

Victoria's Private Security Industry

Issues paper for consultation Police Policy and Strategy

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1. INTRODUCTION

1.1. The Victorian Government is reviewing the Private Security Industry

- 1.1.1 On 23 October 2018 at a meeting of the (then named) United Voice Delegates and Leaders Conference, the Premier, the Honourable Daniel Andrews MP, announced an election commitment to review the Private Security Industry (the Industry) during its next term. The commitment was made with a view to raising industry standards, improving safety of employees and the community, and ensuring workers are paid properly and fairly.
- 1.1.2 The Private Security Industry Review (the Review) includes a full and frank examination of the current licensing and regulatory framework to determine whether any legislative or practice reforms are appropriate to improve the safety and security of all Victorians. It is considering:
- a) the current operation of the *Private Security Act 2004* ('the Act') and the Private Security Regulations 2016 (the Regulations)
 - b) whether probity and professional development requirements meet expectations
 - c) whether training and competency requirements meet expectations and best practice
 - d) the enforcement and compliance arrangements under the Act, including the interface with Victoria Police (the Regulator) operations
 - e) employment frameworks and practices, and the application of workplace laws and instruments to the industry
 - f) whether any other Australian jurisdictions offer positive examples for reforming the industry.
- 1.1.3 Options to meet these aims may include; legislative amendment, education and organisational change, as well as exploring partnerships with other agencies to boost compliance, and improve fair work practices.
- 1.1.4 It is expected that the Review will identify matters which are out of scope, such as, issues falling under the responsibility of Commonwealth agencies.

1.2. Calls to reform the Private Security Industry

- 1.2.1 The Review responds to submissions from the Union (now called the United Workers Union) and the peak national body for security professionals, the Australian Security Industry Association Limited (ASIAL) for a review of legislation, with a view to creating a safe and level playing field for security providers.
- 1.2.2 The Review also responds to calls from the Industry, and other stakeholders, to address issues (covered in more detail in this paper) that have arisen because of social and technological advances, as well as the growth of the Industry and accumulated experience of the Industry in practice.
- 1.2.3 For example, Stakeholders continue to observe issues with 'sham contracting' as a means of reducing an employee's overtime, penalty rates and leave entitlements, and probity requirements, specifically related to organised crime infiltration, or unsuitable persons being involved in the Industry.

- 1.2.4 Issues of misconduct have also damaged the reputation of the Industry, raising questions on the adequacy of Industry training and competency. In July 2011 Mr Anthony Dunning tragically died after having a heart attack while he was being held and restrained by security guards in a prone position on the floor (positional asphyxia) at Crown Casino.
- 1.2.5 Misconduct damages the reputation of the Industry and public confidence in the provision of services. The Industry's professional standing is maintained through strengthening standards and improving best practice in the delivery of services.
- 1.2.6 Unsafe working environments and/or insufficient training and support (including inadequate equipment) have also been identified as concerns for workers within the Industry. Some Industry workers have suffered detrimental impacts to their health and wellbeing as a result of workplace incidents (such as physical or verbal abuse). In some cases, these workers have not been able to return to work due to ongoing mental health issues such as post-traumatic stress disorder.

1.3. Previous Industry reviews and reforms– more change is needed

- 1.3.1 Victoria's Industry legislation was introduced in the context of continuous Industry growth and concern over unsuitable persons providing security services. Such concerns were heightened following the death of cricket coach David Hookes who, in 2004 was killed during an interaction with a crowd control officer outside a club (a court ruled that the crowd controller was acting in self-defence).
- 1.3.2 The Act and complementary regulations (which first came into effect in July 2005) applied new and expanded regulatory requirements for the Industry including:
 - a) extending licensing to include bodyguards
 - b) introducing registration requirements for the technical sector
 - c) introducing competency standards (training) for all licensed activities.
- 1.3.3 It has been 10 years since the Act was last reviewed. In March 2009 PricewaterhouseCoopers (PwC) on behalf of the Department of Justice and Community Safety (the department) delivered a statutory review of the Act (2009 PwC Review). The 2009 PwC Review sought to determine whether the policy objectives of the Act remained valid and whether the provisions in the Act were still appropriate for securing those objectives. It found that, overall, the provisions of the Act and the 2005 Regulations were appropriate and promoted public peace and ensured security of property.
- 1.3.4 The 2009 PwC Review made 34 recommendations focused on reducing the regulatory burden on the Industry and providing a more targeted regulatory effort. There were few recommendations for legislative change. Most notably the 2009 PwC Review recommended increasing penalties for non-compliance (recommendation 8) and removing the registration requirement for all current registered sectors (recommendation 13). Many other recommendations focused on the need for the Government and the Regulator to work closely with Industry participants to increase awareness of requirements under the Act. The impact of the 2009 PwC Review on the industry regulatory framework has been minimal.

- 1.3.5 In July 2008 the Council of Australian Governments (COAG) agreed to implement a nationally consistent approach to the Industry to improve the sector. COAG agreed to:
- a) establish national minimum standards for protective security personnel to improve their competency and skills, and to improve legitimate mobility of licences across jurisdictions
 - b) explore national minimum regulatory standards for the technical sector as well as improving the mobility of business licences
 - c) explore a national registration or licensing system for the private security industry.
- 1.3.6 Competency standards for the protective security sector are largely harmonised across states, however, there is greater discrepancy in how the technical sector is regulated. A national registration or licensing system has not materialised and is unlikely to be pursued by states and territories. In 2013 COAG proposed the implementation of a National Occupation Licensing System following extensive state-based consultation. Most jurisdictions identified concerns with the model and potential costs of moving to one national regulator. However, this has not stopped states and territories working together to harmonise standards across the Industry, where possible.
- 1.3.7 Changes to the Act came into force in 2011 to give effect to the COAG decision to enhance probity in the protective security sector. Changes included: clarifying the scope of licensing activities; prescribing additional offences and thresholds that result in mandatory disqualification of a licence; making fingerprinting of licence applicants mandatory for identity verification; and allowing the Regulator to refuse or cancel a licence if the applicant or holder is the subject of criminal intelligence that renders their presence in the industry to be detrimental to public safety. These additional requirements were positive and strengthen the industry's ability to protect itself against criminal activity.
- 1.3.8 Between 2011 and 2015 several coronial inquiries across jurisdictions made adverse findings with respect to the conduct of licensed security officers and the adequacy of their training. In 2016 the Australian Skills Quality Authority (ASQA) reviewed training in security programs (the ASQA Review). An audit of 67 Registered Training Organisations (RTOs) that offered security training found that more than 80 per cent were non-compliant with at least one of the national training standards. One of the key findings of the ASQA Review was that despite having national qualifications for security roles, the regulation of security licensing is state and territory based, making it more difficult to ensure consistency and alignment between qualifications and licence requirements. The ASQA Review also found that lack of clarity in the training packages pose fundamental challenges in ensuring high-quality security personnel are equipped to safely carry out their duties.
- 1.3.9 In 2016 the Regulations were introduced following a public consultation period on a Regulatory Impact Assessment and exposure draft Regulations. After considering public submissions, the Victorian Government decided to make only minor and technical changes to the original 2005 Regulations.
- 1.3.10 Now in 2020, despite previous efforts to reform the regulatory framework, Stakeholders consider that more can be done to improve the industry.

2. Purpose and scope

- 2.1.1 The purpose of this paper is to set out the issues in the Industry in Victoria so that interested persons and organisations can provide feedback to Government on their perspectives and convey their views about reform to any, or all, parts of the Industry.
- 2.1.2 The department is seeking frank feedback, including personal experiences that highlight concerns or issues, in order to generate a range of options for reform that will be presented to the Government for consideration.

3. How to make a submission

- 3.1.1 Interested persons and organisations are encouraged to make a submission on all or any of the parts of this discussion paper.
- 3.1.2 The department is interested in responses to the questions posed throughout this paper, but submissions need not answer these questions and may address other related issues within the scope of the Review.

Submissions can be made in writing through the Engage Victoria website at engage.vic.gov.au/private-security-review-2020.

or

Post: Private Security Industry Review
Police Policy and Strategy
Police and Community Safety
Department of Justice and Community Safety
(level 21, 121 Exhibition Street)
GPO Box 4356
MELBOURNE VIC 3000

or

You may also wish to submit your views to the project team via email privatesecurity@justice.vic.gov.au.

Submissions in languages other than English are welcome and the department will, wherever possible, arrange for a translation.

Submissions must be received by **Monday 27 July 2020**.

For further information regarding this discussion paper, please contact the project team at the department via email privatesecurity@justice.vic.gov.au.

Please note each submission will be considered on a case-by-case basis.

4. Collection notice

- 4.1.1 You do not have to provide personal information to make a submission. Providing your personal information is optional. The department may use your personal information (if provided) to contact you if we need to clarify any part of your submission.
- 4.1.2 The department intends to publish all submissions on the Engage Victoria website. Submissions will be used to inform recommendations in the final report to Government and your submission may be quoted. The final report may be publicly released. Submissions may also be used in communications about the final report, for example through media releases. When submitting you can choose for your submission to be:
 - a) published and potentially quoted in the final report
 - b) published but identifying information removed and not quoted
 - c) kept confidential and neither published nor quoted.
- 4.1.3 We may redact or not publish information we consider offensive, defamatory, or out of scope.
- 4.1.4 If you prefer, you can post your submission directly to the department. Please email it to privatesecurity@justice.vic.gov.au. If you do, your submission will be confidential and neither published on Engage Victoria nor quoted in the final report (unless you give us permission to do so in your email).
- 4.1.5 Submissions may also be provided by the department to Industrial Relations Victoria (co-authors of the discussion paper), the Minister for Police and Emergency Services, and the Treasurer.
- 4.1.6 Please do not identify third parties in your submission. For example, do not provide the name and/or contact details of a supervisor, training instructor etc.
- 4.1.7 For further information on how your personal information is handled please see the [Engage Victoria](#) and the department's [Information Privacy Policy](#).

