

REPORT

Training in security programs in Australia

Letter of transmittal

The Hon Luke Hartsuyker MP Minister for Vocational Education and Skills Parliament House CANBERRA ACT 2600

Dear Minister

We are pleased to provide the report on the Australian Skills Quality Authority's (ASQA's) national strategic review of training for the security industry in Australia.

ASQA initiated this strategic review into security training in response to concerns raised in successive reports by Coroners investigating the deaths of patrons during or as a result of restraint or intervention by security personnel in the course of incident control, particularly around licensed premises.

Security services have been the subject of significant public scrutiny. The coroners' reports raise significant public safety issues and suggest that a number of training and assessment issues are potentially contributing factors to fatalities. The coroners' findings, together with ongoing stakeholder feedback, indicate that concerns about the security industry, including about the adequacy of training, have been longstanding and persistent.

This national strategic review relied on audits of registered training organisations, surveys of registered training organisations and stakeholder feedback for its findings. The review has found that inconsistent licensing requirements across states and territories, coupled with inadequate specificity in training packages, is leading to poor quality training and assessment being provided by RTOs, and posing fundamental challenges to ensuring high-quality licensed security personnel across the country.

This strategic review was guided by a management committee drawn from key stakeholders from industry, employers, unions and government and chaired by ASQA's Chief Commissioner. ASQA's Commissioners are grateful for the invaluable contribution of the management committee—both collectively and individually—and also for the active support and contributions from other stakeholders.

Key recommendations of this review address the findings that:

- While the qualifications for security roles are national, the regulation of security licensing is state- and territory-based, making it more difficult to ensure consistency and alignment between qualifications and licensing requirements.
- Inconsistent licensing arrangements across states and territories and lack of clarity in the training packages are posing fundamental challenges to ensuring high-quality licensed security personnel who are equipped to safely carry out their duties.
- One of the biggest threats to quality training in the security industry is the prevalence of extremely short courses, which do not allow people to gain the required skills and

competencies. While this issue is systemic across the VET sector, it is endemic in security training

- The training package which contains the relevant security qualifications needs significant review to address issues of content and structure. Licensing authorities will need to play a key role in this process.
- Until the inconsistent licensing arrangements are resolved, people will continue to cross borders to attain licences in jurisdictions with fewer requirements, driving distortions in where training is occurring compared to where the jobs are and potentially compromising safety.
- There is a need for ASQA to work more closely with the state and territory licensing authorities to identify providers of concern that require additional regulatory scrutiny.

The implementation of the strategic review's recommendations will considerably strengthen the quality and safety of security training and assessment provided to learners. This is particularly important: not only for the integrity of the VET sector, but also because this training is integral to safe practices and effective risk management in the security industry.

We commend this report and its recommendations to you.

Yours sincerely

Christopher Robinson
Chief Commissioner and Chief

Executive Officer

Professor The Hon Michael Lavarch AO Commissioner Risk, Intelligence and Regulatory Support

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Key findings

- Coroners in several jurisdictions have expressed concerns over public safety given poor training for security personnel.
- Despite the decision of Australian Governments in July 2008 to harmonise job skills
 requirements for the security industry, this is yet to occur. The operation of the Mutual
 Recognition scheme allows RTOs and students to avoid increased state-based licensing
 requirements by obtaining their licenses in other states and then having those licenses
 recognised in their home state.
- Inconsistent licensing requirements across states and territories, lack of specification in the training package, and inadequate content in qualifications are key issues to be addressed.
- Training courses are generally very short and do not allow sufficient time for the development and assessment of skills and knowledge.
- Almost no assessment is being conducted in the workplace.
- There is evidence of learners with inadequate levels of language, literacy and numeracy skills to undertake security qualifications or to work in the industry.
- There is a deficiency in the training package, in that it does not explicitly address the risks and dangers of restraints and the safe use of restraint techniques.
- The qualifications required for unarmed security guards and crowd controllers need to be accurately aligned to the job roles.
- More strategic engagement between ASQA and the licensing authorities would assist in identifying providers of concern that require greater regulatory scrutiny.

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Executive summary

The Australian Skills Quality Authority (ASQA) commenced operations as the national regulator for Australia's vocational education and training (VET) sector on 1 July 2011. ASQA regulates courses and training providers to ensure nationally approved quality standards are met so that students, employers and governments have confidence in the quality of vocational education and training outcomes delivered by Australian registered training organisations (RTOs).

Under the *National Vocational Education and Training Regulator Act 2011* (the Act), ASQA can conduct reviews of any area where it is concerned about training provided by RTOs, in order to identify systemic poor practice and propose solutions.

One of the key drivers behind this strategic industry review, which focuses on training for the security industry, was a concern repeatedly raised in coroners' reports about the deaths of patrons during (or as a result of) restraint or intervention by security personnel in the course of incident control particularly around licensed premises.

These coroners' reports raise significant public safety issues and suggest that a number of training and assessment issues are potentially contributing factors to fatalities. Coroners' observations include:

- 'People working in the security industry should be required to complete a revised competency module dealing with restraint asphyxia in order to renew their licence' 1
- 'The standard and quality of the training given to security guard applicants varies considerably from jurisdiction to jurisdiction.' ²
- 'Security guards can be trained interstate and then seek to be registered in New South Wales under the Mutual Recognition Act 1992. This in my view leaves a system that is open to abuse and can result in people with insufficient training being employed in this state and ... ultimately putting lives at risk.' ³
- 'It cannot be over-emphasised that guards, security officers and others need to fully understand that positional asphyxia can occur when a person is restrained ... in a prone, face down position.' ⁴
- 'There was no requirement to be examined or observed in any sort of real environment ... The current training is classroom based ... Consideration should be given to requiring a

¹ Office of the State Coroner (24 November 2014), Findings of Inquest into the death of Stephen Arthur Nash, accessed 5 January 2015 at http://www.courts.qld.gov.au/__data/assets/pdf_file/0018/331623/cif-nash-sa-20141124.pdf, pp. 26-27.

² Coroner's Court of NSW (8 December 2011). Inquest into the death of Paul Ahsin accessed 24 June 2015 http://www.coroners.justice.nsw.gov.au/Documents/dic%20dipo%202012%20report.pdf

³ Ibid.

⁴ Coroner's Court of Victoria, State Coroner Judge Gray (27 March 2015) Inquest into the death of Anthony William Dunning, accessed at 24 June 2015 at http://www.coronerscourt.vic.gov.au/home/coroners+ written+findings/findings+-+248011+anthony+william+dunning

crowd controller to first receive a probationary license ... [and be] observed ... in his/her workplace on at least one occasion.' ⁵

The coroners' findings, together with ongoing stakeholder feedback, indicate that concerns about the security industry, including the adequacy of training, have been longstanding and persistent.

ASQA's strategic review has focused on the qualifications required for a number of licensed security activities, as well as on a number of units of competency that:

- were common to those licensed activities in most jurisdictions, and
- contain the specific skills and knowledge about which Coroners, state and territory licensing authorities and other stakeholders have raised concerns.

This strategic review has confirmed many of the issues raised by Coroners and by other stakeholders during consultations.

The key findings of this review are that:

- Inconsistent licensing arrangements across states and territories and lack of specification in the training package are leading to poor-quality training and assessment. This poses a fundamental challenge to ensuring high-quality licensed security personnel who are equipped to safely carry out their duties.
- While the qualifications for security roles are national, the regulation of security licensing is state and territory-based, making it more difficult to ensure consistency and alignment between qualifications and licensing requirements.
- One of the biggest threats to quality training in the security industry is the prevalence of extremely short courses, which do not allow people to gain the required skills and competencies. While this issue is systemic across the VET sector, it is endemic in security training, potentially compromising public safety.
- The training package that contains the relevant security qualifications needs significant review to address issues of content and structure. Licensing authorities will need to play a key role in this process.
- Until the inconsistent licensing arrangements are resolved, people will continue to cross borders to attain licences in jurisdictions with fewer requirements. This leads to discrepancies between where training is occurring and where the jobs are located.

Solutions will require a holistic approach and collaboration between licensing authorities, industry, the training package developer, ASQA and training providers. This collaboration should include:

- agreement by licensing authorities on a single set of qualifications and units to be used in all jurisdictions, paving the way for consistent licensing arrangements
- changes to the training package to more clearly specify:
 - o assessment and volume of learning requirements

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⁵ Coroners Court of Victoria, State Coroner Judge Coate, (5 October 2011), Inquest into the death of Jerry Karamesinis, accessed 11 January 2015 at http://www.coronerscourt.vic.gov.au/home/coroners+written+findings/findings+-+inquest+into+the+death+of+jerry+karamesinis

- what can be delivered and assessed online and what cannot, including what aspects need to be delivered in the workplace
- o the language, literacy and numeracy skill requirements of job roles, and
- skills in safe restraint techniques
- a more strategic and systematic engagement between ASQA and the licensing authorities to facilitate information sharing and to achieve a coordinated response to licensing authority concerns about the quality and integrity of training and assessment.

As at 1 June 2015, 121 ASQA-regulated RTOs were registered to deliver either the Certificate II or Certificate III in Security Operations. These qualifications were the focus of this review.

Of the 67 RTOs audited for this review, the majority of those offering security training were not fully compliant at the initial audit, with 80.6 per cent not compliant with at least one of the national training standards, the *Standards for RTOs 2015* (which RTOs are required to meet at all times if they are offering training programs leading to Australian Qualifications Framework qualifications).

The areas of non-compliance ranged from relatively minor issues (that were rectified quickly) to very serious shortcomings. The highest rates of non-compliance were with the standard relating to training delivery and assessment, which is core business for an RTO. RTOs that were not compliant with the required standards at the initial audit were given 20 working days to respond to the non-compliances found.

After the rectification period:

- 57 RTOs (85.1 per cent) were able to demonstrate full compliance with all of the standards required for registration.
- 10 RTOs (14.9 per cent) remained not compliant with one or more of the required standards.

ASQA continued regulatory action against the 10 RTOs that were unable to demonstrate compliance after the 20 working day rectification period. As at 1 December 2015, six of these RTOs have been able to demonstrate compliance; three RTOs have not achieved compliance and are no longer registered training organisations on the national training register <u>training.gov.au</u>; and one RTO has sought a review of ASQA's decision to cancel its registration at the Administrative Appeals Tribunal and the matter is not yet finalised.

Recommendations

Removing inconsistent licensing requirements

All jurisdictions require security licence applicants to demonstrate they have met nationally agreed minimum competency standards. However, the review identified that in some jurisdictions, licence applicants must demonstrate they have attained additional units of competency to those in the nationally agreed minimum competency standards required for the Certificate II in Security Operations, or that they have attained units from a higher-level qualification (for example, the Certificate III in Security Operations).

In addition, concern about RTOs providing poor-quality security training and assessment has resulted in some jurisdictions imposing state-specific regulatory requirements on RTOs. These state-specific requirements are over and above—or in duplication of—those required by the industry training package and the national standards for RTOs (the standards that training providers must meet in order to become and remain registered). Examples of these additional requirements include mandated minimum course duration and assessment materials, and regular audits of RTOs by licensing authorities.

These differing licensing arrangements, and the variability in the quality and integrity of security training and assessment that RTOs are delivering, have contributed to significant concerns about the way the *Mutual Recognition Act 1992* is being used to gain security licences. Where licensing requirements and the quality of training and assessment practices vary across states and territories, this can encourage the practice of individuals undertaking training and licensing requirements in a jurisdiction with fewer requirements—or requirements which can be achieved more quickly—for the purpose of gaining a licence that will be recognised under the *Mutual Recognition Act 1992* in their actual state of residence. Affected states are concerned that their licensing standards are being circumvented through this practice and that this is resulting in compromised public safety.

Some stakeholders have suggested that the *Mutual Recognition Act 1992* should be reviewed to exclude security licences from the coverage of the Act. This is not considered feasible; it is likely to maintain or increase the different levels of training and licensing across the country and to exacerbate the systemic issue of graduates who are not sufficiently skilled to carry out public safety roles. In addition, it is not appropriate for this review to make recommendations that might undermine the mobility of labour. In September 2015, the Productivity Commission released the *Mutual Recognition Schemes Report*, which found the arrangements are generally working well, making it easier to do business across borders. However, the Productivity Commission report also found that the benefits of mutual recognition risk being eroded due to regulators not always implementing the arrangements as intended, weak oversight, and a growing number of exemptions.⁶

This review proposes that training package developers and jurisdictional licensing authorities collaborate to ensure that nationally recognised portable qualifications meet the skill-related requirements of licences to facilitate the movement of skilled labour. Security jobs are part of a national labour market and there is no justification for having differential requirements across the country for the same job.

⁶ http://www.pc.gov.au/inquiries/completed/mutual-recognition-schemes/report

State and territory licensing authorities, through the Security Industry Regulators Forum, are to commence a project to review the nationally agreed minimum competency standards to address identified inconsistencies. It is strongly recommended that this occur as a matter of priority and in parallel with a review of the training package containing the qualifications, and that licensing authorities agree on a **single set of units/qualifications** to be used for the purposes of licensing security activities across the country.

This collaborative work by the licensing authorities and proposed changes to the training package will strengthen ASQA's ability to address the poor quality and integrity of training and assessment identified by this review and provide a holistic solution to stakeholders' concerns.

Ideally, implementing a single nationally consistent set of qualifications/skill requirements for licences across all jurisdictions and lifting the quality of training delivery and assessment by RTOs will—over time—remove the need for licensing authorities to impose additional regulatory requirements. If licensing authorities determine that additional regulatory requirements (such as assessment conditions) are necessary, these should also be:

- · consistent across the country, and
- incorporated into the training package as industry requirements, rather than individually applied in some jurisdictions (as is currently the case).

However, while licensing authorities agree that consistency in jurisdictional licensing arrangements will be helpful, they consider this will only address the current problems with mutual recognition if all other things are equal, including the duration of courses and the regulatory framework governing RTOs providing the training and assessment. This requires action by the training package developers to ensure the training package explicitly details industry's requirements and thus enhances ASQA's ability to regulate the training and assessment delivered by RTOs. Other recommendations therefore seek to respond to these concerns and the recommendations in this report should be implemented together.

Recommendation 1

It is recommended that the training package developer⁷, in consultation with the state and territory licensing authorities and the security industry progresses as a priority a review of the Certificates II and III in Security Operations, in order to:

- ensure these qualifications meet the skill related requirements for relevant security licence activities, and
- provide a single set of qualifications and units to be agreed by licensing authorities for use in all jurisdictions.

⁷ The Australian Government has announced a new contestable model for training package development and maintenance. The Government has invited proposals from organisations to provide support to Industry Reference Committees which will oversee Training Packages with a view to a new model being in place by January 2016. This may mean that another body is awarded the responsibility for the *CPP07 Property Services Training Package*. In recognition of these potential changes the recommendations in this report will refer actions relevant to the training package to 'the training package developer'.

Addressing poor quality training and assessment practices

Assessment was a key focus of this review. An RTO must only issue VET qualifications to persons whom it has assessed as competent in accordance with the requirements of the training package.

Where assessment is unreliable, the validity of the qualifications issued is questionable; this ultimately erodes the confidence of licensing authorities, employers and individual in the VET system.

The non-compliances identified during ASQA's audits included serious deficiencies in assessment such as:

- inaccurate and poor assessment strategies
- trainers and assessors not holding the necessary training and assessment competencies and not able to demonstrate currency in industry experience
- assessment conducted in a simulated work environment (which may not be sufficient to replicate the resources, environment, time and productivity pressures that exist in the actual workplace), and
- non-compliant assessment tools and practices, for example, assessment that was not conducted in accordance with the principles of assessment and the rules of evidence.

These findings confirmed licensing authorities' and stakeholder views that concerted action—including more explicit specification of the assessment conditions in the training package—is required to lift the quality of VET for the security industry.

In addition, the audits found that some RTOs are delivering training and assessment in security qualifications through the **online delivery mode**. Many stakeholders expressed concern about the use of online delivery, specifically:

- · the capacity to effectively assess competence through online delivery, and
- the risk of identity fraud unless appropriate identity checks are in place.

While credible checks are possible in an online environment, it is the RTO's responsibility to ensure that these take place. Given the nature of the training, however, industry needs to further specify the conditions of assessment, including whether some activities require physical observation. It is proposed that assessment requirements specify when the assessor must be physically present with the student for the assessment.

The review has also found that most training and assessment for security is **classroom based** and **there is limited use of simulated workplace environments** to complement this mode of delivery. Stakeholders reported that licensing restrictions limit access to workplace training and assessment, presenting a systemic challenge to making assessment relevant to the workplace. However, stakeholders held varying views about whether this limitation is real or perceived and about whether legislative changes would be required in individual jurisdictions to enable access to workplaces for training and assessment. In addition, not all stakeholders support the concept of workplace assessment in the security industry. At least one licensing authority expressed concerns about the adequacy and integrity of workplace assessments; this view was based on their previous experience and they questioned whether some competencies (such as conflict resolution) lend themselves to workplace assessment.

Taking into account the diversity of views on this issue, ASQA proposes that the training package developer work with licensing authorities and industry to explore the option of including a mandatory workplace assessment component in the training package. This work should consider the range of stakeholder views and experiences; costs, benefits and impacts of mandatory workplace assessment for students, employers, registered training organisations and the broader community; and the legislative context.

The training package should also provide clearer specifications for assessment in a simulated workplace context. In ASQA's experience, poor-quality training and assessment is a common concern across most training subsectors. Including clear specifications of industry's assessment requirements in the training package will give clarity to RTOs about industry expectations and enable ASQA to better regulate this area of poor-quality practice that has been identified by the review.

Aligning qualification levels to job roles

During the consultations, several stakeholders expressed the view that the certificate II level may not be aligned to the licensed roles of crowd controllers and other security guards.

The review has found that the skills described in the Certificate II in Security Operations are not consistent with AQF level two descriptors and are more aligned to the descriptors in AQF level three.

This design issue could be one of the reasons for the mismatch between employer expectations of graduates and graduates' level of skills and competency—although clearly other issues identified in this review (quality of training and assessment and the short duration of courses) are also factors at play.

However, any attempt to ensure the appropriate alignment of security activities with the related qualifications and the AQF will need to occur in close collaboration with all stakeholders. Some industry stakeholders—while fully supportive of efforts to lift the quality of training and assessment—have expressed concern about the possible unintended consequences of lifting the level of entry-level training.

Stakeholder concerns include:

- the possibility of higher-level qualifications acting as a deterrent to new entrants making recruitment of suitable candidates more difficult and imposing significant additional costs, and
- exacerbating the current situation by forcing some legitimate RTOs out of business and encouraging unscrupulous RTOs to work around the requirements.

It may be that there are a range of security roles which are appropriate at certificate II level. The first step should be for stakeholders to work together to ensure alignment between roles and qualifications.

Recommendation 2

It is recommended that the training package developer in the review of the Certificates II and III in Security Operations:

- explores options for inclusion of a mandatory component of workplace assessment
- specifies what training and assessment can occur online and what cannot
- specifies in the assessment requirements for each unit of competency:
 - the conditions that must be met for assessment to be undertaken in a simulated workplace context
 - when the assessor must be physically present with the student for assessment,
 - assessor requirements including details related to qualifications, experience, industry currency, and knowledge of the language, literacy and numeracy requirements specific to security learners and security roles
- ensures, in collaboration with licensing authorities and industry, that the units and qualifications required for licensed security activities are:
 - accurately aligned to job roles, and
 - o at the appropriate AQF level.

Addressing short courses

One of the biggest systemic threats to the overall quality of VET across the sector is that many providers are delivering courses that are too short to ensure that people are gaining all of the required skills and competencies. **Short duration of security courses** was a recurring theme raised by all stakeholder groups.

One licensing authority argued that extremely short courses (i.e. five days or less) being conducted by RTOs based outside its jurisdiction were a major contributor to the increase in security licences being issued under the *Mutual Recognition Act 1992* in their state.

Therefore, another key focus of this strategic review was to evaluate the duration of courses provided by RTOs and to assess whether students are able to achieve the learning outcomes in a given course duration.

The findings support the many concerns expressed by stakeholders about the short duration of training, which is said to be affecting the competence of qualified graduates to carry out their security roles.

This review has found that a number of RTOs' course durations fell significantly below AQF requirements for certificate II and III qualifications. According to the AQF:

- The full-time volume of learning measure for a certificate II is typically 0.5 to one year (600 to 1200 hours) full-time equivalent.
- The full-time volume of learning measure for a certificate III is one to two years (1200 hours to 2400 hours) full-time equivalent.

All Australian state and territory government ministers for training agreed that these benchmarks should be implemented by 1 January 2015, with training package developers and accrediting authorities⁸ to have policies and processes in place in time to ensure implementation by the required date.

The majority of training for security courses reviewed was completed in less than three weeks. For example, of the 76 RTOs that were delivering the Certificate II in Security Operations, 61 (80 per cent) reported they did so in less than three weeks. RTOs reported that shorter programs in the security sector were delivered for a range of reasons, including student and employer pressure for fast training in required qualifications to gain a licence, and market pressures to reduce the time taken and the cost of programs. RTOs were unable to provide a rationale related to learner needs—for example, that learners had relevant pre-existing industry experience —to justify these short timeframes.

Previous ASQA strategic reviews have found that short duration courses are a systemic problem in the VET sector. It is therefore proposed that there should be a systemic solution across all training packages to address this critical quality issue.

Standard 1 of the *Standards for RTOs 2015* specifies that an RTO's training and assessment strategies, including the amount of training it provides, must be consistent with the requirements of training packages and VET accredited courses. However, training packages remain largely silent on this issue, leaving RTOs to interpret what is needed, rather than setting explicit industry requirements.

The short duration of a high proportion of courses remains an ongoing concern to ASQA and industry stakeholders, as it poses a significant risk to the quality of VET. ASQA is of the view that the training packages need to include explicit guidance to RTOs on this issue to ensure that they are fully aware of the requirements; this will also strengthen ASQA's ability to regulate against the Standards.

ASQA has made a submission to the Australian Government's *Review of Training Packages and Accredited Courses*⁹ which includes advice on the need to address this issue. The outcome of this process is expected to be announced in the near future.

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The Australian Qualifications Framework (the AQF) defines accrediting authorities as 'either authorised under legislation or has been given the responsibility to accredit programs of learning leading to AQF qualifications and/or to register providers to issue AQF qualifications'. The AQF defines 'authorised issuing organisations' as including registered training organisations (RTOs) authorised by the Australian Skills Quality Authority and the government accrediting authorities in Victoria and Western Australia to issue AQF qualifications in vocational education and training. The list of accrediting authorities in place at the time of the AQF 2nd edition which is the current version includes the National Skills Standards Council responsible for the endorsement of AQF qualifications in national training packages. The National Skills Standards Council has been replaced by the Australian Industry and Skills Committee which now has responsibility for endorsement of national training package qualifications. See Australian Qualifications Framework, Second Edition, (January 2013), accessed 27 July 2015, at http://www.aqf.edu.au/resources/aqf/, pp. 21, 22, 91, 103.

⁹ See https://consult.industry.gov.au/vet-reform/training-packages-review

It is proposed that the *Standards for Training Packages* be amended to require all training package developers to specify:

- minimum amount of training benchmarks in the endorsed components of training packages, and
- descriptions of appropriate variations to the benchmarks (to reflect the acceptability of shorter courses when there are relevant learner characteristics, for example, when learners already have relevant and recent industry experience).

In the case of security, this will involve licensing authorities, industry and other stakeholders reaching a considered view about the amount of learning a new learner needs to achieve the skills to undertake security roles.

It is proposed that once the *Standards for Training Packages* have been amended in relation to this systemic issue, the Australian Industry and Skills Committee—as the provider of industry oversight of the quality and relevance of training—prioritises the work of training package developers to revise training packages comply with the new requirements.

Recommendation 3

It is recommended that:

- The Standards for Training Packages be amended as a matter of urgency to include a
 mandatory field in the qualification and unit templates that specifies the 'minimum amount of
 training benchmark' and describes appropriate variations to the minimum amount of training
 benchmark to reflect the acceptability of shorter courses when there are relevant learner
 characteristics (such as learners who already have relevant and recent security experience).
- After the amendments have been made to the Standards for Training Packages, the
 Australian Industry and Skills Committee prioritises the work of training package developers
 to revise training packages to comply with the new requirements.

Improving language, literacy and numeracy skills

Another key concern identified by stakeholders was whether students undertaking training for the security industry have sufficient **language**, **literacy and numeracy** levels to undertake security roles. Effective oral and written communication skills are fundamentally important in public safety roles such as security operatives.

ASQA's audits confirmed the concerns of stakeholders. While RTOs were found to have a range of pre-enrolment tests that addressed different aspects of language, literacy and numeracy and study skills, many of the practices were not effective because:

- Many of these tests were not targeted to security applicants, and were generic in nature.
- RTOs did not provide trainers and assessors with guidance on the expected level of performance that would qualify a student for entry into a security operations qualification.
- In some cases, the language, literacy and numeracy assessment was conducted by administrative staff members who had no prior experience in training and assessment or language, literacy and numeracy; these staff would then determine if enrolment would proceed.

• RTOs were not able to determine a learner's strengths and weaknesses, skill level, learning style, or develop a training plan to suit and support the needs of individuals.

This review found that the foundations for action to address language, literacy and numeracy concerns are in place. Collaborative work by the Construction and Property Services Industry Skills Council, licensing authorities, employers and RTOs has built the *Loud and Clear* strategy to support development of security learners' and workers' language, literacy and numeracy skills. It is proposed that the outcomes of the *Loud and Clear* work be implemented.

Recommendation 4

It is recommended that the training package developer, when reviewing the Certificates II and III in Security Operations, implements the actions of the *Loud and Clear* project, that is:

- Include explicit detail about the language, literacy and numeracy skill demands of each role, as identified by the *Loud and Clear* project, in each unit of competency and in each unit's associated assessment requirements.
- Include information developed by the Loud and Clear project about the objective level of each skill required for security roles and about the language, literacy and numeracy levels that are appropriate for enrolment in the security courses in the Companion Volume that supports implementation of the Property Services training package.

Ensuring the safe use of restraint techniques

The review found that the training given to security guard applicants, including training on key safety issues such as positional asphyxiation, varies considerably from jurisdiction to jurisdiction. This confirmed the findings of coroners' reports and identified a deficiency in the training package in relation to explicitly addressing the risks and dangers of restraints and the safe use of restraint techniques. Licensing authorities were also concerned about ensuring that security licensees maintain the currency of such critical skills and knowledge.

Recommendation 5

It is recommended that:

- In its review of the Certificates II and III in Security Operations, the training package
 developer specifically reviews the relevant units of competency relating to restraints and the
 use of restraint techniques, in order to ensure these explicitly embed knowledge and skill
 requirements to sufficiently address key safety issues such as positional asphyxiation.
- Licensing authorities in all jurisdictions identify—and include as mandatory in the nationally
 agreed single set of competency standards—the most appropriate unit/s of competency to
 ensure security licensees meet the knowledge and skill requirements relating to restraints and
 the safe use of restraint techniques.
- Licensing authorities in all jurisdictions require all relevant current security licensees to refresh
 their skills and knowledge of safe restraint techniques prior to renewing, or re-applying for,
 their licence. The exact requirements should be determined in collaboration with industry and
 be consistent across all jurisdictions.

Changes to the national qualifications are required

The review has found that if progress is to be made in improving safety, substantial efforts must be made to both:

- · address the inconsistent licensing requirements, and
- strengthen the structure and content of the training package (in order to improve the quality and integrity of training and assessment).

This will require collaborative work by licensing authorities, ASQA and other VET regulators, the relevant training package developer, industry stakeholders and training providers.

At a time when the VET system is in transition, many of the recommendations require changes to be made to national qualifications to address critical safety and quality issues.. The VET system is undergoing major reforms, including changes to who has responsibility for training package development and how it occurs.¹⁰

The Australian Industry and Skills Committee has been established to provide industry input on improving the quality and relevance of vocational education and training, to guide the training product development process, to prioritise and schedule training product development, and to endorse products managed by training package developers. 11 To ensure the recommended changes are actioned urgently during the period of reform to the training package development process, it is recommended that the training package developers to include the recommended changes and prioritise the scheduling of this work.

Recommendation 6

It is recommended that:

- The training package developers make the changes to training products proposed in Recommendations 1, 2, 3, 4, and 5 in this report, in consultation with industry.
- In their scheduling of training product development work, the training package developers:
 - o ensure safety and quality issues are urgently addressed, and
 - o give priority to scheduling this training product development work once the Standards for Training Packages have been amended (as proposed by recommendation 3).

¹⁰ The Australian Government has announced a new contestable model for training package development and maintenance. The Government has invited proposals from organisations to provide support to Industry Reference Committees, which will oversee training packages with a view to a new model being in place by January 2016. This may mean that another body (or bodies) is awarded the responsibility for the training packages referenced in this report. In recognition of these potential changes the report uses the term 'training package developer'.

¹¹ Australian Government Department of Education and Training (April 2015), New Arrangements for Training Product Development for Australian Industry, accessed 29 June 2015 at http://docs.education.gov.au/node/37079

Recommendation 7

It is recommended that the Australian Industry Skills Council ensures that the training packages approved have appropriately incorporated the recommendations from this report.

Relationship between licensing authorities and ASQA

The state and territory licensing authorities and ASQA have a shared interest in ensuring that training delivered for the security industry is of high quality and that the qualifications issued have integrity. While concerted action by the licensing authorities, the training package developer and ASQA is required to address these matters, progress will be impeded until the key issue of a common set of licensing requirements is agreed. As such, this important work needs to be accorded a high priority.

It is suggested that ASQA's Chief Commissioner write to the Council of Australian Governments Council of Ministers responsible for the security industry, advising of the outcomes of this review and bringing the urgent need to harmonise the licensing arrangements to their attention. This will help elevate the issues to the highest level and facilitate prioritisation of actions.

The review has found that licensing authorities have held longstanding concerns about poor-quality training and assessment, including RTOs' use of partnership arrangements for delivery and assessment (e.g. cross-border arrangements); the prevalence of extremely short courses; RTOs' use of online delivery; and unscrupulous RTOs issuing qualifications with questionable integrity.

It is clear that licensing authorities—in addition to their detailed knowledge of the security sector—have access to considerable intelligence about the quality and integrity of training, risk and systemic issues, and provider practices. While Memoranda of Understanding have been negotiated with a number of individual licensing authorities, this review suggests that ASQA and the licensing authorities should establish a more strategic and systematic engagement, a view to sharing information about systemic issues as well as specific complaints. This will enable ASQA to respond in a coordinated way to concerns raised by licensing authorities. Where strong evidence of poor practice that warrants an escalated regulatory response can be provided to ASQA in a timely manner, ASQA is more able to apply the full range of legislative sanctions to the relevant providers.

It is recommended that ASQA engages with the licensing authorities both individually and collectively through the Security Industry Regulators Forum to brief them on the outcomes of this review and to seek their collaboration in expediting the implementation of the recommendations (including establishment of an ongoing strategic relationship with ASQA for more timely and coordinated identification and resolution of concerns).

Recommendation 8

It is recommended that:

- ASQA's Chief Commissioner writes to the Council of Australian Governments Law, Crime and Community Safety Council advising of the outcomes of this review and the imperative that ASQA, licensing authorities, the training package developer and other stakeholders expedite implementation of the recommendations in relation to the key issues of inconsistent licensing requirements.
- ASQA briefs individual state and territory licensing authorities and the Security Industry
 Regulators Forum on the outcomes of this review and seeks their collaboration to expedite
 implementation of the review's recommendations and to strengthen the ongoing strategic
 relationship with ASQA to enable effective and timely responses to providers of concern.

Chapter 1 Introduction

1.1 Background

The Australian Skills Quality Authority (ASQA) commenced operations as the national regulator for Australia's vocational education and training (VET) sector on 1 July 2011.

ASQA regulates courses and training providers to ensure nationally approved quality standards are met so that students, employers and governments have confidence in the quality of vocational education and training outcomes delivered by Australian registered training organisations (RTOs).

ASQA is the regulatory body for RTOs in:

- Australian Capital Territory
- New South Wales
- Northern Territory
- South Australia
- Queensland, and
- Tasmania.

ASQA is also the regulatory body for RTOs in Victoria and Western Australia that:

- offer courses to overseas students, and/or
- offer courses to students (including through offering courses online) in the Australian Capital Territory, New South Wales, the Northern Territory, South Australia, Queensland or Tasmania.

The total number of RTOs in Australia is 4590. ASQA regulates 3948 (86.0 per cent) of these RTOs, as shown in Figure 1.

Figure 1: Regulators of Australia's RTOs



Source: training.gov.au 1 June 2015

1.2 Changes to the regulatory framework commencing in 2015

The Council of Australian Governments' Industry and Skills Council is responsible for endorsing vocational education and training (VET) standards for RTOs. The purpose of these standards is to:

- describe the requirements that an organisation must meet in order to be an RTO in Australia, and
- ensure that training delivered by RTOs meets industry requirements (as set out in the training package or accredited course).

All RTOs regulated by ASQA in Australia are responsible for ensuring they fully comply with the standards at all times as a condition of their registration.

The standards describe outcomes RTOs must achieve, but do not prescribe the methods by which they must achieve these outcomes. This non-prescriptive approach:

- allows RTOs to be flexible and innovative in their VET delivery, and
- acknowledges that each RTO is different and needs to operate in a way that suits their clients and learners.

The standards are enabled by the Act under which ASQA operates.

