Agency may require any additional information deemed necessary for the purposes of recognizing a security training program.
 - (e) A Recognized Security Training Program may engage a third-party entity (“Specialized Training Program”) to deliver instruction on specialized training topics, provided that the specialized training topic is not part of the curriculum required under this chapter but is beneficial to the Security Employees and the Specialized Training Provider possesses demonstrated expertise and qualifications in the subject matter. The Security Training Program shall maintain records of all third-party training engagements, including the identity of the provider, the training delivered, and the Security Employees who participated.
 - (f) Each Recognized Security Training Program shall refile on an annual basis the Program’s updated qualifications as required by this Section.
- (6) Exclusive of any requirements set forth in Federal and State law and any site or contract specific training, the Agency shall require certain topics to be included in any initial and recurrent training program and shall only recognize a security training program that provides such training, which shall include, at minimum:
- (a) The appropriate use of force and alternatives to use of force;
 - (b) First aid, including training in administering cardiopulmonary resuscitation (CPR), use of automated external defibrillators (AED);
 - (c) Orientation to the security industry, including industry standards for reporting incidents and preparing written incident reports;
 - (d) Legal powers and limitations of a security officer;
 - (e) Effective communication and writing skills;
 - (f) Emergency response and communication procedures;
 - (g) Security officers’ workplace rights, including health and safety, anti-discrimination, and wage and hour laws.
- (7) The requirements in subsection 9-6704(6) are exclusive of additional topics to be included in the initial and recurring training curriculum required by applicable law and regulation for colleges, universities and hospitals.

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- (8) The Agency shall only recognize a security training program that employs instructors to provide the training required under this Chapter who possess the following qualifications:
- (a) Possess a high school diploma or its equivalent;
 - (b) Satisfy minimum qualification criteria relating to education, teaching experience, formal training, and security experience as determined by the Agency;
 - (c) Submit an application fee as determined by the Agency; and
 - (d) Submit any other additional information as Agency determines necessary to establish the competence of a security instructor or for any other pertinent purpose.
- 9) The Agency shall post publicly on a City website a list of all Recognized Security Training Programs, including the names of the program, address(es), and names of the program owners.

§ 9-6705. Issuance of Certification of Training.

Upon the satisfactory completion of any training required under this Chapter by a Security Employee, the Recognized Security Training Program shall issue such Security Employee a written Certification of Training in a form and manner as prescribed by the Agency. The Recognized Security Training Program shall also provide a true and accurate copy of each such Certification of Training to the Agency and the Security Employer of the Security Employee recipient of the certification.

§ 9-6706. Training Costs Paid by Security Employer.

- (1) No Security Employer may require any Security Employee to bear any costs associated with enrolling in or completing any training required under this Chapter, nor may the Security Employer charge any Security Employee a fee for the written Certification of Training. Security Employers must compensate Security Employees for the time spent attending a Recognized Security Training Program at the Security Employees' regular hourly rate of pay, as that term is defined in 34 Pa. Code § 231.43.
- (2) No Security Employer may require possession of a Certification of Training as a condition of hire for any candidate seeking employment as a Security Employee.

§ 9-6707. Reporting and Record Keeping.

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- (1) Beginning no later than the July first following the effective date of this Chapter, and every July first thereafter, Security Employers shall submit to the Agency an annual report regarding the number of Security Employees employed by the Security Employer who have completed the trainings required under this Chapter during the previous twelve month period. The Security Employer shall provide the Agency with data annually to verify compliance with such training requirements. Such data shall include:
 - (a) A list of all Security Employees employed at any Covered Property during that twelve-month reporting period and the date of hire of each Security Employee;
 - (b) A list of all Security Employees who have completed the trainings required by this Chapter;
 - (c) The identity of the Security Training Program at which the training was received; and
 - (d) The training curricula of the training provided at every Recognized Security Training Program identified above.
- (2) Security Employers shall commence keeping records documenting training received by Security Employees, including wage records and payments of fees and costs associated with such training, upon the effective date of this Chapter; shall retain such records for a period of three (3) years; and shall allow the Agency access to such records, with appropriate notice and at a mutually agreeable time, to monitor compliance with the requirements of this Chapter.

§ 9-6708. Notice and Posting.

Each Security Employer shall post and keep posted, in conspicuous and accessible places on the premises of the employer where notices to Security Employees and applicants for employment are customarily posted, or electronically in a manner accessible to all employees, a notice, to be prepared or approved by the Agency, setting forth the rights and privileges provided under this Chapter, stating that retaliation against employees for exercising such rights is prohibited, and providing such other information as the Agency may require.

§ 9-6709. Enforcement and Penalties.

- (1) Any Security Employer who violates any provision of this Section, or the regulations promulgated pursuant to this Section, shall be subject to a fine in the amount of five hundred dollars (\$500.00). The penalties imposed pursuant to this section shall be imposed on a per Security Employee and per instance basis for each violation. The

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- penalties prescribed by this Section shall be in addition to the penalties or remedies provided under other applicable laws and regulations.
- (2) Any person performing work as a Security Employee, or any representative of such person, including a collective bargaining representative, may file a complaint with the Agency to enforce the provisions of this Section.
 - (3) In addition to the City, any person performing work as a Security Employee who is aggrieved by a violation of this Chapter or any entity a member of which is aggrieved by a violation of this Chapter may bring a civil action in a court of competent jurisdiction against an employer to enforce the requirements of this Chapter. Nothing in this Chapter or its implementing regulations shall be construed to require a complaint to be filed with the Agency before bringing an action in court. Upon prevailing in an action brought pursuant to this Section, the aggrieved person shall be entitled to such legal or equitable relief as may be appropriate to remedy the violation. The aggrieved person shall be entitled to an award of reasonable attorney's fees and costs.
 - (4) The provisions of subsection 9-6709(3) shall not apply if a Security Employer has established, through collective bargaining with a duly authorized bargaining representative of a unit of Security Employees, provisions that provide comparable rights and remedies through a grievance and binding arbitration process.