5. Key bodies and agencies

- 5.1.1 Due to the diversity and size of the Industry in general, the interests of the Industry are represented by peak bodies, and the rights of workers are represented by the United Workers Union (the Union).
- 5.1.2 The Union represents Industry workers, with a focus on remuneration, hiring practices, job stability and entitlements such as leave and superannuation.
- 5.1.3 The Victorian Security Industry Advisory Committee (VSIAC) is a group of stakeholders representing Industry organisations and associations. VSIAC makes recommendations to Government on changes to the regulatory scheme, as well as advising the Minister for Police and Emergency Services on emerging issues. A sub-committee from VSIAC has been formed to work on this Review. Membership of both the Committee and sub-committee is at Appendix A.
- 5.1.4 The other agencies with a significant role to play in the Industry and in this review, are the Licensing and Regulation Division of Victoria Police (LRD), Industrial Relations Victoria (which sits within the Department of Premier and Cabinet), and the Labour Hire Authority. The Labour Hire Authority was established in late 2019 to monitor, investigate and take action in relation to breaches of labour hire laws.
- 5.1.5 The peak national Industry body is ASIAL, which has a strong presence in Victoria.

6. Definitions

- 6.1.1 This paper refers to several terms that may not be familiar to all readers. These terms are defined below. Except as otherwise indicated, they are the same as the definitions in the Act.
 - a) *Clients and host agencies*: these terms are not defined in the Act, but in practice refers to businesses, organisations or individuals who hire a company or individual to fulfil a private security role of any kind;
 - b) *Cash in Transit security personnel*: the Act defines people who transport cash as security guards who collect, transfer or deliver cash or other valuables while armed with a firearm. It is noted that numerous individuals, including company employees and couriers are also tasked with transferring cash or other valuables. However, unless they are licensed and armed, they are not acting in the capacity of a Cash in Transit guard as defined by the Act;
 - c) *Cyber security*: is not defined in the Act; however, a general definition is that it is a sector in the Industry which focuses on protecting computer systems from unauthorised access or being otherwise damaged or made inaccessible;
 - d) *Technical Sector*: while not explicitly defined in the Act, this is the general term used to describe security professionals who are defined in paragraph (b) of the definition of security guard, or someone carrying out a Class B security activity under the Act. In brief, it covers the protecting, guarding or watching of any property by directly or remotely monitoring that property by utilising closed circuit television, a closed monitoring system, radio or other similar device. It also covers security professionals who advise on the scope and installation of security equipment (and its maintenance). (It is noted that a Control Room Operator is classified as a sub-activity of a Security Guard for licensing purposes);

- e) *Fit and Proper Person*: one of the tests used by LRD to determine if someone is eligible to hold a security licence. The term is not defined in legislation, but it has been covered extensively in case law and will be set out in detail in the licensing section of this paper (section [11.3 refers](#));
- f) *Induction*: for the purposes of this paper, induction to a site is the introduction of newly hired protective security personnel to the premises and/or people they are tasked with protecting. It includes introduction to entries and exits, security risk points, communication and escalation procedures, and the client's expectations and oversight of the protective security personnel;
- g) *Private Security Licence*: either a private security business licence or a private security individual operator licence issued by the Chief Commissioner of Police;
- h) *Protective Security Sector*: a term not defined in the Act, but which includes all the activities listed under the umbrella term 'private security' in the Act. That is: investigators, bodyguards, crowd controllers, security guards, and private security trainers;
- i) *Security risk assessments*: this term is not defined in the Act, but it refers to an analysis of the risks posed to businesses or individuals. Clients may perform their own risk assessments or may employ a professional for the Private Security Sector to assess risk and suggest ways to manage identified risks.

7. Private Security Industry

- 7.1.1 The Industry can be broadly divided into two main sectors: the Protective Security Sector, and the Technical Sector. The Protective Security Sector encompasses personnel engaging in a range of work, including:
- a) Crowd controllers, who work in a variety of contexts, including maintaining order at music festivals, bars and sporting events. They do this through frontline activities, screening entry into premises, monitoring or controlling behaviour, and removing any person from the premises;
 - b) Investigators, who may be hired by a company to investigate fraud or theft or to assist in finding information relevant to legal action. They may also be hired by individuals to investigate matters of a more personal nature, such as finding out about the activities of the client's family or associates;
 - c) Cash in Transit guards (please note definition above), who must be armed and licensed to transport cash and other valuables. Their work ranges from work for banks, to collecting cash from MYKI machines, to transporting gemstones from dealers to jewellers;
 - d) Security Guard, who protect, watch and guard property of private businesses (e.g. office buildings and critical infrastructure) and Government agencies. They do this by patrolling the property. A person employed to protect property may patrol with a dog;
 - e) Workers may be in a monitoring centre, such as where a security company provides monitoring of security systems for a number of private, business or Government clients, and immediately contacts the police if necessary, or someone on site, as well as the owner or person in charge of the premises. Monitoring centre operators do not conduct patrols. A Monitoring Centre Operator is classified as a sub-activity of a Security Guard for licensing purposes;
 - f) Control room operators, who may be on site (such as at a hospital) sitting in a room with monitors and other equipment to enable them to identify security issues from the footage. They may respond in person, communicate with guards on site, or even shut down zones remotely. A Control Room Operator is classified as a sub-activity of a Security Guard for licensing purposes.

- 7.1.2 Note there is debate on whether workers in a control room or monitoring centre are more appropriately classified as belonging to the Technical Sector. But as they are licensed under a sub-activity of a Security Guard, for the purposes of this paper they are referred to as belonging in the Protective Security Sector.
- 7.1.3 The Technical Sector encompasses security personnel who provide professional advice on the installation and maintenance of security systems, For example:
- a) Workers may advise people on setting up security equipment for their businesses, and that may extend to installing equipment and providing ongoing support.
- 7.1.4 IBISWorld Research estimates that the Australian Industry has grown at a solid pace over the past five years, (2014–19: 3.5 per cent). The Industry includes approximately 6,856 business, with a market share of \$8 billion. There are currently roughly 147,000 licensed security officers across Australia (according to the ASIAL Security Industry Licensing Report 2020), based on data provided by state/territory licensing agencies. The global market for private security services is now worth an estimated \$180-200 billion.
- 7.1.5 Business and households have continued to invest in security services and crime-prevention measures. Demand for security and investigative services has also risen due to heightened global concerns regarding terrorism, growing internet usage and increasing instances of cybercrime. High-tech surveillance and data-delivery tools will remain at the frontline of industry services. Similar to the United States, the United Kingdom, Canada and China, private security personnel in Australia outnumber public police officers.

8. Overview of the Legislative and Regulatory framework

- 8.1.1 The key objective of the Act is to safeguard public safety and peace. This objective is met by prescribing a licensing and registration regime for the Industry in Victoria. Specific probity requirements must be met by all individuals and/or businesses wishing to attain a licence or registration. In addition, training (competency) requirements must be met by those working in the licensed categories. These requirements work to exclude inappropriate persons and businesses from operating and to improve the overall integrity and competency of the Industry.
- 8.1.2 Victoria Police is the Regulator of the Industry through its LRD, which assesses applications for licences and registrations, and their renewal. LRD is empowered to suspend, cancel or vary registrations and licences. They can conduct disciplinary inquiries where it is suspected a licensee or registrant has contravened licence or registration conditions or engaged in unfair, dishonest or discreditable conduct. The Act also gives Victoria Police inspection and enforcement powers. As such, the framework is set up to allow the Regulator to maintain minimum levels of quality for participants entering the industry, monitor the size and characteristics of the industry over time, and to improve standards by detecting wrongdoing and either enforcing prescribed requirements or excluding persons from continuing to operate in the industry.
- 8.1.3 The Act makes provision for review of licensing and registration decisions by the Victorian Civil and Administration Tribunal (VCAT).
- 8.1.4 The Regulations are in place to operationalise the Act. The Regulations specifically address:
- a) the exemption of certain classes of persons from the Act
 - b) fees for licences, registrations and permits

- c) information applicants must provide as part of their licence or registration application
- d) record keeping requirements for licence and registration holders, and obligation to notify the Regulator of changes in circumstances
- e) infringement penalties for offences
- f) additional requirements for Crowd Controllers.

8.1.5 The Act prescribes a two-pillar system of licensing and registration for both individuals and business.

8.2. Licensing

- 8.2.1 Licensing is a requirement for Crowd Controllers, security guards (armed or unarmed), investigators, Cash in Transit personnel, and bodyguards. Licence holders must meet probity and competency requirements. These measures ensure Industry workers are of suitable character and are properly trained.
- 8.2.2 All security trainers are required to hold a corresponding licence and be approved by LRD prior to delivering training or assessments. All RTOs must forward their training and assessment plans and all assessment instruments to LRD (note there are no mandated assessment instruments or resources) prior to approval. Minimum face-to-face training hours are prescribed for licensing courses.