On 26 September 2014, the Council of Australian Government's Industry and Skills Council agreed to new regulatory standards for training providers and regulators. The *Standards for RTOs 2015* were implemented from 1 January 2015 for organisations applying to become an RTO and were implemented from 1 April 2015 for existing RTOs.

This review of security industry training was commenced in 2014 when the previous standards, the *Standards for NVR Registered Training Organisations 2012*, applied. Hence, where a specific reference is made to a 2012 standard the report also includes in parenthesis the standard that applies from 2015. ASQA has published a mapping summary, which maps the *Standards for NVR Registered Training Organisations 2012* to the *Standards for RTOs 2015*.

1.3 ASQA strategic reviews

As the national regulator, ASQA is committed to maintaining world-class vocational education and training standards across Australia. Section 35 (2) of the Act states that 'the National VET Regulator may review or examine any aspect of an NVR registered training organisation's operations to determine any systemic issues relating to the quality of vocational education and training'.

Under section 35 (2) of the Act, ASQA in 2012-13 initiated three strategic reviews targeting training 'hot spots' where intelligence had identified risks to the quality of outcomes achieved by training delivery and assessment. The three strategic reviews undertaken in 2012-13 were:

- training and assessment for the aged and community care sector
- the entry-level occupational health and safety training required to work on construction sites in Australia, commonly known as the White Card, and
- inappropriate marketing and advertising practices by RTOs.

ASQA's strategic reviews conduct in-depth analysis of a particular issue, sector, qualification or method of delivery. The focus is on examining systemic poor practice and identifying appropriate actions to address poor practice, not just resolving issues with individual RTOs.

ASQA applies a proportionate and risk-based approach to regulation. 'Risk-based regulation' means targeting resources to areas that pose the greatest risk to the delivery of quality vocational education and training—and therefore the greatest risk to the reputation and economic wellbeing of Australia's training and international education and industries. This approach also means that for high-quality providers, the burden of regulation can be minimised.

ASQA implements this proportionate and risk-focused regulation through several key methods:

- applying an agency-wide risk model that utilises data and intelligence to identify evaluate and treat risks, and influences every aspect of the regulation of providers, from application to audit to enforcement
- identifying and addressing major systemic risks through a program of strategic responses, targeted at problematic sub-sectors of the training industry, and
- using complaints and intelligence about regulated providers as a key source to gather data and inform how those providers are regulated.

In 2014, ASQA announced that training in early childhood education and care, security and equine programs would come under scrutiny. The media release can be accessed from www.asqa.gov.au/news-and-media/training-regulator-to-review-key-sectors-of-the-economy.html.

1.4 Coroners' reports involving the security industry

A key driver of the strategic industry review of training for the security industry was concerns raised in a number of successive reports by coroners investigating the deaths of patrons during or as a result of restraint or intervention by security personnel in the course of incident control (particularly around licensed premises). The concerns are serious as they involve significant public safety issues and suggest that that the following are contributing factors to a number of fatalities:

- poor-quality training that does not equip people with the right skills
- inadequate work-based training and assessment
- · security personnel with poor language, literacy and numeracy skills
- no requirements for a newly licensed security worker to be supervised by an experienced licensee
- inadequate content in qualifications
- jurisdictional differences in the level and quality of training
- inconsistent licensing requirements across states and territories, and
- the dangers of restraint (including positional asphyxia) which are not being adequately addressed.

Some of the issues highlighted in coroners' reports are outlined below. They indicate that concerns about the security industry, including whether training is adequate, have been longstanding and persistent.

A Victorian Coroner's report into a 2007 death noted that—given the confronting figures on the number of fatalities in and around licensed premises and the fact that current training is classroom based—it is timely to introduce a probationary period for licensed crowd controllers. The Coroner recommended that:

'The Chief Commissioner of Police together with ASQA, the Victorian Registration and Qualifications Authority and the Department of Justice review the current requirements of licensing crowd controllers and in doing so consider introducing a graduated licensing regime comprised of the following:

- crowd controllers being granted an initial probationary licence after completing basic
 Certificate requirements
- the completion of a number of performance hours under the supervision of a full licensed crowd controller
- a requirement that the RTO must have observed the probationary licence holder in his or her workplace on at least one occasion, and
- that the licensing authority receive a satisfactory report of the probationary licence holder from a current employer.' 12

In its response to these recommendations, ASQA advised that any review of licensing of crowd controllers would need to be referred to and undertaken by the Victoria Police.

ASQA also noted that the introduction of a requirement for RTOs to observe probationary licence holders in the workplace would need to be included as an assessment requirement for the relevant qualifications or units or competency; this would need to be done by the developer responsible for the maintenance of those qualifications, the Construction and Property Services Industry Skills Council. ASQA further advised that once such a requirement is included in the training package, ASQA auditors can audit RTOs delivering the relevant training to ensure that the requirement is being met.¹³

Victoria Police also responded to the Coroner's recommendations and advised in relation to the recommendation above:

Whilst Victoria Police supports this recommendation in principle, the implementation of this recommendation in the absence of a more considered national approach is problematic. To this end Victoria Police will continue to work closely with other regulators through the Security Industry Regulators Forum to implement recommendations made by COAG aimed at achieving harmonisation in security training and licensing more generally.

Victoria Police makes the observation that the model proposed by the Coroner is very similar to that which was implemented in New South Wales. Victoria Police understands that the New South Wales Minister for Police and Emergency Services recently announced that legislative amendments in 2012 will remove this model as there have been numerous issues associated with its implementation.' 14

Provisional licensing in New South Wales was abolished on 1 November 2012. In his Second Reading speech on 19 June 2012, the then NSW Police Minister stated the reasons for the change included:

- · compliance costs for industry
- the burden on employers of supervision of provisional licence holders
- employer reluctance to hire provisional licence holders, and
- new entrants using interstate training and mutual recognition.

The New South Wales Coroner, in investigating a 2010 death due to positional asphyxia, found that the standard and quality of the training given to security guard applicants—including on positional asphyxiation—varies considerably from jurisdiction to jurisdiction. This becomes problematic when security guards trained interstate seek to be registered in New South Wales under the *Mutual Recognition Act 1992*. Evidence was given by the New South Wales Police that New South Wales had advocated to other jurisdictions, in forums such as the Council of Australian Governments, the importance of standard training and quality requirements being adopted across all jurisdictions with respect to training and licensing of applicants for security guard licences. The Coroner recommended to the Council of Australian Governments that it give consideration to a review of the *Mutual Recognition Act 1992* as it applies to the manpower sector of the security industry.

In November 2014, the Queensland Coroner referred to ASQA in the findings into the death of a hotel patron who was restrained face down. He noted that evidence from the security personnel at the inquest generally displayed their lack of awareness of the risks of holding a person face down on the ground for a lengthy period. He recommended that the issue of restraint or positional asphyxia be incorporated into the curriculum for the training of security personnel, and others engaged in work that may require the use of force and restraint. He further recommended that all security personnel should be required to complete a revised competency unit dealing with restraint asphyxia in order to renew their licence.¹⁵

In his response to the Queensland Coroner, ASQA's Chief Commissioner advised of ASQA's strategic review of training in the security industry and that a copy of the Coroner's correspondence and findings would be provided to the committee overseeing the review. He also advised that

¹⁴ Victoria Police, (16 January 2012), Response to the Coroner's Recommendations – Jerry Karamesinis, accessed 11 January 2015 at http://www.coronerscourt.vic.gov.au/home/coroners+written+findings/response+-+inquest+into+the+death+of+jerry+karamesinis

¹⁵ Office of the State Coroner (24 November 2014), Findings of Inquest into the death of Stephen Arthur Nash, accessed 5 January 2015 at http://www.courts.gld.gov.au/ data/assets/pdf file/0018/331623/cif-nash-sa-20141124.pdf, pp 26-27.

particular attention would be paid to the Coroner's concerns regarding the issue of restraint or positional asphyxia. ¹⁶

Further information about the licensing arrangements for security personnel is provided in <u>Chapter 2</u>. Chapter 2 also outlines state and territory licensing authorities' concerns about the quality of the training and assessment provided by some RTOs, and about poor levels of key skills such as language and literacy held by many qualified security personnel (compromising their ability to perform effectively in security roles).

The issues highlighted in coroners' reports were also raised by stakeholders during the review.

Finally, it is important to note that a detailed reading of the coroners' reports highlights another matter relating to the service of alcohol. Without exception, evidence indicated that the patrons had consumed excessive alcohol prior to the incidents which led to their being restrained. As an example, in the case of the most recent report in Queensland, consumption was encouraged by special promotions, with patrons purchasing multiple drinks on each occasion and 'drinking as fast as they could to take advantage of the promotion before it finished.' This issue raises questions about the effectiveness of another unit of competency in the VET system—*SITHFAB201 Provide responsible service of alcohol.*

In most jurisdictions, completion of *SITHFAB201 Provide responsible service of alcohol* is mandatory under liquor licensing laws for employees engaged in the sale or service of alcohol. While there are a number of factors at play in whether the completion of the unit results in workers who are able to competently and responsibly serve alcohol, different jurisdictional approaches may play a part in how effectively the unit is being delivered and assessed. In New South Wales, the Office of Liquor, Gaming and Racing has specific requirements for the delivery of this unit, which:

- must be conducted by an RTO approved by ASQA
- must be delivered over a minimum of 6 hours, and
- · cannot be delivered online.

In Queensland, the Office of Liquor, Gaming and Racing only requires that the unit is delivered by an RTO approved by ASQA. Many RTOs advertise training and assessment for the unit in a 100 per cent online environment. It is not clear how this mode enables the RTO to assess the required skills from this unit, including:

- communication to speak clearly and firmly with intoxicated customers, and
- initiative and enterprise skills.

¹⁶ ASQA (8 December 2014) Letter from Chief Commissioner to Terry Ryan, Queensland State Coroner.

¹⁷ Office of the State Coroner (24 November 2014), Findings of Inquest into the death of Stephen Arthur Nash, accessed 5 January 2015 at http://www.courts.gld.gov.au/ data/assets/pdf file/0018/331623/cif-nash-sa-20141124.pdf, p.3

While the delivery and assessment of this unit of competency is not a matter for this review, ASQA will consider the issue and will draw the issue to the attention of the training package developer for consideration by industry, regulators and stakeholders.

1.5 Management committee and methodology

The review has been overseen by a management committee chaired by ASQA's Chief Commissioner, which included representatives from:

- the Australian Security Industry Association Limited
- the Construction and Property Services Industry Skills Council
- the Victorian Registration and Qualifications Authority
- Training Accreditation Council Western Australia
- the Queensland Office of Fair Trading
- the NSW Police Force Security Licensing & Enforcement Directorate
- the Australian Government Department of Industry (subsequently replaced by the Australian Government Department of Education and Training), and
- United Voice.

The representatives on the management committee are listed in Appendix 3.

The management committee's role has included:

- providing advice on the methodology adopted for the review
- offering expert advice throughout the review and overseeing progress
- · advising on consultations and providing a conduit to stakeholders, and
- providing input into the report and its recommendations.

The management committee agreed that the audits conducted for the review should focus on the following qualifications:

- CPP20211 Certificate II in Security Operations (superseded)¹⁸
- CPP20212 Certificate II in Security Operations, and
- CPP30411 Certificate III in Security Operations.

CPP20212 Certificate II in Security Operations is the qualification required to be a licensed security operative in most jurisdictions. However, different units are required in different jurisdictions. Some authorities only require some units (and not the whole qualification) to be completed to satisfy the licence requirements. CPP30411 Certificate III in Security Operations is the qualification required for roles involving use of firearms, cash-in-transit and use of dogs. Cash in transit may also be performed by an Unarmed Guard with a Class 1A licence in NSW.

¹⁸ The ASQA website explains the meaning of superseded: When a new training package qualification or unit of competency replaces an existing qualification or unit of competency, the existing qualification or unit of competency is referred to as superseded. See http://www.asqa.gov.au/media-and-publications/transition--teach-out.html, accessed 7 August 2014.

Audits focused on the following units of competency, following an analysis of the relevance of these units to issues such as correct physical restraints, and advice from industry:

- CPPSEC2004B Respond to security risk situation
- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC3007A Maintain security of environment, and
- CPPSEC3002A Manage conflict through negotiation.

These units were selected as they are common to most security licences in most jurisdictions and contain specific skills and knowledge pertinent to the review.

At the time of the review, one superseded qualification (*CPP20211 Certificate II in Security Operations*) was in transition to the new qualification *CPP20212 Certificate II in Security Operations*. Hence both the superseded and new qualifications were included in this review, as both were being delivered. More information about superseded qualifications and the requirements for transition to new qualifications is available from the ASQA website.

In summary, the methodology for the strategic review included:

- · reviewing various reports, environmental scans and data
- consulting with key stakeholders
- surveying all RTOs delivering the relevant qualifications
- interviewing a number of students, employers and RTO representatives in the security industry
- analysing complaints received in relation to RTOs delivering the relevant qualifications, and
- analysing the results of 67 audits undertaken by ASQA between 29 January 2013 and 21 October 2014 (24 of these audits were specifically undertaken for this review and 43 were completed by ASQA during the course of its usual regulatory activity).

Further detail about the methodology is included in Appendix 4.

1.6 Structure of the report

- Chapter 2: Provides details on the licensed security industry workforce including the
 nature of state- and territory-based licensing of security personnel, the effects of the operation
 of the Mutual Recognition Act 1992, efforts to harmonise licences across the country, efforts
 to lift the level of language and literacy skills in the workforce, the size of the workforce and
 the types of employment that exist in the security industry.
- <u>Chapter 3</u>: Outlines the nature of training for the security industry including details of RTOs delivering security training, student numbers, the number of qualifications and units being delivered, and the results of the RTO survey undertaken for this review.
- <u>Chapter 4</u>: Provides a summary of stakeholder consultations including the issues raised
 in roundtable discussions; comments provided by RTOs during the survey conducted for the
 review; and insights gathered in interviews with employers, trainers and students of the
 sample RTOs audited.
- <u>Chapter 5</u>: Details the compliance of RTOs offering security training with the requirements
 of the relevant standards for RTOs. This chapter examines compliance with training and
 assessment standards; the adequacy of training resources provided by RTOs; qualifications
 and industry competencies of trainers; the quality of assessment; the provision of appropriate
 information by RTOs to students; and the adequacy of engagement with industry.
- <u>Chapter 6</u>: Presents a summary of the main findings of the review together with recommendations and a discussion of the way forward.

Chapter 2 Security industry licensing and workforce

2.1 State and territory concerns about security industry training

Security industry training has been the focus of concern across a number of jurisdictions. Variations in licensing arrangements across jurisdictions are likely to have been partially driven by responses to jurisdiction-specific events and initiatives, as well as by licensing authority concerns about the quality of training and assessment. Three examples from Western Australia, New South Wales and Queensland are outlined below.

Western Australia strategic industry audit

The Western Australia Training Accreditation Council conducted a strategic industry audit of security training in 2010, after concerns were raised by key industry stakeholders in Western Australia regarding the quality of training and assessment in the industry. ¹⁹ It is of significant concern that a number of years after the publication of the Western Australian report, similar issues continue to be identified in the industry (prompting the initiation of this ASQA review).

The Western Australian strategic audit—although focused on previous versions of qualifications used for training in the security industry—found that there were varying levels of compliance with the relevant national standards for RTOs at that time. Examples of good practice were also found. However, of the 24 RTOs audited, three (12.5 per cent) had significant non-compliances and four (17 per cent) were found to have critical non-compliances.²⁰ At least 50 per cent were found to be not compliant in relation to staff, facilities, equipment, training/assessment materials and assessment practices.

The report noted that the non-compliances with respect to assessment indicated a widespread and systemic challenge for the security industry. This is complicated by the fact that licensing restrictions prevent students from access to the workplace, because a licence is required to operate in a workplace and students are—by definition—working towards obtaining a licence. As a result, the qualification is largely delivered in simulated environments. This remains an issue for training in the industry.

http://www.tac.wa.gov.au/SiteCollectionDocuments/TAC%20Annual%20Report%202010-11.PDF

¹⁹ Training Accreditation Council Western Australia (2011) *2010 Western Australia Strategic Industry Audit of Training in the Security Industry*, published report provided by Western Australia Department of Education Services.

²⁰ Significant non-compliances indicate there is a significant adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace. Critical non-compliances indicate critical advice impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace. Information provided in Training Accreditation Council Western Australia (2011), 2010 Western Australia Strategic Industry Audit of Training in the Security Industry, published report provided by Western Australia Department of Education Services, pp 27, 28. http://www.tac.wa.gov.au/SiteCollectionDocuments/TAC%20Annual%20Report%202010-11.PDF

RTOs that were surveyed during the strategic audit made frequent comments about:

- duration of training (difficulty in competing against other RTOs that are providing inappropriately short and cheap courses)
- language and literacy issues (many employees are issued with qualifications without the degree of literacy and communication skills required for the job), and
- variations in licensing requirements between different jurisdictions, raising a notable concern about national recognition and portability of the qualifications.

The report noted that training duration varied significantly. In relation to language, literacy and numeracy, it was noted that unless RTOs' delivery and assessment strategies reflect real workplace communication skills, language and literacy will continue to remain an issue for the industry.²¹

Reform of the New South Wales regulatory model for the security industry

The New South Wales Independent Commission Against Corruption reported in December 2009 on the findings of its investigation into security industry training (Operation Columba). ²² Evidence of corrupt conduct and poor-quality recognition of prior learning assessments uncovered by the investigation raised doubts about the legitimacy of security licences in New South Wales and the integrity of security training providers. The investigation's identification of inadequate and confusing regulatory arrangements between licensing authorities and the state training regulator and the subsequent independent review in 2010 of the New South Wales Police Force's regulation of the security industry informed a new regulatory model for New South Wales. As a result, the Commissioner of Police was given greater responsibility for regulating security industry training and created specific compliance and enforcement teams within the Security Licensing & Enforcement Directorate. This includes a team that approves RTOs and trainers to conduct security training, and ensures compliance with training requirements set by the Commissioner through regular audits of security licence courses. ²³

²¹ Training Accreditation Council Western Australia (2011) *2010 Western Australia Strategic Industry Audit of Training in the Security Industry*, published report provided by Western Australia Department of Education Services, pp 2,3,7,19,37-39. http://www.tac.wa.gov.au/SiteCollectionDocuments/TAC%20Annual%20Report%202010-11.PDF

²² Independent Commission Against Corruption (2009), Report on corruption in the provision and certification of security industry training (Operation Columba), http://www.icac.nsw.gov.au/investigations/past-investigations/investigationdetail/156, accessed 9 October 2014.

²³ Information sourced from Reform of the New South Wales Regulatory Model for the Security Industry, 30 August 2010, http://www.police.nsw.gov.au/services/security_licensing_and_enforcement_directorate/security_license/news/news_archive, accessed 10 November 2014, and the Security Industry Regulators Forum, Meeting Minutes 13 March 2014, provided by ASQA.

The Independent Commission Against Corruption specifically recommended to the New South Wales Police that its Security Industry Registry²⁴ should ensure that security licences are only issued to persons who have attained the required competencies. ²⁵ Recommendation 5 of the Independent Commission Against Corruption report states that the Security Industry Registry should 'independently test the knowledge of applicants prior to the issue of the licence'. 26 New South Wales Police have responded to these and other recommendations in the report by mandating assessment instruments that must be used by the RTOs it has approved.

This explains why the licensing requirements in New South Wales are now among the most stringent in the country, although other stakeholders noted that this approach also requires significant resources. Section 2.2 of this report provides an overview of state and territory standards and licensing requirements including the variations in requirements across jurisdictions.

Queensland—media coverage

The 2012 report 'Security guard training organisations face scrutiny' on the Australian Broadcasting Corporation's 7.30 Report about the security industry in Queensland is an example of negative media coverage of the security industry. ²⁷ The report focused on claims about qualifications fraudulently obtained in Queensland, which enabled people to become licensed security guards anywhere in Australia using mutual recognition. A case of excessive force used by one such licence holder was used to illustrate how differing training standards and regulation are compromising safety.

ASQA subsequently investigated the allegations against the Queensland provider named on the 7.30 Report and suspended that part of the registration of the training provider related to providing security training courses. The RTO's registration has now been cancelled.

More detailed information about the operation of the Mutual Recognition Act 1992 and concerns about movement of licensed security personnel across borders using the provisions of this Act are outlined in section 2.3.

2.2 **Current state and territory licensing arrangements**

A review of current licensing arrangements across jurisdictions shows that not only training and licensing requirements but also the relevant regulatory authority varies across jurisdictions. The following information has been sourced from licensing authority websites as at 6 July 2015.

All jurisdictions require security operatives, including crowd controllers, to be licence holders, although the requirements for achieving a licence vary across jurisdictions.

²⁴ Now the Security Licensing & Enforcement Directorate

²⁵ Independent Commission Against Corruption op. cit., p. 58

²⁶ Ibid. p. 59

In summary:

- *CPP20212 Certificate II in Security Operations* is the entry-level qualification for security work. It contains **seven core units**, and requires a selection of **five electives**, for the award of the qualification. The certificate II can be found at <u>Appendix 1</u>.
- CPP30411 Certificate III in Security Operations contains eight core units and requires a
 selection of six elective units for the award of this qualification. The certificate III can be
 found at Appendix 2.
- All jurisdictions mandate requirements via legislation.
- In all jurisdictions all businesses and individuals providing security services must hold a licence.
- The licensing authorities are:
 - Department of Business, Northern Territory
 - o Office of Fair Trading, Queensland
 - Consumer and Business Services, South Australia
 - Department of Consumer Affairs and Fair Trading, Tasmania
 - o NSW Police Force, Security Licensing & Enforcement Directorate, New South Wales
 - WA Police Licensing Services (Security), Western Australia
 - o Victorian Police Licensing and Regulation Division, Victoria
 - Office of Regulatory Services, Australian Capital Territory.
- While all jurisdictions require security licence applicants to demonstrate they have met
 nationally agreed minimum competency standards, in some jurisdictions licence applicants
 must also demonstrate they have attained additional units of competency to those in the
 nationally agreed minimum competency standards, or that they have attained units from a
 higher level qualification.
- Some jurisdictions also mandate minimum course duration, assessment materials and other criteria such as methods for verification of student identity (for example, New South Wales, which also conducts compliance activities), while others do not impose mandatory requirements.
- In some jurisdictions (for example, the Northern Territory) RTOs must be approved by the licensing authority to deliver security training. In others (for example, New South Wales and the Australian Capital Territory) the RTO must hold a master licence and/or be approved to deliver and all trainers must hold a licence. Queensland's licensing authority accepts ASQA's registration of the RTOs and does not either impose an additional approval process on RTOs or require them to hold a licence.²⁸
- The fact that the jurisdictions require different electives means that the skills that are attained by students completing the units of competency will be different from one jurisdiction to another.

²⁸ Debra Baxter and Associates (2014) Paper prepared for the Australian Skills Quality Authority, Australian Security Training Industry at 26 June 2014, unpublished.

Licensing jurisdictions

This section introduces the licensing authorities in each jurisdiction. It also provides an overview of each jurisdiction's application processes, licensing standards and practices.

Australian Capital Territory

In the Australian Capital Territory, the licensing authority is the Office of Regulatory Services.

The RTO must hold a master licence and all trainers must have a trainer licence. It is noted that:

- there is no mandated course duration, assessments or other criteria
- there are no specific qualifications for trainers and assessors except those required under the VET Quality Framework
- there are no specific authenticity checks for students apart from applying for the relevant licence, and
- there is a list of approved training associations that provide professional development.

Website: https://www.ors.act.gov.au/industry/security_industry

New South Wales

In New South Wales the licensing authority is the NSW Police Force Security Licensing & Enforcement Directorate. The RTO must hold a relevant master licence and all trainers must hold a security trainer licence. The RTO must also be approved by the Commissioner of Police (the Commissioner) to deliver security training and assessment and comply with conditions imposed on the RTO by the Commissioner. There are mandated course duration, assessments and other criteria as determined by the Commissioner. The Security Licensing & Enforcement Directorate is responsible for ensuring RTOs comply with these legislative requirements. The conditions imposed by the Commissioner on approved RTOs include²⁹:

- RTOs must use the assessment material developed by the Security Licensing & Enforcement Directorate.
- An RTO cannot subcontract any of the security training and assessment without the prior approval of the Security Licensing & Enforcement Directorate.
- Training must be conducted in New South Wales.
- Trainers must be approved by the Security Licensing & Enforcement Directorate.
- The RTO must inform the Security Licensing & Enforcement Directorate when courses are to be conducted and of the details of students that commence the course.
- A language, literacy and numeracy assessment approved by the Security Licensing & Enforcement Directorate must be conducted on each student before commencing any Security Licence Course.

²⁹ Approved Organisation Conditions of Approval effective 16 September 2014, accessed 24 February 2015

• The RTO must verify the identity of all students undertaking a Security Licence Course.

Website: http://www.police.nsw.gov.au/services/security_licensing_and_enforcement_directorate

Northern Territory

In the Northern Territory, the licensing authority is the Department of Business. The Department of Business has a list of approved RTOs and the required units of competency on its website: https://www.dob.nt.gov.au/gambling-licensing/business/security-licensing/pages/default.aspx.

There are no mandatory assessments; there are no specific qualifications for trainers and assessors except those required under the VET Quality Framework; and there are no specific authenticity checks for students apart from applying for the relevant licence.

Website: https://www.dob.nt.gov.au/gambling-licensing/business/security-licensing/pages/default.aspx

Queensland

In Queensland, the licensing authority is the Queensland Office of Fair Trading. The Office requires that corporate licensees must maintain membership with an approved Security Industry Association and all trainers must hold the relevant licence class to enable them to return to industry and to maintain their currency. There are no mandatory requirements for course duration, assessments, resources, or authenticity of student checks.

Website: http://www.qld.gov.au/law/laws-regulated-industries-and-accountability/queensland-laws-and-regulations/regulated-industries-licensing-and-legislation/security-industry-regulation/

South Australia

In South Australia, the licensing authority is Consumer and Business Services. RTOs must be approved by the Commissioner for Consumer Affairs prior to delivery of training. The licensing authority requires that security industry trainers hold a security trainer licence and RTOs be approved prior to delivery. There are no specific requirements for nominal hours, assessment, marketing or authenticity of students.

Website: http://www.cbs.sa.gov.au/wcm/licensing-and-registration/occupational-licensing-and-registration/occupational-licensing-and-registration/security-and-investigation-agents-quick-links/

Tasmania

In Tasmania, the licensing authority is the Department of Consumer Affairs and Fair Trading. The Department mandates the required units of competency and trainers must have a Security Trainer Licence.

Website: http://www.justice.tas.gov.au/licensing_and_accreditation/security

Victoria

In Victoria, the licensing authority is the Victoria Police, Licensing and Regulation Division. The Division requires that: all security trainers are required to hold a trainer licence and be approved prior

to any delivery or assessment; RTOs must be licensed by the Division; all RTOs are also to forward their training and assessment plans and all assessment instruments to the Licensing and Regulation Division prior to approval to deliver and assess; there are no mandated assessment instruments or resources; however, approval must be sought in the first instance and minimum face to face training hours are prescribed for licensing courses.

Website: http://www.police.vic.gov.au/content.asp?Document_ID=37731

Western Australia

In Western Australia, the Licensing authority is the Licensing Enforcement Division of the Western Australia Police. The division requires that: there are mandated minimum hours against each of the units of competency that are required for the qualifications, however, for remote delivery of training, written permission from the Western Australia Police can be sought to alter these hours; there are no mandatory assessments, student authenticity checks, or marketing guidelines; RTOs must be registered to deliver security training and are required to have Commissioner approval of all training venues and must supply a list of enrolled students, seven days prior to commencement of training and the ratio of trainer to student is 1:16 and each student must have allocated one training aid each for all practical assessments.

Website:

http://police.wa.gov.au/Ourservices/PoliceLicensingServices/Security/tabid/1803/Default.aspx

Jurisdictional differences for licence types

This section addresses the jurisdictional differences for licence types. The qualification requirements for five licence types are compared across jurisdictions. The licence types are: Crowd Controller, Unarmed Guard, Bodyguard, Cash-in-transit Officer and Control Room Operator.

Crowd controller

A crowd controller monitors or controls the behaviour of people, screens people for entry or removes people for behavioural reasons. He or she works at licensed premises, places of entertainment and public or private events or functions. Crowd controllers are sometimes known as 'Bouncers' or 'Doormen'.

Summary

Each jurisdiction has different requirements for attaining a crowd controller licence. Many jurisdictions require a Certificate II in Security Operations. However, they differ significantly in terms of the specific electives one must complete and the number of units of competency required. For example, although the Northern Territory, Western Australia and South Australia all require 12 units of competency for licensing purposes, each state differs in terms of the specific units required. In New South Wales, Tasmania and Victoria, applicants need to complete even more units of competency, with New South Wales and Tasmania including units from multiple qualifications. In the Australian Capital Territory competency in 12 units from the Certificate II in Security Operations (with three elective units specified), a current Certificate in First Aid and a Responsible Service of Alcohol statement of attainment are required. To become licensed in Queensland applicants must complete 15 units of competency taken from both the Certificate II and Certificate III in Security Operations. Applicants are given some choice as to the units of competency they choose to complete.

Australian Capital Territory

In the Australian Capital Territory, in order to work as a crowd controller, an individual must hold the Security Employee license (Class 1C: crowd controller). To attain this licence, a Certificate II in Security Operations, a current Certificate in First Aid and a Responsible Service of Alcohol statement of attainment are required. The certificate II includes a core first aid unit. To achieve a certificate II, competency in seven core units and five electives (three of which are specified by the licensing body) must be demonstrated. These units are set out below.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid.

Plus the following three specific elective units:

- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2011B Control access to and exit from premises.

Plus any two of the following elective units:

- CPPCMN2001B Control and direct traffic
- CPPSEC2007A Screen people
- CPPSEC2008A Screen items
- CPPSEC2009A Give evidence in court
- CPPSEC2010A Protect safety of persons
- CPPSEC2013A Protect valuables in transit
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2016A Contribute to investigative activities
- CPPSEC2018A Monitor electronic reporting facility
- CPPSEC2019A Monitor biometrics equipment and systems
- CPPSEC2027A Load and unload cash-in-transit in a secured environment
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3010A Manage dogs for security functions
- CPPSEC3011A Handle dogs for security patrol
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- HLTCSD306D Respond effectively to behaviours of concern

- TLIB2004A Carry out vehicle inspection
- TLIE2007A Use communication systems.

New South Wales

In New South Wales, in order to work as a crowd controller, an individual must hold the Security Operator Licence Crowd Controller (Class 1C). The units of competency required for this licence are mostly taken from the Certificate II in Security Operations. Whereas the Certificate II in Security Operations only requires competency in 12 units, qualifying for a crowd controller licence in New South Wales requires competency in 15 units. One of the first aid units applicants can choose to complete is taken from the Certificate III in Security Equipment. In most circumstances, completing the units set out below would entitle a person to a Certificate II in Security Operations.

The following six core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B (or CPPSEC2003A) Work effectively in the security industry
- CPPSEC2004B (or CPPSEC2004A) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B (or CPPSEC2006A) Provide security services to clients.

Plus one of the following three first aid units:

- HLTAID003 Provide first aid (elective from the UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (core unit from the CPP20212 Certificate II in Security Operations)
- HLTFA301C Apply first aid (core unit from the superseded CPP20211 Certificate II in Security Operations).

Plus the following eight specific units:

- CPPSEC2009A Give evidence in court
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC2010A Protect safety of persons
- CPPSEC2011B (or CPPSEC2011A) Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- TLIE2007A (or TLIE707B) Use communication systems.

The Northern Territory

In the Northern Territory, in order to work as a crowd controller, an individual must hold the Crowd Controller Licence. To apply for a crowd controller licence, an applicant must be certified by an RTO as competent in the 12 units listed below. Most of these units are taken from the Certificate II in Security Operations. One of the first aid units applicants can choose to complete is taken from the Certificate III in Security Equipment. In most circumstances, completing the units set out below would entitle a person to a Certificate II in Security Operations.

The following six core units from the Certificate II in Security Operations

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to customer.

Plus one of the following three first aid units

- HLTAID003 Provide first aid (elective from the UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (core unit from the CPP20212 Certificate II in Security Operations)
- HLTFA301B (or HLTFA301C) Apply first aid (unit from the superseded CPP20211 Certificate II in Security Operations).

Plus the following five specific elective units

- CPPSEC2009A Give evidence in court
- CPPSEC2014A Operate basic security equipment
- CPPSEC2011A (or CPPSEC2011B Control access to and exit from premises)
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2017A Protect self and others using basic defensive tactics.

Queensland

In Queensland, in order to work as a crowd controller, individuals must apply for a security provider licence individual, the licence type being a crowd controller licence. Applicants must also demonstrate competency in the units below. These units are taken from the Certificate II in Security Operations and Certificate III in Security Operations and 15 units of competency must be completed. An applicant must also complete a unit in Cardio Pulmonary Response if they have not done so within the last 12 months. Within the 15 units, applicants have some choice as to the units of competency they decide to complete for licensing purposes.

The following units:

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015 Patrol premises
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3007A Maintain security of environment
- CPPSEC3013A Control persons using empty hand techniques
- HLTFA301B (or HLTFA301C or HLTFA311A Apply first aid or HLTAID003 Provide First Aid)
- HLTCPR201A (or HLTCPR201B) Perform CPR or HLTAID001 Provide CPR
- CPPSEC2001A Communicate effectively in the security industry or CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC2002A Follow workplace safety procedures in the security industry or CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry or BSBCMN302A (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC2005A Work as part of a security team or BSBFLM302A (BSBFLM303B or BSBFLM303C) Contribute to effective workplace relationships
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients or CPPSEC3006A Coordinate a quality security service to customers.

