

Application For Security Personnel Permit – Guidance Notes

Important notice

This set of Guidance Notes and the enclosed Application Form (PoL 966) are applicable to:-

- (1) New Application -- Applicant who has never been issued with a Security Personnel Permit.
- (2) Renewal Application -- Applicant who has to renew the Security Personnel Permit within 3 to 6 months before the permit is due to expire.
- (3) Re-apply Application -- Applicant who has been late to renew his permit or an ex-permit holder (i.e. his permit has been revoked or has expired.)
- (4) Amendment Application on Categories of Security Work -- Applicant who has to add or amend the Categories of Security Work in his existing permit.

Guidance Notes and Application Forms are issued free of charge to persons aged 18 years or over who wish to apply for a Security Personnel Permit. Please read the Guidance Notes and the attached 'Criteria for Issuing a Security Personnel Permit' carefully before completing the Application Form.

Applicants who require further information or Application Forms may contact the staff of the Police Licensing Office during office hours at the following address:-

<u>Address of Police Licensing Office</u>	<u>Operating Hours for Receiving Application</u>
12/F, Arsenal House	Monday to Friday
Police Headquarters	9:00 a.m. – 12:45 p.m.
No. 1 Arsenal Street	2:00 p.m. – 5:30 p.m.
Wan Chai, Hong Kong	(Closed on Saturdays, Sundays and Public Holidays)
<u>Enquiry Hotline</u>	<u>Operating Hours for Receiving Payments by Cash</u>
General Enquiry : 2860 2973	Monday to Friday
New Applications : 2860 6543	9:00 a.m. – 12:45 p.m.
Renewal Applications : 2860 6546	2:00 p.m. – 4:45 p.m.
Email : security-personnel-permit@police.gov.hk	(Closed on Saturdays, Sundays and Public Holidays)

Note: Police Licensing Office will suspend service when Black Rainstorm Signal or Typhoon Signal No. 8 or above is being hoisted.

Fee schedule

The current application fee for a Security Personnel Permit is \$50 and this fee is not refundable irrespective of the outcome of the application. If the application is successful, a permit fee of \$110 has to be paid for the issue of the Security Personnel Permit. For administrative convenience, a total of \$160 covering both application fee and permit fee will be collected when an applicant submits an application. If the application is unsuccessful, the permit fee of \$110 will be refunded to the applicant by cheque sent through the post.

The fees for a Security Personnel Permit is as follows:-

<u>Type of Applications</u>	<u>Fee (\$)</u>
1. New Application	160
2. Renewal	160
3. Re-apply Application (for applicant who has been late to renew his permit or with revoked/expired permit)	160
4. Amendment Application on Categories of Security Work	160
5. Amendment Application (change of personal particulars and other items)	155
6. Replacement (permit lost, stolen, damaged or destroyed)	95

Payment can be made by cash, crossed cheque, EPS or Octopus. After 4:45 p.m., our Office only accepts payments by cheques, EPS or Octopus; applicants will have to come on the following working day if they wish to pay in cash. As both our Office and Shroff do not provide Octopus Add-Value Service, applicants should ensure that their Octopus cards have sufficient funds to pay for the fees. Crossed cheques should be made payable to 'The Government of the Hong Kong Special Administrative Region'. In the case of online application, an applicant shall follow the instructions in the online application form to pay for the fees online. For details, please refer to 'Licensing E-service

(Security Personnel Permit) - Notes for Applicants' at <https://www.licensing.police.gov.hk/licensing>.

General Information

The Security and Guarding Services Industry Authority

The Security and Guarding Services Ordinance (hereafter referred to as 'the Ordinance') provides for a licensing scheme to regulate the security industry. It aims to promote and encourage higher standards in the industry, thereby aiding the fight against crime. Under the Ordinance, the Security and Guarding Service Industry Authority (hereafter referred to as 'the Authority') is established to specify the criteria and conditions for issuing permits to security personnel. For more details, please visit the website of the Authority at <http://www.sb.gov.hk/eng/links/sgsia/>.

Who should apply for a Security Personnel Permit

A person who does 'Security Work' for another person for reward is required to apply for a permit. Applications shall be made to the Commissioner of Police (hereafter referred to as 'the Commissioner'). The Commissioner will consider whether the applicant is a fit and proper person to do a specific type of security work.