8.3. Registration

- 8.3.1 Registration is a requirement for the Technical Sector (security equipment installers and advisers). The registration arrangements acknowledge that these professions hold a position of trust, to the extent that those providing security related services have access to private property, and to privileged personal and security information.
- 8.3.2 As a rule of thumb, locksmiths do not have to register, however, they do require a registration if the activities they are carrying out fall under the Act's definition of security equipment installer (for example, installing security cameras or installing vaults). There are already sufficient competency standards in the locksmith sector (locksmiths are required to complete a Certificate III in locksmithing). There is no evidence of harm to public safety as a result of current arrangements.
- 8.3.3 Registration holders must meet probity requirements, but there are no competency standards required under the Act. Note that it is typical for Technical Security personnel to undergo on-the-job training, and/or complete courses with security equipment manufacturers, such as 'cabling', 'harness', and so on.

8.4. Snapshot of the Victorian Industry

- 8.4.1 In Victoria, as of February 2020 the following individuals/businesses held licences or registrations:
- a) 33,149 individual licences
 - b) 4,462 individual registrations
 - c) 833 business licences
 - d) 960 business registrations.

- 8.4.2 For the 2020 financial year to date the Regulator processed 11,184 private security applications.
- 8.4.3 A two-pillar system (requiring licences or registrations) arguably creates more ambiguity and could potentially drive down compliance if individuals perceive registrations as being a 'lesser' category of the regulated framework. The benefits of a two-pillar system may need to be reconsidered.

Consultation Questions

1. Should Victoria move away from a two-pillar system consisting of licences and registrations? What are the risks and/or benefits of doing so?
2. Should the Act be streamlined by requiring those working in the technical sector to obtain a licence, and consolidating probity requirements?
3. Are there safety/security benefits in requiring security equipment installers and advisers to hold a licence, which they must carry with them?

9. Training and Accreditation

- 9.1.1 Adequate training is essential for the Industry to deliver a professional and consistent service, but the Industry is characterised by a workforce that is highly casualised, relatively low-paid and transient. This presents competency challenges for the Industry and end-users of security services.
- 9.1.2 Successive coroners' reports investigating the deaths of patrons as a result of restraint or intervention by security personnel in the course of incident control (especially in licensed premises) found the following factors contributed to the fatalities:
- a) poor quality training that did not equip people with the right skills
 - b) inadequate content in training
 - c) inconsistency in training between jurisdictions
 - d) security personnel with poor language, literacy and numeracy skills
 - e) few or no requirements for a newly licensed security worker to be supervised by an experienced licensee.
- 9.1.3 In view of these findings, a balance needs to be struck between upskilling industry personnel (ensuring higher competency) without imposing unnecessary regulatory burden on individuals seeking to enter the Industry.

9.2. Training packages – is the content adequate?

- 9.2.1 Training for security officers is maintained within the vocational education and training (VET) sector. The process for establishing training standards and packages is complex. Industry Reference Committees (IRCs) are charged with identifying Industry skill needs and clearing training products before it goes to the Australian Industry and Skills Committee (AISC) for consideration. There are various IRCs representing different industries.
- 9.2.2 Security Industry training packages are developed by the Property Services IRC, which is also responsible for qualifications on waste collection, real estate services, engineering, technical services and others. Note that in practice IRCs contract the development of training packages to specialists within the private sector (referred to as Skills Service Organisations).

- 9.2.3 The Public Safety IRC which is responsible for public safety, defence and police training packages may be better placed to improve security practice. The Public Safety IRC focuses on community safety and engagement, close personal protection, investigations and protective services, making it more aligned with the Industry's training needs.

Consultation Questions

4. Should Victoria recommend the AISC transfer security industry training packages from the Property Services IRC to the Public Safety IRC with the objective of improving security practice?
5. Is the training content adequate to prepare individuals for their job?

9.3. Harmonising licensing requirements across jurisdictions

- 9.3.1 In Victoria the Act requires an applicant for a private security individual operator licence to have successfully completed correlating set units of competency (i.e. training subjects). The applicant may also have their experience or training approved by the Chief Commissioner of Police as relevant to each activity, or any aspect of such activity, that a person is authorised to undertake under the licence.
- 9.3.2 Qualifications for security roles are national, but the regulation of security licensing is state and territory based, making it difficult to ensure consistency between qualifications and licensing requirements across jurisdictions. Australian states and territories generally require applicants for security guards or crowd controller licences to hold a Certificate II in Security Operations (Cert II). With armed guards, and bodyguards generally requiring a Certificate III in Security Operations (Cert III). Investigators must complete Certificate III in Investigative Services.
- 9.3.3 A review of the training package was completed by Artibus Innovation (the relevant Skills Service Organisation) in 2019 and its recommendations are due to be implemented by July 2020. In practice the Regulator (LRD in Victoria Police) sets the units of competency that individuals are required to complete. In Victoria, set units are currently based on the national CPP07 – Property Services Training Package but from July 2020, this will be superseded by the latest training package CPP – Property Services Training Package. It is expected that Victoria Police will set units of competencies for each licence type (e.g. crowd controller, armed guard) in line with the national recommendations of the CPP package. New South Wales is expected to do the same, increasing consistency of training across jurisdictions.

VICTORIA, Certificate II in Security Operations for crowd controller/security guard – (CPP20218 - CPP training package)	
CPPSEC2101	Apply effective communication skills to maintain security
CPPSEC2102	Apply legal and procedural requirements to work effectively within a security team
CPPSEC2103	Apply WHS, emergency response and evacuation procedures to maintain security
CPPSEC2104	Apply risk assessment to select and carry out response to security risk situations
CPPSEC2105	Provide quality services to a range of security clients
CPPSEC2106	Protect self and others using basic defensive techniques
CPPSEC2107	Patrol premises to monitor property and maintain security
CPPSEC2108	Screen people, personal effects and items to maintain security
CPPSEC2109	Monitor and control access and exit of persons and vehicles from premises
CPPSEC2110	Monitor and control individual and crowd to behaviour to maintain security
CPPSEC2111	Apply security procedures to manage intoxicated persons
CPPSEC2112	Apply security procedures to remove persons from premises
CPPSEC2113	Escort and protect persons and valuables
HLTAID003	Provide first aid

- 9.3.4 There was consensus at a recent Security Industry Regulators Forum (SIRF) meeting that 130 hours of training, inclusive of 14 units of competency-based training is adequate for a Crowd Controller or Security Guard licence. This position has been agreed in-principle by the ASQA.
- 9.3.5 It is beyond the scope of this paper to provide a detailed comparison of competency requirements for all licensed activities across multiple jurisdictions. It is enough to note that all jurisdictions require businesses and individuals providing security services to hold a licence and thus must have completed appropriate training. Following efforts from regulators across the country, there will be greater harmonisation of training requirements across jurisdictions from July 2020. Regulators continue to work through the SIRF to increase consistency where possible.
- 9.3.6 Reducing inconsistency in licensing arrangements reduces the opportunity for people to cross borders to attain licences in jurisdictions with fewer requirements, lessening distortions in where training is occurring compared to where jobs are located. It is too early to assess the effectiveness of the new training package (not yet implemented) but it is a positive step towards improving the preparedness of protective security personnel and the safety of all citizens.
- 9.3.7 There is greater discrepancy between jurisdictions in how the electronic/technical sector is regulated (section [8.7 refers](#)).

- 9.3.8 For a full list of required competencies for licensing activities refer to the Regulator at <https://www.police.vic.gov.au/competencies-licensing-activities>.

Consultation Questions

6. Do the selection of competency-based units as prescribed for each licence type adequately prepare people for the job?
7. What more can be done to make competency requirements nationally consistent?

9.4. Issues with clients and host agencies

- 9.4.1 Concerns have been raised with the department about clients and host agencies who do not understand the need to conduct their own business risk assessment before employing Industry staff. Ideally, a risk assessment would be given to Industry staff to alert them to risks they need to be aware of.
- 9.4.2 In addition, clients and host agencies reportedly often fail to provide site inductions: for example, a walk around, pointing out entry and exit points, setting expectations (for example, to patrol the perimeter once an hour). The risk assessment should clarify the roles of staff and include information about who is supervising workers and where to go to for advice or if escalation is required.
- 9.4.3 There have been anecdotal reports of clients and host agencies seeking to use Industry staff to fulfil other roles that detract from their ability to carry out their own duties and make them vulnerable to deliberate distraction. For example, a guard working on a University campus who is also appointed as first aid officer could be distracted by health emergencies, while an offender noticing the lack of security staff targets a victim.
- 9.4.4 Finally, workers have raised the issue of safety when patrolling premises alone. They note, for example, that Protective Services Officers (who are employed by Victoria Police) are required to patrol in pairs for safety.
- 9.4.5 While this is not within scope for legislative change, there are other ways for it to be given consideration, such as whether it becomes an Industry standard or best practice.

Consultation Question

8. Should an industry standard be introduced to require all security personnel working in high risk situations to conduct patrols in pairs?

9.5. On the job training, mandated training and continuous professional development

- 9.5.1 Beyond the required training, on the job experience is necessary to teach individuals how to operate in specialised fields or environments, including how to interact with specific security equipment.

- 9.5.2 On the job training is not a legislated requirement under the Act. When a security company applies for the Private Security Business Licence, they are required to provide a Standard Operating Procedure (SOP) on their in-house training to the Regulator (LRD). LRD can assess that the business is complying with their SOPs during an audit or disciplinary inquiry.
- 9.5.3 Anecdotal evidence suggests on-the-job training is not always occurring. Formal on-the-job training requires employers to invest time and money. The ability and willingness of employers to do so varies depending on the size of the company (available financial resources) and the nature of the workforce. Employers may be less willing to invest in casual and/or transient staff.