South Australia

In South Australia, in order to work as a crowd controller, an individual must hold a Security Agents Licence. To attain this licence a Certificate II in Security Operations is required, with applicants needing to complete five specific elective units from the qualification along with the seven core units.

The following seven core units from the Certificate II in Security Operations

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid.

Plus the following five specific elective units

CPPSEC2010A Protect safety of persons

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3013A Control persons using empty hand techniques.

Tasmania

In Tasmania, in order to work as a crowd controller, an individual must hold an Employee Licence (with the crowd control activity endorsed) and the units of competency set out below. Prior to applying for a full licence, applicants must hold a provisional employee licence. To apply for this, applicants must be competent in several units. After a provisional licence is issued, other units must be completed before reapplying for the full employee licence. The 17 units required for this licence are taken from the Certificate I and II in Security Operations and the Certificate III in Security Equipment.

The provisional license requires the following five units:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedure in the security industry
- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- HLTAID003 Provide first aid (or a senior first aid work place level two)
- CPPSEC1003A Apply security procedures for the responsible service of alcohol

The full licence requires the following four core units from the Certificate II in Security Operations:

- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients

Plus the following eight specific elective units:

- CPPSEC2007A Screen people
- CPPSEC2009A Give evidence in court
- CPPSEC2010A Protect safety of persons
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3013A Control person using empty hand techniques.

Victoria

In Victoria, in order to work as a crowd controller, an individual must hold the Private Security Individual Operator Licence—Crowd Control and the units of competency set out below. 17 units

(including first aid) are required for this licence. 14 units are taken from the Certificate II in Security Operations, two units are taken from the Certificate III in Security Operations and one unit is taken from the Certificate I in Security Operations. Completing these units is the equivalent of a Certificate II in Security Operations.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid.

Plus the following ten units from the Certificates I, II and III in Security Operations:

- CPPSEC1003A Apply security procedures for the responsible service of alcohol
- CPPSEC2010A Protect safety of persons
- CPPSEC2011B Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation of premises.

Western Australia

In Western Australia, in order to work as a crowd controller, an individual must hold the Crowd Controller Licence and the units of competency set out below. Applicants must hold a Certificate II in Security Operations (including a current first aid certificate), including five specific elective units, in order to attain this licence.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team

- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply First Aid.

Plus the following five specific elective units:

- CPPSEC2010A Protect safety of persons
- CPPSEC2011B Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3013A Control person using empty hand techniques.

Unarmed guard

The 'unarmed guard' licence allows persons to work as an unarmed security officer. An unarmed guard is a person who guards, patrols or watches another person's property without a guard-dog or weapon.

Summary

Each jurisdiction has different requirements for attaining an unarmed guard licence. While most jurisdictions require a Certificate II in Security Operations, jurisdictions differ in terms of the specific electives a learner must complete and the number of units of competency required. For example, although the Australian Capital Territory, Western Australia and South Australia all require applicants to complete 12 units of competency, they differ in terms of the specific electives required for licensing. In New South Wales, the Northern Territory, Tasmania and Victoria applicants need to complete even more units of competency, with New South Wales, the Northern Territory and Tasmania including units from multiple qualifications. To become licensed in Queensland applicants only need to be competent in 10 units taken from both the Certificate II and Certificate III in Security Operations. Applicants are also given some choice as to the units of competency they can complete.

Australian Capital Territory

In the Australian Capital Territory, in order to work as an unarmed guard, an individual must hold the Security Employee license (Class 1A: patrol guard, watch or protect property). A Certificate II in Security Operations and a current Certificate in First Aid is required for this licence. The certificate II includes a core first aid unit. To achieve a certificate II, competency in seven core units and five electives must be demonstrated. The units of competency are set out below.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid.

Plus any five elective units from the following:

- CPPCMN2001B Control and direct traffic
- CPPSEC2007A Screen people
- CPPSEC2008A Screen items
- CPPSEC2009A Give evidence in court
- CPPSEC2010A Protect safety of persons
- CPPSEC2011B Control access to and exit from premises

- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2013A Protect valuables in transit
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2016A Contribute to investigative activities
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC2018A Monitor electronic reporting facility
- CPPSEC2019A Monitor biometrics equipment and systems
- CPPSEC2027A Load and unload cash-in-transit in a secured environment
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3010A Manage dogs for security functions
- CPPSEC3011A Handle dogs for security patrol
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- HLTCSD306D Respond effectively to behaviours of concern
- TLIB2004A Carry out vehicle inspection
- TLIE2007A Use communication systems.

New South Wales

In New South Wales, in order to work as an unarmed guard, an individual must hold the Security Operator Licence Unarmed Guard (Class 1A). The 15 units of competency required for this licence are mostly taken from the Certificate II in Security Operations. These are the same units required for the Licence Crowd Controller (Class 1C).

Whereas the Certificate II in Security Operations only requires 12 units to be completed, attaining an unarmed guard licence in New South Wales requires competency in 15 units. One of the first aid units applicants can complete is taken from the Certificate III in Security Equipment. In most circumstances, completing the units set out below would entitle one to a Certificate II in Security Operations.

The following six core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B (or CPPSEC2003A) Work effectively in the security industry
- CPPSEC2004B (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B (or CPPSEC2006A) Provide security services to clients.

Plus one of the following three first aid units:

- HLTAID003 Provide first aid (elective from the UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (core unit from the CPP20212 Certificate II in Security Operations)
- HLTFA301C Apply first aid (core unit from the superseded CPP20211 Certificate II in Security Operations).

Plus the following eight specific elective units:

- CPPSEC2009A Give evidence in court
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC2010A Protect safety of persons
- CPPSEC2011B (or CPPSEC2011A) Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- TLIE2007A (or TLIE707B) Use communication systems.

Northern Territory

In the Northern Territory, in order to work as an unarmed guard, an individual must hold the Security Officer Licence. To apply for this license, an applicant must be certified by an RTO as competent in the units of competency listed below. Completing these 13 units (six core units, six specific elective units and one first aid unit) would entitle a person to a Certificate II in Security Operations.

The following six core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to customer.

Plus one of the following three first aid units:

- HLTAID003 Provide first aid (elective from the UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (core unit from the CPP20212 Certificate II in Security Operations)
- HLTFA301C Apply first aid (core unit from the superseded CPP20211 Certificate II in Security Operations).

Plus the following six specific elective units:

- CPPSEC2009A Give evidence in court
- CPPSEC2014A Operate basic security equipment
- CPPSEC2007A Screen people
- CPPSEC2008A Screen items
- CPPSEC2013A Protect valuables in transit
- CPPSEC2015A Patrol premises.

Queensland

In Queensland, in order to work as an unarmed guard, an individual must hold the Security Officer— Unarmed Licence and the 11 units of competency listed below. These units are taken from the Certificate II and Certificate III in Security Operations. Within these 11 units applicants have some choice as to units of competency they decide to complete for licensing purposes i.e. being able to choose between completing two different units.

The following eleven units:

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- HLTFA301B (HLTFA301C or HLTFA311A) Apply First Aid
- CPPSEC2001A Communicate effectively in the security industry or CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC2002A Follow workplace safety procedures in the security industry or CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC2005A Work as part of a security team or BSBFLM302A (or BSBFLM303B or BSBFLM303C) Contribute to effective workplace relationships
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry or BSBCMN302A (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC2006A (or CPPSEC200B) Provide security services to clients or CPPSEC3006A
 Coordinate a quality security service to customers
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation or CPPSEC3003A
 Determine response to security risk situation
- CPPSEC2017A Protect self and others using basic defensive tactics or CPPSEC3013A Control persons using empty hand techniques.

South Australia

In South Australia, in order to work as an unarmed guard, an individual must hold a Security Agents Licence and the below competencies. A Certificate II in Security Operations is required, with applicants needing to complete five specific units, along with the seven core units. In most

circumstances, completing the units set out below would entitle one to a Certificate II in Security Operations.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid

Plus the following four specific elective units

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques (or tactics)

Plus one of the following units

- TDTE701A Use communication systems (unit from the PRM20504 Certificate II in Asset Maintenance)
- TLIE707B Use communication systems (unit from the superseded CPP20211 Certificate II in Security Operations)
- TLIE2007A Use communication systems (elective unit from CPP20212 Certificate II in Security Operations).

Tasmania

In Tasmania in order to work as an unarmed guard, an individual must hold an Employee Licence (with the security general guarding activity endorsed) and the units of competency set out below. Prior to applying for a full licence, applicants must hold a provisional employee licence. To apply for this, applicants must be competent in several units. After a provisional licence is issued, other units must be completed before reapplying for the full employee licence. The 16 units required for licensing are taken from the Certificate I and Certificate II in Security Operations and the Certificate III in Security Equipment.

The provisional licence requires the following five units:

- CPPSEC1001A Identify and report risk situations
- CPPSEC1005A Apply critical infrastructure protection procedures
- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedure in the security industry

HLTAID003 Provide first aid (or a senior first aid work place level 2).

The full licence also requires the following eleven units:

- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients
- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3013A Control person using empty hand techniques
- TLIE707B Use communication systems.

Victoria

In Victoria, in order to work as an unarmed guard, an individual must hold the Private Security Individual Operator Licence—Unarmed Guard and the units of competency set out below. Thirteen units (including first aid) are required for this licence. All units of competency (seven core and six specific electives) are taken from the Certificate II in Security Operations and completing them would entitle one to this qualification.

The following seven core units from the Certificate II in Security Operations

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid

Plus the following six specific elective units

- CPPSEC2011B Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation
- TLIE2007A Use communication systems.

Western Australia

In Western Australia, in order to work as an unarmed guard, an individual must hold the Security Officer Licence and have completed the units of competency set out below. Applicants must hold a Certificate II in Security Operations, including five specific elective units.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid

Plus the following five specific elective units:

- CPPSEC2011B Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques
- TLIE2007A Use communication systems.

Bodyguard

A bodyguard's job is to protect the personal safety of a specific individual. This can include guarding and keeping a person under surveillance, as well as preventing, detecting or investigating the commission of an offence in relation to a person.

Summary

Each jurisdiction has different requirements for attaining a Bodyguard Licence.

Western Australia, Victoria and South Australia require 14 units from the Certificate III in Security Operations. In New South Wales applicants must complete 16 units from the Certificate II and Certificate III in Security Operations. In Queensland applicants only need to complete 13 units of competency, with applicants having some choice as to the units they can complete. These units are taken from both the Certificate II and Certificate III in Security Operations. For bodyguard licensing in The Australian Capital Territory, only a Certificate II in Security Operations is required, including some specific electives. In Tasmania, applicants are required to hold an Employee Licence, with the security general guarding activity endorsed, prior to applying for a bodyguard licence. This requires competency in several units from multiple qualifications. Following this, applicants must complete 13 units of competency from the Certificate III in Security Operation to become endorsed as a bodyguard. Finally, in the Northern Territory there is no bodyguard licence.

Australian Capital Territory

In the Australian Capital Territory, in order to work as a bodyguard, an individual must hold the Security Employee licence (Class 1B: bodyguard). To attain this licence one must have a Certificate II in Security Operations and a current Certificate in First Aid. The Certificate II in Security Operations includes a core first aid unit. To achieve a certificate II, competency in seven core units and five electives must be demonstrated. Within these five electives, the Australian Capital Territory licensing body requires that applicants complete two specific electives.

The following seven core units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2004B Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- HLTFA311A Apply first aid

Plus the following two specific elective units

- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC2010A Protect safety of persons

Plus any three of the following elective units

- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2011B Control access to and exit from premises
- CPPCMN2001B Control and direct traffic
- CPPSEC2007A Screen people
- CPPSEC2008A Screen items
- CPPSEC2009A Give evidence in court
- CPPSEC2013A Protect valuables in transit
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2016A Contribute to investigative activities
- CPPSEC2018A Monitor electronic reporting facility
- CPPSEC2019A Monitor biometrics equipment and systems
- CPPSEC2027A Load and unload cash-in-transit in a secured environment
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3010A Manage dogs for security functions
- CPPSEC3011A Handle dogs for security patrol
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- HLTCSD306D Respond effectively to behaviours of concern
- TLIB2004A Carry out vehicle inspection
- TLIE2007A Use communication systems.

New South Wales

In New South Wales, in order to work as a bodyguard, an individual must hold the Security Operator Licence Bodyguard (Class 1B). Competency in 16 units (including a Certificate in First Aid) is required for this licence. The units of competency required for this licence are mostly taken from the Certificate II and III in Security Operations. One of the first aid units applicants can complete is taken from the Certificate III in Security Equipment. In most circumstances, completing the units set out below would entitle the applicant to a Certificate III in Security Operations.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301B (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation

- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to clients
- CPPSEC3007A Maintain security of environment.

Plus one of the following three first aid units:

- HLTAID003 Provide first aid (elective unit from UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (elective unit from CPP30411 Certificate III in Security Operations)
- HLTFA301C Apply first aid (elective unit from release 3 of CPP30411 Certificate III in Security Operations)

Plus the following seven units from the Certificate II and III in Security Operations:

- CPPSEC2003B (or CPPSEC2003A) Work effectively in the security industry
- CPPSEC2010A Protect safety of persons
- CPPSEC3009A Prepare and present evidence in court
- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC2011B (or CCPSEC2011A) Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3018A Provide for the safety of persons at risk.

Northern Territory

There is no bodyguard licence in the Northern Territory.

Queensland

In Queensland in order to work as a bodyguard individuals must apply for a security provider licence individual, the licence type being a bodyguard licence. You must also demonstrate competency in the 13 units set out below. These units of competency are taken from both the Certificate II and Certificate III in Security Operations. Within the 13 units applicants have some choice as to units of competency they decide to complete for licensing purposes.

The following 13 units:

- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC2014A Operate basic security equipment
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3007A Maintain security of environment
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3018A Provide for the safety of persons at risk

- HLTFA301B (HLTFA301C or HLTFA311A) Apply first aid
- CPPSEC2001A Communicate effectively in the security industry OR CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC2002A Follow workplace safety procedures in the security industry OR
 CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry OR BSBCMN302A (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC2005A Work as part of a security team OR BSBFLM302A (or BSBFLM303B or BSBFLM303C) Contribute to effective workplace relationships
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients OR CPPSEC3006A
 Coordinate a quality security service to customers.

South Australia

In South Australia, in order to work as a bodyguard, an individual must hold the Security Agents Licence and the units of competency set out below. A Certificate III in Security Operations is required, including eight core units, one first aid unit and fived specific elective units. In most circumstances, completing the units set out below would entitle one to a Certificate III in Security Operations.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following five specific elective units:

- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC3018A Provide for the safety of persons at risk
- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
 CPPSEC2012A Monitor and control individual and crowd behaviour.

Plus one of the following three first aid units:

- HLTFA301B Apply first aid (elective unit from release 1 of CPP30411 Certificate III in Security Operations)
- HLTFA301C Apply first aid (elective unit from release 3 of CPP30411 Certificate III in Security Operations)

 HLTFA311A Apply first aid (elective unit from the CPP30411 Certificate III in Security Operations).

Tasmania

In Tasmania, in order to work as a bodyguard, an individual must hold the Employee Licence (with the bodyguard activity being endorsed) and the units of competency set out below. Prior to acquiring this licence you must hold an Employee Licence with the security general guarding activity endorsed. You cannot hold a provisional bodyguard licence. The 16 units of competency required for the security general guarding endorsement are taken from both the Certificate I and II in Security Operations and the Certificate III in Security Equipment. The 13 units of competency required for the bodyguard activity endorsement are taken from the Certificate III in Security Operations.

The provisional licence for Security General Guarding requires the following five units:

- CPPSEC1001A Identify and report risk situations
- CPPSEC1005A Apply critical infrastructure protection procedures
- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedure in the security industry
- HLTAID003 Provide first aid (or a senior first aid work place level 2).

The full licence for Security General Guarding also requires the following four core units from the Certificate II in Security Operations:

- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients.

Plus the following seven specific elective units

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3013A Control person using empty hand techniques
- TLIE707B Use communication systems.

The Bodyguard full licence requires the following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and developments
- CPPSEC3001A Maintain workplace safety in the security industry

- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to clients
- CPPSEC3007A Maintain security of environment.

Plus the following five specific elective units:

- CPPSEC2011A Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour.
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation from premises
- CPPSEC3018A Provide for the safety of person at risk.

Victoria

In Victoria, in order to work as a bodyguard, an individual must hold the Private Security Individual Operator Licence—Bodyguard and the units of competency set out below. Fourteen units of competency (eight core and six specific electives) are required for this licence. These units are the equivalent of a full Certificate III in Security Operations.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following six specific elective units:

- CPPSEC2011B Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC3018A Provide for the safety of persons at risk
- HLTFA311A Apply first aid.

Western Australia

In Western Australia, in order to work as a bodyguard, an individual must hold the Security Bodyguard Licence and the units of competency set out below. Applicants must hold a Certificate III in Security Operations, including six specific elective units.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following six specific elective units:

- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC3018A Provide for the safety of persons at risk
- HLTFA311A Apply first aid
- CPPSEC2011B Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour.

Cash-in-transit officer

A cash-in-transit officer is a person employed to collect, transfer and/or deliver cash or other valuables whilst being armed with a firearm.

Summary

Each jurisdiction has different requirements for attaining a Cash-In-Transit Officer licence. South Australia, Victoria and Western Australia require a Certificate III in Security Operations. However, each of these jurisdictions differs in the specific electives required for their licence. In the Australian Capital Territory, applicants must have a Certificate III in Security Operations, competency in several specific units and a Certificate in First Aid. In New South Wales, applicants must complete not only a Certificate III in Security Operations (with specific elective units needing to be taken) and a first aid unit of competency, but also two specific units from the Certificate II in Security Operations. In the Northern Territory, the Department of Business (which administers security licensing) does not issue either Cash-In-Transit Officer licences or Armed Guard licences. However, weapons licences for employment/business purposes are available through the Northern Territory police. In Queensland, applicants must demonstrate competency in 14 units taken from the Certificate II and Certificate III in Security Operations. They also have some choice as to the units selected. In Tasmania, there is no specific licence for cash-in-transit officers; rather, under an employee licence a person can become endorsed in the security guarding with a firearm activity. Prior to this, applicants must be endorsed in the security general guarding activity. Following this, applicants need to complete units from the Certificate III in Security Operations to become endorsed in the security guarding with a firearm activity.

Australian Capital Territory

In the Australian Capital Territory, in order to work as a cash-in-transit officer, an individual must hold the Security Employee Licence (Class 1FC: guard with a firearm for cash-in-transit). A Certificate III in Security Operations and a current Certificate in First Aid are required for this licence. The Certificate III in Security Operations consists of eight core units of competency and six electives. For the Cash-In-Transit licence, competency must be shown in five specific electives from the Certificate III in Security Operations. The Certificate in First Aid is an eligible elective for the current Certificate III in Security Operations.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following five specific units of competency:

- CPPSEC3008A Control security risk situations using firearms
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3051A Implement cash in transit security procedures
- CPPSEC3052A Inspect and test cash-in-transit security equipment
- CPPSEC3050A Load and unload cash in transit in an unsecured environment

Plus any one of the following elective units:

- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC3009A Prepare and present evidence in court
- CPPCMN3002A Develop a traffic management plan
- CPPSEC2011A Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3004A Lead small teams in the security industry
- CPPSEC3010A Manage dogs for security functions
- CPPSEC3011A Handle dogs for security patrol
- CPPSEC3012A Store and protect information
- CPPSEC3014A Control persons using baton
- CPPSEC3015A Restrain persons using handcuffs
- CPPSEC3016A Defend persons using spray
- CPPSEC3018A Provide for the safety of persons at risk
- CPPSEC3019A Operate specialised security equipment
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- CPPSEC3022A Maintain biometrics database
- CPPSEC3023A Coordinate biometric equipment and systems
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- HLTFA311A Apply first aid
- CPPSEC3052A Inspect and test cash-in-transit security equipment.

New South Wales

In New South Wales, in order to work as a cash-in-transit officer, an individual must hold the Security Operator Licence Armed Guard (Class 1F). The units of competency required for this licence are mostly taken from the Certificate III in Security Operations and the Certificate II in Security Operations. Applicants must also complete a first aid unit of competency. One of the first aid units of competency applicants can complete is taken from the Certificate III in Security Equipment. Sixteen units of competency must be completed from the Certificate II and III in Security Operations.

Completing the units of competency set out below would entitle one to a Certificate III in Security Operations.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301B (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to clients
- CPPSEC3007A Maintain security of environment.

Plus the following seven specific units from the Certificate II and III in Security Operations:

- CPPSEC3009A Prepare and present evidence in court
- CPPSEC3017A Plan and conduct evacuation of premises
- CPPSEC2013A Protect valuables in transit
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- CPPSEC2027A Load and unload cash-in-transit in a secured environment
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3052A Inspect and test cash-in-transit security equipment.

Plus one of the following three first aid units:

- HLTAID003 Provide first aid (elective unit from UEE31411 Certificate III in Security Equipment)
- HLTFA311A Apply first aid (elective unit from CPP30411 Certificate III in Security Operations)
- HLTFA301C Apply first aid (elective unit from release 3 of CPP30411 Certificate III in Security Operations).

Plus the following core unit from the Certificate II in Security Operations:

CPPSEC2003B (or CCPSEC2003A) Work effectively in the security industry.

The unit CPPSEC3008A Control security risk situations using firearms must be completed after the attainment of the 1F licence.

Northern Territory

In the Northern Territory, the Department of Business which administers security licensing does not issue either Cash-In-Transit Officer licences or Armed Guard licences. However, weapons licences for employment/business purposes are available through the Northern Territory police.

Queensland

In Queensland, in order to work as a cash-in-transit officer, an individuals must apply for a security provider licence individual, the licence type being a Security Officer—Cash-in-transit licence. They must also demonstrate competency in the 14 units below. These units of competency are taken from the Certificate II and Certificate III in Security Operations. Within these 14 units applicants have some choice as to units of competency they decide to complete for licensing purposes.

The following 14 units:

- CPPSEC2015A Patrol premises
- CPPSEC3002A Manage conflict through negotiation (TR)
- CPPSEC3007A Maintain security of environment
- CPPSEC3051A (or TDT0898B or TLI0807C) Implement cash-in-transit security procedures
- CPPSEC3052A (or TDT0998B or TLI0907C) Test and inspect cash-in-transit security equipment
- HLTFA301B (or HLTFA301C or HLTFA311A) Apply first aid
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment or TDTD4198A (orTLID4107C) Undertake cash-in-transit loading and unloading in an unsecured environment
- CPPSEC2001A Communicate effectively in the security industry or CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC2002A Follow workplace safety procedures in the security industry or CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry or BSBCMN302A (or BSBWOR301A) Organise personal work priorities and development
- CPPSEC2005A Work as part of a security team or BSBFLM302A (or BSBFLM303B) or BSBFLM303C) Contribute to effective workplace relationships
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients or CPPSEC3006A
 Coordinate a quality security service to customers
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation or CPPSEC3003A
 Determine response to security risk situation
- CPPSEC2017A Protect self and others using basic defensive tactics or CPPSEC3013A Control persons using empty hand techniques.

South Australia

In South Australia, there is no specific licence dedicated to working as a cash-in-transit officer. However, an individual can become endorsed as a Security Agent—Guarding with a Firearm by applying for a Security Agents licence. To apply for this licence, applicants must have a Certificate III in Security Operations, have completed one first aid unit and be competent in four specific elective units. Applicants have a choice as to the other elective they decide to complete. Applicants must also hold an appropriate licence under the *Firearms Act 1977*.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following four specific elective units:

- CPPSEC3008A Control security risk situations using firearms
- CPPSEC3009A Prepare and present evidence in court
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3017A Plan and conduct evacuation of premises.

Plus any one of the following elective units:

- CPPCMN3002A Develop a traffic management plan
- CPPSEC2011A Control access to and exit from premises
- CPPSEC2012A Monitor and control individual and crowd behaviour
- CPPSEC3004A Lead small teams in the security industry
- CPPSEC3010A Manage dogs for security functions
- CPPSEC3011A Handle dogs for security patrol
- CPPSEC3012A Store and protect information
- CPPSEC3014A Control persons using baton
- CPPSEC3015A Restrain persons using handcuffs
- CPPSEC3016A Defend persons using spray
- CPPSEC3018A Provide for the safety of persons at risk
- CPPSEC3019A Operate specialised security equipment
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- CPPSEC3022A Maintain biometrics database
- CPPSEC3023A Coordinate biometric equipment and systems
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3052A Inspect and test cash-in-transit security equipment.

Plus one of the following three first aid units:

- HLTFA301B Apply first aid (elective unit from release 1 of CPP30411 Certificate III in Security Operations)
- HLTFA301C Apply first aid (elective unit from release 3 of CPP30411 Certificate III in Security Operations)
- HLTFA311A Apply first aid (elective unit from the CPP30411 Certificate III in Security Operations).

Tasmania

In Tasmania, in order to work as a cash-in-transit officer, an individual must hold the Employee Licence and the units set out below. There is no specific licence for cash-in-transit officers in Tasmania; rather, under an Employee Licence, a person can become authorised in the activity security guarding with a firearm. Prior to acquiring this authorisation, a person must be authorised as a full security general guard under the Employee Licence. A person must also have a H6 category firearms licence issued by the Firearms section, Tasmania Police. There is no provisional licence for security guarding with a firearm. The 16 units of competency required for security general guarding are taken from both the Certificate I and II in Security Operations and the Certificate III in Security Equipment. The 19 units of competency required for endorsement in the security guarding with firearm activity are taken from the Certificate III and Certificate II in Security Operations. Completing these units of competency would entitle one to a Certificate III in Security Operations.

Provisional licence for Security General Guarding requires the following five units:

- CPPSEC1001A Identify and report risk situations
- CPPSEC1005A Apply critical infrastructure protection procedures
- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedure in the security industry
- HLTAID003 Provide first aid (or a senior first aid work place level 2)

Full licence for Security General Guarding also requires the following four units from the Certificate II in Security Operations:

- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients

Plus the following seven specific elective units:

- CPPSEC2011A (or CPPSEC2011B) Control access to and exit from premises
- CPPSEC2014A Operate basic security equipment
- CPPSEC2015A Patrol premises
- CPPSEC2017A Protect self and others using basic defensive techniques
- CPPSEC3002A Manage conflict through negotiation

- CPPSEC3013A Control person using empty hand techniques
- TLIE707B (or TLIE2007A) Use communication systems

Full licence for Security guarding with firearm requires the following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and developments
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to clients
- CPPSEC3007A Maintain security of environment

Plus the following eleven units from either the Certificate II or III in Security Operations:

- CPPSEC3008A Control security risk situations using firearms
- CPPSEC3009A Prepare and present evidence in court
- CPPSEC3013A Control persons using empty hand techniques
- CPPSEC3014A Control person using baton
- CPPSEC3015A Restrain person using handcuffs
- CPPSEC3017A Plan and conduct evacuation from premises
- HLTAID003 Apply first aid
- CPPSEC2027A Load and unload cash in a secured environment
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- CPPSEC3052A Inspect and test cash-in-transit security equipment

Victoria

In Victoria, in order to work as a cash-in-transit officer, an individual must hold the Private Security Individual Operator Licence—Cash-in-transit and the units of competency set out below. These units are the equivalent of a full Certificate III in Security Operations. Applicants must complete all eight core units and the six specific elective units.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation

- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following six specific units from the Certificate III in Security Operations:

- CPPSEC3008A Control security risk situations using firearms
- CPPSEC3013A Control persons using empty hand techniques
- HLTFA311A Apply first aid
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3052A Inspect and test cash-in-transit security.

There is also a combined armed guard and cash-in-transit officer licence in Victoria.

Western Australia

In Western Australia, in order to work as a cash-in-transit officer, an individual must hold the Security Officer Licence and the 14 units of competency set out below. Applicants must hold a Certificate III in Security Operations, including six specific elective units. They must also hold a current first aid certificate.

The following eight core units from the Certificate III in Security Operations:

- BSBFLM303C Contribute to effective workplace relationships
- BSBWOR301A Organise personal work priorities and development
- CPPSEC3001A Maintain workplace safety in the security industry
- CPPSEC3002A Manage conflict through negotiation
- CPPSEC3003A Determine response to security risk situation
- CPPSEC3005A Prepare and present security documentation and reports
- CPPSEC3006A Coordinate a quality security service to customers
- CPPSEC3007A Maintain security of environment.

Plus the following six specific elective units:

- CPPSEC3008A Control security risk situations using firearms
- CPPSEC3013A Control persons using empty hand techniques
- HLTFA311A Apply first aid
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3050A Load and unload cash-in-transit in an unsecured environment
- CPPSEC3052A Inspect and test cash-in-transit security equipment.

Control room operator

A control room operator is a person who monitors activity, usually by way of a bank of Closed Circuit Television monitors or similar means, and who may be required to respond in person and/or conduct additional guarding duties such as patrolling. A control room is typically on-site but may be off-site as part of a remote monitoring centre.

Summary

Each jurisdiction has different requirements for attaining a control room operator licence. New South Wales, Queensland, South Australia and Victoria have no unit of competency requirements for attaining this licence. The Australian Capital Territory requires competency in five units and Western Australia requires competency in six units from the Certificate II in Security Operations. Tasmania has comparatively stringent standards, requiring competency in 15 units. These units are taken from multiple qualifications. Finally, in the Northern Territory there is no control room operator licence.

Australian Capital Territory

In the Australian Capital Territory, in order to work as a control room operator, an individual must hold the Security Employee licence (Class 1E: monitoring centre operator). Applicants only need to hold five units from the Certificate II in Security Operations to attain this licence.

The following six units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- CPPSEC2018A Monitor electronic reporting facility

New South Wales

In New South Wales, in order to work as a control room operator, an individual must hold the Security Operator Licence Monitoring Centre Operator (Class 1E). No qualification requirements exist for this licence.

The Northern Territory

There is no control room operator licence in the Northern Territory.

Queensland

In Queensland, in order to work as a control room operator, an individual must apply for a security provider licence individual, the licence type being a Security Officer—Monitoring license. No qualifications are required to apply for this licence.

South Australia

In South Australia, in order to work as a control room operator, an individual must hold a Security Agents License. Applicants apply to be a Security Agent—Monitoring Centre Operations as an employee. There are no qualification requirements for this licence.

Tasmania

In Tasmania in order to work as a control room operator an individual must hold an Employee Licence (with endorsement in the monitoring room activity) and the units of competency set out below. A provisional employee licence requires the completion of certain units prior to making an application. After a licence is issued, other units must be completed before reapplying for the full employee licence. The 15 units set out below are taken from the Certificate I, Certificate II and Certificate III in Security Operations and the Certificate III in Security Equipment.

The **Provisional licence** requires the following five units:

- CPPSEC1001A Identify and report risk situations
- CPPSEC1005A Apply critical infrastructure protection procedures
- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedure in the security industry
- HLTAID003 Provide first aid (or a senior first aid work place level two).

The Full licence requires the following 10 units from the Certificate II and III in Security Operations:

- CPPSEC2003A (or CPPSEC2003B) Work effectively in the security industry
- CPPSEC2004A (or CPPSEC2004B) Respond to security risk situation
- CPPSEC2005A Work as part of a security team
- CPPSEC2006A (or CPPSEC2006B) Provide security services to clients
- CPPSEC2014A Operate basic security equipment
- CPPSEC2018A Monitor electronic reporting facility
- CPPSEC3012A Store and protect information
- CPPSEC3020A Monitor security from control room
- CPPSEC3021A Maintain and use security database
- TLIE707B Use communications systems.

Victoria

In Victoria, in order to work as a control room operator, an individual must hold the Private Security Individual Operator Licence—Monitoring Centre Operator. There are no qualification requirements for this licence.

Western Australia

In Western Australia, in order to work as a control room operator, an individual must hold the Security Officer Licence and the below competencies. Applicants only need to hold six units from the Certificate II in Security Operations and a current first aid certificate to attain the licence.

The following six units from the Certificate II in Security Operations:

- CPPSEC2001A Communicate effectively in the security industry
- CPPSEC2002A Follow workplace safety procedures in the security industry
- CPPSEC2003B Work effectively in the security industry
- CPPSEC2005A Work as part of a security team
- CPPSEC2006B Provide security services to clients
- CPPSEC2018A Monitor electronic reporting facility.

2.3 Operation of the Mutual Recognition Act 1992

Differing licensing arrangements and variability in the quality and integrity of training and assessment across jurisdictions have contributed to significant concerns about the way the *Mutual Recognition Act* 1992 is being used to gain security licences. The *Mutual Recognition Act* 1992 enables those who are registered—that is, those who are licensed to carry out an occupation in one state—to seek registration for an equivalent occupation in a second state. The occupation is taken to be 'equivalent' if the activities authorised to be carried out under each registration are substantially the same. That is, the decision of the second jurisdiction as to whether or not to grant the licence is to be based only on whether the activities covered by the licence are equivalent and not whether the requirements to obtain the licence are equivalent.³⁰

Where licence requirements and the quality of training vary between states and territories, it can encourage the practice of individuals undertaking training and licensing requirements in a state with fewer requirements, or with requirements that can be achieved more quickly, for the purpose of gaining a licence that will be recognised under the *Mutual Recognition Act 1992* in their actual state of residence.

Affected states are concerned that their licensing standards are being circumvented through this practice, resulting in compromised public safety.