An applicant with a criminal record will not be automatically debarred from being a fit and proper person. Such an application will be examined on a case by case basis. However, the applicant shall meet the criteria specified by the Authority under section 6(1)(b)(i) (see 'Annex A') and the Commissioner's Issuing Policy (see 'Annex B').

Definitions of 'Security Work' and 'Security Device'

'Security Work' means any of the following activities:-

- (a) guarding any property;
- (b) guarding any person or place for the purposes of preventing or detecting the occurrence of any offence;
- (c) installing, maintaining or repairing a security device*;
- (d) designing for any particular premises or place a system incorporating a security device.

* 'Security Device' means a device designed or adapted to be installed in any premises or place, except on or in a vehicle, for the purposes of detecting or recording –

- (a) the occurrence of any offence; or
- (b) the presence of an intruder or of an object that persons are, for reasons of security, not permitted to bring onto the premises or place or any other premises or place.

Please see 'Annex C' for detailed description of security work, major duties and responsibilities when completing Part 'C' of the Application Form.

How to submit an application

An applicant may send in his/her application through his/her employer, or choose to submit his/her application in person, by post or online. If an applicant submits his/her application in person, he/she shall bring along the original documents for verification. If an applicant submits his/her application by post, he/she may have to produce the originals of the supporting documents enclosed with his/her application for verification upon request. In the case of online application, an applicant shall follow the instructions in the online application form to upload the required documents. For details, please refer to 'Licensing E-service (Security Personnel Permit) - Notes for Applicants' at <https://www.licensing.police.gov.hk/licensing>.

Processing Time

The normal processing time for an application is six working days. The processing time may vary depending on the actual number of applications being received by the Police Licensing Office and on the completeness of information provided in the application. If insufficient information is supplied, the time required to process the application will be longer.

How to collect the permit

For all applications submitted through prospective/existing employers, the issued Security Personnel Permits will be sent to them for further distribution to individual applicants unless the applicants have already requested to collect the permits in person, or asked to mail the permits to their home addresses (provided that applicants have already submitted proof of their addresses).

Validity

A permit is normally valid for a period of five years, or such shorter period as the Commissioner may specify.

Renewal

Applications for renewal must be made **within 3 to 6 months before the Security Personnel Permit is due to expire.**

Conditions of a Security Personnel Permit

A security personnel permit holder must abide by the conditions subject to which a permit is issued as specified in Section 6(1)(b)(ii) of the Ordinance. A security personnel permit holder who does not carry out security work in accordance with the conditions imposed commits an offence and is liable for prosecution.

The permit holder must:-

- (a) carry this permit at all times when he/she is on duty;
- (b) produce this permit for inspection on demand by any police officer;
- (c) notify the Commissioner of Police in writing of:-
 - (i) any change of employer, unless he/she is employed by a licensed security company; and
 - (ii) any institution of criminal prosecution against him/her within 14 days after the relevant event has occurred;
- (d) only perform the type(s) of security work as specified in this permit;
- (e) not work over 372 hours per month and not normally work over 12 hours per day;
- (f) not act contrary to the requirements of his/her duties as a security personnel, such as sleeping on duty, or being negligent, or remiss in the execution of his/her duty; and
- (g) for performance of Category A and/or B security work, submit to the Licensing Office of the Hong Kong Police Force a medical certificate issued by a registered medical practitioner (see Note*) to certify that he/she is fit to undertake the duties required,
 - (i) if he/she was younger than 65 years of age at the time of application for the permit, when he/she reaches the age of 65 and thereafter every two years; or
 - (ii) if he/she was 65 years of age or above at the time of application for the permit, every two years after the permit was issued.

The medical certificate must reach the Licensing Office within three months immediately prior to the permit holder's 65th birthday or the end of the relevant two-year period as mentioned above. It must be issued by a registered medical practitioner within four months before he/she submits the certificate to the Licensing Office.

Note*

A registered medical practitioner means a person who is registered under the Medical Registration Ordinance (Cap 161).

Revocation of Permit

Where any holder of a permit is convicted of any offence specified in column 2 of Schedule 2 and the penalty imposed on him for that offence is the penalty specified in relation to that offence in column 3 of that Schedule, the Commissioner shall, by notice in writing to the holder of the permit, revoke the permit (See Appendix 1 of Annex B).