Consultation Questions

9. How can employers be encouraged to provide on the job training to staff?
10. What role should industry play in the ongoing demonstration of competency over and above the minimum required training?

- 9.5.4 Where an employer (that is, not a client or host agency, but a business providing Industry professionals), mandates training, stakeholders report that there is often an expectation that workers will complete that training on their own time, rather than providing dedicated paid time to complete the training.
- 9.5.5 This practice contravenes workplace relations laws, and in the case where the employee may try to complete training while on a job (such as sitting at a security desk or working in an electronic monitoring centre), this may compromise their attention to their work, making them less effective.

Consultation Questions

11. To what extent are security businesses conducting training of employed security officers in dedicated paid time?
12. Should sanctions be introduced for businesses that direct employees to complete mandated training in the own personal time?

- 9.5.6 End-users of security services have criticised the lack of mandated professional development for security personnel.
- 9.5.7 The Australian Standard for Guard and Patrol Security Services (AS/NZS 4421:2011) requires refresher training, if necessary, after security officers' performance assessments, and imposes an obligation on the organisation for maintaining standards (arguably through training). Compliance with the standard is not required by the Regulator or security industry associations. However, a proposal to implement continuous professional development requirements for a licence renewal, which would include a valid first aid certificate, is being developed by the Regulator. Note that the current first aid unit in Cert II does not have an expiry date, but the revised unit 'HLTAID003 Provide First Aid' will expire after three years.
- 9.5.8 Continuous Professional Development (CPD) programs have been developed and are being delivered by approved Security Industry Organisations such as ASIAL and the Victoria Security Institute (VSI), but the uptake is relatively low. Arguably this is because completion of CPD units is not a mandatory requirement for maintaining a business licence.

- 9.5.9 Mandatory CPD would require commitment from employers as it would involve funding attendance at CPD courses and/or allowing staff to undertake training during work hours. If the costs were born by employees, low wage rates in the industry may create a culture of non-compliance.

Consultation Questions

13. Is there merit in making CDP mandatory?
14. Should the Regulator require licensees to refresh their skills and knowledge before renewing a licence?

9.6. Competency requirements for business (licence)

- 9.6.1 A private security business may employ others to carry on one or more activities of the following security activities:
- a) acting as an Investigator
 - b) acting as a Bodyguard
 - c) acting as a Crowd Controller
 - d) acting as a Security Guard (and sub-activities)
 - e) acting as a private security trainer.
- 9.6.2 In Victoria a business licence applicant must demonstrate competency by either:
- a) possessing a Certificate IV in Security Risk Management (must be held by the nominated person)
 - b) being a member of an Approved Security Industry Organisation.
- 9.6.3 In addition to this, the Regulator may require the following to be submitted as part of the business licence application:
- a) detailed resume
 - b) personal information forms for relevant people connected to the business (includes references of suitable character)
 - c) Certified National Police Record Checks Certificates for all relevant people connected to the business
 - d) standard operating procedures
 - e) business plans
 - f) evidence of public liability insurance in the form of a certificate of currency from the insurance provider, showing coverage for the activities and sub-activities applied for
 - g) evidence of financial viability including a declaration by a chartered accountant verifying the financial viability of the business
 - h) evidence of understanding of employer responsibilities
 - i) newspaper advertisement indicating the intent to apply for a business licence.

Consultation Questions

15. Is membership of an Approved Security Industry Organisation a suitable way to demonstrate business competency?
16. Is the prescribed training for the nominated person of a security business adequate? Should the nominated person have to complete any formal training beyond the Cert IV?
17. Should there be controls on which person within a business should be the nominated person on the business licence?

9.7. There are no competency requirements for the Technical Sector

- 9.7.1 In Victoria, the Technical Sector (i.e. security equipment installer and security advisers) must meet probity requirements only. The Act does not require individuals or businesses applying for a registration to meet minimum competency standards.
- 9.7.2 There is no substantial evidence that establishing competency standards for the Technical Sector would improve public safety, but a two-pillar system creates inconsistency and ambiguity. Stakeholders have reported that there are security advisers and security equipment installers operating without a registration. Exact numbers are hard to quantify without knowing the true size of the technical sector but results from a PwC industry survey confirmed the perception of non-compliance, with 53 per cent of registered respondents considering the sector is non-complaint.
- 9.7.3 In some other jurisdictions, competency is a requirement for the technical sector. Refer to the table below for a comparison on how the technical sector is regulated across states and territories.

Qualification Required	VIC	NSW	ACT	QLD	SA	WA	TAS	NT
Security adviser consultant	None	Cert IV(a)	Cert IV	None	Cert III	-	-	-
Security equipment installer	None	None	Cert III	None	Cert III	-	-	-
• Electrical equipment			Cert II					
• Barrier Equipment			Cert II					
• Locksmith			Cert III					
Security Retailer	-	None	Cert II	None	Cert III (b)	-	-	-

- a. Either Cert IV and five years relevant experience, or a diploma and two years relevant experience, or a degree and one-year relevant experience.
- b. Does not apply to persons employed as a shop assistant who provides advice on security alarms.

Note there is no uniformity regarding definitions of 'security equipment' among jurisdictions that regulate security equipment installers.

New South Wales example

- 9.7.4 In NSW a licence (not registration) is required for the Technical Sector. The *Security Industry Act 1997* (NSW) classifies these as 'class 2' security activities and mandates set competencies for each. Specifically:

Security Activity NSW	Qualification Required
<p>Security Consultant (class 2a) authorises the licensee to sell security methods or principles, and to act as a consultant by analysing security risks and providing solutions and management strategies to minimise those risks.</p>	<p>Applicants must:</p> <p>Hold Certificate IV in Security and Risk Management, and have attained the following units of competency:</p> <ul style="list-style-type: none"> • Implement Security Risk Management Plan (CPPSEC5005A) • Prepare Security Risk Management Plan (CPPSEC55004A). <p>Applicants must also demonstrate, to the satisfaction of the Commissioner of Police, that they possess the relevant experience. Such as, have held a Class 1 and/or a Class 2 security licence continuously for a total period of at least 5 years, or</p> <p>have been recorded as a nominated person for one or more master security licensees continuously for a total period of at least 5 years, or</p> <p>have been employed by one or more master security licensees to manage the carrying on of security activities continuously for a total period of at least 5 years, or</p> <p>have carried on the activities authorised by a Class 2A licence in another jurisdiction, or as an exempt person, for a total period of at least 5 years.</p>
<p>Security Seller (class 2B) authorises the licensee:</p> <ul style="list-style-type: none"> - to sell, and provide advice in relation to, security equipment, and - to sell the services of persons to carry on any security activity, and - to act as an agent for, or otherwise obtain contracts for, the supply of persons to carry on any security activity, the supply of any security equipment or the supply of any security activity, and - to broker any security activity by acting as an intermediary to negotiate and obtain any such activity for a person in return for a commission or financial benefit. 	<p>No competency required.</p>

Security Activity NSW	Qualification Required
Security Equipment Specialist (Class 2C) authorises the licensee to sell, install, maintain, repair and service, and provide advice in relation to, security equipment (including electronic security equipment and barrier equipment) and to act as a locksmith.	No competency required.
Security Trainer (Class 2D) Class 2D licence does not extend to training or instruction in the use of firearms.	Must hold a minimum of one of the following credentials: A diploma or higher-level qualification in adult education, or TAE40116 Certificate IV in Training and Assessment which includes qualifications for the areas they train and assess, or TAE40110 Certificate IV in Training and Assessment which includes qualifications for the areas they train and assess plus the following units: either TAE40116 or TAE40110, and either TAEASS502 or TAEASS502A or TAEASS502B provide documentary evidence of at least three years of relevant industry experience.

- 9.7.5 The NSW regulatory model provides an example of how security industry activities can be split between Class 1 and Class 2 licence types, the protective security personnel and technical sector respectively, with specific (or no) competency requirements set for each subclass of these licence types. Adopting a similar approach could go some way to improving competency in the Industry and streamlining the Act by removing the requirement for registrations.

Consultation Questions

18. Do the activities of the technical sector in Victoria warrant the introduction of competency standards?
19. If competency standards are required, what sub-classes of the technical sector should they apply to? What is the level of competency that should be prescribed for these activities?
20. Is there merit in better defining the activities of the technical sector (including security equipment) in the Act to reduce ambiguity?

9.8. Mutual Recognition - enabling a mobile workforce

- 9.8.1 Security jobs are part of a national labour market and the *Mutual Recognition Act 1992* enables individuals who are licensed to carry out an occupation in one state to seek a licence for an equivalent occupation in a second state. The occupation is taken to be equivalent if the activities authorised to be carried out under the licence are the same (irrespective of whether the requirements (such as training) to obtain the licence are identical).

- 9.8.2 Due to varying licence and training requirements between states and territories, individuals are attracted to training and applying for a licence in a state with fewer requirements with the intention of gaining a licence (through *the Mutual Recognition Act 1992*) in their state of residence. Evidence has shown this has been a concern for Victoria and NSW, with a large number of applicants who are either Victorian or NSW residents initially training and obtaining a licence in QLD (whose requirements are less stringent than NSW).
- 9.8.3 Even with good intentions, one jurisdiction's pursuit of more robust training and licensing requirements may only further compound the problem. As discussed previously, Regulators are continuing efforts to harmonise training and licence requirements. Uniform adoption of the newest training package by states and territories would negate this as an issue.