The Productivity Commission has released the *Mutual Recognition Schemes Report*³¹, and has acknowledged these concerns, noting that the practice of 'shopping and hopping' has the potential to weaken the community and regulators' trust in the schemes and undermine their efficiency. However, the review has also found the schemes are generally working well, making it easier to do business across borders. Nevertheless, the Productivity Commission found that the benefits risk being eroded due to regulators not always implementing the arrangements as intended, weak oversight, and a growing number of exemptions. It has therefore proposed to reform the governance arrangements and improve regulator accountability in jurisdictions and has noted that where there are legitimate concerns about shopping and hopping, governments should make better use of existing mechanisms to address them. There is no suggestion of winding back mutual recognition.

It is the concern about the potential for compromised public safety that led the New South Wales Coroner to recommend a review of the *Mutual Recognition Act 1992* as it applies to the manpower sector of the private security industry.

In his report (in 2013) Coroner Freund stated:

'What became clear from the evidence was that the standard and quality of the training given to security guard applicants, including that about positional asphyxiation, varies considerably from jurisdiction to jurisdiction. However, despite this security guards can be trained interstate and then seek to be registered in New South Wales under the Mutual Recognition Act 1992. This in my view leaves a system that is open to abuse and can result in people with insufficient training being employed in this state and others as the case may be and ultimately

³⁰ See ss 19 and 29 of the *Mutual Recognition Act 1992*, accessed 13 January 2015 at http://www.comlaw.gov.au/Details/C2013C00485

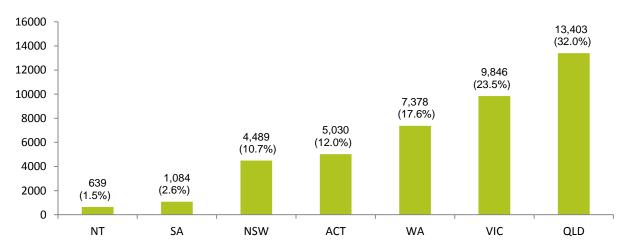
³¹ http://www.pc.gov.au/inquiries/completed /mututal-recognition-schemes/report

The Coroner in this case recommended:

' ... so as to ensure the competence of persons licensed to work in the manpower sector of the private security industry, the Council of Australian Governments give consideration to implementing a review of the Mutual Recognition Act 1992 as it applies to the manpower sector of the private security industry.'32

A review of licences issued across the jurisdictions in the 2013–14 financial year, shown in Figure 2. This illustrates how one jurisdiction's continuing to increase its licensing requirements results in compounding the problem—as individuals simply avoid the requirements by obtaining their licences interstate and crossing back into their home state to have the licence recognised. A total of 41,869 security licences (excluding figures for Tasmania which were not available) were issued, of which the majority 13,403 (32.86 per cent) were issued in Queensland. Victoria had the next highest number 9846 (24 per cent) followed by Western Australia with 7378 (18.09 per cent). New South Wales had the third lowest number at 4489 (11.01 per cent).

Figure 2: Number of Security licences issued by each state and territory*, by completion of units of competency from the Certificate II and/or III in Security Operations, 2013 – 2014 financial year



Source: Provided by each licensing authority in the last quarter of 2014.

*Tasmania figures unavailable as at date of publication and South Australia figures from 20 September 2013 to 22 September 2014.

The figures on the number of security licences issued through mutual recognition provisions, as shown in Figure 3, paint a very different picture and illustrate starkly that New South Wales—the jurisdiction which argues it has implemented very stringent licensing and training requirements—is the licensing authority with by far the highest number of licences issued under mutual recognition. This suggests that applicants are gaining their licence in other states with fewer requirements or requirements that take less time to meet and then moving to New South Wales to gain a licence under mutual recognition, thus avoiding having to meet New South Wales standards. The figures show that New South Wales issued 2623 or (76.9 per cent) of all licences issued across the country under mutual recognition in the 2013-2014 financial year.

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³² Coroners Court of NSW 2010/00435430

2,623 3000 (71.0 %) 2500 2000 1500 1000 264 251 206 146 150 (7.1%)(6.8%)55 500 (5.6%)(4.1%)(4.0%)(1.5%)0 **NSW** SA QLD WA ACT NT VIC

Figure 3: Number of security licences issued by state and territory*, by mutual recognition 2013 – 2014 financial year

Source: Provided by each licensing authority in the last quarter of 2014.

*Tasmania figures unavailable as at date of publication and South Australia figures from 20 September 2013 to 22 September 2014.

Data on employment figures illustrates the same point. As shown in Table 1, in May 2015, there were approximately 51,400 Security Officers and Guards employed in Australia. The largest proportion were employed in New South Wales—16,500 (32.1 per cent). However, in the 2013-14 year (the latest figures available), New South Wales issued only 4489 (10.7 per cent) of the total number of licences issued across the country (the third lowest of all jurisdictions). Hence, while New South Wales has the largest employment share, it trains and licenses a much lower number of people. ³³

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³³ Source: Australian Bureau of Statistics, Labour Force, Australia, Detailed, Quarterly, May 2015 (cat.no. 6291.0.55.003), Department of Employment trend. Note that labour force data is available only at the four-digit ANZSCO unit group level (security officers and guards). Census data refers to the more detailed six-digit ANZSCO code for security officers. Census data shows that security officers account for a large proportion of all security officers and guards so four-digit labour force data can be (and has been) used as a proxy for the security officer occupation in the figures quoted above.

Table 1: The total employment numbers and licences issued for each jurisdiction.

State/Territory	Number employed, May 2015 ³⁴	Licenses issued via training (2013-2014 Financial Year) ³⁵
New South Wales	16,500 (32.1%)	4,489 (10.7%)
Victoria	7,300 (14.2%)	9,846 (23.5%)
Queensland	11,500 (22.4%)	13,403 (32.0%)
South Australia	3,400 (2.6%)	1,084 (2.6%)
Western Australia	8,100 (15.8%)	7,378 (17.6%)
Tasmania	900 (1.8%)	Not available
Northern Territory	1,600 (3.1%)	639 (1.5%)
Australian Capital Territory	2,100 (4.1%)	5, 030 (12.0%)
TOTAL, Australia	51,400	41,869

Source: ABS, Labour Force, Australia, Detailed, Quarterly, May 2015 (cat. no. 6291.0.55.003), Department of Employment trend.

2.4 Efforts to harmonise training and licensing requirements across jurisdictions

In recognition of the impact of state and territory variations in licensing requirements, previous efforts have been made to harmonise training and licensing requirements across jurisdictions; these efforts are continuing. In July 2008, the Council of Australian Governments agreed:

' ... to adopt a nationally consistent approach to the regulation of the private security industry, focusing initially on the guarding sector of the industry, to improve the probity, competence and skills of security personnel and the mobility of security industry licences across jurisdictions. Council of Australian Governments asked the Ministerial Council for Police and Emergency Management, in consultation with the Security Industry Regulators Forum, to undertake further work on minimum regulatory standards for the technical sector of the industry by mid-2009, as well as proposals for a possible national system for security industry licensing by mid-2010. ³⁶

³⁴ Small estimates can be volatile and often exhibit considerable variability between points in time and should be used with caution.

³⁵ Figure 3: Number of Security licenses issued by each state and territory*, by completion of units for competency from the Certificate II and/or III in Security Operations, 2013 – 2014 financial year.

³⁶ Council of Australian Governments (2008) Meeting Communique 3 July 2008, https://www.coag.gov.au/node/291, accessed 7 August 2014.

A subsequent report on stage one, the minimum standards in the manpower sector³⁷, was prepared for the Council of Australian Governments, overseen by a group of licensing authorities (known as the Security Industry Regulators Forum). The report identified the competence and skills required of security personnel across jurisdictions.

Stage two (agreed by the Council of Australian Governments) was to focus on the technical sector of the industry and stage three was to explore a national registration or licensing system for the private security industry. However, it appears that stages two and three have not progressed to date. The stage one report:

- detailed minimum standards of required training for all classes of licence, as agreed by all jurisdictions
- outlined requirements for the development and maintenance of competencies, particularly with respect to the language and literacy requirements of the roles, and
- recommended that the Ministerial Council for Police and Emergency Management make a recommendation to the Ministerial Council for Training, Education and Employment that the National Quality Council (at that time responsible for the endorsement of national qualifications in training packages) include in its next work program a review of the implementation of the standards for the regulation of training providers as they relate to the security industry. The review was intended to lead to additional measures to improve the quality and consistency of the delivery of security industry training by RTOs.

Concern about language and literacy skills is a recurring theme with the stage one report, indicating licensing authorities and industry are increasingly concerned about the standard of applicants' written and oral communication skills and the increase in applicants with limited communication skills for work in the industry over the past five years.³⁸ This has driven a significant piece of work to develop a strategy for lifting such skills as outlined in section 2.5.

In November 2009, the Ministerial Council for Police and Emergency Management (the Police Ministerial Council) endorsed in principle the recommendations made in the report. As part of this process the Police Ministerial Council agreed to the qualifications and units of competency required to meet the minimum training standard for each licensable security activity.

The Construction and Property Services Industry Skills Council is currently responsible for the development and continuous improvement of the national qualifications in the CPP07 Property Services Training Package, which includes the qualifications for the licensing of security activities. In

³⁷ The Construction and Property Services Industry Skills Council notes that the security industry comprises two distinct sectors. These are the manpower sector, which centres on the protection of property and persons through activities such as guarding and the technical sector which focuses on the installation and monitoring of security equipment and activities related to that equipment. See Construction and Property Services Industry Skills Council ((February 2011) DRAFT Case for National Quality Council Endorsement CPP07 Property Services Training Package (Version 7), http://www.cpsisc.com.au/training/Case_For_Endorsement/CPP07_V7_CfE, accessed 3 November 2014.

³⁸ Authors and date unspecified, Council of Australian Governments Harmonisation of the Private Security Industry, Stage One; Manpower Sector of the Security Industry Report, http://www.cpsisc.com.au/Resources/CPSISC/Harmonisation_Security_Quals/COAG_PSI%20Training%20Rept_180110.pdf, accessed 7 August 2014, pp 5,7,8,26.

December 2009, the Chair of the Police Ministerial Council requested that the Minister for Education, Employment and Workplace Relations have the Construction and Property Services Industry Skills Council redevelop these security qualifications to meet the proposed new licensing outcomes.

The then-Minister for Education's letter to the Construction and Property Services Industry Skills Council advised of the work of the Ministerial Council for Police and Emergency Management—Police:

'This work has resulted in a report, COAG Harmonisation of the Private Security Industry—Stage One: Manpower Sector of the Security Industry, which contains a number of recommendations in relation to the future skill and training requirements of workers in the private security industry.

I understand the report has identified existing units of competency from the CPP07 Property Services Training Package in setting the qualification requirements for each licensable activity in the security industry.

The major action which MCPEMP³⁹ has requested CPSISC take in relation to implementing the outcomes from their report is a re-packaging of qualifications to meet the stated skill and training requirements for workers in the private security industry.⁴⁰

The Construction Property and Industry Skills Council subsequently redeveloped the Certificates II and III in Security Operations for inclusion in the CPP07 Property Services Training Package in accordance with the qualifications and units of competency agreed by the Police Ministerial Council. The redeveloped qualifications and units were endorsed by the National Quality Council in April 2011.

The Industry Skills Council's draft Case for Endorsement to the National Quality Council notes that:

- the key objective of the project was to facilitate the harmonisation of qualifications for licensable occupations in the private security industry, and
- the qualifications were designed in direct response to input from the private security industry (including enterprises and licensing authorities) gathered through the Council of Australian Governments Harmonisation of the Private Security Industry—Stage One: Manpower Sector of the Security Industry project.

It notes that:

'At present the manpower sector of the industry is subject to a range of state and territory regulatory and licensing requirements. The fragmented nature of these arrangements serves to limit both the mobility of labour and the portability of skills and qualifications in the industry.'

It was anticipated that the redeveloped qualifications endorsed in 2011 would provide a common framework for licensable security-related occupations across Australia. Ultimately these new

⁴⁰ The Hon Julia Gillard MP Deputy Prime Minister and Minister for Education, (10 February 2010), Letter to Chair of the Construction and Property Services Industry Skills Council, supplied to ASQA by Construction and Property Services Industry Skills Council.

³⁹ Ministerial Council for Police and Emergency Management—Police

arrangements would be expected to replace the current fragmented licensing and regulatory arrangements that exist within the states and territories. ⁴¹ Licensing authorities argue that progress has occurred since this time, with the implementation of nationally agreed minimum competency standards, although it is accepted that there is variability across jurisdictions in the exact units of competency/qualifications prescribed for some security activities.

In addition, licensing authorities' strongly held concerns about poor-quality security industry training and assessment and unscrupulous providers issuing certificates which call into question the integrity of the qualifications—have resulted in some jurisdictions imposing state-specific regulatory requirements on RTOs. These requirements are over and above, or in duplication of, those required by the industry training package and the *Standards for RTOs 2015*. Examples include mandated minimum course duration, mandated assessment materials and the requirement for RTOs to be audited by licensing authorities.

The licensing authorities are of the view that some of the variations in competency and regulatory requirements are marginal to both the problem and the solution, and that the highest priority issue is to lift the quality of training delivery and assessment and to deal definitively with unscrupulous providers. The NSW Police Force Security Licensing & Enforcement Directorate asserts that some training and assessment can be regarded as fraudulent.

There is also a view shared by licensing authorities and other stakeholders that the structure of some of the qualifications in the training package needs review.

Stakeholders believe that to make progress in improving safety, there must y be substantial parallel efforts to:

- address the inconsistent licensing requirements and the quality of training and assessment,
 and
- strengthen the structure and content of the training package.

This will require collaborative work by licensing authorities, ASQA and other VET regulators, the relevant training package developer, industry stakeholders and training providers.

Licensing authorities, through the Security Industry Regulators Forum, have advised that they are commencing a project to review the nationally agreed minimum competency standards to address the identified inconsistencies in competency requirements. New South Wales is leading the project with the involvement of Western Australia, Victoria and South Australia. 42

⁴¹ Construction and Property Services Industry Skills Council (February 2011) DRAFT Case for National Quality Council Endorsement CPP07 Property Services Training Package (Version 7), provided by Construction Property Services Industry Skills Council October 2014.

⁴² Security Industry Regulators Forum, Meeting Minutes 13 March 2014, provided by Security Industry Regulators Forum to ASQA.

It is strongly recommended that the review of competency requirements occur as a matter of priority and in parallel with a review of the training package containing the qualifications ⁴³, and that licensing authorities agree on a **single set of units/qualifications** to be used for the purposes of licensing security activities across the country. This, along with improvements to the training package recommended in this report, will complement efforts by ASQA to address the issues of poor—quality training and assessment identified by this review, providing a holistic solution to the problems.

Ideally, implementation of a single nationally consistent set of qualifications/skill requirements for licences across all jurisdictions, and lifting the quality of training delivery and assessment by RTOs will, over time, remove the need for imposition by licensing authorities of additional regulatory requirements (such as mandated assessment materials). At the very least, if licensing authorities determine that additional regulatory requirements (such as assessment conditions) are necessary, these should be:

- · consistent across the country, and
- incorporated into the training package as industry requirements—rather than individually applied in jurisdictions, as is currently the case.

2.5 A focus on language and literacy skills—the Loud and Clear project

Licensing authorities have consistently queried whether students undertaking training for the security industry have sufficient language, literacy and numeracy skills to undertake security roles. They have also expressed concerns that students are entering training with insufficient language, literacy and numeracy skills for them to gain the level of skills required for the job by the time they have attained the qualification. Effective language skills are essential as a tool to resolve conflict, in communication with police and emergency services personnel during crises, and in recording and reporting incidents and testifying in court.

The Security Industry Regulators Forum considered two requests from the Standing Council on Police and Emergency Management relating to language requirements, that:

- industry regulators develop nationally consistent specifications to clearly define required language requirements for the award of licences in the private security industry, and
- Industry and training regulators monitor the extent to which the Certificate II unit
 CPPSEC2001A Communicate effectively in the security industry is effective in ensuring a
 minimum level of language, literacy and numeracy skills as required by security operatives,
 and that this be referred for action to the Council of Australian Governments Harmonisation
 project (see section 2.3).

⁴³ National Industry Skills Councils have been progressively reviewing their Training Packages to comply with the 2012 *Standards for Training Packages*. All Training Packages have been required to comply with these standards since December 2015. The Construction and Property Services Industry Skills Council has indicated its intention to conduct a full review of the training package that contains security qualifications at the same time as it revises the training package to comply with the new training package standards. However, VET reforms to the way training packages are developed and maintained may affect the timing and responsibility for training package redevelopment. See <u>section</u> 2.6 for further information.

The Construction and Property Services Industry Skills Council has facilitated the collaboration of licensing authorities, employers and training providers to build the Loud and Clear strategy. This strategy supports the development of security workers' language, literacy and numeracy skill needs on the job and helps learners in training to get and keep a security job.

The Loud and Clear project has found that, in relation to security workers and learners, stakeholders widely agreed that:

- the security industry attracts
 - culturally and linguistically diverse people for whom English is a second language
 - Australian-born people with low levels of education
- security operatives are qualifying with the Certificate II in Security Operations despite lacking the oral and written communication skills required on the job, and
- security operatives can find themselves in complex or stressful situations on the job where, under pressure, their barely adequate language skills falter and become less than adequate.

Project consultation for the Loud and Clear project found stakeholders believe that people are being:

- accepted into training for CPP20212 Certificate II in Security Operations without the language skills needed in the qualification's units of competency, the training specification and the job
- deemed competent in the qualification but then not being able to secure or sustain work in the private security industry because of their insufficient language skills, and
- placed in security jobs without being able to communicate well enough verbally or in writing.⁴⁴

The project:

- focused on the four licensable activities associated with the Certificate II in Security Operations which particularly need the ability to respond to potentially emergency and highrisk situations, and
- produced a set of profiles developed by industry that set out examples of the different language, literacy and numeracy skills needed in job roles associated with the CPP20212 Certificate II in Security Operations.

Several of the project's recommendations were expected to be progressed by the Construction and Property Services Industry Skills Council when it reviewed the CPP07 Property Services Training Package and redesigned the security units of competency. The Industry Skills Council has indicated its intention to consider the outcomes of the Loud and Clear project in order to include explicit detail of the language, literacy and numeracy skill demands and to make information available about the objective level of each skill in the Companion Volume that supports implementation of the training package. These plans may alter as a result of the VET reforms outlined in section 2.6 of this report.

⁴⁴ Construction and Property Services Industry Skills Council (August 2014, unpublished and supplied by ASQA), Loud and Clear! A Strategic Response to Communication Issues in the Security Industry. Construction and Property Services Industry Skills Council report to Security Industry Regulators Forum on key findings and recommendations.

The project findings and recommendations have been referred to the Security Industry Regulators Forum for their consideration. The project also suggested the Regulator's Forum progress the following recommendations:

- Consideration of the development and administration of a nationally consistent, independent
 pre-enrolment assessment of learners' language, literacy and numeracy skills specific to the
 context of the Certificate II in Security Operations—this would address concerns about
 enrolment of learners who do not have the language, literacy and numeracy skills required to
 successfully complete the Certificate II in Security Operations.
- That regulators host a bank of basic online self-assessments—this would help people seeking
 to enter the security industry to understand the language, literacy and numeracy demands of
 the role, to self-identify where their skills are inadequate and find out how they can obtain
 support to build such skills.

2.6 VET reforms that may impact training package changes

As previously discussed, the Construction and Property Services Industry Skills Council has proposed undertaking a full review of the security qualifications during its revision of the training package to comply with the 2012 *Standards for Training Packages*.

The Australian Government has announced a new contestable model for training package development and maintenance. The Government has invited proposals from organisations to provide support to Industry Reference Committees. These committees will oversee training packages, with a view to a new model being in place by January 2016. This may mean that another body is awarded the responsibility for the training package and this may affect the scheduling of revisions to the security qualifications as envisaged in this report.

In recognition of these potential changes, the recommendations in this report refer actions relevant to the training package to 'the training package developer'.

2.7 Other concerns held by state and territory licensing authorities

In addition to concerns about low levels of language, literacy and numeracy skills and the inconsistencies across state and territory requirements, licensing authorities have expressed concern about issues such as:

- extremely short duration of training delivery
- RTOs using partnership arrangements(including cross-border arrangements) for delivery and assessment
- unscrupulous providers issuing qualifications of questionable integrity, and
- the use of online and take-home assessments (particularly whether some RTOs have adequate procedures in place to verify that the person issued with the qualification is the person who successfully completed the assessment).

Further references are made to these concerns in <u>Chapter 4</u>, which focuses on stakeholder perspectives.

ASQA is seeking to agree a Memorandum of Understanding with each of the state and territory licensing authorities, with the aim of improving the quality of outcomes in the VET sector through:

- sharing information to inform each party's risk management and regulation
- providing ASQA with subject matter expertise where needed, and
- other collaborative work.

Memoranda have been agreed with some licensing authorities, and others are under development. However, the findings of this review suggest that a more systematic, coordinated and purposeful engagement needs to be established with all licensing authorities to ensure concerns are raised in a timely manner and are supported by evidence wherever possible.

2.8 Security workforce projections

The Australian Government Department of Employment's data on Australian jobs indicates that, as at November 2013, there were 56,300 security officers and guards, an increase of 13.8 per cent over the previous five-year period.⁴⁵

The Construction and Property Services Industry Skills Council's *Environmental Scan 2014*–15 predicts variable demand for security personnel dependent on the roles but in general growth is expected to be steady over the coming period. In summary, the scan advises:

- Monitored and patrol services will be correlated to the unemployment rate, which is forecast
 to rise. This is turn sees an increase in break-in rates which drives demand for security
 services.
- Despite a general decline in reported crime rates in the past few years, cautious households and businesses are increasingly investing in security and preventive measures.
- Servicing of automatic teller machines and cash transport have been growth drivers for the industry. However, cash transfer and armoured vehicle services are expected to decline over the five years to 2017-18 due to weaker retail sales and decreased cash use.
- Crowd control is a rising area of industry activity, particularly at major events and
 entertainment venues. Over the period to 2018, it is anticipated that regulations will
 increasingly require crowd controllers to be employed by pubs, clubs, bars, nightclubs and
 other venues serving liquor for on-premises consumption.

The Australian Government Department of Employment's labour market projection data indicates that future job openings for security officers and guards are estimated at between 25,000 and 50,000 in the five years to November 2018.⁴⁶

The Construction and Property Services Industry Skills Council's *Environmental Scan 2015–16* reports IBISWorld data indicating that industry employment is forecast to increase by an annualised

⁴⁵ Australian Government Department of Employment (May 2014), Australian Jobs 2014, accessed 12 January 2014 at https://docs.employment.gov.au/documents/australian-jobs-2014-publication, p 41.

⁴⁶ Australian Government Department of Employment (May 2014), Australian Jobs 2014, accessed 12 January 2014 at https://docs.employment.gov.au/documents/australian-jobs-2014-publication, pp 35, 41

1.6 per cent in the five years to 2019–20. Growth in security guarding will result from heightened community concern with global terrorism and increased need for public safety. The scan also notes that population growth will provide industry employment opportunities and that migrant workers and mature age workers would be a key source of employment.

However, new entrants from English as a second language backgrounds need to be competitive in obtaining employment opportunities. Particularly in the high consumer contact area in the provision of crowd control and guarding services and language, literacy and numeracy skills are often a barrier.

The Environmental Scan also notes that low wages and often difficult working conditions lead to very high labour turnover.⁴⁷

⁴⁷ Construction and Property Services Industry Skills Council (2015) Environmental Scan 2015-16, accessed 4 May 2015 at http://www.cpsisc.com.au/escan and publications, pp 184, 187, 188.

Chapter 3 Survey of RTOs delivering training

3.1 Survey findings

As part of this strategic review, in mid-2014, ASQA issued a survey to all RTOs identified as delivering one or more of the *CPP20211 Certificate II in Security Operations*, *CPP20212 Certificate II in Security Operations*, and the *CPP30411 Certificate III in Security Operations*. Completion of the survey was mandatory, although some questions were optional, (for example, those depending on the RTO's particular training mode).⁴⁸

ASQA identified 123 RTOs as having one or more of the relevant security training qualifications on scope. A total of 100 responses were received (81.3 per cent of those surveyed), while 23 RTOs (18.7 per cent) did not complete the survey for a range of reasons:

- 14 RTOs did not complete the survey due to either not receiving the correspondence, illness
 or simply refusing to participate.
- The other nine RTOs had withdrawn the security qualifications from their scope of registration and as such were not required to complete the survey.

The survey comprised 38 questions on the nature of training in the security industry. RTOs were also invited to provide any comments they wished to make. Of the 100 RTOs who responded to the survey, 50 (50 per cent) provided comments, and these are analysed in Chapter 4.

As only three RTOs (three per cent of respondents) indicated that they were currently delivering the superseded qualification *CPP20211 Certificate II in Security Operations*, the analysis below does not specifically refer to that qualification.

Student numbers

The survey asked the RTOs to estimate the numbers of 'current enrolments' in the certificate II and III qualifications.

Of the 76 RTOs delivering the *CPP20212 Certificate II in Security Operations*, a majority (55 RTOs or 72.3 per cent of those delivering this qualification) had 20 or fewer students enrolled.

Of the 62 RTOs delivering *CPP30411 Certificate III in Security Operations*, a majority (53 RTOs or 85.5 per cent of those delivering this qualification) had 20 or fewer students enrolled.

Three providers delivering the *CPP20212 Certificate II in Security Operations* had between 150 and 250 enrolments; of those delivering *CPP30411 Certificate III in Security Operations* only one provider exceeded 200 enrolments (with a total of 202 students enrolled), as shown in Tables 2 and 3.

⁴⁸ ASQA has authority under s26 of the *National Vocational Education and Training Regulator Act* 2011 to request RTOs to provide it with such information as the Regulator requests.

Table 2: Total number of students enrolled in Certificate II in Security Operations*

Total number of students enrolled in Certificate II in Security Operations		
Number of students	Number of RTOs	Proportion (% of RTOs)
0	18	24.1
1-10	25	32.9
11-20	12	15.2
21-30	8	10.1
31-100	10	12.7
150-250	3	5.1
Total	76	100 per cent

Source: ASQA survey

Table 3: Total number of students enrolled in Certificate III in Security Operations*

Total number of students enrolled (studying and yet to commence) in Certificate III in Security Operations		
Number of students	Number of RTOs	Proportion (% of RTOs)
0	22	35.5
1-10	23	37.1
11-20	8	12.9
21-40	8	12.9
202	1	1.6
Total	62	100 per cent

Source: ASQA survey

Delivery profile

Of the 100 RTOs that responded to the ASQA survey, 93 (93 per cent) advised that they are registered to deliver *CPP20212 Certificate II in Security Operations* and 76 (76 per cent) indicated they are currently delivering the qualification.

Eighty RTOs (80 per cent) indicated they are registered to deliver *CPP30411 Certificate III in Security Operations* and 62 (62 per cent) advised they are currently delivering. Three RTOs advised they are currently delivering the superseded *CPP20211 Certificate II in Security Operations*.

Eighteen (18 per cent) RTOs advised that they are not currently delivering any of the qualifications and nine of these (9 per cent) indicated they have never delivered. Of those not currently delivering the *CPP20212 Certificate II in Security Operations* or units from this qualification, five (5 per cent) indicated that their reason is because they cannot compete with other RTOs. Other reasons cited included little interest or take up by students and state and territory licence restrictions.

Of those not currently delivering the *CPP30411 Certificate III in Security Operations*, the 11 (11 per cent) indicated that the reason is due to little interest or take up by students.

Providers were asked in which jurisdictions they had delivered security qualifications, or units from these qualifications, in the period from 1 January 2014 to 30 June 2014 (responses are shown in

Figure 4). By far the majority, 45 RTOs (45 per cent of survey respondents) indicated they are had delivered in Queensland during this period. The next most nominated jurisdictions were Victoria, where 21 RTOs (21 per cent of respondents) had delivered and New South Wales, where 17 RTOs (17 per cent of respondents) had delivered.

50 45 45 40 35 30 25 21 20 17 15 10 8 10 7 7 5 1 0 TAS VIC **ACT** NSW NT QLD SA WA Overseas

Figure 4: Number of RTOs that identified delivery of CPP20211, CPP20212 or CPP30411 or units of competencies in any jurisdiction, 1 January 2014 – 30 June 2014

Source: ASQA survey

The survey asked if RTOs are currently delivering security qualifications or units of competency from these qualifications to overseas students in Australia on a student visa. The majority of RTO respondents (76 RTOs) indicated they do not, nine advised that they do and the remainder indicated they do not know. It should be noted that only a course registered on the Commonwealth Register for Institutions and Courses for Overseas Students under the *Education Services for Overseas Students Act 2000* can be offered and provided to Australian student visa holders.

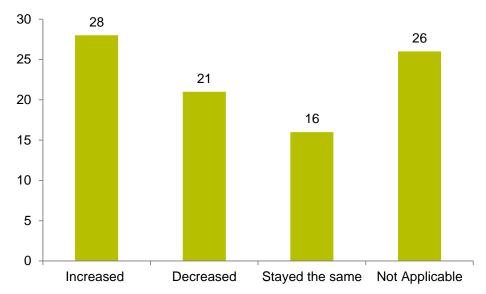
Shifts in enrolments in each qualification

In terms of student enrolments, the number of RTOs reporting a difference in enrolments in both the certificates II and III from 2013 to 2014 is small, with a slight increase reported for the certificate II, and a slight decrease for the certificate III:

A total of 100 RTOs responded to the survey, with nine of these indicating did not currently and had never delivered the relevant qualifications. Of the 91 RTOs that indicated that they have delivered or are delivering these security qualifications:

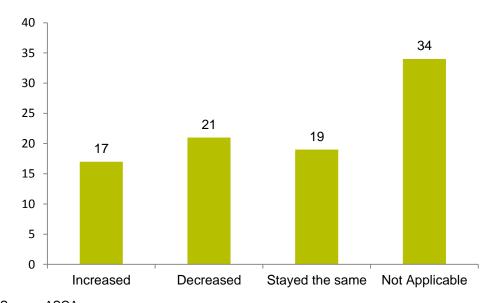
- Twenty-eight RTOs (25.4 per cent) reported an increase in student enrolments in the certificate II
- 17 RTOs (18.7 per cent) reported an increase in enrolments for the certificate III
- Twenty one RTOs (23.1 per cent) reported a decrease for enrolments in both the certificate II and III as shown in Figure 5 and 6.

Figure 5: Number of RTOs reporting change in enrolments in the Certificate II in Security Operations between 2013 and 2014



Source: ASQA survey

Figure 6: Number of RTOs reporting change in enrolments in the CPP30411 Certificate III in Security Operations between 2013 and 2014



Source: ASQA survey

RTOs were also asked about the total number of qualifications they issued between 1 January 2014 and 30 June 2014 (in relation to each of the qualifications being considered for the review).

Of the 76 providers delivering the *CPP20212 Certificate II in Security Operations*, 68 (89.5 per cent) issued between 101 and 1519 qualifications.

Of the 62 providers delivering the *CPP30411 Certificate III in Security Operations*, 47 providers (75.8 per cent) did not issue any qualifications during this time. In contrast, one provider issued 1574 qualifications.

The distribution of the qualifications issued during the period 1 January 2014 to 30 June 2014 is shown in Tables 4 and 5.

Table 4: Total number of qualifications issued 1 January 2014 to 30 June 2014 Certificate II in Security Operations

Total number of qualifications issued 1 January 2014 to 30 June 2014 Certificate II in Security Operations		
Number of students	Number of RTOs	Proportion per cent of RTOs
0	26	28.6
1-10	16	17.6
11-50	19	20.9
51-100	7	7.7
101-200	8	8.8
201 or more	15	16.5
Total	91*	100 per cent

Source: ASQA survey

Table 5: Total number of qualifications issued 1 January to 30 June 2014 Certificate III in Security Operations

Total number of qualifications issued 1 January 2014 to 30 June 2014 Certificate III in Security Operations		
Number of students	Number of RTOs	Proportion per cent of RTOs
0	47	51.6
1-10	19	20.9
11-20	7	7.7
21-100	9	9.9
101-150	2	2.2
151 or more	7	7.7
Total	91	100 per cent

Source: ASQA survey

^{*} In total, there were 91 respondents to this question. Table 4 therefore includes some RTOs that indicated they were not delivering the Certificate II during the relevant period.

^{*} In total, there were 91 respondents to this question. Table 5 therefore includes some RTOs that indicated they were not delivering the Certificate III during the relevant period.

Mode of delivery

The survey also sought information about the mode of delivery used by RTOs. Options for responses included:

- Face to face at own premises
- Face to face at client premises
- Online learning and assessment
- Distance learning (marked by a trainer and assessor)
- Workplace
- Workplace simulation
- Other (to be specified).

Ninety-one RTOs responded to this question. One hundred and eighty responses were received, reflecting the fact that many RTOs nominated that they use a number of modes of delivery. Most are delivering entirely in a classroom (either their own or at a client's premises) in face-to-face mode, with a smaller number utilising a workplace or simulation of a workplace as shown in Figure 7.

90 83 80 70 60 50 40 25 30 19 19 17 20 9 10 0 Face to Face Face to face at Online learning Distance Workplace Workplace at own client premises and learning Simulation premises assessment (marked by a (Please describe in Trainer and detail in the Assessor) box below)

Figure 7: Modes of delivery reported by surveyed RTOs

Source: ASQA survey

From responses to questions seeking detail on what percentage of each mode is being used for training and assessment, it appears that most common mode is training completed in a classroom, with only a small number of RTOs providing training in a workplace or simulated workplace.