A list of invalid security personnel permits which have not been returned to the issuing authority is available for viewing from the website of the Security and Guarding Services Industry Authority at <http://www.sb.gov.hk/eng/links/sgsia/>. This list will be updated on a regular basis by the Police Licensing Office.

Offences

No individual shall do, agree to do, or hold himself out as doing or as available to do, security work for another person for reward without a valid permit. The offender is liable on conviction to a fine of \$10,000 and to imprisonment for three months.

Warning Against Bribery

Under the Prevention of Bribery Ordinance (Cap. 201), it is an offence for any person to solicit, offer or accept any advantage including money and gifts in connection with the possession of any Security Personnel Permit application.

Appeals Against Decisions

Any person aggrieved by a decision under section 14(5), 15(3), 16(4) or 18(4) of the Security and Guarding Services Ordinance, Cap. 460, Laws of Hong Kong, may appeal to the Administrative Appeals Board within 10 days after receiving notice of the decision. The Board is situated at Room 321, 3/F., East Wing, Central Government Offices, 2 Tim Mei Avenue, Tamar, Hong Kong, or you may call 2810 2092 for enquiries. Appellants will be required to appear before the Administrative Appeals Board for the hearing of the appeal.

Please ensure that you have enclosed the following: -

1. An application form shall be duly completed and signed.
2. A photostat copy of the applicant's **Hong Kong identity card**.
3. A **recent photograph** of full face without a hat of size not smaller than **50mm x 40mm**, which must be affixed to Part G of the Application Form and endorsed by a company chop if you have a prospective/existing employer.
4. For Category A and/or B security work, if the applicant is 65 years of age or above, please attach the original of a **medical certificate** issued by a registered medical practitioner (see Note 2). A medical certificate is to be submitted once every two years afterwards. For Category A, B and/or C security work, if the applicant is aged below 65, a medical certificate issued by a registered medical practitioner (see Note 2) may be required if the Commissioner of Police reasonably considers necessary. A standard medical certificate report form is available at the Licensing Office.
5. For Category D security work, the applicant should have received appropriate training or can demonstrate the capability and proficiency in the skills/technique required in performing his/her job. (The applicant should attach copies of **certificate of relevant technical training**, or **records of employment** showing his/her past experience in this category of security work.). For new application, the applicant must produce a **letter of employment from the prospective employer**.
6. A **crossed cheque for payment** of the application fee (\$50) and the issue of a Security Personnel Permit (\$110) amounting to **\$160**. The cheque should be made payable to **'The Government of the Hong Kong Special Administrative Region'**.
7. A photostat copy of both sides of the applicant's **current/expired Security Personnel Permit** for renewal/re-apply application.
8. Supporting documents for Amendment Applications on Category of Security Work.
9. A photostat copy of **the applicant's residential address** if the applicant requests the permit to mail to his/her residential address. e.g. letters from government departments, bills from utilities companies or letters from banks.

Proficiency in Security Work (for Categories A, B and C only)

10. A photostat copy of the documents to certify that the applicant has passed a **trade test** recognized and announced by the Authority within one year before submitting the application; or
11. A photostat copy of the documents to certify that the applicant has at least **three years** of cumulative working experience in performing security work lawfully in Hong Kong over the past five years immediately before submitting the application; or
12. A photostat copy of the documents to certify that the applicant has at least **one year** of cumulative working experience in performing security work lawfully in Hong Kong over the past 2 years immediately before submitting the application; or
13. A photostat copy of the documents to certify that the applicant has sat and passed a course-end examination, within 1 year before submitting the application, of a security training course that has met the requirements of a scheme for quality assurance endorsed and announced by the Authority.
14. The Police Licensing Office will accept application from an applicant who can produce documentary proof of his registration/enrollment in a trade test recognized and announced by the Authority, or of a security training course that has met the requirements of a scheme for quality assurance endorsed and announced by the Authority. An SPP will only be issued to the applicant who is fit and proper and is able to submit proof of his passage of the trade test or the security training course.
15. An applicant may produce salary slips, documents of Mandatory Provident Fund (MPF), reference letters or employment certificates issued by his/her employers as the documentary proofs of his/her working experience.