Consultation Question

21. Is the current mutual recognition process meeting industry needs in Victoria?

10. Registered Training Organisations and trainers

- 10.1.1 The Act enables the Regulator to approve industry training providers to deliver the specified training. In practice the Regulator and Victorian Registration and Qualifications Authority (VRQA) jointly audit the organisation prior to registration being approved. In Victoria there are roughly 34 RTOs as of March 2020.
- 10.1.2 The VRQA regulates education and training providers in Victoria. ASQA regulates RTOs that offer courses from Victoria to overseas students or students based in other states and territories. VQRA has the power to suspend or cancel the registration of an RTO.
- 10.1.3 An RTO must only issue VET qualifications to persons whom it has assessed as competent in accordance with the training package. If the training or assessment provided is inadequate then the validity of the qualification is questionable, eroding the confidence of licensing authorities and employers. In addition, inadequate training and assessment not only compromises the safety of security industry personnel (as they lack the necessary skills to carry out their role), but also the safety of citizens as they come into contact with industry personnel.

11. Poor quality training and assessment practices

11.1. Safe use of restraint techniques and de-escalation skills

- 11.1.1 The quality of training provided continues to be a concern for stakeholders. The ASQA review found that there is deficiency in the current training package such as inadequate content, e.g. competency units did not explicitly address the risk of restraint and the safe use of restraint techniques. The ASQA Review confirmed that deficiencies in training and assessment were potentially contributing factors to fatalities.
- 11.1.2 The updated training package expected to be implemented by July 2020, specifically the 'Apply Security Procedures to Remove Persons from Premises' unit contained in Cert II requires a student to demonstrate knowledge of adverse health effects from the use of restraint, the signs of positional asphyxiation, and how to escort a person from premises using safe and suitable restraint. Adopting this unit of competency will increase the skills of future security personnel and reduce the risks of unsafe restraint techniques being used.
- 11.1.3 As part of the ASQA Review roundtable participants also expressed a greater need for training to focus on resolution prior to restraint action. The unit of competency described above also requires students to demonstrate knowledge of negotiation techniques and how they can be used to defuse and resolve conflict. As such, the most current national training package goes a long way in addressing points of failure in the training identified by successive coroners' reports and reviews.
- 11.1.4 Another example of the importance of training in observation and de-escalation skills is well illustrated by a recent (de-identified) incident at a regional nightclub. Two Crowd Controllers were onsite. Evidence obtained from CCTV footage from a nearby shop and witness statements indicated that two patrons were engaged in what appeared to be an escalating disagreement. Both patrons were intoxicated, and increasingly aggressive.
- 11.1.5 Neither Crowd Controller intervened to de-escalate the situation in any way. For example, techniques may have included moving near them to deter further aggression, talking to them to change the dynamic, indicating to bar staff that they needed to be cut off, or removing one or both from the premises. Ultimately, with the guards watching on, at closing time, one of the patron's king-hit the other and left the scene. It is not clear who called the police, but it is clear from the footage that the Crowd Controllers did not approach the unconscious patron until lights and sirens became obvious, at which time they moved him to a slumped position.
- 11.1.6 When police arrived, the Crowd Controllers told them that the patron was just drunk, not mentioning the assault. It should also be noted that there was no input from staff on site either. These types of incidents have a negative and long-lasting impact on the reputation of the Industry. It overshadows the efforts of many other Security personnel who strive to protect citizens from harm. Comprehensive training on the need to act, and how to act responsibly, is a positive step forward in achieving best practice in the Industry.

Consultation Questions

22. Does the industry have adequate understanding of positional asphyxia and/or adverse health effects arising from restraint techniques?
23. Does the industry have an adequate understanding of de-escalation techniques?

11.2. Short courses undermining public safety

- 11.2.1 There is continuing concern over the short duration of Industry courses. Courses that are too short directly impact a student's ability to comprehend and maintain the required skills and knowledge, thus undermining their ability to carry out their role in the future.
- 11.2.2 The ASQA Review affirmed ASQA's original and long-standing position that the Cert II typically has a duration of 0.5 to one year (600 hours minimum), and a Cert III has a duration of one to two years (1200 hours minimum). It found most of the training for security courses was completed in less than three weeks (estimated 80 percent of all RTOs are operating in this manner). Cert III courses were typically delivered between five to nineteen days. The Regulator considers 130 hours of training is adequate to deliver a Cert II. As stated previously, ASQA has agreed to this position in-principle. Ultimately, a balance needs to be achieved between ensuring high quality training material is developed and delivered in a way that facilitates learning and retention. LRD in conjunction with ASQA continue to work together to assess whether RTOs are operating effectively.
- 11.2.3 RTOs report that shorter programs are delivered due to student and employer pressure for fast training, and market pressures to reduce the time-taken and cost of programs. Implementation of short courses are not based on learner needs and is a direct response of RTOs' attempts to remain competitive.
- 11.2.4 Short duration courses are a systemic problem in the VET sector as training packages leave RTOs to interpret the amount of training required to deliver the requirements of the training package. This discretion potentially compromises public safety by allowing RTOs to deliver inadequate training.

Consultation Questions

24. Should training benchmarks (such as the duration of courses) be imposed on RTOs? If so, what is the best method to achieve this?

11.3. Poor assessment practices

- 11.3.1 Unreliable assessments can lead to persons obtaining qualifications without possessing the necessary skills and competency. The ASQA review found that out of 67 RTOs they audited, 58.2 per cent were not initially compliant with the assessment standard (15.5) which stipulates that assessments must:
- a) Meet the requirements of the training package
 - b) Be valid, flexible, reliable, and fair
 - c) Be conducted according to the rules of evidence
 - d) Meet workplace requirements
 - e) Be systematically validated.
- 11.3.2 Note that only five RTOs remained non-compliant after being given the opportunity to address issues identified by ASQA. This example shows that audits can have a positive effect on the performance of RTOs.

- 11.3.3 As part of the ASQA Review one RTO gave examples of students being given qualifications without being assessed, providers issuing answer sheets to students, and students having to be retrained after undergoing training with other low-quality providers. Such practices degrade professionalism and competency of the industry.
- 11.3.4 RTOs play an important role in providing foundational skills to security personnel and there may be a need to increase accountability. The Regulator and ASQA have a memorandum of understanding (MOU) to improve the monitoring and auditing of RTOs. The MOU's are currently being reviewed between LRD and a few other agencies. It is a priority of LRD to enhance productive working relationships with stakeholders to better share information and have a greater impact on compliance and enforcement.
- 11.3.5 The focus of the LRD is on the quality of the security training that is being provided by the RTO. The focus of ASQA is the quality of the education training that is being provided by the RTO. While both regulators are concerned with quality, they are concerned with the quality of different things. In practical terms this means that the LRD is concerned with the content of the training material and ASQA is concerned with the implementation of the training material.
- 11.3.6 It is the regulatory responsibility of the LRD to ensure that the content of the training being delivered by RTOs licensed to deliver private security training, provides an adequate level of baseline knowledge to people working in the security industry to ensure community safety. This is done by looking at the material being delivered, and the amount of time dedicated to delivering this training. The regulatory focus of the ASQA differs from the regulatory responsibility of the LRD. The responsibility of the ASQA is to ensure that what is being delivered to students is being delivered in a way that delivers satisfactory learning outcomes for students.
- 11.3.7 Failure to comply with the requirements of either Regulator will affect an RTO adversely.

Consultation Questions

25. Should more explicit specification of assessment conditions be mandated? What would be the best method of achieving this (e.g. via the training package?)

11.4. Poor literacy and numeracy skills

- 11.4.1 Poor levels of language, literacy and numeracy skills held by students and graduates is a continuing concern for employers and the Regulator. In terms of training – poor communication and writing skills is a barrier against attaining an adequate level of competency in the industry. Students may not be understanding the training material that is delivered. In practice proficient language skills are vital for security personnel when communicating with the public, negotiating to diffuse conflict, or even engaging with police.
- 11.4.2 Questions have been raised on whether pre-enrolment tests carried out by RTOs are effective in only letting in capable students.
- 11.4.3 The Loud and Clear Project (2014) was a joint effort by the Skill's Council and licensing authorities, which found that the industry attracts:
- a) Culturally and linguistically diverse people for whom English is a second language
 - b) People with low levels of education.

- 11.4.4 It also found there is a widespread perception by stakeholders that individuals are being accepted into training who do not have the necessary skills needed to complete training and that graduates are not able to sustain work in the industry because of their lack of competency.
- 11.4.5 ASIAL has called for a tightening of licence eligibility requirements, including the exclusion of student and working holiday visa holders from being eligible to apply for a security licence. Additionally, that holders applying for an individual licence need to be able to demonstrate Literacy Language and Numeracy competencies to the Australian Core Skills Framework (ACSF) Level 2 for reading and writing, and Level 3 for oral communication.
- 11.4.6 Careful consideration is needed on a way to ensure that only students who meet the required language, literacy, and numeracy skills can enrol in Cert II and Cert III courses, without overly restricting entry into the industry.

Consultation Question

26. Is there merit in prescribing a consistent pre-enrolment test for RTOs to use?

Poor quality training and assessment practices – case example

Majid v Chief Commissioner of Police [2018] VCAT 1126 (18 July 2018)

Mr Majid worked as a trainer for Austwide Institute of Training Pty Ltd (Austwide) which was a RTO that was found to have fast-tracked security guard courses for over 100 students over a weekend. The courses were 'Certificate II Security Operations – Unarmed Security Guard and Crowd Controller' (Certificate II). Students paid an inflated cash only fee of \$1,200 (the fee previously being \$850) and completed a course which should take approximately three weeks (involving a minimum of 128 face-to-face hours in a classroom environment) over one or two days. Mr Majid's licence as a trainer was cancelled.