These figures showing low levels training and assessment activity in workplaces are not surprising given that coroners' reports and the 2010 West Australian strategic audit of security industry training found that licensing restrictions act as a barrier to students having access to the workplace, meaning that training is largely delivered in simulated environments. However, as outlined in Chapter 4, at least

one licensing authority has suggested that there are no legislative barriers to work-based training in its jurisdiction. This issue is explored further in the review's conclusions.

For the *CPP20212 Certificate II in Security Operations*, 62 RTOs (68.1 per cent of RTO survey respondents who were delivering or had previously delivered security qualifications) advised that they delivered all or most of the training and assessment in this face-to-face classroom-based mode, while 42 RTOs (46.1 per cent) delivered the *CPP30411 Certificate III in Security Operations* in this mode.

For the Certificate II in Security, only four RTOs (5.3 per cent of RTO survey respondents who were delivering or had previously delivered security qualifications) delivered all or most training and assessment in a workplace or simulated workplace, with four RTOs (6.5 per cent) doing so for the certificate III.

The CPP07 Training Package identifies that:

'... licensing and regulatory requirements ... determine that Certificate II is the minimum level for a security worker to be operational or "on the job". *49

This regulatory requirement, common across all jurisdictions, means that practical work experience or placement may not be feasible for students enrolled in the Certificate II in Security Operations, unless they are 'trainees' as conceived in some regulatory regimes. For example, in NSW Regulation 26, Schedule 1 of the Security Industry Regulation 2007 provides that:

'Apprentices or trainees (within the meaning of the Apprenticeship and Traineeship Act 2001) while carrying on security activities of a type that may be authorised under a class 2 licence in the course of their apprenticeship or training with a person who is the holder of a licence authorising that person to carry on those security activities'

This allows the possibility of supervised on-the-job experience, at least in some jurisdictions.

Core units in both the Certificate II and III in Security Operations specify that the:

'Context of assessment includes a setting in the workplace or environment that simulates the conditions of performance described ...⁵⁰

The survey asked how RTOs managed the simulation of a workplace environment. Of the 91 RTOs that indicated that they were currently delivering or had delivered the relevant security qualifications, only 17 RTOs (18.7 per cent) stated that they included 'workplace simulation' in their training and assessment strategy.

Responses included from the use of:

- role play
- scenarios with industry equipment within a classroom context, and

⁴⁹ CPP07 Property Services Training Package, accessed 12 January 2015 at http://training.gov.au/Training/Details/CPP07, p 237.

⁵⁰ See, for example, *CPPSEC2001A Communicate effectively in the security industry*, accessed 12 January 2015 at http://training.gov.au/Training/Details/CPPSEC2001A, p 6.

actual premises such as a nightclub or multi-level building.

Many of these responses demonstrate good practice, with significant investment in workplace equipment, and design of training rooms and props to create a range of scenarios and environments in which students can test their skills and be assessed.

However, given the heavy reliance on face-to-face delivery, limited use of simulation, and examples of poor practice in assessment in simulated workplaces found at audit (as outlined in Chapter 5), the issue of the training package providing specifications on the conditions for simulated workplaces is explored in the conclusion.

There is limited distance or online delivery of security training and assessment. Of the 76 RTOs currently delivering *CPP20212 Certificate II in Security Operations*:

- 64 RTOs (84.2 per cent) stated that they did no delivery of the *CPP20212 Certificate II in Security Operations* through online means, and
- 57 RTOs (75 per cent) utilised no distance learning.

The percentages are similar among the 62 providers currently delivering the *CPP30411 Certificate III* in *Security Operations:*

- 50 RTOs (80.7 per cent) did not utilise online delivery, and
- 45 RTOs (72.6 per cent) did not utilise distance learning.

Nevertheless the review has found that the practice of online delivery and assessment in security was a notable concern.

Trainers and assessors

The survey sought information from RTOs about the number of their trainers and assessors who deliver security qualifications, and their qualifications.

Seventy-four RTOs employ between one and five trainers and assessors to deliver security qualifications or relevant units of competency. Three providers employ between 11 and 30 such trainers and assessors.

The majority of RTOs advised that they employ between one and five trainers and assessors who hold either the CPP20211 (superseded) or the CPP20212 Certificate II in Security Operations. Seventy-four of the providers who employ between one and five trainers and assessors advised that their trainers and assessors also hold the CPP30411 Certificate III in Security Operations. Sixty nine providers who employ between one and five trainers and assessors advised that their trainers and assessors hold the CPP40707 Certificate IV in Security and Risk Management.

Course duration

To understand how RTOs were meeting the requirements of the AQF, the survey sought information from RTOs on their shortest and longest delivery times for the two qualifications.

The AQF defines volume of learning as identifying the notional duration of all activities required for the achievement of the learning outcomes of a particular qualification type. According to the AQF, the full-time volume of learning measure for a certificate II is 0.5 to one year (600-1200 hours full-time equivalent); the full-time volume of learning measure for a certificate III is one to two years (1200-2400 hours full-time equivalent).

In its explanation of volume of learning, the Australian Qualifications Framework Council states that:

'The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.' ⁵¹

The AQF states that accrediting bodies, qualification developers and issuing bodies (that is, RTOs) are required to meet the qualification specifications in the AQF. The VET Quality Framework also specifies that RTOs meet the requirements of the AQF. RTOs are therefore responsible for ensuring that the programs designed by them meet these requirements. From 1 January 2015, all new enrolments must be in qualifications that meet the requirements of the AQF. ⁵²

The major concern related to volume of learning is that substantially shortened courses may lead to poor-quality outcomes as such timeframes 'cannot deliver the rigour or depth of training and competency required by industry'. ⁵³ Stakeholders have expressed concerns about short duration courses in security undermining the quality of outcomes (outlined in Chapter 4: Stakeholder consultation). However, when discussing volume of learning, consideration needs to be given to the target group and whether the target group has existing skills and knowledge which may warrant a shortened duration.

As shown in Table 6, the shortest duration identified by the 76 RTO survey respondents that indicated they were currently delivering *CPP20212 Certificate II in Security Operations* is less than one week. This duration was identified by 15 RTOs (19.7 per cent of those delivering this qualification). Forty-six RTOs (60.5 per cent) delivered this qualification in one to two weeks, with five RTOs (6.6 per cent) delivering in three to five weeks. Five RTOs (6.6 per cent) delivered this qualification within the 0.5 to one year required by the AQF volume of learning measure.

⁵¹ Australian Qualifications Framework Council (May 2014) Volume of Learning: An Explanation, accessed 12 January 2015 at http://www.aqf.edu.au/wp-content/uploads/2013/06/Volume-of-learning-explanation-v2-2014.pdf p 1. An extract of the Volume of Learning Explanation is included in Appendix 5

⁵² Australian Qualifications Framework Council, (January 2013), AQF Second Edition, accessed 13 January 2014 at http://www.aqf.edu.au/wp-content/uploads/2013/05/AQF-2nd-Edition-January-2013.pdf, p103.

⁵³ Halliday-Wynes and Misko 2013.

Table 6: Course duration—Certificate II in Security Operations

Course duration—Certificate II in Security Operations		
Number of weeks	Number of RTOs	Proportion per cent of RTOs
104	1	1.3
26 - 52	4	5.3
AQF requirement for a Certificate II - 0.5 to 1 year (26-52 weeks)		
17 - 21	2	2.6
7 - 13	3	3.9
3 - 5	5	6.6
2	27	35.5
1	19	25.0
Less than 1 week	15	19.7
Total	76	100 per cent

Source: ASQA survey

Of the 62 RTOs that indicated they were currently delivering *CPP30411 Certificate III in Security Operations*, 36 RTOs (58 per cent) reported delivering this qualification in one to two weeks, with four RTOs (6.5 per cent) delivering in three to five weeks. Six RTOs (9.7 per cent) delivered this qualification within the one to two years required by the AQF requirements as shown in Table 7.

Table 7: Course duration—Certificate III in Security Operations⁵⁴

Course duration—Certificate III in Security Operations		
Number of weeks	Number of RTOs	Proportion per cent of RTOs
52 - 104	6	9.7
AQF requirement for a Certificate III – 1 to 2 years (52-104 weeks)		
43	1	1.6
17 – 26	4	6.5
7 – 13	4	6.5
3 – 5	4	6.5
2	16	25.8
1	20	32.3
Less than 1 week	7	11.3
Total	62	100 per cent

Source: ASQA survey

These figures indicate that RTOs may not be meeting volume of learning requirements —unless the RTOs are able to demonstrate clear reasons for reduced course duration based on learner needs (such as learners having significant relevant work experience and existing knowledge and skills relevant to the qualifications). The figures support the many concerns expressed by stakeholders

⁵⁴ The websites for some of the RTOs nominating a longer duration were reviewed, with some providing a traineeship form of delivery, and some others using a self-paced mode which had an upper limit of hours available, dependent on students' prior experience.

including RTOs about the short duration of training that is impacting on the competence of qualified graduates to carry out their security roles.

3.2 Specific characteristics of security training

Short courses

The two security qualifications reviewed are at AQF levels two and three. Unless a **pedagogical rationale** is provided, an AQF level two qualification typically has a minimum duration of 0.5 to one year (600 – 1200 hours); an AQF level three qualification typically has a minimum duration of one to two years (1200 – 2400 hours). A pedagogical rationale could include a greater intensity of hours or a target group of people experienced in the specific industry area.

In general, in the survey responses, RTOs provided no rationale for the very short duration of the security courses being provided, other than the pressure of competition between RTOs, or a 'speed to market' pressure from students. Such reasons do not qualify as a 'pedagogical rationale' as required by the AQF.

Given that a key reason for this review was the lack of effective training reflected in the coroners' reports, the short duration of courses—and resultant few opportunities for effective training and assessment—must be considered an important finding of the review. This issue is addressed in Chapter 6 and this report's recommendations.

Workplace training or assessment

Little training or assessment for the two security qualifications is being performed in an actual workplace. In the survey discussed above, 17 out of the 91 RTOs that were delivering or had previously delivered the relevant security qualifications (18.7 per cent) stated that they are providing a simulated workplace environment.

A Coroner raised the issue of wholly classroom-based training (Victoria, 2007) and recommended consideration be given to *a graduated licensing system*. A form of this was trialled in New South Wales, where it was known as a provisional licensing regime. It was introduced in 2007, and endorsed by the Council of Australian Governments in 2008. After completing training and assessment in a number of units of competency in a classroom environment with an approved RTO, students could apply for a provisional licence. After this provisional licence was issued, they were required to work under the direct supervision of a fully licensed security operative. While holding a provisional licence they would undertake further training and assessment through an approved RTO, including multiple workplace assessments. Once the remaining units of competency were attained, and they had held the provisional licence for 12 months, the licensee could apply for a full licence. This system ceased in 2012, with the passage of the *Security Industry Amendment Bill 2012* on 25 June 2012. In the second reading address to the New South Wales Legislative Council, the Minister gave the following reasons for disbanding the system:

- New South Wales had been the only state to introduce provisional licensing
- additional compliance and supervision costs for industry, and
- new entrants bypassing New South Wales requirements by training in other states (the Minister stated that in 201150 per cent of licences were granted under the mutual recognition system).

The NSW Police Force Security Licensing & Enforcement Directorate found some workplace assessments conducted under the previous provisional licensing system to be inadequate and of questionable value, with some competencies not suited to assessment in a workplace (for example, an assessor could conduct many workplace assessments without ever having the opportunity to observe a learner using their negotiation skills to manage a conflict situation). Any exploration of the inclusion of workplace assessment as a component of security training as a result of the findings of this review will need to consider these issues.

Chapter 4 Stakeholder consultation

An important element in this review has been consultation with stakeholders to obtain their perspectives on training for the security industry area; many stakeholders have had longstanding and persistent concerns.

ASQA sought stakeholder perspectives through:

- surveying RTOs
- conducting roundtable meetings and teleconference consultations with employers, state and territory licensing authorities and RTOs
- interviewing a number of students, employers and RTO representatives during the strategic audit process, and
- analysing complaints to ASQA.

This report summarises the views of these stakeholders according to themes or the specific concerns that they raised. The most commonly cited concerns were:

- short course duration
- inconsistency in requirements between jurisdictions, which compromises quality outcomes
- poor quality of training and assessment, which calls into question the integrity of qualifications
- poor language, literacy and numeracy skills held by students and graduates of the courses
- online and distance learning and its impact on the quality of learning outcomes
- regulatory issues, related to both state and territory licensing authorities and VET regulators,
 and
- the training package.

A summary of complaints to ASQA is addressed later in this chapter.

4.1 Course duration

The short duration of courses in security training was a recurring theme raised by all stakeholder groups.

Roundtable participants commented on the prevalence of short delivery and undercutting in the security sector. It was also suggested that government subsidies are distorting training with claims that some RTOs grant qualifications without providing any training in order to receive government subsidies.

Many RTOs expressed concern about this issue:

I become disillusioned when I see security officers sit in a classroom for 10 days or less with very little practical experience provided and walk away with a certificate and become licensed yet these same people struggle to deal with a security related situation when it occurs.

How can some RTOs issue Certificate III qualifications with only one week's training?

For us the key issue is that it has been difficult to compete with RTOs offering courses in unrealistically short time frames and a market that doesn't seem to care/understand about quality training and assessment. As a result we haven't pursued the security training.

We have trouble competing against a Queensland qualification that can be obtained in half the time as NSW which is the same qualification at a very reduced course fee.

In their commentary responses to the survey questions on course duration, some RTOs confirmed that they deliver in timeframes much shorter than that required by the AQF, while others indicated that they adjust timeframes to meet learner needs and experience and that duration may be increased to (for example) enable re-attendance at practice days or provide additional one-on-one support:

It's a 200+ (hours) course—would like to see learning over a longer period of time, not necessarily four weeks straight. Victoria's 17 days, 128 hour course is OK. I would ideally like to implement it over time and with them coming in for training in between bursts—opportunities for spaced practice and repeated demonstrations of competency, taking account of authentic contexts.

Many of the students who were interviewed during the strategic audits were satisfied with the length of the course they undertook; others thought it should have been longer:

Course was five days long. Lots of out of session work.

10 days face to face would have been better. Other people wouldn't enrol if it was that long.

One week course. The course should have been two weeks. First week was theory. Second week should have been practical.

The Australia New Zealand Policing Advisory Agency was consulted to provide a police perspective to inform the strategic review. In relation to course duration, they advised that auditing of security training providers should consider:

- the notional hours of the course associated with the AQF levels
- whether delivery times are consistent and appropriate in relation to the material being delivered, and
- how time is spent within courses, in particular, time spent on the concept of what constitutes appropriate use of force.

It is notable that these issues of short and variable duration were a key theme in the Western Australian strategic audit conducted in 2010.

4.2 Inconsistency in the requirements across jurisdictions for security licensing

The inconsistent competency and other licence requirements highlighted in coroners' reports—as discussed in Chapter 1 and Chapter 2—was a persistent theme raised across stakeholder groups. One 2010 Coroner's report recommended that the inconsistencies be addressed. The 2010 Western Australian strategic audit of training in the security industry (see Chapter 2.1) also highlighted variations in licensing requirements across jurisdictions, with RTOs expressing concern about the impact on national recognition and portability of the qualifications.

Roundtable participants commented that complex cross-border licensing requirements are affecting both students and employers and proposed that there should be nationally standardised training and licensing.

The Australia New Zealand Policing Advisory Agency contends that:

'This "uneven playing field" can interact with mutual recognition arrangements to lower training standard across the board. It may also attract applicants to jurisdictions with the "easiest" training stipulations and, once considered qualified, these applicants could migrate their license to their state/territory.'

RTOs also commented on the inconsistencies that occur across borders:

The Mutual Recognition system that applies to security licences has caused a significant impact on the legitimacy of security licence holders in New South Wales. I have been lobbying to change this since 2008.

Every state has different units of competency requirements and mandated hours. In WA, NSW, and Victoria the licensing requirements for mandated hours for Certificate II is excessive.

As a Security training provider we often hear of stories of students who are moving to NSW and would like to continue their career in the industry come up against issues of other RTOs in NSW not accepting an ACT certificate in any way ... The RTOs have been told by the legislating security body in NSW (Police) not to accept these certificates. Considering we are supposed to be operating in a nationally recognised working environment this is not only frustrating to us as the RTO but the students who come up against even more costs of re-training in areas they are already competent in or otherwise they seek employment in another industry.

The differences in the licensing requirements in different states. The licensing bodies putting mandated training hours etc. that do not take into consideration the experience of the students.

People are going interstate to get licences in the easiest jurisdiction. There should be one national licence.

As outlined in <u>Chapter 2</u>, Ministerial Council decisions show that efforts have been made to harmonise the training and licensing requirements in the security industry since 2008, resulting in national agreement on minimum competency standards. However, to address continuing inconsistencies, the Security Industry Regulators Forum has advised that it is reviewing the nationally agreed minimum competency standards for the manpower sector of the industry.

4.3 Poor quality of training and assessment

Roundtable participants expressed concern that the quality of training fluctuates within the industry. Many expressed views that graduates' skills were insufficient, suggesting that either the quality of delivery and assessment is inadequate or the training package contents need review. State and territory licensing authorities expressed significant concerns about inconsistent and poor quality of training delivery and assessment. Comments by stakeholders included:

- customer service skills are lacking in the majority of graduates
- training is focused on the safety of security officers; the safety of patrons is not addressed
- · additional focus on resolution prior to restraint action is required, and
- substandard crowd control training leading to employers retraining staff.

Several RTOs commented on a lack of commitment to achieving quality outcomes by employers, RTOs and students. Several also said it had caused them to reassess their involvement in the industry or to cease training in the security qualifications:

We have made the decision not to offer training for licence purposes. Over the past two years we have witnessed a complete lack of interest from industry to support quality training and workforce development. In one instance we received an abusive phone call from a HR manager ... This was due to us deeming two of their staff not competent in an RPL assessment where neither employee could explain the concept of duty of care, open hand technique ... and various other examples of compliancy relating to their licences and the industry as a whole.

Another example is where one of our assessors in partnership with an employer both agreed that an employee required further training. A training plan was developed and agreed upon with management. In the space of 48 hours the employee, paid another RTO \$400 and was found competent on not only the one unit but a complete certificate II and III in security operations, thus gaining his full licence.

We now have one company that we will work with. In partnership, we are building an internal induction program aligned to a certificate III in security operations. All new employees are required to undertake this training program regardless of previous qualifications because the employer has no faith in the validity of the current qualifications in the industry ...

In short we can no longer support the industry and are not prepared to compete on price at the expense of quality. We are more than happy to work with any department, agency or employer that is prepared to work towards a better industry training/licensing model.

I have grave concerns about the way RTOs are conducting themselves ... we refused to significantly lower quality training standards to compete with other providers who only focus on quality training 6 months before an ASQA audit.

The security training industry should be ethically driven and I am ashamed to say that ethics has been pushed aside by most security training providers in the pursuit of profit to pay high fees and to line their own pockets ...

Current RTOs in this industry have an over use of sub-contract agreements, where owners of security companies are having new applicants for employment complete a workbook (with answers supplied) just to get the award issued and the applicant on the job with licence in hand much quicker than would be normally possible. Whilst the RTO industry would find in very difficult to pay even more operating costs to yet again another regulator, it seems that state regulation is the only answer to maintain equity of training standards across Australia which mutual licensing recognition requires.

One RTO trainer—who queried whether the sector is being audited enough—provided examples of:

- students having to be retrained after attending training programs with other providers
- students being issued with qualifications without being trained or assessed, and
- providers issuing answer sheets to students.

Some employers who were interviewed during the strategic audits were satisfied with the training delivered and others were very critical of a number of aspects:

I don't really think any of it is adequate.

Too many modules, too much content, being delivered in too short a timeframe.

(In response to questions about areas of inadequate skills) Dealing with aggressive people. Conflict resolution. Items relating to safety. Being safe in the role needs a higher focus.

(In response to questions about whether courses are ensuring students have adequate communication skills) Some do. Not all. Overwhelmingly no. Ones that do have adequate skills are in the minority.

Students who were interviewed during the strategic audits were supportive of the training, although several indicated that they found the level of paperwork and theory and the amount of time in the classroom challenging. Most were optimistic about obtaining a job as a result of the qualification and some graduates indicated they were now employed. One graduate on a working holiday from overseas, who had prior experience in the industry, advised that the Certificate III in Security Operations was a good refresher and gave good information about Australian law. He was also impressed with the selection process for the Certificate III, as he felt it weeded out those that were not really serious. Other student or graduate comments included:

The practical scenarios were excellent. How to handle a crowd, how to handle emergency situations.

The course was long enough. The best thing was learning about all the law and legal issues. The trainer was so knowledgeable and because of his experience in working in the industry he was able to explain it all.

Other issues relevant to quality have been referenced in Coroners' reports (as outlined in <u>Chapter 1</u>). For example, some reports have included concerns about the fact that learning does not include actual workplace experience. This is a result of licensing requirements that mandate that a person cannot work in a security role unless they are licensed.⁵⁵

However, one licensing authority advised that:

If the comment is based on a belief that there is a restriction of 'unlicensed' security providers being physically present on licensed premises, this may not necessarily be well founded. To use the example of a crowd controller, the Queensland legislation only requires a person to hold a licence if that person acts 'for reward'. The legislation would appear to permit on-site training, simply because the conduct was unpaid and obviously for the purposes of work experience.

Several RTOs commented on this issue:

... a work experience opportunity is not possible due to state licensing requirements.

Simulation is a 'poor second place'. Nothing replaces on the job experience.

I do not believe this course should be done in a classroom—full stop. If the restricted licence could only be issued after some training by an RTO it would be better. It should have a compulsory on-the-job component.

One RTO seemed to indicate that it is able to provide work-based learning in its jurisdiction, which appears to reinforce the advice of the licensing authority above:

We currently do not run 'courses' off the job as we believe that the units required should be done and assessed on the job.

Another licensing authority indicated that its previous experience raised questions about the adequacy and integrity of work-based assessment, and the suitability for assessment of some competencies (such as conflict resolution in a workplace).

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⁵⁵ See also comments in <u>Chapters 3</u> and <u>Chapter 6</u>

One employer interviewed during the audits indicated that he believed the certificate II should have a greater practical component 'on the job', for example, in use of radios. He finds that people coming to him have received the training in using radios but have little confidence and he has to show them and work with them to get them to apply the skill.

Another employer noted there should be more time in the course on patrols and on report writing and that there is not enough practical work done in class. This employer stated every time he employs a new employee, that employee has to spend a month in the car with a current employee until the employer is confident the new person can go out alone, and that this costs him \$5000 in additional staffing costs. .

As outlined earlier, one Coroner's report recommended that a solution to this problem lies in the introduction of probationary licences with the requirement that the probationer complete a number of performance hours under the supervision of a full licensee. However, the Council of Australian Governments report on harmonisation of the private security industry (see Chapter 2.4) noted that all jurisdictions have the ability within their current respective legislation for the issue of a provisional licence, but that experience across jurisdictions indicates there are a range of challenges with this type of licence. ⁵⁶

Several RTOs and trainers expressed support for provisional or probationary licences:

The six-month probation period—buddy system—unlicensed and supervised is a fantastic option. It is available but should be used more often. Then get your qualification and demonstrate competence as a traineeship.

The Coroner also recommended the introduction of a requirement that the RTO must observe the probationer in the workplace, presumably as a form of work-based assessment.⁵⁷

Another option which has been proposed to strengthen assessment is to introduce a form of independent assessment prior to the issue of licences. A specific recommendation of the 2009 report by the New South Wales Independent Commission Against Corruption on the findings of its investigation into security industry training (Operation Columba) was that the regulator should independently test the knowledge of applicants for security licences prior to the issue of the licence. ⁵⁸

⁵⁶ Authors and date unspecified, Council of Australian Government Harmonisation of the Private Security Industry, Stage One; Manpower Sector of the Security Industry Report, http://www.cpsisc.com.au/Resources/CPSISC/Harmonisation_Security_Quals/COAG_PSI%20Training%20Rept_180110.pdf, accessed 7 August 2014, p. 22.

⁵⁷ Coroners Court of Victoria, State Coroner Judge Coate, (5 October 2011), Inquest into the death of Jerry Karamesinis, accessed 11 January 2015 at http://www.coronerscourt.vic.gov.au/home/coroners+written+findings/findings+-+inquest+into+the+death+of+jerry+karamesinis

⁵⁸ Independent Commission Against Corruption (2009), Report on corruption in the provision and certification of security industry training (Operation Columba), http://www.icac.nsw.gov.au/investigations/past-investigations/investigationdetail/156, accessed 9 October 2014, see recommendation 5.

However, not all stakeholders support such a proposal, with one licensing authority noting that if the candidates have been assessed as competent by an RTO, the additional costs and impost of an independent assessment would be difficult to support in a red-tape-reduction environment.

4.4 Poor language, literacy and numeracy skills

The poor levels of language, literacy and numeracy skills held by students and graduates of the courses were raised consistently by stakeholders at roundtables. This issue has also been raised by state and territory licensing authorities over a long period of time. The Construction and Property Services Industry Skills Council efforts to develop a strategy for improvement of these critical skills (in collaboration with the licensing authorities, employers and providers) are outlined in Chapter 2.

The Australia New Zealand Policing Advisory Agency advises that:

'There are challenges in relation to language abilities within the private security industry. Proficient language, interpersonal and negotiation skills are considered to be vital for practitioners within the private security industry. In many instances the use of such skills prevents miscommunication, misunderstandings and conflict.

This is evident when considering the primary "use of force" option for Crowd Controllers within the private security industry is communication. Verbal commands, in particular, are used to defuse potential conflict.

In many instances private security practitioners would be required to communicate with police in a concise and clear manner when explaining the circumstances of an event that may require law enforcement actions. Such communication provides the platform for enabling a timely policing response to prevent injury to persons or property. Should communication fail, the event may escalate.

Furthermore, the ability to report on events that may link to court processes is of the utmost importance as this requires a proficient command of the English language. ⁵⁹

One employer commented that:

I would like to see a stronger emphasis on literacy skills as I find these lacking. Report writing, communication skills, conflict resolution. The practical aspects of actually talking to clients and personal presentation when representing a company could be improved.

⁵⁹ Australia New Zealand Policing Advisory Agency, 8 December 2014, Email to ASQA re ANZPAA's input into security strategic review.

4.5 Online and distance learning

Many stakeholders expressed concern about the use of online and distance learning and queried whether competence can be demonstrated in the security qualifications using this mode of delivery.

Issues raised at roundtables and during consultations related to this theme included:

- Some RTOs are assessing competency entirely through online delivery and assessment.
- There is a lack of identity checking of students. This raises the risk of identity fraud if inadequate arrangements are in place to ensure the online assessment is actually being done by the person enrolled in the training.
- A greater focus on hands-on training is required.
- Key aspects of the training, including communicating effectively and use of open hand techniques, are problematic to deliver online. A combined approach—with some online content and some face to face—seems more desirable.

The Australia New Zealand Policing Advisory Agency noted that training is undertaken through different modes of delivery (including self-paced learning and online learning) and that questions arise about how training could be properly delivered through these particular modes.

However, one RTO commented that blended learning is important to provide access for some students:

We currently do a lot of combined distance learning (self-paced) and classroom, which suits students in remote areas. The state license regulators govern in what units we train/assess, also including timeframes in some states.

4.6 Regulatory issues

Many stakeholders—including RTO survey respondents—made comments about issues of regulation in relation to VET providers and licensing.

Roundtable participants commented that:

- there is a need for an improved relationship between the security licensing body and the VET regulator, and
- audits are not focused on the content of training and auditors are not content experts.

Several New South Wales—based RTOs expressed frustration at needing to be compliant with the requirements of two regulators (ASQA and the New South Wales Police Security Licensing & Enforcement Directorate) when the two sets of requirements may be inconsistent. Others raised the commitment of resources this involves, effectively duplicating the functions of ASQA and undermining the purpose and value of having a national VET regulator:

It is difficult in the Security Training Industry when ASQA claim noncompliance for training documents, when we are governed by NSW Police Force Security Licensing & Enforcement Directorate to teach with their Training Material. Security training (CPP20212) is made more difficult these days operating under two regulators. As an RTO that does want to see improvement in the industry (and training) our hands are tied by the fact that we are unable to make changes through validation and moderation—even down to being unable to make subtle changes in grammar in our Mandated Training Guides.

One RTO outlined the impact of what it considers to be prescriptive regulation and outdated resources and scenarios, which they believe are counterproductive to achieving quality outcomes for learners. Issues identified included:

- As all training and assessment for security operations is regulated, designed and strictly
 mandated by the licensing authority there is no flexibility in course duration, course design,
 contextualisation for specific client and employer requirements or design of assessment tools.
- Recognition of prior learning is not allowed—no matter how many years of experience the student may have in security or in related sectors such as law enforcement or military.
 Reasonable adjustment for students with learning difficulties is not allowed.
- Assessment tools designed by the licensing authority are sometimes not relevant to roles
 performed by security operatives and do not always assess the learner for realistic situations
 that would be faced in the security industry.
- Trainers have an onerous task when completing student assessment tools and records
 throughout the duration of the course. For example, for one student completing 14 units of
 competency (as per licensing requirements), the trainer and student have over 100 signatures
 each to be completed as well as peer assessments signed by other students
- Role-play scenarios are sometimes irrelevant to duties to be performed in the industry.
 Students are required to write scripts for role-play assessments and then to act out the script rather than being exposed to realistic workplace situations in a simulated environment and assessed on appropriate responses.
- The licensing authority has little consultation with RTOs or industry in the design, mapping
 and implementation of security courses and RTOs are not permitted to repair errors in the
 mandated training material.

4.7 The CPP07—Property Services Training Package

During the strategic audits, RTO representatives, students and employers were asked about the CPP07—Property Services Training Package, the competency of graduates, the relevance and quality of training and whether improvements could be made.

Many comments were supportive of the training package.

Communication is the main aspect and it is done well in the package. (A trainer)

Our students have to have good communication skills given the job demands. We run a 'testing day' before they are employed and this includes an assessment of communication skills. The training

package is OK. There are no skills gaps that we have identified. (An employer)

Others made useful suggestions for improvement that can inform the next review of the package. Several RTOs and trainers believe there is duplication in the units that needs to be addressed. Several trainers and employers advised that there should be increased emphasis on the legal aspects of security roles.

The Australian Qualifications Framework (AQF) is the structure underpinning all nationally recognised qualifications. It describes 'the level of complexity and depth of achievement and the autonomy required of graduates. Some stakeholders also expressed the view that the AQF certificate II level is too low for the industry and for the requirements of the licensed role. Graduates of a certificate II level course will work within a 'defined range of information', and be able to 'apply ... known solutions to a limited range of predictable problems'. The Certificate II in Security Operations includes in its employability skills summary, the requirement that graduates be able to:

- · negotiate to defuse conflict
- provide back-up as required
- manage and resolve conflict
- respond to incidents that are dangerous
- · respond to emergency, and
- prepare evidence for presentation in legal proceedings.

These skills are not consistent with the AQF level two descriptors. The level three descriptors better reflect the skills described above, as they include, for example, dealing with 'unforeseen contingencies'.

When other qualifications at a certificate II level are reviewed, the emphasis on routine, under supervision, is marked. For example, in the *SIR20312 Certificate II in Retail Fast Food*, the description of the qualification is as follows:

'This qualification provides the skills and knowledge for an individual to be competent in a range of activities and functions requiring basic retail operational knowledge and limited practical skills in a defined context. Work would be undertaken in various retail food outlets. Individuals may work with some autonomy or in a team but usually under close supervision.'

When the deaths which have been analysed in the coroners' reports are considered, the circumstances were in most cases not routine, with fast responses to emergencies and conflict required of security guards.

Comments made about the possible misalignment of the qualification to the actual work of guards, should be considered in any review of the training package. The Security Industry Regulators Forum has advised that its planned review of the nationally agreed competency requirements will also consider this issue, in parallel with the planned review of the training package. However, there is some concern by industry stakeholders about the possible unintended consequences of lifting the entry level qualification requirements:

... in raising entry level training for security licences to an aspirational Certificate III level it will become increasingly difficult for the industry to attract suitable candidates. This, in addition to the duration of entry level training will act as a significant deterrent to new entrants to the industry as well as imposing significant additional costs.

The AQF level of the qualification may be misaligned to the actual work duties of guards. With security guards having the authority to arrest the level of required knowledge and experience is inconsistent. Expertise and experience required to operate is not adequately represented by an AQF II qualification. (An RTO)

Be more explicit about what is required in the assessment in terms of where practical assessment is required and what they want to be covered – which skills they want observed etc.
(A trainer)

Introduction level AQF qualification does not provide adequate skills for the job. (An RTO)

Critical aspects should be more explicit More 'musts'. (An RTO)

Less duplication, far too much repetition. Students keep reporting that they have answered the same questions over and over again. (An RTO)

Repetition across every unit, particularly at the required skill level. Some units are too similar, distinguish between the units more. (An RTO)

Would like to see more emphasis on the law, types of law and how it is applied. Terminology that is used in the industry is not covered in the Package.

(An RTO)

Legislation and legal frameworks and their rights and obligations with use of force.
(An employer)

4.8 Complaints to ASQA

ASQA accepts complaints about training providers from students, their representatives, and other members of the community. ASQA has reviewed the complaints made about training in the security industry to gain further insights about issues of concern, and to identify whether systemic issues exist to be considered in the strategic review.