§ 9-6710. License Revocation and Procurement.

- (1) The Agency is authorized to develop criteria and procedures for identifying Security Employers that violate the requirements and obligations of this Chapter with a frequency and severity that undermine the Chapter's purpose.
- (2) Upon notice from the Agency pursuant to such criteria and procedures under subsection (1), the Department of Licenses and Inspections shall have the authority to deny an application for or suspend or revoke a commercial activity license or any other license, in accordance with the procedures set forth in Section 9-103, of any Security Employer who meets the criteria established by the Agency under this Section.
- (3) A Security Employer that meets the criteria established by the Agency under this Section shall be provided written notice of the identified deficiencies and afforded a period of up to ninety (90) days to remedy deficiencies before being deemed ineligible for any future City contract.
- (4) All City contracts shall contain a provision that the contract shall be revocable at the City's option if the person entering into the contract with the City fails to meet the criteria established by the Agency under this Section, provided that the City shall

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first provide written notice of non-compliance and allow a period of up to ninety (90) days for the person to cure such non-compliance before any revocation is effective.

§ 9-6711. Exercise of Rights Protected; Retaliation Prohibited.

- (1) It shall be unlawful for a Security Employer or any other person to interfere with, restrain, or deny the exercise of, or the attempt to exercise, any right protected under this Chapter.
- (2) A Security Employer or any other person shall not take retaliatory personnel action or discriminate against a Security Employee because the employee has exercised rights protected under this Chapter. Such rights include but are not limited to the right to receive training free of charge pursuant to this Chapter; the right to pay at the Security Employee's regular rate of pay for time spent in the training; the right to receive a Certification of Training upon completion of the training program; the right to file a complaint or inform any person about any Security Employer's alleged violation of this Chapter; the right to cooperate with the Agency in its investigations of alleged violations of this Chapter; and the right to inform any person of his or her potential rights under this Chapter.
- (3) The protections of this Section shall apply to any person who mistakenly but in good faith alleges violations of this Chapter.
- (4) There shall be a rebuttable presumption of unlawful retaliation under this Section whenever an employer discharges, suspends, demotes, or takes other adverse action against a person within 90 days of when that person:
 - (a) files a complaint with the Agency or a court alleging a violation of any provision of this Chapter;
 - (b) informs any person about an employer's alleged violation of this Chapter;
 - (c) cooperates with the Agency or other persons in the investigation or prosecution of any alleged violation of this Chapter; or
 - (d) takes action to opposes any policy, practice, or act that is unlawful under this Chapter.
- (5) The provisions of Section 9-6711 shall not apply if a Security Employer has established, through collective bargaining with a duly authorized bargaining representative of a unit of Security Employees, provisions that provide comparable rights and remedies through a grievance and binding arbitration process.

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9-6712. Dispute Resolution.

(1) If a Security Training Program is offered by a Security Employer, the Security Employer must provide all Security Employees with access to a dispute resolution process to resolve complaints regarding compliance with the provisions of this ordinance. The Agency shall recognize a Security Training Program pursuant to Section 9-6704 only if the dispute resolution process includes the following provisions:

- (a) An employee who reasonably believes, in good faith, that the employer is not in compliance with the training standards set forth herein, may, in addition to filing a complaint as provided for in this Chapter, require the employer to provide a dispute resolution process with the employee, the employer and an independent party.
- (b) The dispute resolution process must include all remedies that would otherwise be available pursuant to this Chapter.
- (c) The dispute resolution process must be provided at no cost to the employee.
- (d) The Security Employer is prohibited from retaliating against any Employee for invoking the dispute resolution process.
- (e) The Security Employer must notify all employees of their rights under this Section and how to access the dispute resolution process, which must be posted in all work locations or posted electronically for all employees to access.
- (f) The dispute resolution process provides for binding appeal to a neutral third-party decision-maker.

(2) The provisions of subsections 9-6712(1) shall not apply if a Security Employer has established, through collective bargaining with a duly authorized bargaining representative of a unit of Security Employees, provisions that provide comparable rights and remedies through a grievance and binding arbitration process.

§ 9-6713. Regulations.

The Agency is authorized to coordinate implementation, administration, and enforcement of this Chapter and shall promulgate appropriate guidelines or regulations for such purposes, and for the purposes of establishing procedures for the filing, investigation, and resolution of complaints regarding alleged violations of this Chapter.

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§ 9-6714. Severability.

If any provision of this Chapter or application thereof to any person or circumstance is judged invalid, the invalidity shall not affect other provisions or applications of the Chapter which can be given effect without the invalid provision or application, and to this end the provisions of this Chapter are declared severable.

Section 2. This ordinance takes effect March 1, 2026.

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CERTIFICATION: This is a true and correct copy of the original Bill, Passed by the City Council on December 11, 2025. The Bill was Signed by the Mayor on January 20, 2026.

A handwritten signature in black ink, reading "Elizabeth McCollum". The signature is fluid and cursive, with the first name "Elizabeth" and last name "McCollum" clearly distinguishable.

Elizabeth McCollum
Chief Clerk of the City Council