Following a tip-off, Police attended the premises where this training was occurring. They found over 100 students present in the training facility. When the police arrived, many students immediately fled. The police found evidence which indicated students participating in the 'fast-tracked' course were not trained, they were simply required to copy into their 218-page assessment workbooks, answers from an already completed workbook, for each of the 19 modules included in the course.

A student made the following statement on the activity that occurred –

"I sat down and the instructor came around and handed out the answer books to all the students. The instructor... told us to copy all the answers from the book into our books. We all went through the books together and finished the book. We also did a little bit on first aid, about 10 minutes. I practice on the dummies. I was asked to sign part of the learning in the book and also a page which listed all the units. There were 19 units that I signed. I was told not to date, just sign. I did this and at 5 o'clock I go home".

VCAT Senior Member J Smithers affirmed the decision of the Regulator to cancel Mr Majid's licence. J Smithers found that Mr Majid was involved in the fast-tracking process and as such was not a fit and proper person to hold a security licence and it is not in the public interest for him to do so. This conclusion applies not only to Mr Majid in his capacity as a trainer and assessor, but also in his capacity as a security guard and crowd controller.

Austwide's accreditation as an RTO was cancelled due to previous conduct which compromised the integrity of Australian VET systems through inadequate assessment practices, falsifying its trainer/assessor credentials and falsifying trainer/assessor existence. Refer *Austwide Institute of Training Pty Ltd and Secretary, Department of Education and Training* [2016] AATA 266 (28 April 2016) per Senior Member O'Loughlin.

The above example demonstrates that poor training and assessment is a continuing problem in the industry. It also shows the importance of having police resources available to conduct audits.

12. Probity

- 12.1.1 To obtain and maintain an industry licence or registration, individuals must also meet the probity requirements set out in section 25 of the Act.
- 12.1.2 To meet the probity requirements, applicants must be at least 18 years old, not have certain criminal offences on their record and be found to be a 'fit and proper person'.

12.2. Criminal record and compliance with the Act

- 12.2.1 Applicants must not have a history of contravening the Act (or preceding legislation) and must not be a 'prohibited person'. That is, someone who has been convicted of certain offences within the last 10 years or been found guilty with no conviction recorded in the last five years.
- 12.2.2 The term 'disqualifying offence' is defined in section 13 of the Act, and includes offences such as drug trafficking, cultivating drugs in commercial quantities, offences involving violence against another person, dishonesty or theft, and offences relating to firearms and control of weapons laws.
- 12.2.3 In addition, the Chief Commissioner of Police may form the opinion that an applicant is unsuitable if they have been convicted within the last 10 years of an offence that renders them unsuitable to hold a licence (or within the last five years if found guilty without conviction).
- 12.2.4 There is some discretion for the Chief Commissioner of Police, for example, if the person has failed to comply with Act in a way that the Commissioner considers does not make the person ineligible for a licence, it is open to the Commissioner to grant the licence.

12.3. Fit and Proper Person

- 12.3.1 Finally, to be eligible for a licence, the Chief Commissioner of Police must be satisfied that the person is a 'fit and proper person' to hold a licence. This requirement was introduced in 2011 following an agreement by COAG.
- 12.3.2 This phrase is not defined in the Act or any other relevant Act or Regulation. This allows the Chief Commissioner a certain amount of discretion. However, that discretion is guided by decisions made by Courts when interpreting the meaning of 'fit and proper person' in industry licensing and registration.
- 12.3.3 Disputes about the Regulator's decision to refuse, suspend or revoke a licence can be taken to the VCAT. In deciding whether a dispute about the validity of Victoria Police's application of the test, VCAT has looked to case law from the higher courts on the interpretation of the phrase.
- 12.3.4 An illustrative example that sets the standard test for whether a person is a 'fit and proper person' to hold a licence or registration under the Act comes from the decision of VCAT in *Shortis*¹. In that case, the applicant sought a licence as a crowd controller. The applicant had a history of being an outspoken 'white supremacist' who had a widely publicised conviction under the *Racial and Religious Tolerance Act 2001* (VIC). In examining the arguments in relation to whether the applicant passed the fit and proper person test, VCAT referred to a number of High Court decisions on the 'fit and proper person' test, and in particular, the case of the *Australian Broadcasting Corporation v Bond*², as follows:

¹ *Shortis v Chief Commissioner of Police (Review and Regulation)* [2019] VCAT 1379

² *Australian Broadcasting Tribunal v Bond* [1990] HCA 33

[The test] includes not only whether a person has the necessary honesty, knowledge and ability, but also whether the person is possessed of sufficient moral integrity and rectitude of character to permit him to be accredited to the public as a person to be trusted.

The decision maker needs to make a value judgment and in doing so, must assess the seriousness or otherwise of the particular conduct for evaluation.

- 12.3.5 VCAT also made the point that the test must be applied in the context of what the person will be authorised to do if the licence is granted. In that context, VCAT considered that a purpose of the Act is to regulate the industry for the purposes of ensuring public safety and peace. Ultimately, VCAT upheld the Regulator's decision and found that the applicant, with his history of vilification of a particular religion, and his continued denial of the validity of the Act under which he was convicted of vilification, "*could not be relied on to treat all people he comes into contact with equally and set aside his political views given his significant investment in those beliefs*".³

12.4. Issues with the Fit and Proper Person Test?

- 12.4.1 While no issues have been raised to date about the test itself, Industry has expressed concerns about the ability to assess applicants in cases where there may be insufficient information. For example, those applicants who are international university students. The concern is about a lack of access to the kind of intelligence and criminal record history that Victoria Police has about applicants who have resided in Australia for a lengthy period.
- 12.4.2 This issue can, to some extent, be ameliorated by law enforcement cooperation and information sharing with other countries, however, there is concern that the quality of information is not as good.
- 12.4.3 In addition, while the introduction of the probity requirements has had a very positive impact on standards across the Industry, concerns remain over industry infiltration by members of organised crime groups who have found a way around probity requirements.

Consultation Questions

27. Have you experienced any probity issues with employees?
28. Are you aware of reports of insufficient information in relation to probity that lead to adverse outcomes?
29. Have you noticed any organised crime activity in the industry? If so, what additional probity requirements could be put in place to further minimise this activity?

³ Shortis, paragraph 107.

13. Industrial relations issues

- 13.1.1 Stakeholders continue to raise concerns about 'sham contracting', insecure work, and underpayment of wages and superannuation in the Industry. The Review seeks to understand how these issues impact the Industry, workers in the industry, their families and the community at large. It also seeks to understand the extent to which workers can understand their rights and obligations and seek assistance if something goes wrong.
- 13.1.2 A key challenge in addressing these issues is that there are limits on the Victorian Government's regulatory powers. Victoria has referred most of its industrial relations powers to the Commonwealth. This means it has limited capacity to regulate where Federal legislation applies. Any recommendations of this Review will take this into account.

13.2. Engagement of security workers

- 13.2.1 Many security workers are classified as independent contractors, rather than employees, although this classification can be contestable. 'Sham contracting' is discussed in more detail later in this chapter.
- 13.2.2 The legal status of private security workers is important as it determines how regulatory frameworks apply to their work arrangements, including wages and conditions and health and safety obligations.
- 13.2.3 If a worker is an employee, he or she is generally entitled to the protections of Australia's national workplace laws, the *Fair Work Act 2009* (Cth) (the Fair Work Act). This includes minimum wages, paid leave entitlements (such as annual leave and personal leave), notice of termination and protection from unfair dismissal. Similarly, Victoria's long service leave legislation (the *Long Service Leave Act 2018* (Vic) and the *Long Service Benefits Portability Act 2018* (Vic) apply only to employees.
- 13.2.4 Employees are also entitled to the protections of modern awards. In the Industry, the key modern awards are the Security Services Industry Award 2010 and the Transport (Cash in Transit) Award 2010. The Security Services Industry Award covers employees performing duties including crowd control at venues, events etc. and guarding including loss prevention, patrolling and concierge work. The Transport (Cash in Transit) Award covers employees performing escort, armoured, and non-armoured vehicle operator duties. Some other awards also contain security related classifications, for example, the General Retail Industry Award 2010. Enterprise agreements made under the Fair Work Act may also apply at individual workplaces.
- 13.2.5 Individuals performing paid work who are not employees are generally supplying services as 'independent contractors' (whether as an individual or business). The key consequence of an independent contracting arrangement is that most employment-related protections, such as minimum wages, paid leave entitlements, regularity of engagement and notice of termination, do not apply. Independent contractors receive some protections under the *Independent Contractors Act 2006* (Cth) (IC Act) and competition and consumer law, although they are more heavily reliant on the common law.