When ASQA accepts a complaint, ASQA reviews the information provided and conducts a risk assessment. ASQA may then:

- use the information provided in the complaint to inform future regulatory activity
- contact the provider to request a specific action, and/or
- undertake a formal investigation (in the most serious cases).

The outcomes of a formal investigation can include a compliance audit of a provider's registration, which may lead to a decision to suspend, cancel or place conditions on a provider's registration.

ASQA's ability to respond to these complaints is improved when complaints are made in a timely manner and are supported by evidence.

In the period 1 July 2013 to 30 March 2015 ASQA received 40 complaints about training in the security industry. ASQA categorises the issues raised within each complaint received about a provider. The five most frequently raised issues raised in complaints about security training providers last financial year are shown in Figure 8.

Figure 8: Issues most frequently raised in complaints about security training providers, 1 July 2013 – 30 March 2015



Source: ASQA Complaints 2013 - 2015

Chapter 5 Analysis of the levels of compliance of training quality of security training and assessment

The findings of this strategic review include a summary of the results of the audits of 67 RTOs conducted by ASQA between 1 July 2013 and 31 December 2014. An overview and analysis of the outcomes of these audits is provided in this chapter.

5.1 Overview of the Standards

The strategic review focused on a series of quality standards from the *Standards for NVR Registered Training Organisations 2012*. The *Standards for RTOs 2015* were introduced in late 2014 and applied from 2015 (for organisations applying to become an RTO from 1 January 2015 and for existing RTOs from 1 April 2015).

The focus of the strategic review was on a specific subset of Standard 15 that particularly relates to quality training delivery and assessment, but the review also included other standards relevant to concerns raised by coroners, regulators, employers and the industry generally.

The standards selected directly affect students, as they relate to the quality of information provided, support services and the accuracy of qualifications issued. The selected standards also impact the quality of training and assessment provision such as the suitability of the training and assessment strategy, access to suitable resources, adequacy of trainers and assessors, valid assessment and engagement with industry.

In addition, the review looked at the variation in the quality of actual delivery by different RTOs, and resultant concerns in industry about the quality and consistency of security training in the VET system.

Details of the standards are explained in this chapter and details of the standards are included in Appendix 4.

5.2 Overall levels of compliance and non-compliance with the standards

Sixty seven audits were conducted—43 audits undertaken during ASQA's regulatory activity and 24 audits that were specifically conducted for this review.

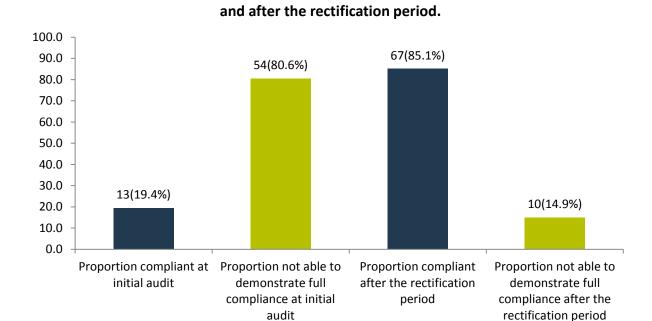
Of the 67 RTOs audited, 54 (80.6 per cent) were not able to demonstrate full compliance at the initial audit. If RTOS are found not to be fully compliant with the national standards they are given a 20—working day rectification period to address the non-compliances that were identified at their audit.

Following the 20–working day rectification period, 57 (85.1 per cent) of the RTOs were found to be compliant with the standards.

The overall level of compliance with the standards at the initial audit and after rectification period for the 67 RTOs that were audited is shown in Figure 9.

Figure 9: Proportion of RTOs able to demonstrate compliance at the initial audit and after the rectification period

Proportion of RTOs able to demonstrate compliance at the intial audit



Source: ASQA audits

5.3 Final outcome

Of the 67 RTOs audited, 13 (19.4 per cent) were able to demonstrate full compliance with the standards at the initial audit. Fifty four RTOs (80.6 per cent) were not able to demonstrate compliance with the standards, with the non-compliance ranging from minor to serious areas of concern.

Ten RTOs (14.9 per cent) remained not compliant following the rectification period. These RTOs failed to demonstrate that they were compliant with one or more of the standards, including the requirements to demonstrate:

- training and assessment strategies which met the requirements of the training package
- trainers and assessors who met the requirements of the training package
- adequate training materials and assessment tools, and
- accurate course information.

Listed below are the outcomes of the regulatory processes taken by ASQA for the 10 RTOs that did not demonstrate compliance at the end of the rectification period:

- One RTO requested withdrawal of the Certificate III in Security Operations from its scope of registration and demonstrated compliance for Certificate II in Security Operations.
- Five RTOs have been able to demonstrate compliance.

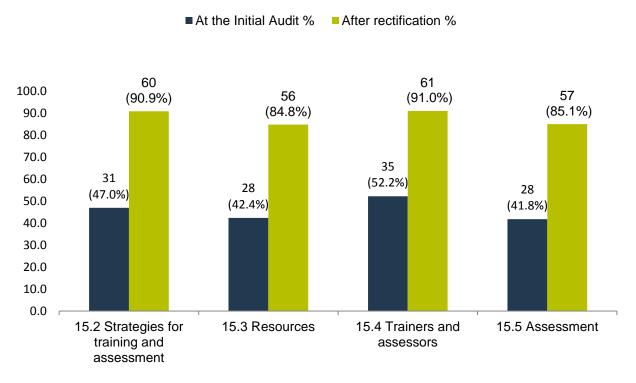
- Three RTOs did not achieve compliance after rectification and are no longer registered on the national training register <u>training.gov.au</u> to deliver national qualifications.
- One RTO has appealed to the Administrative Appeals Tribunal against ASQA's decision to
 cancel its registration and the matter is not yet finalised (Further information about RTOs appeal
 rights can be found at <u>Appendix 6: Fact Sheet—Reconsideration of a decision by ASQA.</u>).

Compliance against specific standards

The greatest rate of non-compliance was recorded against Standard 15 (Standards 1.1, 1.3, 1.4, 1.5, 1.6, .18, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards), which requires an RTO to provide quality training and assessment across all of its operations.

The proportion of RTOs that were able to demonstrate compliance with Standard 15 at the initial site audit and after the rectification period is shown in Figure 10.

Figure 10: Proportion of RTOs able to demonstrate compliance with quality training and assessment



Source: ASQA audits

5.4 Training and assessment strategies—Standard 15.2

Requirements of the Standard

Standard 15.2 (Standards 1.1, 1.4, 1.5, 1.6 of the *Standards for RTOs 2015*) requires RTOs to have strategies for training and assessment that meet the requirements of the training package. These strategies are to guide trainers and assessors who are delivering a program (cluster of units or a qualification) to students. The training and assessment strategies must be developed *through effective consultation with industry*.

There is no specific format for describing a strategy. However, it should include key parameters such as whether the program is delivered in a classroom or delivered in a work-based setting or a blend of both; assessment methods; additional components such as workplace training; what (if any) prerequisites are required; who the targeted learners are (for example, school leavers, existing workers); as well as an outline of the units included.⁶⁰

RTOs must develop a strategy or strategies for each training product they are registered to deliver, in the format they choose. Different strategies may need to be developed for different delivery modes or target groups. The strategy may consist of multiple documents; however, there must be consistency between these documents so that the overall strategy is clearly described. An RTO may need to develop multiple strategies where the needs of different learner cohorts require different approaches to the delivery of training and/or assessment.

There is no requirement that a VET regulator review changes to a training and assessment strategy made by an RTO. Such changes might be made to reflect the needs of a new client group, or the availability of different resources. Such flexibility is necessary and desirable. However, the requirement that the strategies are developed with effective consultation with industry should mean that the strategies (both as developed initially and as amended) would meet the needs of learners (and others impacted such as employers and members of the public) and the requirements of the training package. ⁶¹

Requirements of the training package

The Certificate II and III in Security Operations include a mix of core and elective units of competency. Each of these units of competency comprises specific knowledge and skills, which must be demonstrated by a student within the industry context and across the range of conditions described in the unit before the student can be found competent by the RTO.

The audit sample for the 24 RTOs that participated in the audits specifically conducted for this review included four units of competency (CPPSEC2004B Respond to security risk situation; CPPSEC2001A Communicate effectively in the security industry; CPPSEC3007A Maintain security of environment, and

⁶⁰ Further clarification of what could be in a training and assessment strategy is contained in the *Users' Guide to the Standards for RTOs 2015*, published by ASQA 2014

⁶¹Training packages are developed by industry, through extensive industry consultation, under the auspices of the Australian Industry and Skills Committee

CPPSEC3002A Manage conflict through negotiation). All units require as the context of assessment, a setting in the workplace or environment that simulates the conditions of performance described in the elements, performance criteria and range statement (of each unit).

The following resource implications for assessment were also identical across four units:

- access to a registered provider of assessment services
- · access to a suitable venue and equipment
- access to plain English version of relevant statutes and procedures
- assessment instruments including personal planner and assessment record book, and
- work schedules, organisational policies and duty statements.

The training and assessment strategies developed by RTOs needed to reflect these requirements.

A range of training and assessment strategies were utilised by the 24 RTOs audited specifically for this review, incorporating various modes of delivery. Most RTOs offered qualifications or statements of attainment which led to a licence as either a crowd controller or unarmed security guard, or both. The predominant mode of delivery was face to face in a setting that aimed to simulate the conditions of performance described in the elements, performance criteria and range statement of units of competency within each qualification. Most RTOs delivered the course independent from partner organisations.

All RTOs were required to submit strategies for training and assessment that outlined each course structure. From these strategies, it was observed that there are large variations in the way different RTOs approach the delivery of training.

The variance in unit selection and course structure appears to be driven by the licensing requirements that are in place in each state and territory. Each state and territory requires completion of a number of units of competency from the Certificate II and/or III in Security Operations. RTOs are predominantly delivering courses for students who are seeking a licence in one or more licence category.

Licence requirements vary from state to state and therefore training and assessment strategies, in particular the number of units of competency that make up a course structure, also varied.

Duration

As previously noted in <u>Chapter 3</u> of this report, a certificate II and III should be typically between 0.5 to one year (600 – 1200 hours) and between one and two years (1200 – 2400 hours) respectively in volume of learning, according to the AQF which also states that the 'generally accepted length of a full time year, used for educational participation, is 1200 hours'.

The Australian Qualifications Framework Council (2012) has stated that the definition of volume of learning covers a range of learning activities that include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.

A key focus of this strategic review was to evaluate the duration of courses provided by RTOs and assess whether students are able to achieve the learning outcomes in a given course duration. The 24 RTOs audited specifically for this review were required to complete a Course Duration Form that outlined the total number of weeks of the course and total hours of course duration.

Expectedly, the duration of courses also varied. For example, in relation to the *CPP20212 Certificate II* in *Security Operations*:

- A 12 unit course is delivered via 20 hours via self-paced distance delivery plus 20 hours (delivered over a two day period) of face to face delivery.
- A 15 unit course is delivered via face to face mode over 100 hours.
- A 16 unit course is delivered over 80 hours via face to face mode over a nine day period.
- A 17 unit course is delivered via face to face mode over 128 hours.

In relation to the *CPP30411 Certificate III in Security Operations* courses were delivered between five and 19 days and between 37.5 and 140 hours of face-to-face delivery and assessment.

The RTO offering the dual qualification, comprising 22 units, was delivering the course over six hours per day for seven days, being 42 hours.

The reasons for RTOs' decisions on how long a program would be, its duration or 'volume of learning', were explored.

Shorter programs in the security sector were delivered for a range of reasons, including student and employer pressure for fast training of the required qualifications to gain a licence, and market pressures to reduce the time taken and the cost of programs. In no cases were auditors provided with a rationale related to an experienced client group, as justifying a short timeframe.

Longer programs were found in those states where assessments have been mandated.

In New South Wales and Victoria, RTOs are approved to deliver training for licensing purposes. In these states it is a requirement for RTOs to use mandated assessment materials that are designed to ensure that competence is assessed in a consistent manner.

Based on the evidence presented during the audit and review process it was found that none of the RTOs took six months or twelve to twenty four months to deliver their programs, in line with the AQF requirements for a certificate II and certificate III.

In summary the duration or volume of learning of training and assessment provided by RTOs typically offered in security training programs was found to be significantly less than the benchmark in the AQF as being typically required for certificate II and certificate III programs.

Areas of non-compliance

At the initial audit, 31 (47 per cent) of all 67 RTOs audited showed that RTOs were compliant with their training and assessment strategies. Following the rectification period, the number of compliant RTOs rose to 60 (90.9 per cent).

A reason for the level of non-compliance at the initial audit was that the strategies did not provide an accurate or sufficiently detailed framework for the delivery and assessment.

Many RTOs delivering the Certificate II and III in Security Operations in significantly shorter duration that what is required by the AQF were found to be not compliant in this review.

After the RTOs audited had the opportunity to rectify the non-compliances identified with this standard, the rate of non-compliance fell to 9.1 per cent.

5.5 Resources required—Standard 15.3

Requirements of the Standard

Standard 15.3 (Standards 1.3, 1.5 and 1.6 of the Standards for RTOs 2015) requires RTOs to have:

- the resources (staff, facilities, equipment, materials) required by the training package, and
- training and assessment strategies that are 'consistent with the requirements of the training package ... and the RTO's own training and assessment strategies.

In the 2015 Standards, Standard 1.3 (c) requires that an RTO has 'learning resources to enable learners to meet the requirements of each unit of competency' and in reference to assessment, Standard 1.8 (a) requires that the RTO ensures that assessment 'complies with the assessment requirements of the relevant training package'.

It is clear from both the *Standards for NVR Registered Training Organisations 2012* and the *Standards for RTOs 2015* that it is the RTO's responsibility to ensure that training and assessment materials meet the requirements of the training package.

Some training organisations delivering security training have informed auditors that they rely on materials available from the Construction and Property Services Industry Skills Council, or on the use of assessment materials mandated by the New South Wales Police Force Security Licensing & Enforcement Directorate.

In the case of the former, the Construction and Property Services Industry Skills Council states:

'CPSISC has developed these Delivery and Assessment Guides to help with the implementation of the CPP07 Training Package. **The Guides are intended to provide guidance only** using a template which provides quality and consistency for the industry. **Guides must be customised by the RTO** which means providing the next level of detail to meet the required standards and the individual needs of the learner and their work requirements.

They contain:

- Training Plan
- Assessment Plan
- Suggested activities / case studies
- Work Project
- Evidence Report
- Record of Assessment

- Related Resources
- Contacts. ⁶²

An Administrative Appeals Tribunal decision recently reported an ASQA auditor's rationale for finding an initial registration applicant not compliant with Standard 4.5 (the assessment standard) was 'sound and persuasive'. ⁶³. The auditor had found the applicant not compliant because they 'did not review and adapt [the Construction and Property Services Industry Skills Council Guide] to ensure it reflected its own proposed practices'.

Ensuring that their training and assessment resources meet the requirements of the training package is the responsibility of each RTO.

Areas of non-compliance

At the initial audit, 28 (42.4 per cent) of the 67 audits showed that RTOs had sufficient resources to deliver and assess security operations courses properly. Following the rectification period, the level of compliance rose to 56 (84.8 per cent).

Fourteen of the 24 RTOs (58.3 per cent) audited specifically for this review were found not compliant at initial audit for one or more of the reasons listed below:

- trainers and assessors not meeting the requirements of Standard 15.4 (Standard 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards)
- assessment not meeting the requirements of Standard 15.5 (Standard 1.8 of the 2015 Standards), and
- Inaccurate training and assessment strategies Standard 15.2 (Standards 1.1, 1.4, 1.5, 1.6 of the 2015 Standards).

After the RTOs audited had the opportunity to rectify the non-compliances identified with this standard, the rate of non-compliance fell to 15.2 per cent.

5.6 The adequacy of trainers—Standard 15.4

Requirements of the Standard

Standard 15.4 (Standards 1.13, 1.14, 1.15 and 1.16 of the *Standards for RTOs 2015*) requires that trainers and assessors:

- have training and assessment competencies—currently defined as holding the TAE40110
 Certificate IV in Training and Assessment) or demonstrated equivalent competencies
- have relevant vocational competencies
- · have current industry skills, and

⁶² From Construction and Property Services Industry Skills Council website http://www.cpsisc.com.au/productcategories/property-delivery-assessment-guides on 12 January 2015

⁶³ AAT General Administrative Division number 2013/3517

 continue to develop their knowledge and skills related to VET knowledge, training and assessing competence and their industry currency.

Vocational competency is defined as 'broad industry knowledge and experience, usually combined with a relevant industry qualification. A person who has vocational competency will be familiar with the content of the vocation and will have relevant current experience in the industry. Vocational competency must be considered on an industry-by-industry basis and with reference to any guidance provided in the relevant training package or accredited course'. ⁶⁴

Finally, if the trainers/assessors do not have the *TAE40110 Certificate IV in Training and Assessment* or demonstrated equivalent competencies, then they must hold a skill set such as the *TAESS00007 Enterprise Trainer—Presenter's Skill Set*, and be under supervision.

Requirements of the training package

There are no specific requirements in the training package for trainers and assessors of security qualifications.

Areas of non-compliance

The notion of vocational competency is linked to both *current industry skills* and *industry currency*, which are independently included within the Standard. The audit findings indicate RTOs find it difficult to comply with 'currency'. Coupled with the notion of vocational competency is the requirement that trainers/assessors should also continue to develop their VET knowledge and their training and assessment competence. Many RTOs do not meet this requirement.

Of the 67 RTOs audited, 35 (52.2 per cent) were compliant with this standard, employing trainers and assessors with qualifications, vocational skills and experience that met the requirements of this standard.

Of the 67 RTOs audited, 32 (47.8 per cent) were not compliant with the standard for trainers and assessors at the initial site audit.

Areas of non-compliance included:

- there were no procedures for ensuring trainers had vocational competence, or for verifying resume, certificates and qualifications
- not all trainers and assessors met the requirements of the standard
- · not all trainers and assessors held the necessary training and assessment competencies
- there was little evidence of currency in industry experience, and
- there was little evidence of professional development for trainers or assessors.

After the RTOs audited had the opportunity to rectify the non-compliances identified with this standard, the rate of non-compliance fell to nine per cent.

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⁶⁴ National Skills Standards Council determination 17 June 2013, http://www.nssc.natese.gov.au/policies/determination_for_trainer_and_assessor_competencies

5.7 Assessment—Standard 15.5

It is a requirement that an RTO must only issue a VET qualification 'to persons whom it has assessed as competent in accordance with the requirements of the training package'. 65

Where assessment is unreliable, the validity of the qualifications issued is questionable. Coroners, licensing authorities, employers and the industry have raised concerns about the quality of training and assessment provided by RTOs. There were also comments made to the review team about the low level of competency of some graduates from some Certificates II and III in Security Operations courses.

Assessment was a focus of this review, specifically the quality of educational design (including mode of delivery, workplace learning and the 'depth and duration of training') given its importance in shaping the learning experience.

Requirements of the Standard

Assessment must:

- meet the requirements of the training package
- be in accordance with the principles of assessment—that is, be valid, reliable, flexible and fair 66
- be conducted according to the rules of evidence—that is, sufficient, valid, authentic and current evidence should be collected
- meet workplace requirements, and
- be systematically validated.

It is required that RTOs demonstrate that assessment is conducted in accordance with the principles of assessment and with the rules of evidence and that they have developed assessment tools and used them in line with the instructions within the tools. An assessment tool includes the following components:

' ... context and conditions of assessment, tasks to be administered to the student, an outline of the evidence to be gathered from the candidate and evidence criteria used to judge the quality of performance (that is the assessment decision-making rules). This term also takes in the administration, recording and reporting requirements, and may address a cluster of competencies as applicable for holistic assessment.⁶⁷

Validation involves checking that the assessment tool produced valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the

⁶⁵ Standard 23.1 of the *Standards for NVR Registered Training Organisations 2011*, and Standard 3.1 in the *Standards for Registered Training Organisations 2015*

⁶⁶ Refer to Appendix 7 for definitions of these terms.

⁶⁷ ASQA General Direction – Retention requirements for completed student assessment items (Feb 2014)

relevant aspects of the training package have been met. It includes reviewing and making recommendations for future improvements to the assessment tool, process and/or outcomes.⁶⁸

Requirements of the training package

The qualifications reviewed include the following assessment requirements:

- demonstrate skills such as oral communication, literacy and numeracy
- competency in using a range of communications equipment (including a two way radio) and technologies to communicate written information in a suitable format, language and structure
- competency in the use of restraints and knowledge of the adverse effects of use of restraints including positional asphyxiation
- · access to a suitable venue and equipment, and
- a setting in the workplace or environment that simulates the conditions of performance described in the elements, performance criteria and range statement.

When using 'simulated' workplace environments, the RTO must ensure they fully replicate the resources, environment and any time and productivity pressures that exist in the actual workplace. It is important to ensure the development and use of simulated environments is informed by consultation with industry stakeholders. This helps to ensure relevance to real workplaces.

Areas of non-compliance

Of the 67 RTOs audited, 28 (41.8 per cent) provided evidence of assessment tools and practices which met the requirements of this standard at the initial audit.

Of the 67 RTOs audited, 39 (58.2 per cent) had not-compliant assessment tools and practices at the initial audit. This is the highest rate of non-compliance for any standard.

The main reasons for this were:

- assessment tools did not reflect the context and conditions for assessment (a breach of principles of assessment)
- inadequate time allocated for depth and duration of training and assessment
- no advice to assessors on how to determine sufficient and valid evidence to make a judgement of competence
- validation of assessment tools not undertaken
- inconsistent understanding of 'quality' and what is expected for training to be of adequate quality, particularly with regard to the depth and duration of training
- there was too much a focus on written tasks
- there was no assessment in the workplace, rather assessment was conducted in a 'simulated work environment' and there was a reliance on role plays, and

⁶⁸ National Quality Council 2009, p22.

some RTOs delivering in more than one state and/or territory did not use the same assessment
tools across borders. In these cases, it was found that the RTOs did not ensure that the delivery
and assessment requirements of the standards for all units and qualifications were interpreted
consistently.

According to the evidence of all the security guards who gave evidence to a New South Wales Coroner's inquest into the death of a hotel patron in 2010, none had ever received any proper training about positional asphyxiation or its dangers. At the very least, none were able to properly explain what positional asphyxiation was or the risks associated with the prone position and all effectively maintained that they lacked a proper understanding about positional asphyxia when the events unfolded on 2 April 2010.⁶⁹

What became clear from the evidence was that the standard and quality of the training given to security guard applicants, including about positional asphyxiation, varies considerably from jurisdiction to jurisdiction.

After the RTOs audited had the opportunity to rectify the non-compliance identified with this standard, the rate of non-compliance fell to 14.9 per cent.

Examples of poor practice

Examples of poor practice identified during audits included:

- assessment tools did not include the context and conditions for assessment;
- assessment tools did not consistently include across the assessment methods the tasks or the performance indicators/observable behaviours relevant to the tasks;
- assessment tools did not include advice to assessors as to how to determine successful completion of tasks and how to synthesise the evidence and make a determination of competence, and
- assessment was not conducted in accordance with the principles of assessment and the rules
 of evidence.

5.8 Appropriate information to participants—Standard 16.3

Requirements of Standard 16.3

This standard requires that before students enrol or enter into an agreement (or a contract) with the RTO, the RTO must inform them about:

- the training, assessment and support services to be provided, including duration, costs and any student attendance requirements
- student rights and obligations, for example, the requirement for students to meet the appropriate person requirement and satisfy police checks, and
- licensing outcomes.

⁶⁹ New South Wales Office of the State Coroner (2013) Report by the NSW State Coroner into deaths in custody/police operations for the year 2012, accessed 5 May 2015 at http://www.coroners.justice.nsw.gov.au/Documents/dic%20dipo%202012%20report.pdf, p 108.

Areas of non-compliance

Of the 67 RTOs audited, 45 RTOs (69.2 per cent) were found to comply with this standard. The remaining 22 (30.8 per cent) were found to be not compliant with the standard at the initial audit.

The main reasons for this non-compliance were:

- Hard copy pre-enrolment information was not consistent with electronically available preenrolment information, for example, in relation to fees and charges, entry requirements and pathways from the qualification, particularly in respect of licensed outcomes.
- Pre-enrolment information contained errors and there were references to out-of-date information, such as superseded qualifications.
- Pre-enrolment information did not inform potential students that the RTO was offering a course
 that packaged for example, a CPP20212 Certificate II in Security Operations qualification with
 additional units of competency (that would enable a student to attain a particular security licence
 under varying state/territory security licensing arrangements). Rather, students were advised
 that he or she would attain just the CPP20212 Certificate II in Security Operations.
- Pre-enrolment information available from RTOs delivering in multiple states and territories did
 not address licensing and other regulatory requirements in each jurisdiction. For example, the
 pre-enrolment information of an RTO delivering in both New South Wales and Queensland
 markets offers the potential student pre-enrolment information applicable to a student
 undertaking the course in Queensland.

There is considerable variation in the quality and accuracy of information provided to students before enrolment.

After the RTOs audited had the opportunity to rectify the non-compliances identified with the standard, the rate of non-compliance fell to 7.7 per cent.

5.9 Support Services—Standard 16.5

Standard 16.5 (Standard 1.7 of the 2015 standards) requires RTOs to ensure that students receive training, assessment and support services that meet their individual needs. There is no defined approach as to how this support will be evaluated and provided; however, there is an assumption that the purpose of the support is to maximise the outcomes for the learner.

As mentioned in <u>Chapter 2</u>, the security industry attracts a range of learners, including culturally and linguistically diverse people for whom English is a second language and Australian-born people with limited education.

Requirements of the training package

While there are no specific requirements concerning support for students in the training package, the Employability Skills Summary at the beginning of each of the two qualifications provides a clear summary of the skills performance required in the workforce. For an RTO designing a training program for a target group that may include people with few of these skills, and perhaps a limited experience in the Australian workforce, support to achieve these outcomes should be a key concern.

Communication skills are explicit in all *CPP20212 Certificate II in Security Operations* core units of competency, either in the unit's performance criteria or required skills. Security officers need to be able to understand and communicate security information (requiring reading, writing, speaking, numeracy and listening skills) to work effectively on an individual basis and as part of a team.

Despite differing licensing requirements in each state and territory, common to all licensing bodies is the requirement for an individual seeking an unarmed guard and/or crowd controller licence to hold competency in the unit *CPPSEC2001A Communicate effectively in the security industry*. This core unit has wide application in a range of work roles in the security industry.

The auditors noted that RTOs had a range of pre-enrolment tests that addressed different aspects of language, literacy and numeracy and study skills. However, many of these tests were not targeted to security applicants, and were generic in nature. Further, although language, literacy and numeracy testing was being carried out, many RTOs' language, literacy and numeracy assessments did not include decision-making rules for staff to follow. Therefore, trainers and assessors were not provided guidance on the expected level of performance that would qualify a student for entry in to a security operations qualification. Many trainers and assessors stated that they adopted a common sense approach—if the language, literacy and numeracy assessment responses 'looked alright' then enrolment would be accepted.

In some cases, the language, literacy and numeracy assessment was conducted by administrative staff members, (with no prior experience in training and assessment or language, literacy and numeracy), who would then determine if enrolment would proceed.

It was found that while pre-enrolment screening was occurring at most RTOs, the practices were not always effective, meaning that RTOs were not able to fully determine a learner's strengths and weaknesses, skill level or learning style, or to develop a training plan to suit and support the needs of individuals within the target group(s).

Areas of non-compliance

Of the 67 RTOs audited, 59 RTOs (88 per cent) were audited against this standard. At the initial audit, 54 RTOs (91.5 per cent of those audited against this standard) demonstrated appropriate support services to meet individual needs. Only five RTOs (8.5 per cent) were not compliant with the standard. Following the opportunity to address the non-compliances identified in their audit reports, the rate of compliance rose to 96.6 per cent (57 RTOs).

Although ASQA found a high level of compliance with this standard, it is clear that in practice, approaches to assessing and providing support to address language, literacy and numeracy needs are could be improved. There is undoubted concern among stakeholders about the low level of language and literacy of many in the security workforce (as explored in Chapter 2). The Loud and Clear project, sponsored by the Construction and Property Services Industry Skills Council, and its outcomes are detailed in that chapter.

When trainers and assessors were asked what the most challenging aspect in the training for a new entry student was, one of the most frequent responses was that students had poor communication skills. Further, the overwhelming majority of survey respondents reported *experiences with security industry learners with poor language, literacy and numeracy skills*.

Some better practice examples of pre-enrolment language, literacy and numeracy assessment undertaken by RTOs included:

- A language, literacy and numeracy tool requiring students to write approximately 50 words about why they want to become a security guard/crowd controller and to complete basic numeracy calculations based on a security guarding scenario.
- A language, literacy and numeracy assessment that requires the student to draft a short letter, and to complete word identification, a lost and found register and a timesheet.
- An interview with the trainer/assessor followed by a security-specific language, literacy and numeracy assessment completed under supervision.

At least two RTOs had access to a dedicated language, literacy and numeracy division with expert practitioners in providing support and learning programs.

An example of poor practice was an RTO using its enrolment form as a language, literacy and numeracy tool, stating students who can fill out the form have the capabilities required to complete the course.

Trainer and assessor comments

Trainers and assessors stated that learners found it challenging to engage with learning materials because of poor understanding and comprehension skills. Students are unable to read textbooks or comprehend assessment questions. Learners who have poor writing skills are unable to express themselves.

Trainer and assessor survey respondents also noted the challenges with targeting training to a class with a divergent range of language, literacy and numeracy skills. In some cases, trainers and assessors felt constrained by the range of strategies they could employ. In some states, the inflexible nature of mandated assessments meant that trainers and assessors were not able to offer reasonable adjustment to learners. Trainers and assessors also stated that it was difficult to provide meaningful literacy and numeracy support, given the short course duration and this—coupled with the licensing authorities' view that any adjustment to mandated assessment would undermine the rigour of the assessment process—meant that students were left feeling unsupported.

Trainers and assessors stated that in addition to professional development related to language, literacy and numeracy, there is a need to increase the clarity and specificity of language, literacy and numeracy in the *CPP07 Property Services* Training Package.

Training for trainers and assessors

A review of trainer and assessor files of the 24 RTOs that were audited specifically for this review found that there had been an uptake of the *TAELLN401A Address adult language, literacy and numeracy skills* or *TAELLN411 Address adult language, literacy and numeracy skills* as part of individual or RTO required staff development.

Employer comments

Employers stated that it was difficult to find good and competent staff, despite new crowd controller and unarmed guarding recruits holding competencies from the *CPP07 Property Services Training Package* and the relevant licence for the particular state or territory.

This may mean that the language, literacy and numeracy skills of Certificate II in Security Operations are not at the level required to get and keep a security job. It may also mean that the Certificate II is too low a level for the work requirements (as discussed in Chapter 4).

These language, literacy and numeracy issues will be addressed further in the conclusions and recommendations, specifically:

- The need to establish clearer and more specific requirements in the training package about the language, literacy and numeracy levels required to gain enrolment into the CPP20212 Certificate II in Security Operations, and
- Making the language, literacy and numeracy demands of the job roles explicit in the units of competency and their assessment requirements.

Summary

While the percentage of RTOs found to be not compliant at the initial audit stage was high—80.6 per cent or 54 RTOs)—the percentage able to demonstrate compliance after rectification evidence was provided rose to 85.1 per cent (or 57 RTOs).

The highest level of non-compliance at the initial audit was for the assessment standard. There was a significant amount of poor practice in assessment, much of which was found not to meet the principles of assessment and the rules of evidence.

Licence requirements vary from state to state; therefore, training and assessment strategies—in particular the number of units of competency that make up a course structure—also varied. Some jurisdictions require more than the 12 core units plus elective units (for the certificate II) to be achieved, for the unarmed guard and crowd controller licences.

Most courses are delivered in a timeframe significantly shorter than that benchmarked in the AQF.

RTOs find it difficult to maintain the industry currency of their trainers as required by the Standards.

Key aspects of job roles such as understanding of the risks of restraint and positional asphyxia were not adequately covered in training and assessment and there was very limited delivery and assessment in work places.

Approaches to assessing and providing support to address language, literacy and numeracy are needed so that graduates are equipped with the skills to undertake security roles are inadequate.

Chapter 6 Conclusion

The genesis of this review was a concern that security personnel may not be receiving training that equips them with the skills to work safely with members of the public. The wide-ranging consultations undertaken with stakeholders for this review identified a number of serious concerns, including:

- poor quality training and assessment, including training of very short duration, which does not
 equip people with the right skills for the roles and which calls into question the integrity of the
 qualifications
- inadequate content in qualifications, including language, literacy and numeracy skills and the skills to manage the dangers of restraint including positional asphyxia
- inadequate work-based training and assessment
- jurisdictional differences in the level and quality of training, and
- inconsistent licensing requirements across states and territories.