Length of Residency in Hong Kong

16. A photostat copy of the applicant's **One-Way Exit Permit/Document of Identity for Visa Purpose** is required if the applicant is a **Chinese citizen** who has **less than seven years** of residency in Hong Kong (except permanent residents in Hong Kong).
17. For the purpose of checking the employment condition during the stay in Hong Kong, a photostat copy of the **applicant's passport (non-Chinese citizens)** is required for non-permanent residents in Hong Kong.
18. A **certificate of no criminal record from the country of origin** is required for all applicants if the length of residency in Hong Kong is **less than three years**.

Annex A

SECURITY AND GUARDING SERVICES ORDINANCE (Chapter 460) (Notice under section 6(1)(b)(i))

CRITERIA FOR ISSUING A SECURITY PERSONNEL PERMIT

Take notice that, pursuant to section 6(1)(b)(i) of the Security and Guarding Services Ordinance, the Security and Guarding Services Industry Authority (hereafter referred to as 'the Authority') hereby specifies the following revised criteria (hereafter referred to as 'the revised criteria'), which replace the ones published in G.N. 9730 on 18 December 2015 with effect from the day on which the notice is published in the Gazette, for issuing a permit under the said Ordinance. The criteria specified below in relation to a particular type of security work must be satisfied by a person before the Commissioner of Police may issue to him a permit under the said Ordinance to do that type of security work.

(A) Guarding work restricted to a 'single private residential building', the performance of which does not require the carrying of arms and ammunition (See Note 1)

- (a) *Age* The applicant must be 18 years of age or above on the date of application.
- (b) *Fitness* The applicant must be physically fit to perform the job. If the applicant is 65 years of age or above, he/she must produce a medical certificate issued by a registered medical practitioner (see Note 2) to certify that he/she is fit to undertake the duties required. If the applicant is aged below 65, a medical certificate issued by a registered medical practitioner (see Note 2) may be required if the Commissioner of Police reasonably considers necessary.
- (c) *Good Character* The applicant must be of good character having regard to his employment history, criminal records (see Note 3) and other relevant factors.
- (d) *Proficiency in Security Work* The applicant must satisfy one of the followings: –
- He/She must have sat and passed a trade test recognized by the Authority and announced in a manner that it thinks fit, within 1 year before submitting his/her application; or
 - He/She must have not less than 3 years of cumulative working experience in performing security work lawfully in Hong Kong over the past 5 years immediately before submitting his/her application (Note 4); or
 - He/She must have not less than 1 year of cumulative working experience in performing security work lawfully in Hong Kong over the past 2 years immediately before submitting his/her application (Note 4); or
 - He/She must have sat and passed a course-end examination, within 1 year before submitting his/her application, of a security training course that has met the requirements of a scheme for quality assurance that has been endorsed by the Authority and announced in a manner that it thinks fit.

(B) Guarding work in respect of any persons, premises or properties, the performance of which does not require the carrying of arms and ammunition and which does not fall within Category A

- (a) *Age* The applicant must be 18 years of age or above. The upper age limit for engaging in this type of security work is 70 years.
- (b) *Fitness* The applicant must be physically fit to perform the job. If the applicant is 65 years of age or above, he/she must produce a medical certificate issued by a registered medical practitioner (see Note 2) to certify that he/she is fit to undertake the duties required. If the applicant is aged below 65, a medical certificate issued by a registered medical practitioner (see Note 2) may be required if the Commissioner of Police reasonably considers necessary.
- (c) *Good Character* The applicant must be of good character having regard to his employment history, criminal records (see Note 3) and other relevant factors.
- (d) *Proficiency in Security Work* The applicant must satisfy one of the followings: –
- He/She must have sat and passed a trade test recognized by the Authority and announced in a manner that it thinks fit, within 1 year before submitting his/her application; or
 - He/She must have not less than 3 years of cumulative working experience in performing security work lawfully in Hong Kong over the past 5 years immediately before submitting his/her application (Note 4); or
 - He/She must have not less than 1 year of cumulative working experience in performing security work lawfully in Hong Kong over the past 2 years immediately before submitting his/her application (Note 4); or
 - He/She must have sat and passed a course-end examination, within 1 year before submitting his/her application, of a security training course that has met the requirements of a scheme for quality assurance that has been endorsed by the Authority and announced in a manner that it thinks fit.