- 13.2.6 Multi-factor indicia established by the courts over many decades are applied to help determine the status of persons. Some of these indicia suggest an employment relationship, while other indicia indicate that the relationship is not an employment relationship. This multi-factor test is summarised here (please note this is a guide only and should not be taken as legal advice):

	Indicative of employee relationship	Indicative of independent contractor
Do they have control over the way they perform tasks?	No	Yes
Do they supply/maintain tools or equipment?	No	Yes
Do they work standard hours?	Yes	No
Are they paid according to task completion, rather than receiving wages based on time worked?	No	Yes
Do they incur any loss or receive any profit from the job?	No	Yes
Do they accept responsibility for any defective or remedial work which was their doing?	No	Yes
Are they free to work for others at the same time?	No	Yes
Do they have the right to employ or subcontract any aspect of their work to another person?	No	Yes
Do they file GST returns?	No	Yes

13.3. Sham contracting

- 13.3.1 Genuine independent contracting is a legitimate business arrangement, and as a mode of work can afford flexibility, autonomy, recognition and reward which goes beyond that which would be available in an employment relationship.
- 13.3.2 However, there may be situations where some workers, who should more accurately be treated as employees, are told by their 'employer' that they are independent contractors and treated as such. Deliberately treating a person as an independent contractor to avoid obligations under industrial relations laws is known as 'sham contracting'.
- 13.3.3 Simply telling a person that they are an independent contractor and requiring that they obtain an ABN as a condition of engagement, may be indicative of 'sham contracting'. This is particularly so if the person had been engaged until then as an employee. In such cases, an employee may no longer receive employment entitlements such as overtime, penalty rates, and leave.
- 13.3.4 Part 3-1, Division 6 of the Fair Work Act provides that it is unlawful to misrepresent an employment relationship as an independent contracting relationship.

- 13.3.5 The IC Act, which has been in force since 1 March 2007, provides some limited protection to independent contractors. It allows contractors to apply to the Federal Court to review a services contract on the grounds that the contract is unfair, or harsh. Subsection 15(1) of the IC Act provides that in reviewing the contract, the Court may have regard to:
- a) the relative strengths of the bargaining positions of the parties to the contract or their agents
 - b) whether any undue influence or pressure was exerted on, or unfair tactics were used against, a party to the contract
 - c) whether the contract provides total remuneration that is, or is likely to be, less than that of an employee performing similar work
 - d) any other matter that the Court thinks relevant.
- 13.3.6 If a finding is made that the contract is unfair or harsh, the court may make an order setting aside all or part of the contract, and/or orders to vary it. While the IC Act doesn't expressly provide for a power to make orders for compensation, a court can vary a contract to include a term that an amount be paid, even after its termination. If such orders are made, the independent contractor will then be able to sue the other party for damages for breach of that term.
- 13.3.7 However, to date only 16 applications under the IC Act for contract review have been made to the Federal Court. Some of these 16 cases were dismissed on jurisdictional grounds.

Consultation Questions

For workers

30. [If you are working as an independent contractor] Did you freely choose to work as an independent contractor or was this a requirement? Did you understand that by doing so, you lost your entitlements under workplace laws, such as leave, shift allowances and superannuation and may be required to procure your own insurance cover or pay your own WorkCover premiums?
31. Did you feel that the terms of engagement reflected the reality of the relationship? For example, did you control how and where you worked? Were you able to work for other security businesses?
32. If you had a dispute or concern about your engagement, would you know where to go for assistance?

For businesses

33. Do you engage your workers as employees, independent contractors or a combination. Why?
34. Do you feel you are able to distinguish between a contract *for* service (an employment relationship), and a contract *of* service (an independent contractor)?

13.4. Underpayment of wages and superannuation

- 13.4.1 Underpayment of wages is particularly prevalent in some sectors, but is now recognised to occur in many industries, including the security industry.
- 13.4.2 Underpayments can arise in different ways. Some examples include:
- a) Employees are incorrectly classified under their industrial instrument
 - b) Entitlements such as penalty rates aren't paid
 - c) Employees who are covered by a modern award are simply paid a flat rate, which is intended to incorporate any penalty rates and other entitlements due under the award.
- 13.4.3 Underpayment of superannuation is often linked with the deliberate and dishonest underpayment of wages, commonly referred to now as 'wage theft'. Wage theft is distinct from genuine mistake and administrative errors resulting in underpayment of wages or superannuation. Addressing wage theft is a key priority for the Victorian Government. The Wage Theft Bill 2020 was introduced into the Victorian Parliament in March 2020. This Bill will:
- a) create new wage theft offences, targeting employers who steal pay and other employee entitlements, or engage in efforts to obscure wage theft through dishonest record keeping practices
 - b) establish the Wage Inspectorate Victoria as statutory body and provide it with functions and powers to enable it to investigate and prosecute the new wage theft offences.
- 13.4.4 It is difficult to quantify an employee's underpayment when their employer has not complied with their pay slip and employee record keeping obligations. Employers are required under the Fair Work Act to give their employees pay slips and keep employee records. This includes records of pay, overtime, leave and superannuation. In its National Security Industry Campaign, the Fair Work Ombudsman found there was notable non-compliance in this area.

Consultation Questions

For workers

35. What would you do if you felt you were not being paid correctly? For example, you worked on a Sunday but didn't receive penalty rates. Where would you go for help? Has this ever happened to you?
36. Does your employer give you pay slips? Do you know if your employer keeps records of your hours, leave etc.? Have you ever requested a copy of these records?

For businesses

37. Where do you go for advice on meeting your obligations as an employer? Is the information easy to find?

13.5. Cash in hand

- 13.5.1 While paying workers cash 'on the books' is lawful, paying 'cash in hand' is illegal. Cash payments are common practice across all industries. A 2013 study by the Australian Bureau of Statistics estimated that the so-called 'black economy' comprised about 2.1 per cent of GDP.⁴ Whilst a proportion of this black economy relates to criminal activity such as drug production, the largest component, worth nearly \$23 billion (at the time of the study), includes cash in hand payments for otherwise legal work. No estimate is available for the prevalence of cash in hand for the security sector.
- 13.5.2 The Black Economy Taskforce Report (October 2017) produced by the Commonwealth Treasury Department examined the harm that the black economy causes to honest businesses and the community, penalising taxpayers, undermining the integrity of our tax and welfare systems and creating an uneven playing field for the majority of small businesses that are doing the right thing. It should be noted that the report only touched lightly on cash in hand payments but did recommend that all salaries and wages should be paid electronically into an account with an Authorised Deposit Taking Institution. This would not, however, address cash payments to independent contractors. This is ultimately a matter for the Commonwealth and Commonwealth enforcement agencies. However, where permitted by legislation, there may be scope for some Victoria agencies to provide information to the Australian Taxation Office (ATO) or Fair Work Ombudsman to assist with compliance functions.

Consultation Questions

For workers

38. Have you ever been offered cash in hand for a job? Was this a condition of getting the work?

For businesses

39. Has a worker ever asked you to pay them cash in hand?

13.6. Job security

- 13.6.1 The Union reports that there is widespread use of casual labour hire across the industry where permanent employment would be more appropriate. For example, while casual hire agreements may be appropriate in the events sector, it may not be appropriate for crowd controllers at establishments or ongoing businesses.
- 13.6.2 The incidence of insecure work in Victoria was considered by the Victorian Inquiry into the Labour Hire Industry and Insecure Work (Labour Hire Inquiry). While the Labour Hire Inquiry's final report did not include any findings or conclusions specific to the security industry, evidence about insecure work in the sector was given to the Inquiry. For example, a labour hire worker in the security industry submitted as follows:

⁴ Australian Bureau of Statistics – Information Paper: The Non-Observed Economy and Australia's GDP, 2010 (5204.0.55.008)

"I was employed through a labour hire agency in my current job. An under \$20 flat rate, for all hours and shift lengths regardless of warning, overtime, casual loading, night loading. No roster, 24/7 on call. The company I work for changed its ABN and business name every 3 months without warning. They cut our pay with no warning. I just noticed a lower pay rate in my payslip and asked, and that's when they told me we had a pay cut. I am constantly on call thus cannot go out because with friends or schedule things a week in advance because I may get called into work and need to be there in less than 30 minutes from the call in".

- 13.6.3 The Union also submitted that labour hire, including extensive subcontracting, is prevalent in the private security industry⁵ that private security services in Victoria are now almost entirely supplied by contract security firms, and there is a growing practice within the contract security industry to supplement their directly employed labour force with the use of subcontracted labour. Amongst the examples provided was that of security officers working at special events such as the Spring Racing Carnival or the Melbourne Grand Prix, who may appear to be working for a single private security company, but are in fact largely engaged by subcontractors – security officers who are supplied by a separate labour hire contractor to work at the venue wearing the principal contractor's uniform and livery.⁶
- 13.6.4 At its Melbourne hearing, the Labour Hire Inquiry also heard from Mr Anthony Ellis, a security guard with 28 years' experience, about the detrimental effect on wages, conditions and security standards which have resulted from increased use of labour hire and subcontracting arrangements in the industry.⁷
- 13.6.5 The Victorian Parliament's *Inquiry into portability of long service leave entitlements* also looked into issues in the security industry that go to job security.⁸ This inquiry looked at the issue of non-traditional forms of employment in certain industries, including security where:
- "...the nature of employment does not allow employees to serve with a single employer long enough to qualify for long service leave. This occurs when workers in these industries are not hired on a permanent basis. For example, employees who are contracted based on short-term funding arrangements may have a different employer following each competitive tendering process. Even though their work and/or workplace may stay the same, the change of employer may mean these employees lose the long service leave entitlements they had accrued with the previous employer. Traditionally, employees are hired on a permanent basis and have regular hours of work each week. They are employed on a full-time or part-time basis and have a range of entitlements protected by law which includes long service leave. Non-traditional forms of employment include casual, fixed-term, independent contracting and labour hire employment. The range of entitlements available to workers hired under these forms of employment varies".⁹
- 13.6.6 This inquiry ultimately concluded that "due to the contract-based nature of employment in the security industry, some workers are unable to work with a single employer long enough to qualify for long service leave."¹⁰

⁵ Labour Hire Inquiry, Final Report, page 67.

⁶ Labour Hire Inquiry, Final Report, pages 348-9.

⁷ Labour Hire Inquiry Final Report, page 349.