A number of coroners' reports over the past decade have found that poor training and assessment may have contributed to fatalities in the industry; these reports raise significant public safety issues, including the dangers of asphyxiation, and the impacts of poor training and little assessment in a real work environment. Their reports included the following findings:

- 'People working in the security industry should be required to complete a revised competency module dealing with restraint asphyxia in order to renew their licence'. ⁷⁰
- 'The standard and quality of the training given to security guard applicants varies considerably from jurisdiction to jurisdiction.' ⁷¹
- 'Security guards can be trained interstate and then seek to be registered in New South Wales under the Mutual recognition Act 1992. This in my view leaves a system that is open to abuse and can result in people with insufficient training being employed in this state and ... ultimately putting lives at risk.' ⁷²
- It cannot be over-emphasised that guards, security officers and others need to fully understand that positional asphyxia can occur when a person is restrained ... in a prone, face down position.' 73
- 'There was no requirement to be examined or observed in any sort of real environment....The current training is classroom based....Consideration should be given to requiring a crowd

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⁷⁰ Office of the State Coroner (24 November 2014), Findings of Inquest into the death of Stephen Arthur Nash, accessed 5 January 2015 at http://www.courts.qld.gov.au/_data/assets/pdf_file/0018/331623/cif-nash-sa-20141124.pdf, pp 26-27

⁷¹ Coroner's Court of NSW (8 December 2011). Inquest into the death of Paul Ahsin accessed 24 June 2015 http://www.coroners.justice.nsw.gov.au/Documents/dic%20dipo%202012%20report.pdf

⁷² Ibid.

⁷³ Coroner's Court of Victoria, State Coroner Judge Gray (27 March 2015) Inquest into the death of Anthony William Dunning, accessed at 24 June 2015 at http://www.coronerscourt.vic.gov.au/bome/coroners+written+findings/findings+-+248011+anthony+william+dunning

controller to first receive a probationary licence....[and be] observed ...in his/her workplace on at least one occasion.⁷⁴

Audits conducted for this review found significant evidence that confirmed many of the concerns.

Of major concern is that the issues identified have been longstanding and persistent and resistant to a number of efforts to address them. Therefore, the recommendations for action arising from this review seek to confront and resolve the issues through concerted action that will require collaboration and involvement by ASQA, jurisdictional licensing authorities, the training package developer, and (in the case of systemic national training system issues) all training package developers, as well as RTOs. What is clear is that initiatives in individual jurisdictions—as well as efforts by licensing authorities to agree and implement minimum competency standards—have not been sufficient to resolve the concerns. A coordinated national response is required.

In addition to the recommended actions below, ASQA will collaborate with the training package developer and licensing authorities to publicise the findings of this review so that RTOs know the outcomes and the implications for their training and assessment practice.

The review has found that inconsistent licensing requirements across states and territories, and poor quality training and assessment being provided by RTOs, are fundamental challenges to ensuring high-quality licensed security personnel across the country.

An additional challenge is that while qualifications are national, regulation of licensed security roles is state and territory-based, making alignment of licenses and the training required more difficult.

Licensing authorities' significant concerns about poor-quality training and assessment in the security industry have resulted in some jurisdictions imposing state-specific regulatory requirements on RTOs. These requirements are over and above, or in duplication of, the requirements of the industry training package and the standards that RTOs must meet in order to become and remain registered. Examples include mandated minimum course duration, mandated assessment materials and regular audits of RTOs by licensing authorities.

Additionally, while all jurisdictions require security licence applicants to demonstrate they have met nationally agreed minimum competency standards, in some states security licence applicants must attain additional units of competency or units from the higher level qualification (the Certificate III in Security Operations).

Stakeholder views are that if progress is to be made in improving safety, substantial efforts must be made in parallel to address the inconsistent licensing requirements and the quality and integrity of training and assessment and to strengthen the structure and content of the training package.

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⁷⁴ Coroners Court of Victoria, State Coroner Judge Coate, (5 October 2011), Inquest into the death of Jerry Karamesinis, accessed 11 January 2015 at http://www.coronerscourt.vic.gov.au/home/coroners+written+findings/findings+-+inquest+into+the+death+of+jerry+karamesinis

In order to address these interrelated problems, this review proposes that licensing authorities and the training package developer work together with other stakeholders to ensure the security units of competency and qualifications meet the skill-related requirements of relevant security licence activities. This will allow licensing authorities to agree on a single set of qualifications and units to be used in all jurisdictions.

A new, consistent set of licensing arrangements could then form the basis of a revised training package that should specify the core elements that RTOs are required to deliver. The revised training package needs to clearly and explicitly include agreed training requirements. This would enhance ASQA's ability to ensure RTOs deliver against the training package requirements.

This reform—combined with other recommendations in this report—can be expected to lift the quality and integrity of training and assessment across the country, paving the way for removal of (or at least harmonisation of) other regulatory requirements that are currently individually imposed through the licensing regimes. At the very least, if licensing authorities determine that additional regulatory requirements—such as assessment conditions—are necessary, these should also be consistent across the country and should be incorporated into the training package as industry requirements (rather than individually applied in jurisdictions, as is currently the case).

The review confirmed views expressed in coroners' reports that there is significant concern about the way the *Mutual Recognition Act 1992* is being used to gain security licences. Where licensing requirements and the quality of training and assessment practices vary across states and territories, this can encourage the practice of individuals undertaking training and licensing requirements in a jurisdiction with fewer requirements (or requirements which can be achieved more quickly) for the purpose of gaining a licence that will be recognised under the *Mutual Recognition Act 1992* in their actual state of residence.

The data clearly demonstrates the impact of this practice in New South Wales. As of May 2015, New South Wales had 32.1 per cent of the national share of security jobs, despite having issued only 10.7 per cent of the licences nationally in 2013-14; New South Wales issued 71 per cent of the licences granted under mutual recognition in the same year. It is for this reason that attempts by some jurisdictions to address the issue by lifting their licensing requirements are failing: because increased requirements in one jurisdiction simply create an incentive for individuals to cross borders to seek their licences elsewhere.

It is clear that unless stakeholders work collaboratively on a number of fronts to resolve the quality of delivery and assessment and inconsistent licensing arrangements, affected states will continue to be concerned that their licensing standards are being circumvented through the use of mutual recognition, resulting in compromised public safety.

The option suggested by some stakeholders of reviewing the *Mutual Recognition Act 1992*— presumably to exclude security licences from the coverage of this Act—is not considered feasible. This is likely to maintain or increase the differences in levels of training and licensing across the country, and it fails to address the systemic issue of graduates who are not sufficiently skilled to carry out public safety roles. In addition, it is not appropriate for this review to make recommendations that might undermine the mobility of labour. The Productivity Commission has recently released its *Mutual Recognition Schemes Report*, which has found that these schemes are generally working well and making it easier to do business across borders. However, the Productivity Commission has also found that the benefits of mutual recognition risk being eroded due to regulators not always implementing the arrangements as intended, weak oversight, and a growing number of exemptions. The

Productivity Commission has therefore focused on improving governance arrangements, potentially expanding coverage, and addressing irritants to the smooth operation of the schemes.⁷⁵

This review proposes that training package developers and jurisdictional licensing authorities collaborate to ensure that nationally recognised portable qualifications meet the skill-related requirements of licences to facilitate the movement of skilled labour.

However, while some licensing authorities agree that consistency in jurisdictional licensing arrangements will be helpful, they consider this will only address the current problems with mutual recognition if all other things are equal, including the duration of courses and the level of regulation of RTOs providing the training and assessment. Other recommendations therefore seek to respond to these concerns and the recommendations in the report should be implemented together.

Recommendation 1

It is recommended that the training package developer⁷⁶, in consultation with the state and territory licensing authorities and the security industry, progresses as a priority a review of the Certificates II and III in Security Operations, in order to:

- ensure they meet the skill-related requirements for relevant security licence activities, and
- provide a single set of qualifications and units to be agreed by licensing authorities for use in all jurisdictions.

The poor quality of assessment and the issue of very short course duration were central themes in the research and consultations and were confirmed by the audit results.

The non-compliances identified included serious deficiencies in assessment, raising questions about the validity and integrity of the qualifications and ultimately undermining licensing authority, employer and individual confidence in the VET system. The findings confirmed stakeholder views that concerted action, including improved specification in the training package and regulatory action by ASQA to high risk areas such as security training, is required to lift the quality of VET for the security industry.

Training and assessment in the security industry does not currently require a workplace component. This is unusual in the vocational education and training sector. Most stakeholders

⁷⁵ Productivity Commission (26 June 2015) Mutual Recognition Schemes, Draft report, Key points, accessed 24 July 2015 at http://www.pc.gov.au/inquiries/current/mutual-recognition-schemes/draft#media-release

⁷⁶ The Government has announced a new contestable model for training package development and maintenance. The Government has invited proposals from organisations to provide support to Industry Reference Committees which will oversee Training Packages with a view to a new model being in place by January 2016. This may mean that another body is awarded the responsibility for the CPP07 Property Services Training Package. In recognition of these potential changes the recommendations in this report will refer actions relevant to the training package to 'the training package developer'.

acknowledge the value of on-the-job experience in the development of competencies. Employers have commented that newly trained security operatives do not always have sufficient skills and knowledge for the job.

Coroners' reports expressed concern about lack of workplace training and assessment and this was confirmed by the RTO survey which indicated the majority of training was occurring in a classroom. A small number of RTOs are using **workplace simulation** due to perceived restrictions on access to workplaces imposed by licensing requirements.

Furthermore the review found that where workplace simulation is occurring, much involved primarily use of role plays which may not be sufficient to replicate the resources, environment and the time and productivity pressures that exist in the actual workplace.

While current orthodoxy is that unlicensed staff cannot work in direct security work, supervision of trainees is managed within other industries where public safety is a concern- for example, in aged care and early childhood care and a small number of RTOs have indicated they are finding ways to access work based training and assessment for learners. There are diverse views on the issue. At least one licensing authority has suggested that there are no legislative impediments to on-site training if the conduct is 'not for reward' and for the purposes of work experience.

Other stakeholders consider that the issue is more complex and that legislative changes will be required in individual jurisdictions to enable workplace training and assessment to occur. Another licensing authority expressed concerns based on their previous experience about the adequacy and integrity of workplace assessment, as well as its appropriateness for assessing certain competencies in the security industry which are only required to be applied in urgent, high risk or conflict situations.

The Standards for Training Packages require all training package developers to specify the assessment conditions and performance and knowledge evidence for all units of competency by December 2015. This empowers developers to detail industry's assessment requirements such as the conditions for assessment, thus giving greater clarity to RTOs about industry expectations and enabling ASQA to audit these requirements.

Despite the diverse views about the issue of workplace assessment it is proposed that the training package developer work with licensing authorities and industry to explore the option of including a component of mandatory workplace assessment in the training package, taking into account the range of views, experiences and legislative contexts referred to above, in addition to providing clearer specifications for assessment that occurs in a simulated workplace context.

Many stakeholders expressed concern about the use and appropriateness of **online learning** and queried whether competence can be demonstrated in the security qualifications using this mode of delivery. It also raises the risk of identity fraud if there are not adequate arrangements in place to ensure the online assessment is actually being done by the person enrolled in the training.

Between 15 and 20 per cent of RTOs surveyed indicated that they use online delivery of training and assessment. A review of the elements and performance criteria and evidence guide in a core public safety unit such as *CPPSEC2004B Respond to security risk situation* raises questions about how competency can be assessed online. It is proposed that assessment requirements specify when an assessor must be physically present with the student for the assessment.

The audits found that a significant number of RTOs were not compliant with the standard requiring trainers and assessors to have appropriate training and assessment competencies including

vocational competency and current industry skills. While some licensing authorities require that trainers/assessors be approved before they can conduct security training and/or that they hold the relevant licence class to enable them to return to industry to maintain their currency, other jurisdictions have no such requirements. This is another example of inconsistent licensing arrangements which have grown over time as individual jurisdictions have sought to address their concerns about poor quality training and assessment in the industry.

It is proposed that the training package, when revised to comply with the *Standards for Training Packages*, specifies assessor requirements including details related to qualifications, experience, industry currency, and knowledge of the language, literacy and numeracy requirements specific to security learners and security roles.

It can be expected that clarity about industry requirements with regard to assessment and assessor requirements and the capacity for ASQA to audit against such requirements, should build RTOs' compliance with the delivery and assessment standard. This in turn could enable licensing authorities to consider relinquishing the individual jurisdictional arrangements they have put in place over time to address their concerns about poor quality in the training system, setting the foundation for greater consistency across the country in licensing requirements.

During the consultations several stakeholders expressed the view that the Certificate II qualification may not be aligned to the licensed role of crowd controllers and other security guards.

The review has found that the skills described in the *CPP20212 Certificate II in Security Operations* are not consistent with AQF level two descriptors and in fact are more aligned to the descriptors in AQF level three.

The AQF states that graduates of a certificate II level course will work within a *defined range of information*, and be able to *apply ...known solutions to a limited range of predictable problems*. However, the employability skills summary in the Certificate II in Security Operations indicates that graduates are expected to, for example, negotiate to defuse conflict, manage and resolve conflict, respond to incidents that are dangerous and respond to emergencies.

This identified design issue could be one of the reasons for the mismatch between employer expectations of graduates and their level of skills and competency although clearly other issues identified in the review related to the quality of training and assessment and the short duration of courses are also factors at play.

However, any review to ensure the appropriate alignment of security activities with the related qualifications and the AQF will need to occur in close collaboration with all stakeholders. Some industry stakeholders while fully supportive of efforts to lift the quality of training and assessment have expressed concern about the possible unintended consequences of lifting the level of entry level training.

Concerns include the possibility of higher level qualifications acting as a deterrent to new entrants making recruitment of suitable candidates more difficult, imposing significant additional costs and exacerbating the current situation by forcing some legitimate operators out of business and encouraging unscrupulous operators to work around the requirements.

It may be that there are a range of security roles which are appropriate at certificate II level and it is considered that the first step should be for stakeholders to work together to ensure alignment of roles and qualifications.

Recommendation 2

It is recommended that the training package developer in the review of the Certificates II and III in Security Operations:

- explores options for inclusion of a mandatory component of workplace assessment
- specifies what training and assessment can occur online and what cannot
- specifies in the assessment requirements for each unit of competency:
 - the conditions that must be met for assessment to be undertaken in a simulated workplace context
 - when the assessor must be physically present with the student for assessment, and
 - assessor requirements including details related to qualifications, experience, industry currency, and knowledge of the language, literacy and numeracy requirements specific to security learners and security roles
- ensures, in collaboration with licensing authorities and industry, that the units and qualifications required for licensed security activities are:
 - o accurately aligned to job roles, and
 - o at the appropriate AQF level.

One of the biggest threats to the overall quality of VET that has been identified as a systemic issue across the VET sector is that many providers are delivering courses that are too short to ensure that people are gaining all of the required skills and competencies. **Short duration of security courses** was a recurring theme raised by all stakeholder groups.

One licensing authority argued that extremely short courses (i.e. five days or less) being conducted by RTOs based outside its jurisdiction were a major contributor to the increase in security licences being issued under the *Mutual Recognition Act 1992* in their state.

Therefore another key focus of this strategic review was to evaluate the duration of courses provided by RTOs and to assess whether students are able to achieve the learning outcomes in a given course duration.

The findings support the many concerns expressed by stakeholders about the short duration of training that is said to be impacting on the competence of qualified graduates to carry out their security roles.

This review has found that a number of course durations advised by RTOs fell significantly below *Australian Qualifications Framework* (AQF) requirements for certificate II and III qualifications. The full-time volume of learning measure for a certificate II according to the AQF is typically 0.5 to one year (600 to 1200 hours) full-time equivalent, and for a certificate III, one to two years (1200 hours to 2400 hours) full-time equivalent. All Australian Government, state and territory ministers for training agreed that these benchmarks should be implemented by 1 January 2015 with training package

developers and accrediting authorities⁷⁷ to have policies and processes in place in time to ensure implementation by the required date.

The majority of training for security courses reviewed was completed in less than three weeks. For example, of the 76 RTOs that were delivering the Certificate II in Security Operations, 61 (80 per cent) reported they did so in less than three weeks. RTOs reported that shorter programs in the security sector were delivered for a range of reasons, including student and employer pressure for fast training of the required qualifications to gain a licence, and market pressures to reduce the time taken and the cost of programs. RTOs were unable to provide a rationale to justify a short timeframe related to learner needs, for example, learners with relevant pre-existing industry experience.

Previous ASQA strategic reviews have found that short duration courses are a systemic problem in the VET sector and it is therefore proposed that there should be a systemic solution across all training packages to address this critical quality issue.

Standard 1 of the Standards for RTOs 2015 specifies that an RTO's training and assessment strategies, including the amount of training they provide must be consistent with the requirements of training packages and VET accredited courses. However, training packages remain largely silent on this issue leaving RTOs to interpret what is needed rather than having explicit industry requirements.

The short duration of a high proportion of courses remains an ongoing concern to ASQA and industry stakeholders, as it poses a significant risk to the quality of VET. ASQA is of the view that the training packages need to include explicit guidance to RTOs on this issue to ensure that they are fully aware of the requirements and ASQA's ability to regulate against the Standards is strengthened.

ASQA has made a submission to the Australian Government's *Review of Training Packages and Accredited Courses*⁷⁸ and included advice on the need to address this issue. The outcome of this process is expected to be announced in the near future.

It is proposed that the *Standards for Training Packages* be amended to require all training package developers to specify minimum amount of training benchmarks in the endorsed components of training packages together with descriptions of appropriate variations to the benchmarks to reflect the acceptability of shorter courses when there are relevant learner characteristics, such as learners who already have relevant and recent industry experience. In the case of security, this will involve licensing authorities, industry and other stakeholders reaching a considered view about the amount of learning a new learner needs to achieve the skills to undertake security roles.

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⁷⁷ The Australian Qualifications Framework (the AQF) defines accrediting authorities as 'either authorised under legislation or has been given the responsibility to accredit programs of learning leading to AQF qualifications and/or to register providers to issue AQF qualifications'. The AQF defines 'authorised issuing organisations' as including registered training organisations (RTOs) authorised by the Australian Skills Quality Authority and the government accrediting authorities in Victoria and Western Australia to issue AQF qualifications in *vocational education and training*. The list of accrediting authorities in place at the time of the AQF 2nd edition which is the current version includes the National Skills Standards Council responsible for the endorsement of AQF qualifications in national training packages. The National Skills Standards Council has been replaced by the Australian Industry and Skills Committee which now has responsibility for endorsement of national training package qualifications. See Australian Qualifications Framework, Second Edition, (January 2013), accessed 27 July 2015, at http://www.aqf.edu.au/resources/aqf/, pp21, 22, 91, 103.

⁷⁸ See https://consult.industry.gov.au/vet-reform/training-packages-review

It is proposed that once the *Standards for Training Packages* has been amended in relation to this systemic issue, the Australian Industry and Skills Committee in its role to provide industry oversight of the quality and relevance of training, prioritises the work of training package developers to revise training packages as a priority to comply with the new requirements.

Recommendation 3

It is recommended that:

- The Standards for Training Packages be amended as a matter of urgency to include a
 mandatory field in the qualification and unit templates that specifies the 'minimum amount of
 training benchmark' and describes appropriate variations to the minimum amount of training
 benchmark to reflect the acceptability of shorter courses when there are relevant learner
 characteristics (such as learners who already have relevant and recent security experience).
- After the amendments have been made to the Standards for Training Packages, the
 Australian Industry and Skills Committee prioritises the work of training package developers
 to revise training packages to comply with the new requirements.

Poor levels of language, literacy and numeracy of students undertaking security programs and of graduates also emerged as a systemic issue in the research conducted for the review and in the course of consultations. Effective oral and written communication skills are fundamentally important in public safety roles such as those undertaken in security.

While the audits found that the majority of RTOs had a range of pre-enrolment tests to address various aspects of language, literacy and numeracy, these were mostly found to be not effective and ill-matched to individual learners and the communication needs of security roles. The result of this is that learners may be entering training with language and literacy skills that are too low for them to gain the level of skills required for the job by the time they graduate.

The concern prompted the joint development by the Construction and Property Services Industry Skills Council, licensing authorities and other stakeholders in 2014 of a strategy to build the language, literacy and numeracy skills of certificate II security operatives on the job and in training so that they have the skills they need to get and keep a security job.

The work undertaken during development of the *Loud and Clear* strategy has identified the detail of the language, literacy and numeracy skills required for security roles as well as the objective levels of each skill.

As the training package developer reviews its training packages to comply with the Standards for training packages it can use the work undertaken for *Loud and Clear* to make explicit the language, literacy and numeracy skills content of the units of competency as well as the assessment requirements.

However, this will not necessarily address the issue of students with insufficient levels of language, literacy and numeracy gaining enrolment into the security courses and it is proposed that the training package developer use the work undertaken during the *Loud and Clear* project to establish the language, literacy and numeracy levels that are appropriate for enrolment in the security courses that lead to a licensed outcome and to provide such advice in the Companion Volume that supports implementation of the training package.

Recommendation 4

It is recommended that the training package developer, when reviewing the Certificates II and III in Security Operations, implements the actions of the *Loud and Clear* project, that is:

- Include explicit detail about the language, literacy and numeracy skill demands of each role, as identified by the *Loud and Clear* project, in each unit of competency and in each unit's associated assessment requirements.
- Include information developed by the *Loud and Clear* project about the objective level of each skill required for security roles and about the language, literacy and numeracy levels that are appropriate for enrolment in the security courses in the Companion Volume that supports implementation of the Property Services training package.

A number of coroners found that inappropriate and unsafe restraints caused deaths, particularly through positional asphyxiation. While some units of competency (including core units) in the Certificates II and III in Security Operations include the use of physical restraints⁷⁹, no unit has as its core focus, the safe use of restraints. In addition it appears there are jurisdictional variations in the units mandated, a point made by the Queensland Coroner when he found that security personnel at the inquest generally displayed their lack of awareness of the risks of holding a person face down on the ground for a lengthy period. He recommended that the issue of restraint or positional asphyxia be incorporated into the training.

Comments during consultations confirmed concerns about gaps in the training with stakeholders suggesting inadequate focus on the safety of patrons and the need for additional focus on resolution of problems through other means, prior to restraint action.

The training package should explicitly embed the knowledge and skill requirements to address the risks and dangers of restraints and the safe use of restraint techniques in all relevant units of competency including CPPSEC3013A Control persons using empty hand techniques and CPPSEC2017A Protect self and others using basic defensive techniques. The most appropriate unit of competency that addresses this issue should be mandated for all relevant security licences in all states and territories so that no future coroner need make a finding that graduates were not trained in this skill area. Finally it is proposed that licensing authorities and industry work collaboratively to determine a nationally consistent requirement for security licensees to maintain the currency of their skills and knowledge in this critical area of safety.

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⁷⁹ For example, CPPSEC2017A Protect self and others using basic defensive techniques and CPPSEC3013A Control persons using empty hand techniques

Recommendation 5

It is recommended that:

- In its review of the Certificates II and III in Security Operations, the training package developer specifically reviews the relevant units of competency relating to restraints and the use of restraint techniques, in order to ensure these explicitly embed knowledge and skill requirements to sufficiently address key safety issues such as positional asphyxiation.
- Licensing authorities in all jurisdictions identify—and include as mandatory in the nationally
 agreed single set of competency standards—the most appropriate unit/s of competency to
 ensure security licensees meet the knowledge and skill requirements relating to restraints and
 the safe use of restraint techniques.
- Licensing authorities in all jurisdictions require all relevant current security licensees to refresh
 their skills and knowledge of safe restraint techniques prior to renewing, or re-applying for,
 their licence. The exact requirements should be determined in collaboration with industry and
 be consistent across all jurisdictions.

Many of the recommendations require changes to national qualifications to address safety and quality issues. To ensure that the changes are actioned urgently during a period of reform to the training package development process, a recommendation is made to the Australian Industry and Skills Committee to direct the changes and to prioritise the scheduling.

Recommendation 6

It is recommended that:

- The training package developers make the changes to training products proposed in Recommendations 1, 2, 3, 4, and 5 in this report, in consultation with industry.
- In their scheduling of training product development work, the training package developers:
 - o ensure safety and quality issues are urgently addressed, and
 - give priority to scheduling this training product development work once the Standards for Training Packages have been amended (as proposed by recommendation 3).

Recommendation 7

It is recommended that the Australian Industry Skills Council ensures that the training packages approved have appropriately incorporated the recommendations from this report.

The state and territory licensing authorities and ASQA have a shared interest in ensuring that training delivered for the security industry is of high quality and that the qualifications issued have integrity.

As outlined in section 2.7 ASQA has established Memoranda of Understanding with a number of individual licensing bodies to share information and collaborate when appropriate. However, the

findings of this review suggest that a more systematic, coordinated and purposeful engagement with all licensing bodies could deliver benefits by addressing systemic, longstanding concerns.

An agreement that includes regular face to face meetings to share intelligence about systemic quality issues as well as individual complaint matters would establish the basis for working collaboratively on quality issues and enable ASQA to rapidly respond in a coordinated way to licensing authorities' concerns as they are identified.

It is suggested that ASQA's Chief Commissioner write to the Council of Australian Governments Council of Ministers responsible for the security industry, advising of the outcomes of this review and of the proposal for a more purposeful engagement between ASQA and licensing authorities. This will assist to elevate the issues to the highest level and facilitate prioritisation of actions.

In addition it is suggested that ASQA engages with the licensing authorities both individually and collectively through the Security Industry Regulators Forum to brief them on the outcomes of this review and to seek their collaboration in relation to the expediting the implementation of the recommendations, including establishment of an ongoing strategic relationship with ASQA for more timely and coordinated identification and resolution of concerns.

Recommendation 8

It is recommended that:

- ASQA's Chief Commissioner writes to the Council of Australian Governments Law, Crime and Community Safety Council advising of the outcomes of this review and the imperative that ASQA, licensing authorities, the training package developer and other stakeholders expedite implementation of the recommendations in relation to the key issues of inconsistent licensing requirements.
- ASQA briefs individual state and territory licensing authorities and the Security Industry
 Regulators Forum on the outcomes of this review and seeks their collaboration to expedite
 implementation of the review's recommendations and to strengthen the ongoing strategic
 relationship with ASQA to enable effective and timely responses to providers of concern.

List of acronyms

Acronym	Definition
AQF	Australian Qualifications Framework
ASQA	Australian Skills Quality Authority
NVR	National VET Regulator
RTO	Registered Training Organisation
VET	vocational education and training
RPL	Recognition of Prior Learning

Glossary

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Term	Definition
Access and equity	Policies and approaches aimed at ensuring that vocational education and training are responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.
	Source: Standards for NVR Registered Training Organisations 2012 and Standards for Registered Training Organisations (RTOs) 2015
Assessment	The process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a training package or by the learning outcomes of a VET accredited course.
	Source: Standards for NVR Registered Training Organisations 2012
Assessment requirements	Are the endorsed components of a training package. Assessment requirements set out the industry's approach to valid, reliable, flexible and fair assessment.
	Source: Standards for NVR Registered Training Organisations 2012
Assessment tools	An assessment tool includes the following components: the context and conditions for the assessment, the tasks to be administered to the candidate, an outline of the evidence to be gathered from the candidate and the evidence criteria used to judge the quality of performance (that is the assessment decision-making rules). It also includes the administration, recording and reporting requirements.
	Source: http://www.asqa.gov.au/verve/ resources/Guide to developing assessment tools. pdf#search=assessment tools
Audit	An audit, or compliance audit undertaken, by the VET Regulator, under Section 35 of the National Vocational Education and Training Regulatory Act 2011.
Authenticity	One of the rules of evidence. To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.
	Source: https://www.comlaw.gov.au/Details/F2014L01377
Course	Course means a course of vocational education and training.
	Source: https://www.comlaw.gov.au/Details/C2015C00186
Industry Skills Council	Are national bodies recognised and funded by the Australian Government to develop and maintain training packages specific to the industry area(s) for which they have coverage.
	Source: Standards for NVR Registered Training Organisations 2012

Term	Definition
Learner	An individual who is receiving, responding to and processing information in order to acquire and develop competence. This incorporates the processes of preparing and presenting for assessment.
	Source: Standards for NVR Registered Training Organisations 2012
Non-compliance	The evidence reviewed during an audit indicates that the requirements of VET Quality Framework have not been met.
Principles of assessment	To ensure quality outcomes, assessment should be fair, flexible, valid, and reliable. See also: Fairness, Flexibility, Reliability and Validity. Fairness
	Fairness in assessment requires consideration of the individual candidate's needs and characteristics, and any reasonable adjustments that need to be applied to take account of them.
	It requires clear communication between the assessor and the candidate to ensure that the candidate is fully informed about, understands, is able to participate in, the assessment process, and agrees that the process is appropriate. It also includes an opportunity for the person being assessed to challenge the result of the assessment and to be reassessed if necessary.
	Flexibility
	To be flexible, assessment should reflect the candidate's needs; provide for recognition of competencies no matter how, where or when they have been acquired; draw on a range of methods appropriate to the context, competency and the candidate, and, support continuous competency development.
	Reliability
	One of the principles of assessment. There are five types of reliability: internal consistency, parallel forms, split-half, inter-rater and intra rater. In general, reliability is an estimate of how accurate or precise the task is as a measurement instrument. Reliability is concerned with how much error is included in the evidence.
	Validity
	One of the rules of evidence and one of the principles of assessment.
	There are five major types of validity: face, content, criterion (that is predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (for example, competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified.

Term	Definition
	It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence. Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group. Source: Standards for NVR Registered Training Organisations 2012
Recognition of Prior Learning (RPL)	An assessment process that assesses an individual's formal, non-formal and informal learning to determine the extent to which that individual has achieved the required learning outcomes, competency outcomes, or standards for entry to, and/or partial or total completion of, a VET qualification. Source: Standards for NVR Registered Training Organisations 2012
Registration audit	 An audit undertaken to assess an application for: initial registration as a NVR RTO renewal of registration as an NVR RTO, or change to the scope of registration of an NVR RTO. Any audit undertaken under the NVR Act that is not a registration audit is a compliance audit.
Registered training organisation (RTO)	A training organisation registered by a national, state or territory registering body.
Rules of evidence	These are closely related to the principles of assessment and provide guidance on the collection of evidence to ensure that it is valid, sufficient, authentic and current. Validity There are five major types of validity: face, content, criterion (that is predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (for example, competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified. It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about

Term	Definition
	competence.
	Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.
	Sufficiency
	One of the rules of evidence. Sufficiency relates to the quality and quantity of evidence assessed. It requires collection of enough appropriate evidence to ensure that all aspects of competency have been satisfied and that competency can be demonstrated repeatedly. Supplementary sources of evidence may be necessary. The specific evidence requirements of each unit of competency provide advice on sufficiency.
	Authenticity
	To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.
	Currency
	In assessment, currency relates to the age of the evidence presented by candidates to demonstrate that they are still competent. Competency requires demonstration of current performance, so the evidence must be from either the present or the very recent past.
	Source: Standards for NVR Registered Training Organisations 2012
Simulated work environment	The requirement for a unit of competency to be assessed in a simulated workplace environment may be identified either within the unit of competency itself or within the relevant Training Package Assessment Guidelines.
	A simulated workplace may be required for the following reasons:
	the learner may not have access to a workplace
	the available workplace may not use the relevant skill, equipment or process
	 conducting assessments may be disruptive or interfere with work requirements, for example, there may be ethical, privacy or confidentiality issues to consider
	• it may not be appropriate to apply the skills in the workplace due to potential risks

For the purposes of assessment, a simulated workplace may be described as one in which all of the required skills are performed with respect to the provision of paid services to an employer or the public can be demonstrated as though the business was actually operating.

such as health and safety, or equipment being damaged.

In order to be valid and reliable, the simulation must closely resemble what occurs in a real work environment.

Term

Definition

The simulated workplace should involve a range of activities that reflect real work experience. The simulated workplace should allow the performance of all of the required skills and demonstration of the required knowledge.

It is critical that when a simulated workplace is being set up, the assessor is thoroughly familiar with the competency standard/s, as well as experienced in the current circumstances and environment of the workplace.

In deciding whether a simulation or an assessment environment has been adequately set up, the following should be considered.

Are there opportunities to:

- test the full range of equipment
- use up-to-date equipment and software
- reflect times and deadlines
- show the complexity of dealing with multiple tasks
- involve prioritising among competing tasks
- · deal with customers, including difficult ones
- · work with others in a team
- · communicate with diverse groups
- find, discuss and test solutions to problems
- explore health and safety issues
- answer practically oriented, applied-knowledge questions, and
- show the level of written and verbal expression sufficient for, but not exceeding, the work requirements.

Source: 2010 AQTF User's Guide to the Essential Conditions and Standards for Initial Registration. http://natese.gov.au/?a=69353

Training and assessment strategy

A framework that guides the learning requirements and the teaching, training and assessment arrangements of a vocational education and training qualification. It is the document that outlines the macro-level requirements of the learning and assessment process, usually at the qualification level.

Source: Standards for NVR Registered Training Organisations 2012

Training package

A nationally endorsed, integrated set of competency standards, assessment requirements, AQF qualifications, and credit arrangements for a specific industry, industry sector or enterprise.