(C) Guarding work, the performance of which requires the carrying of arms and ammunition

- (a) *Age* The applicant must be 18 years of age or above. The upper age limit for engaging in this type of security work is 60 years.
- (b) *Fitness* The applicant must be physically fit to perform the job. A medical certificate (see Note 2) issued by a registered medical practitioner may be required if the Commissioner of Police reasonably considers necessary.
- (c) *Good Character* The applicant must be of good character having regard to his employment history, criminal records (see Note 3) and other relevant factors.
- (d) *Proficiency in Security Work* The applicant must satisfy one of the followings: –
- He/She must have sat and passed a trade test recognized by the Authority and announced in a manner that it thinks fit, within 1 year before submitting his/her application; or
 - He/She must have not less than 3 years of cumulative working experience in performing security work lawfully in Hong Kong over the past 5 years immediately before submitting his/her application (Note 4); or
 - He/She must have not less than 1 year of cumulative working experience in performing security work lawfully in Hong Kong over the past 2 years immediately before submitting his/her application (Note 4); or
 - He/She must have sat and passed a course-end examination, within 1 year before submitting his/her application, of a security training course that has met the requirements of a scheme for quality assurance that has been endorsed by the Authority and announced in a manner that it thinks fit.
- (e) *Arms Licence* The applicant must possess a valid arms licence for the arms used on duty issued by the Commissioner of Police.
- #### **(D) Installation, maintenance and/or repairing of a security device and/or designing (for any particular premises or place) a system incorporating a security device**
- (a) *Age* The applicant must be 18 years of age or above.
- (b) *Proficiency* The applicant shall have received appropriate training or can demonstrate the capability and proficiency (see Note 5) in the skills/technique required in performing his/her job.
- (c) *Good Character* The applicant must be of good character having regard to his employment history, criminal records (see Note 3) and other relevant factors.
- (d) *Certification of Employment by Prospective Employer* On his/her first application for a permit, the applicant must produce a letter of employment from the prospective employer.

Notes

- A single private residential building means an independent* structure:-
 - covered by a roof and enclosed by walls extending from the foundation to the roof, and
 - used substantially for private residential purpose; and
 - with only one main access point*.

* A building is considered to be independent from another if on most of the floors, one cannot get access to the quarters on the same floor in the other building without going to an upper/lower floor, roof or the street.

+ 'Main access point' means the entrance gate or lift lobby or staircase commonly used by residents to gain access to their flats. This excludes emergency and fire exit.
- A registered medical practitioner means a person who is registered under the Medical Registration Ordinance (Cap. 161). A standard medical certificate form is available from the Licensing Office of the Hong Kong Police Force. The medical certificate must be issued by a registered medical practitioner within four months before the applicant submits the application.
- The Commissioner of Police shall consider the nature of the criminal offence committed by the applicant and may refer the application to the Security and Guarding Services Industry Authority for decision under section 14(5)(b) of the Security and Guarding Services Ordinance. No person will normally be granted a permit if he/she:-
 - was convicted of any offence specified in column 2 of Schedule 2 to the Security and Guarding Services Ordinance and the penalty imposed on him/her for that offence is the corresponding penalty specified in column 3 of that Schedule, within 5 years before submitting his/her application; or
 - is currently on probation, bound over, remission or suspended sentence; or
 - is within 3 years of release from a term of imprisonment; or
 - was convicted of 3 or more offences within 5 years before submitting his/her application. Offences involving fixed penalty tickets, traffic summons, illegal hawking, article obstruction, littering, jaywalking and failing to answer Police or Court bail are considered minor and will be excluded.
- Working experience may be substantiated by relevant documentary evidence, certification provided by employers or a statutory declaration of experience by the applicant.
- The applicant shall attach copies of certificate of relevant technical training, or record of employment showing his/her experience in this type of security work.

Jane Curzon LO, *Chairman, for and on behalf of the Security and Guarding Services Industry Authority*

APPLICATION FOR SECURITY PERSONNEL PERMITTHE POLICY OF THE COMMISSIONER OF POLICE
IN ISSUING SECURITY PERSONNEL PERMITS
TO PERSONS WITH CRIMINAL CONVICTIONS

Under section 14(5) of the Security and Guarding Services Ordinance, Cap. 460, Laws of Hong Kong, the Commissioner of Police ('the Commissioner') has to be satisfied that an applicant is a fit and proper person to do security work before he can issue a security personnel permit ('permit') to that applicant. It is the policy of the Commissioner, in determining whether the applicant is a fit and proper person, to take into consideration the following matters if the applicant has record of criminal conviction(s):-

- (a) the time-gap between the conviction(s) and the date of application. A conviction which is 5 years old may be disregarded;
- (b) the nature of the offence(s);
- (c) the sentence(s) passed by the court;
- (d) age of the applicant at the time of the conviction(s); and
- (e) any repetition of commission of the same or similar offences.