⁸ Victorian Parliament, *Inquiry into portability of long service leave entitlements*, available at https://www.parliament.vic.gov.au/file_uploads/EEJSC_Inquiry_into_portability_of_long_service_leave_entitlements_wTXc6qGv.pdf.

⁹ *Inquiry into portability of long service leave entitlements*, page 7.

¹⁰ *Inquiry into portability of long service leave entitlements*, Finding 14.

- 13.6.7 A portable long service leave scheme has now been introduced in Victoria to deal with the consequence of the nature of the industry on employee entitlements to long service leave.
- 13.6.8 The Victorian Government has also introduced a Labour Hire Licensing Scheme. The scheme applies across the Victorian labour hire industry and includes the private security industry. The objectives of the scheme are to protect workers from being exploited by providers and hosts, and to improve the transparency and integrity of the labour hire industry. The scheme essentially operates by:
- a) requiring labour hire providers to hold a labour hire licence and creating penalties for providers operating without a licence and for hosts who use unlicensed providers
 - b) empowering the Labour Hire Authority to take licensing action, including imposing licence conditions, suspending and in the most serious cases, cancelling licences, in a range of circumstances including when providers do not comply with workplace laws.

Consultation Questions

For workers

40. What is your experience of working in the security industry? Have you been able to find steady, on-going employment or has it mostly been short-term or fixed-term contracts?
41. Have you been in a situation where your employer has changed (e.g. because a new security company has won the contract) but your job has stayed the same?
42. Have you heard of the Victorian Labour Hire Licensing Scheme? Do you know what it does?

For businesses

43. What proportion of your workforce are independent contractors, casual employees, full-time employees and part-time employees?
44. If you engage labour hire staff or casual employees, what advantages do you feel this gives you?

14. Licensing and Regulation Division

- 14.1.1 As discussed previously, the Licensing and Regulation Division (LRD) of Victoria Police is responsible for regulating the Industry. Its primary role is to issue licences and registrations to suitable individuals or businesses seeking to enter the industry. Achieving this aim prevents unsuitable persons from taking hold in the industry (e.g. organised crime groups, or persons unfit to carry out public safety duties).
- 14.1.2 LRD balances these licensing activities with proactive stakeholder engagement and enforcement activities. Enforcement and compliance activities are conducted by Victoria Police as part of normal duties where required. Various state-wide taskforces across Victoria Police also incorporate compliance activities, including checking private security licence holders.
- 14.1.3 One practical issue reported by security personnel to the United Workers Union, is that often an individual would like to report non-compliance with the Act to the Regulator, but the avenues for doing so are not always sufficiently clear.
- 14.1.4 LRD has strong linkages within Victoria Police and to other law enforcement agencies and is involved in joint task-force operations and intelligence gathering, as appropriate. This collaborative approach ensures compliance with the Act is monitored effectively.
- 14.1.5 Private security businesses are a major focus of LRD. Compliance exercises are performed daily to ensure legislative requirements are being met. These exercises ensure a company:
 - a) is only employing licensed individuals
 - b) provides security services for which it is licensed
 - c) maintains relevant records.
- 14.1.6 Compliance exercises performed by LRD also include:
 - a) rigorous assessment of new business applications (pursuant to section 26 of the Act) and renewal applications
 - b) routine and proactive auditing of private security
 - c) intelligence gathering activities
 - d) ongoing assessment of private security business' close associates
- 14.1.7 Proactive audits carried out on a consistent basis ensures businesses providing security services are compliant with legislative requirements. Uniform compliance is important to safeguard public safety.

LRD can implement a range of sanctions:

 - a) formal warning
 - b) issuing a penalty infringement notice
 - c) initiation of a disciplinary inquiry
 - d) laying of charges.
- 14.1.8 LRD has the power to suspend or cancel licences/registrations (note that only VRQA/ASQA has the authority to suspend or cancel the registration of an RTO).

- 14.1.9 Enforcement and compliance activities are working well, but this does not mean that it cannot be improved. The scale and scope of the industry has increased considerably over the past 10 years and this trend is expected to continue, putting more pressure on LRD's resourcing.
- 14.1.10 The Security Licensing and Enforcement Directorate of NSW Police (the NSW Regulator) has eight full time auditors to assess RTOs. LRD recognises RTO auditing would improve with better resources and has presented a business model to the Victoria Police Staff Allocation Model for additional resources to proactively audit and inspect private security businesses including RTOs.
- 14.1.11 Any changes to the legislative framework and/or expansion of regulated activities must be considered together with the additional resources that would be required by LRD to continue to carry out their role effectively.
- 14.1.12 During preparation of this Issues Paper, the United Workers Union reported that some members are unhappy with the cost of licences and do not have a clear understanding of what their fees are used for. The fees are set out in the Regulations and were subject to a Regulatory Impact Statement, which clearly set out that the fees merely cover the costs of licensing and those costs are different for individuals and businesses.
- 14.1.13 While licence fees are outside the scope of this review, there is an argument that there is lack of clarity for some licence holders about what the fees are used for, and this information may assist in understanding exactly where their licence fee goes.

Consultation Questions

- 45. How can compliance with the Act be improved? Are there opportunities for greater collaboration between agencies?
- 46. Are there ways to further automate the components of the application process (e.g. probity checks)?
- 47. Are there ways to facilitate reporting of breaches of the Act to the Regulator?
- 48. Should the LRD website contain accessible information about fees and costs associated with licences?

- 14.1.14 In Victoria, NSW and WA policing agencies regulate the private security industry, with consumer protection or generalist service delivery agencies regulating the industry in other jurisdictions. Policing agencies are in the best position to undertake the administration of security industry regulation – as they are best placed to conduct and monitor probity checks. For example, the security licensing databases are integrated with the operational policing systems so that a new policing event (e.g. a charge) involving a security licensee is immediately notified to licensing administration staff for review of the licensee's suitability to hold a licence.
- 14.1.15 In June 2006, COAG agreed that 'regulation of the security industry' must be administered by or in close connection to the police. There is no evidence to suggest that moving away from Victoria Police as the regulatory body would have any benefits. As such this paper does not consider moving away from Victoria Police as the Regulator.

- 14.1.16 In response to the Independent Commission Against Corruption (ICAC) investigation findings (2009 Report on corruption in the provision and certification of security industry training), the NSW Police Force established a Training Regulation Team within its Security Licensing and Enforcement Directorate. The responsibility of that team includes approving RTOs, developing mandated assessment materials for use by approved RTOs, and auditing approved RTOs. Members of the Training Regulation Team who are trained in vocational training and assessment, attend scheduled training courses around the state to observe the training being delivered to students. Such attendance occurs without prior notice to the RTO.
- 14.1.17 In Victoria before an RTO is approved it must submit its training materials for assessment. The Compliance Support Unit that sits within LRD has performed RTO audits, which included sitting in on classes to observe how the training was delivered and ensuring students took part in the session. Issues around delivery were reported to ASQA. Joint audits have also been performed with ASQA. The CSU role has become more administratively burdensome over time, including updating the Licensing and Registration System with training venues, trainer assessments and responding to RTO queries. Compliance and enforcement could be more effective with better resources to perform additional proactive audits. It could also be improved with a narrower focus on compliance and enforcement under the Act and clearer distinction from ASQA's. It is important to note that CSU are not qualified in teaching or delivery of assessment.

Consultation Question

Is there a need to increase LRD capability so it is in a better position to audit and undertake other compliance activities?

15. Public-Private Partnerships

- 15.1.1 While this issue is beyond the scope of this paper, it is worth noting that in both Britain and New York, there are established partnerships between police and the private security industry in relation to assistance in picking up serious threats to public safety, such as terrorism.
- 15.1.2 There has also been academic consideration of this way of working in Australia because there are so many security personnel in public places. They are first responders to many incidents, are uniquely placed in the centre of busy streets and events and are better able to notice when incidents or suspicious activity occurs.
- 15.1.3 This sort of work is at an early stage in Australia. Considerations include specialist training for security personnel, strong relationships between police and the security industry in terms of reporting, and expectations about response to imminent threat.

16. Final Notes

- 16.1.1 This paper has sought to address the issues that have emerged over time and in some cases, which have been extensively debated over several years.
- 16.1.2 As noted at the outset, the aim of publishing the paper is to elicit feedback, in whatever form you are comfortable with.

- 16.1.3 Whether you would like to provide your views or your direct experience (or both), please feel free to comment on as little or as much of the Issues Paper based on your own preferences and experience.
- 16.1.4 We look forward to receiving your submissions and developing recommendations for change.

Appendix A

Victorian Security Industry Advisory Council (VSIAC)

A Chairperson appointed by the Minister
A nominee of Australian Security Industry Association Limited
A nominee representing the Crowd Controllers Employers Association
A nominee of the Australian Skills Quality Authority
A nominee of the Victorian Security Institute
A nominee of the Security Trainers Association
A nominee of ASIS International
A nominee of the Security Providers Association of Australia Limited
A nominee of the United Workers Union
A nominee of the National Electrical and Communications Association
A nominee of the Chief Commissioner of Police
Such other members with expertise or knowledge as the Minister may decide to appoint including, but not limited to, suitably qualified industry members or academics

VSIAC Working Group Nominees

ORGANISATION
Acting Chair – VSIAC
Australian Security Industry Association Limited nominee
Security Trainers Association nominee
Art Security nominee
Security Providers Association of Australia nominee
Victoria Police nominee
Victorian Security Institute nominee
United Workers Union nominee
Oracle Investigation Services nominee
Global Public Safety nominee
Industrial Relations Victoria nominee