Should the applicant, by virtue of his/her previous criminal record(s), does not appear to the Commissioner to be a fit and proper person to hold a permit, the Commissioner will inform the applicant accordingly and at the same time invite him/her to submit written representation(s).

With regard to the time-gap between the conviction(s) and the date of application, the Commissioner will normally not attach much weight to a conviction which is of or more than 5 years old from the date of application unless the conviction is of a serious nature.

In addition, pursuant to the criteria specified by the Security and Guarding Services Industry Authority, no person will normally be granted a permit if he/she:-

- (a) was convicted of any offence specified in column 2 of Schedule 2 (at 'Appendix 1') to the Security and Guarding Services Ordinance and the penalty imposed on him/her for that offence is the corresponding penalty specified in column 3 of that Schedule within 5 years before submitting his/her application; or
- (b) is currently on probation, bound over, remission or suspended sentence; or
- (c) is within 3 years of release from a term of imprisonment; or
- (d) was convicted of 3 or more offences within 5 years before submitting his/her application. Offences involving fixed penalty tickets, traffic summons, illegal hawking, article obstruction, littering, jaywalking and failing to answer Police or Court bail are considered minor and will be excluded.

**Licensing Office
Hong Kong Police Force**

Dated this 1st April 2003

Appendix 1 of Annex BSecurity and Guarding Services Ordinance (Chapter 460)
Laws of Hong Kong

Schedule: 2 Heading: Offences for which permit to be revoked

<u>Item</u>	<u>Offence</u>	<u>Penalty</u>
1.	Any offence against the Societies Ordinance (Cap. 151) or the Dangerous Drugs Ordinance (Cap. 134)	Any penalty
2.	Any offence involving fraud or dishonesty	Any penalty
3.	Any offence involving violence	Imprisonment
4.	Any offence against Part XII of the Crimes Ordinance (Cap. 200)	Any penalty

DESCRIPTION OF SECURITY WORK
MAJOR DUTIES AND RESPONSIBILITIES

Category A - Guarding work restricted to a 'single private residential building', the performance of which does not require the carrying of arms and ammunition. (See Note 1)

- (a) Prevent unauthorized access to the properties.
- (b) Report and record incidents verbally or in writing.
- (c) Be alert at all times and able to identify risks.
- (d) Take appropriate actions in emergencies, e.g. fire, burglary, typhoon, landslide and other disasters, operate fire services installations and other emergency equipment when required, inform residents and report to the police.
- (e) Take necessary action to ensure that smoke stop doors are closed and fire escapes are free from obstruction, etc.

Category B - Guarding work in respect of any persons, premises or properties, the performance of which does not require the carrying of arms and ammunition and which does not fall within Category A

Basically the same as Category A but more demanding and with greater responsibilities as the security personnel may be required to guard all types of premises (including commercial, industrial, residential, shopping centres, hotels, etc.) and/or buildings with heavy traffic of people, large number of units and access points. Moreover, Category B permit holders should patrol the premises and properties.

Category C - Guarding work, the performance of which requires the carrying of arms and ammunition

- (a) Collect and deliver valuable properties or cash in transit.
- (b) Be able to respond in the event of emergencies.
- (c) Be able to maintain a secure and safe environment of transit operations.
- (d) Patrol and static guarding in banks, jewellery shops, etc.
- (e) Be alert at all times and able to identify risks.

Category D - Installation, maintenance and / or repairing of a security device and / or designing (for any particular premises or place) a system incorporating a security device.

Note (1) A single private residential building means an independent* structure:-

- (a) covered by a roof and enclosed by walls extending from the foundation to the roof, and
- (b) used substantially for private residential purpose; and
- (c) with only one main access point*.

* A building is considered to be independent from another if on most of the floors, one cannot get access to the quarters on the same floor in the other building without going to an upper/lower floor, roof or the street.

+ 'Main access point' means the entrance gate or life lobby or staircase commonly used by residents to gain access to their flats. This excludes emergency and fire exit.