Source: Standards for NVR Registered Training Organisations 2012

Term	Definition
Unit of competency	The specification of industry knowledge and skill and the application of that knowledge and skill to the standard of performance expected in the workplace. Source: Standards for NVR Registered Training Organisations 2012
Vocational education and training (VET)	Post-compulsory education and training, excluding degree and higher-level programs delivered by higher education institutions, which provides people with occupational or work-related knowledge and skills. VET also includes programs that provide the basis for subsequent vocational programs. Alternative terms used internationally include technical and vocational education and training (TVET), vocational and technical education and training (VTET), technical and vocational education (TVE), vocational and technical education (VTE), further education and training (FET), and career and technical education (CTE).
Volume of learning	The AQF defines volume of learning as identifying the notional duration of all activities required for the achievement of the learning outcomes of a particular qualification type. The full-time volume of learning measure for a Certificate II according to the AQF is typically 1200 hours full time equivalent, and for a Certificate III, 1200 hours to 2400 hours full time equivalent. The Australian Qualifications Framework Council in its explanation of volume of learning, states that: The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities. For more detailed information refer to Appendix 5 Source: AQF.
VET Quality Framework	A set of standards and conditions used by the Australian Skills Quality Authority (ASQA) to assess whether a registered training organisation (RTO) meets the requirements for registration. It comprises: • the Standards for Registered Training Organisations (RTOs) 2015 • the Fit and Proper Person Requirements 2011 • the Financial Viability Risk Assessment Requirements 2011 • the Data Provision Requirements 2012, and • the AQF. Source: Standards for NVR Registered Training Organisations 2012 and Standards for Registered Training Organisations (RTOs) 2015

Term	Definition
training.gov.au	Training.gov.au is the official National Register on VET in Australia and is the authoritative source of information on training packages, qualifications, accredited courses, units of competency, skill sets and Registered Training Organisations.

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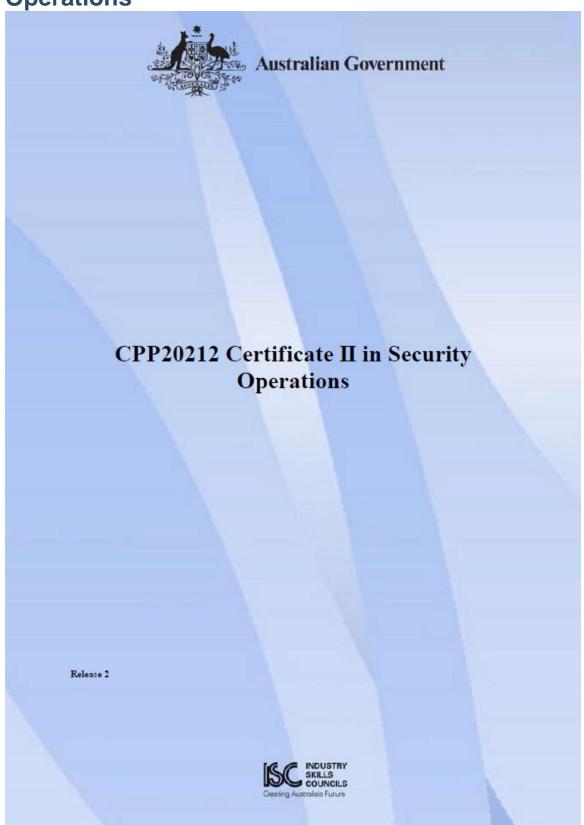
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CPP20212 Certificate Ⅱ in Security Operations

Modification History

Revised qualification deemed equivalent. Change to elective unit:

addition of HLTCSD306D Respond effectively to behaviours of concern

Description

Not Applicable

Pathways Information

Not Applicable

Licensing/Regulatory Information

This is a licensed occupation. Check with relevant state and territory licensing and regulatory authorities. State and territory jurisdictions may have different regulatory requirements.

Entry Requirements

Not Applicable

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Employability Skills Summary

Employability skill	•
Employability skill	Industry/enterprise requirements for this qualification include:
Communication	apply literacy skills to: assess and use workplace information interpret and understand basic legal, financial, procedural and technical requirements process workplace documentation read and record data apply numeracy skills to accurately record and collate and to undertake basic computations ask for advice, clarification and verification of instructions where appropriate communicate demonstrating social and cultural sensitivity and respect communicate in a clear and concise manner, in written and verbal modes
	 follow procedures and instructions as they relate to legal and regulatory requirements, occupational health and safety, industry standards and codes of practice, manufacturer specifications, emergency procedures give and receive information accurately interact with customers and handle complaints appropriately negotiate and communicate effectively to defuse conflict prepare and present evidential information suitable for use in legal proceedings provide clear instructions and directions to others
	 report and record faulty equipment report and/or record routine workplace information as well as incidents that cause injury, are dangerous or potentially dangerous or are emergencies, and breaches of assignment instructions report hazards, potential hazards and risks understand meanings of safety signs and symbols, call signs and codes, phonetic alphabet, security alarm signals, and basic technical terminology
Teamwork	develop effective relationships with others and take steps to reduce or resolve conflict participate in and encourage others' contributions to WHS management provide assistance to team members including back-up as required relate to people from a range of social, cultural and ethnic backgrounds and with a range of physical and mental abilities seek feedback from team members

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Employability skill	Industry/enterprise requirements for this qualification include:
	 seek specialist advice where appropriate seek support to improve own performance understand own and team members' roles and responsibilities use interpersonal skills such as cooperation and flexibility work effectively as part of a team work within a team in a range of security activities
Problem solving	 apply understanding of height, depth, breadth, dimension and position to operational activities assess legislation, procedural requirements and WHS issues relevant to own role and work activities
	 identify and control workplace risks and hazards manage and resolve conflict report contingencies that may affect equipment usage
	 respond appropriately to changing security circumstances respond appropriately to emergencies, security risks and threats, prohibited and hazardous items, security alarms, and situations requiring first aid
	 solve routine problems and fix faulty or damaged equipment understand emergency evacuation procedures use basic problem-solving techniques use lawful defensive techniques to protect self and others
Initiative and enterprise	decide appropriate first aid response identify areas for improvement of WHS identify opportunities for vocational development in consultation with appropriate persons tailor service to meet clients' particular needs use analytical skills in relation to a limited range of routine areas
Planning and organising	estimate time to complete activities and prioritise tasks maintain inventory of equipment and consumables manage access control systems prepare evidence for presentation in legal proceedings prepare necessary equipment for use source, organise and record information store all information and documentation according to organisational and legislative guidelines
Self management	 comply with all legislation associated with assignment instructions contribute to improving work practices demonstrate a commitment to complying with applicable legislative and procedural requirements estimate time to complete work tasks
	identify opportunities for professional development

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Employability skill	Industry/enterprise requirements for this qualification include:
	 maintain expected standards of work and personal presentation organise, prioritise and complete daily work activities seek feedback to improve own work performance use relevant techniques to manage own stress work effectively on an individual basis
Learning	 apply knowledge of terms and conditions of employment encourages and supports others to identify and organise professional development opportunities identify fixture career opportunities notifies others of equipment training needs update skills and knowledge to accommodate changes in work environment
Technology	drive vehicles operate and maintain a range of security equipment including communication equipment, alarm systems and entry barriers operate traffic control equipment program and configure basic security equipment select and operate electronic reporting facility software and resources use computers and other information technology to communicate and prepare reports and documentation

Due to the high proportion of electives required by this qualification, the industry/enterprise requirements described above for each Employability Skill are representative of the property industry in general and may not reflect specific job roles. Learning and assessment strategies for this qualification should be based on the requirements of the units of competency for this qualification.

This table is a summary of Employability Skills that are typical of this qualification and should not be interpreted as definitive.

Packaging Rules

To achieve this qualification, the candidate must demonstrate competency in:

- 12 units of competency:
 - 7 core units
 - 5 elective units.

The elective units are chosen as follows:

- 5 units from the elective units listed below
- 2 of the units may be chosen from Certificate I, II or III qualifications in CPP07 or another current Training Package, provided the integrity of the AQF alignment is ensured, and

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they contribute to a valid, industry-supported vocational outcome and no more than $1\,\mathrm{unit}$ is from Certificate $\,\mathrm{I.}$

Core units

CPPSEC2001A	Communicate effectively in the security industry
CPPSEC2002A	Follow workplace safety procedures in the security industry
CPPSEC2003B	Work effectively in the security industry
CPPSEC2004B	Respond to security risk situation
CPPSEC2005A	Work as part of a security team
CPPSEC2006B	Provide security services to clients
HLTFA311A	Apply first aid

Elective units

CPPCMN2001B	Control and direct traffic
CPPSEC2007A	Screen people
CPPSEC2008A	Screen items
CPPSEC2009A	Give evidence in court
CPPSEC2010A	Protect safety of persons
CPPSEC2011B	Control access to and exit from premises
CPPSEC2012A	Monitor and control individual and crowd behaviour
CPPSEC2013A	Protect valuables in transit
CPPSEC2014A	Operate basic security equipment
CPPSEC2015A	Patrol premises
CPPSEC2016A	Contribute to investigative activities

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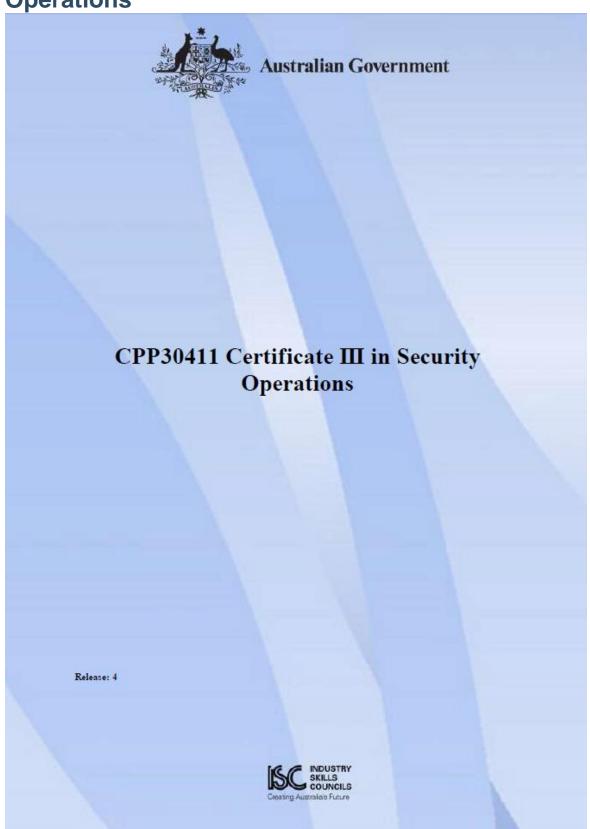
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CPPSEC2017A	Protect self and others using basic defensive techniques
CPPSEC2018A	Monitor electronic reporting facility
CPPSEC2019A	Monitor biometrics equipment and systems
CPPSEC2027A	Load and unload cash in transit in a secured environment
CPPSEC3002A	Manage conflict through negotiation
CPPSEC3010A	Manage dogs for security functions
CPPSEC3011A	Handle dogs for security patrol
CPPSEC3013A	Control persons using empty hand techniques
CPPSEC3020A	Monitor security from control room
CPPSEC3021A	Maintain and use security database
HLTCSD306D	Respond effectively to behaviours of concern
TLIB2004A	Carry out vehicle inspection
TLIE2007A	Use communication systems

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Appendix 2: CPP30411 Certificate III in Security Operations



CPP30411 Certificate III in Security Operations

Modification History

New units

- CPPSEC3050A Load and unload cash in transit in an unsecured environment
- CPPSEC3051A Implement cash-in-transit security procedures
- CPPSEC3052A Inspect and test cash-in-transit security equipment

Replaced imported units:

- TLID4107C Undertake cash-in-transit loading and unloading in an unsecured environment
- TLIO807C Implement cash-in-transit security procedures
- TLIO907C Test and inspect cash-in-transit security equipment

Description

Not Applicable

Pathways Information

Not Applicable

Licensing/Regulatory Information

Not Applicable

Entry Requirements

Not Applicable

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Employability Skills Summary

Employablity 2	
Employability skill	Industry/enterprise requirements for this qualification include:
Communication	apply literacy skills to: assess and use workplace information interpret and understand basic legal, financial, procedural and technical requirements process workplace documentation read and record data apply numeracy skills to: record and collate accurately undertake basic computations communicate demonstrating social and cultural sensitivity and respect communicate in a clear and concise manner, in written and verbal modes
	 draft and present reports explain OHS requirements to others and contribute input to drafting of evacuation policy and procedures follow procedures, guidelines and instructions as they relate to legal, regulatory and licensing requirements, occupational health and safety (OHS), industry standards and codes of practice, use of force, manufacturers' specifications and emergency procedures interpret non-verbal communication effectively prepare and present evidential information suitable for use in legal proceedings provide clear instructions, warnings and directions to others in accordance with legislative requirements provide feedback to others
	 report and record faulty equipment report and record routine workplace and regulatory information as well as incidents that cause injury, are dangerous or potentially dangerous, or are emergencies tailor communication to needs of the audience understand meanings of call signs and codes, phonetic alphabet and security alarm signals use interactive communication techniques to elicit and clarify information and manage, negotiate and defuse conflict situations use standard commands to control security dogs
Teamwork	 apply interpersonal skills including cooperation and flexibility build and maintain effective professional networks and working relationships with team members contribute to team goals

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Employability skill	Industry/enterprise requirements for this qualification include:
	 implement procedures to encourage others' contributions to OHS management
	 lead, supervise, coach and mentor team members and monitor performance
	 provide assistance to team members including back-up support as required
	 relate to people from a range of social, cultural and ethnic backgrounds and with a range of physical and mental abilities
	 seek feedback, advice and assistance where appropriate
	 understand own and team members' roles and responsibilities
	 work within a team in a range of operational activities
Problem solving	constructively resolve conflict situations
Trookin solving	determine appropriate responses to security risk situations
	· identify and diagnose equipment faults and data processing errors
	 identify hazards, implement risk assessment and control methods, and apply emergency and evacuation procedures
	 identify potential and actual security risk situations
	resolve customer service problems
	 respond appropriately to situations requiring first aid
	solve routine problems
	use appropriate negotiation techniques and use of force to minimise
	risk to self and others
	 use lawful defensive techniques to protect self and others
Initiative and	adapt security responses to changing circumstances
enterprise	adapt service to meet customer requirements
•	apply analytical skills
	assess client needs in routine matters
	 identify and introduce new ways to improve own performance
	 interpret and act upon available information using discretion and
	judgement
	 recommend improvements to policies and procedures
Planning and	adopt a systematic approach to training security dogs
organising	allocate and schedule work
	 coordinate first aid activities until arrival of medical assistance
	 develop work plans to achieve personal and team or organisational
	deadlines and targets
	estimate required resources
	plan and adhere to OHS requirements
	plan and conduct evacuation of premises
	plan and organise own work
	 plan and prepare security assignments and contingencies

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Employability skill	Industry/enterprise requirements for this qualification include:
	prepare evidence for presentation in legal proceedings source, evaluate, organise and store information
	source, evaluate, organise and store information update and maintain records and documentation
Self management	 maintain expected standards of personal presentation, professional image, ethics and codes of conduct
	 maintain own work performance and identify opportunities for professional development
	organise and prioritise own work
	 review effectiveness of response and own work practices
	 review relevant aspects of work performance against organisational and legislative requirements
	 seek feedback and support to improve own work performance
	 use personal protective equipment according to OHS guidelines
	 use relevant techniques to manage own stress
	use time management skills
Learning	 arrange and participate in evacuation drills
	 identify and provide advice on individuals' and teams' OHS training needs
	 update skills and knowledge to accommodate changes in:
	client enquiries
	operational activities and procedures
	 equipment and operating procedures
Technology	operate a range of security and communications equipment
Te change of	operate life support equipment as appropriate
	 operate, check and handle firearms safely and in accordance with legislative and procedural requirements
	 use computers and other information technology to communicate as well as prepare and store documentation and database information

Due to the high proportion of electives required by this qualification, the industry/enterprise requirements described above for each Employability Skill are representative of the property industry in general and may not reflect specific job roles. Learning and assessment strategies for this qualification should be based on the requirements of the units of competency for this qualification

This table is a summary of Employability Skills that are typical of this qualification and should not be interpreted as definitive.

Packaging Rules

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To achieve this qualification, the candidate must demonstrate competency in:

- · 14 units of competency:
 - 8 core units
 - 6 elective units.

The elective units are chosen as follows:

- · 6 units from the elective units below listed below
- 2 of the units may be chosen from Certificate II, III or IV qualifications in CPP07 or another current Training Package, provided the integrity of the AQF alignment is ensured, they contribute to a valid, industry-supported vocational outcome and no more than 1 unit is from Certificate II.

Core units

BSBFLM303C	Contribute to effective workplace relationships
BSBWOR301A	Organise personal work priorities and development
CPPSEC3001A	Maintain workplace safety in the security industry
CPPSEC3002A	Manage conflict through negotiation
CPPSEC3003A	Determine response to security risk situation
CPPSEC3005A	Prepare and present security documentation and reports
CPPSEC3006A	Coordinate a quality security service to customers
CPPSEC3007A	Maintain security of environment

Elective units

CPPCMN3002A	Develop a traffic management plan
CPPSEC2011A	Control access to and exit from premises
CPPSEC2012A	Monitor and control individual and crowd behaviour
CPPSEC3004A	Lead small teams in the security industry
CPPSEC3008A	Control security risk situations using firearms

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	·
CPPSEC3009A	Prepare and present evidence in court
CPPSEC3010A	Manage dogs for security functions
CPPSEC3011A	Handle dogs for security patrol
CPPSEC3012A	Store and protect information
CPPSEC3013A	Control persons using empty hand techniques
CPPSEC3014A	Control persons using baton
CPPSEC3015A	Restrain persons using handcuffs
CPPSEC3016A	Defend persons using spray
CPPSEC3017A	Plan and conduct evacuation of premises
CPPSEC3018A	Provide for the safety of persons at risk
CPPSEC3019A	Operate specialised security equipment
CPPSEC3020A	Monitor security from control room
CPPSEC3021A	Maintain and use security database
CPPSEC3022A	Maintain biometrics database
CPPSEC3023A	Coordinate biometric equipment and systems
CPPSEC3050A	Load and unload cash in transit in an unsecured environment
CPPSEC3051A	Implement cash-in-transit security procedures
CPPSEC3052A	Inspect and test cash-in-transit security equipment
HLTFA311A	Apply first aid

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Appendix 3: List of Management Committee representatives

Christopher Robinson (Chair)

Chief Commissioner, Australian Skills Quality Authority

Dianne Orr

Deputy Chief Commissioner and Commissioner Regulatory Operations, Australian Skills Quality Authority

Don Hudgson

Victorian Registration and Quality Authority

Pokua Asomani and Morena Stanley

Training Accreditation Council Western Australia

Peter Johnson

Australian Security Industry Association Limited

David Magee

Construction and Property Services Industry Skills Council

Brian Bauer

Queensland Office of Fair Trading

Brian Moir

NSW Police Force Security Licensing & Enforcement Directorate

Jeremy Hodes and Lee Katauskas

Department of Education

Sharon Caddie

United Voice

Appendix 4: Review methodology

The findings of the review were informed by five components:

- researching context and background data
- stakeholders consultations and an RTO survey
- interviews with students, RTO representatives and employers
- analysis of complaints about security qualifications and RTOs delivering security training. and
- audits of RTOs undertaken between 1 July 2013 and 31 December 2014 delivering security training.

More detail is provided about each component below.

A2.1 Context and background data

Various reports, environmental scans and census data were reviewed to inform the review. This included especially:

- labour market information about security workers
- the Environmental Scans produced annually by the Construction and Property Services Industry Skills Council, and
- data related to delivery of training including numbers of RTOs, national distribution of RTOs and numbers of students.

A2.2 Consultations and survey

Consultations

Consultation with key stakeholders occurred in a number of ways through:

- opportunities identified by committee members such as attendance at forums and workshops;
- focus groups, and
- formal roundtable meetings with stakeholders initiated for the review.

Consultations with stakeholders in the security sector were undertaken in 2014 with face to face meetings and teleconferences to participants in Queensland, Victoria and New South Wales.

Organisations consulted included:

- each of the state and territory licensing authorities
- organisational groups
- not-for-profit organisations
- peak bodies
- RTOs
- associations.

Survey

As part of this review, one survey was conducted of ASQA registered RTOs offering security training.

In August 2014, ASQA undertook a survey of registered training organisations it regulates that had approval to deliver the Certificate II and III in Security Operations.

The aim of the survey was to:

- provide more detailed information about the nature of security training delivery by RTOs that were registered with ASQA to deliver such training, and
- inform the development of any audits undertaken for this national strategic review of security training.

RTOs delivering these qualifications were targeted for the survey.

- CPP20211 Certificate II in Security Operations
- CPP20212 Certificate II in Security Operations
- CPP30411 Certificate III in Security Operations.

In September 2014, when the survey was issued, there were more than 100 RTOs regulated by ASQA with one or more of the specific security qualifications within their scope of registration. All RTOs were notified about the survey and required to complete an online questionnaire within 14 days. All RTOs submitted a survey response (although may not have responded to all questions).

Information on the security qualifications offered, the location of delivery, the mode of delivery, the course duration reflected in weeks, and data on enrolments and completions, was provided by RTOs in this survey.

A2.3 Interviews with students, RTO representatives and employers in security training – the voices

During this review the strategic review team was able to consult with employers, students, trainers and the RTO management, to gather ideas and concerns on how training and assessment could be improved and how well the training equipped people with the skills needed for security roles. This has been of considerable value to the review.

A2.4 Complaints

A review of complaints made to ASQA related to security qualifications were analysed to determine if there were any specific issues and trends related to security training.

A2.5 Audits of RTOs offering security training

The core aspect of this review has been to carry out audits of RTOs providing security training to test the level of compliance with required national standards for training. The primary purpose of these audits was to determine the compliance or otherwise of RTOs with the *Standards for NVR Registered Training Organisations 2012.*

Essential standards for the continuing registration of an RTO relate to:

- the quality of training and assessment provided by the RTO (Standard 15 [Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards]);
- adhering to principles of access and equity to maximise trainee outcomes (Standard 16 [Standards 1.5, 1.6, 1.7, 5.1, 5.2, 6.1 and 6.2 of the 2015 Standards]);
- RTO management systems that are responsive to client, staff and stakeholder needs (Standard 17 [Standard 2.4 of the 2015 Standards]);
- compliance with legislation (Standard 20 [Standards 8.5 and 8.6 of the 2015 Standards]);
- proper financial management (Standard 22 [Standards 5.3 and 7.2 of the 2015 Standards]);
- appropriate arrangements for issuing and recognising VET qualifications and statements of attainment (Standard 23 [Standards 3.1, 3.2, 3.3, 3.4, 3.5, 3.6 and 7.5 of the 2015 Standards]);
- the accuracy and integrity of marketing material put out by the RTO (Standard 24 [Standards 4.1 and 4.2 of the 2015 Standards]), and
- the transition of courses to new training package requirements (Standard 25 [Standards 1.26 and 1.27 of the 2015 Standards]).

There are similar standards which applicants for initial registration as a provider need to meet. The standards are set out in a legislative instrument, *Standards for NVR Registered Training organisations 2012*, in accordance with subsection 185 (1) of the *National Vocational Education and Training Regulator Act 2011*.

RTOs must be compliant at all times with these standards to fulfil the requirements for registration as a training provider. RTOs are required to renew their registration every seven years. Applications for renewal are risk assessed, and, for most RTOs, the process will also involve an audit of their compliance against all the standards required for continuing registration. Moreover, all RTOs that have only recently been registered for the first time will have a compliance audit after 12 months of operation. In addition, ASQA can require a compliance monitoring audit of an RTO at any time during the registration cycle, irrespective of whether or not they have submitted an application for registration renewal to ASQA.

ASQA audits RTOs offering security industry training and the results of these audits, particularly data on RTO compliance with the standards, was used to inform the review's findings. In the report these audits are referred to 'ASQA registration audits'.

This compliance data is taken from 43 audits conducted after 1 January 2013 and finalised before 31 October 2014, where the audit was conducted for one of the following reason:

- provider change application to add scope items
- provider renewal application to renew registration
- monitoring, or
- post initial compliance assessment

Excluded from this review are audits that ASQA has undertaken for initial registration as an RTO where the applicant was seeking to establish a new RTO that would have the relevant qualifications on its scope of registration.

The focus of the audits was on the following qualifications and units of competency as shown in Table 8.

Table 8: Qualification and units of competency sampled

Qualification	Units
CPP20211 Certificate II in Operations (superseded)	 CPPSEC2004B Respond to security risk situation CPPSEC2001A Communicate effectively in the security industry
CPP20212 Certificate in II Security Operations	 CPPSEC2004B Respond to security risk situation CPPSEC2001A Communicate effectively in the security industry
CPP30411 Certificate III in Security Operations	 CPPSEC3007A Maintain security of environment CPPSEC3002A Manage conflict through negotiation

Source training.gov.au

These strategic review audits also focused on a specific subset of the Standards [Standards 1.1, 1.3, 1.4, 1.5, 1.6, 1.8, 1.13, 1.14, 1.15, 1.16 and 2.2 of the 2015 Standards]) that particularly relates to training delivery and assessment, specifically:

- the strategies for training and assessment, including the student target group; whether the course is delivered in the workplace or classroom or in some other way; the duration of the course, and whether strategies were developed through *effective consultation with industry* (Standard 15.2 [Standards 1.1, 1.4, 1.5 and 1.6 of the 2015 Standards])
- what staff, facilities, equipment and training and assessment materials the RTO uses to deliver the course (Standard 15.3 [Standards 1.3, 1.5 and 1.6 of the 2015 Standards])
- the qualifications of trainers and assessors, including their industry experience and vocational competence (Standard 15.4 [Standards 1.13, 1.14, 1.15 and 1.16 of the 2015 Standards])
- assessment material to be used by the RTO to determine student competence (Standard 15.5 [Standard 1.8 of the 2015 Standards])
- whether the RTO provided clear information to learners prior to enrolment (Standard 16.3 [Standards 5.1 and 5.2 of the 2015 Standards])
- how employers were involved in assisting with training and assessment of learners (Standard 16.4 [Standards 1.5 and 1.6 of the 2015 Standards])
- whether learners receive training, assessment and support service that meet their individual needs (Standard 16.5 [Standard 1.7 of the 2015 Standards])
- whether the RTO monitors training and/or assessment services provided on its behalf (17.3 [Standard 2.4 of the 2015 Standards])
- whether the RTO issues to persons who it has assessed as competent in accordance with various requirements (Standard 23.1 [Standards 3.1, 3.2, 3.3 and 3.4 of the 2015 Standards])

- whether the RTO ensure its marketing and advertising of AQF and VET qualifications is ethical, accurate and consistent with its scope of registration (Standard 24.1 [Standard 4.1 of the 2015 Standards]), and
- whether the RTO has managed the transition of superseded training packages and qualifications (Standard 25.1 [Standards 1.26 and 1.27 of the 2015 Standards]).

Appendix 5: Volume of learning: an explanation

An extract from Australian Qualifications Framework Council www.aqf.edu.au

© Australian Qualifications Framework Council, Issued May 2014

The volume of learning, and the breadth and depth of the knowledge, skills and application of the knowledge and skills determined for a qualification, define the complexity of the qualification.

The volume of learning determined for a qualification must fall within the range provided in the descriptor for the qualification type.

The concept of 'typically' used to describe the volume of learning is intended to provide some flexibility in relation to pathways into and from AQF qualifications that are incorporated into the design of the qualification. It is not intended as justification for not applying the requirement.

Volume of learning applied

It is the responsibility of organisations developing and/or accrediting qualifications to exercise professional judgment to ensure that the design of programs of learning leading to qualifications enables students to achieve the learning outcomes for both the qualification type and the discipline. Decisions about design of qualifications must take into account students' likelihood of successfully achieving qualification outcomes and also must ensure that integrity of qualification outcomes is maintained. Those developing and/or accrediting qualifications should be able to provide a pedagogical rationale to justify a decision about the volume of learning.

The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, learning activities in the workplace and assessment activities.

The teaching, learning and assessment activities are usually measured in equivalent full time years. The generally accepted length of a full time year, used for educational participation, is 1200 hours.

The volume of learning allocated in the design of a qualification may vary depending upon:

- the level of the previous qualification required for entry
- whether the purpose of the qualification is for deepening or broadening of knowledge and skills, or
- whether the qualification leads to professional outcomes or is generalist in purpose.

It would be usual for a greater volume of learning to be allocated to qualifications designed to:

- build on a previous qualification in a different discipline regardless of the level of the previous qualification,
- build on a qualification from any lower level, or
- require workplace, clinical or professional practice.

If a lesser volume of learning is allocated to a qualification, the components of the program of learning must be predominately or entirely at the level of the qualification type.

If credit—such as through articulation arrangements—contributes to the volume of learning, the learning outcomes for the qualification must be achievable despite the reduced volume of learning.

Volume of learning applied in delivery

The duration of the delivery of the qualification may vary from the volume of learning specified for the qualification.

Providers may offer the qualification in more or less time than the specified volume of learning, provided that delivery arrangements give students sufficient opportunity to achieve the learning outcomes for the qualification type, level and discipline.

Students may be fast-tracked through the qualification, for example, by providers offering three semesters per year, longer study hours in the traditional two semester model, or intensive periods of study. Conversely, some cohorts of students may be offered a longer duration of delivery to support their successful achievement of the qualification outcomes. Students may be offered more self-paced methodologies, including online delivery and workplace delivery, which will vary the duration required to achieve the learning outcomes. The duration may be reduced for individual students if credit towards the qualification is given in the form of recognition of prior learning, advanced standing or credit transfer.

Provider decisions about the duration of the delivery of a qualification must take into account the students' likelihood of successfully achieving the learning outcomes and ensure that the integrity of the qualification outcomes is maintained. If the duration of delivery is substantially different from the volume of learning specified by the qualification type specification, providers should be able to provide pedagogical rationale to support the variation.

Volume of learning for each qualification type

Senior Secondary Certificate of Education	typically two years			
Certificate I	typically 0.5-1 year			
Certificate II	typically 0.5-1 year			
Certificate III	typically 1-2 years. Up to 4 years may be required to achieve the learning outcomes though a program of indentured training/employment.			
Certificate IV	typically 0.5-2 years. There may be variations between short duration specialist qualifications that build on knowledge and skills already acquired and longer duration qualifications that are designed as entry level work.			
Diploma	typically 1-2 years			
Advanced Diploma	typically 1.5-2 years			
Associate Degree	typically 2 years			
Bachelor Degree	typically 3-4 years			
Bachelor Honours Degree	typically 1 year following a Bachelor Degree.			
Graduate Certificate	typically 0.5-1 year			
Graduate Diploma	typically 1-2 years			
Refer to Australian Qualifications Framework qualification type specifications for information about Masters Degree and Doctoral Degree.				

Australian Qualifications Framework Council, Issued November 2012

Source: ©



FACT SHEET

Appendix 6: Reconsideration of a decision by ASQA (Fact sheet)

The Australian Skills Quality Authority (ASQA), the national VET regulator, makes decisions about the registration of training providers as registered training organisations (RTOs) and the accreditation of VET courses.

If you are dissatisfied with a decision made by ASQA, you have a number of options:

- Consider the reasons for the decision, address the outstanding areas of non-compliance and submit a fresh application.
- 2. Ask ASQA to reassess its position
- 3. Ask ASQA to reconsider the decision.
- Apply to have the decision reviewed by the Administrative Appeals Tribunal (AAT). Refer to the ASQA fact sheet '<u>Administrative</u> <u>Appeals Tribunal review of an ASQA decision'</u>.

This fact sheet tells you about **Option 3**, the reconsideration process.

Which decisions can be reconsidered?

Not all decisions can be reconsidered.

Only 'reviewable decisions' as specified in section 199 of the National Vocational Education and Training Regulator Act 2011 (the NVR Act) can be reconsidered. These are list on Page 2 of this fact sheet.

How do I apply for reconsideration?

You must apply to ASQA for reconsideration using the <u>Application for reconsideration of reviewable decision</u> form.

You must apply either within 30 days after you are informed of ASQA's decision, or—if you have requested an extension to submit your application and ASQA has granted the extension—within the extended period.

You will receive an email acknowledging receipt of the application.

Is there a fee?

The fee payable for an application for reconsideration is identified in ASQA's <u>Schedule of fees and charges</u>.

Will ASQA place a stay on its decision?

A stay is a decision to suspend the implementation of the decision that you have asked ASQA to reconsider. A stay may be granted subject to conditions.

ASQA will consider whether to place a stay on its decision if:

your organisation's registration is likely to expire before the completion of the reconsideration process, or

you request ASQA to do so.



Reviewable decisions under s 199 of the NVR Act

A decision to grant an application for registration (including renewal of registration) as an NVR registered training organisation.

A decision determining the period for which a national VET regulator (NVR) registered training organisation is registered.

A decision to impose a condition on an NVR registered training organisation's registration.

A decision to reject an application for registration (including renewal of registration) as an NVR registered training organisation.

A decision to vary a condition on an NVR registered training organisation's registration.

A decision not to determine a shorter period for making an application for renewal of registration as an NVR registered training organisation.

A decision to change, or refuse to change, an NVR registered training organisation's scope of registration.

A decision to suspend all or part of an NVR registered training organisation's scope of registration.

A decision to shorten the period of an NVR registered training organisation's registration.

A decision to defer making a decision to change an NVR registered training organisation's scope of registration until the organisation addresses issues identified by the national VET regulator.

A decision not to allow an NVR registered training organisation's registration to be withdrawn.

A decision to cancel an NVR registered training organisation's registration.

A decision to grant an application for accreditation of a course (including renewal of accreditation) as a VET accredited course.

A decision to impose conditions on the accreditation of a VET accredited course.

A decision to vary a condition on the accreditation of a VET accredited course.

A decision to reject an application for accreditation of a course (including renewal of accreditation) as a VET accredited course.

A decision to amend a VET accredited course.

A decision to cancel the accreditation of a VET accredited course.

A decision to give a written direction to an NVR registered training organisation under paragraph 36(2)(a) or (b).

A decision to issue, or not issue, a VET qualification.

A decision to issue, or not issue, a VET statement of attainment.

A decision to cancel, or not cancel, a VET qualification.

A decision to cancel, or not cancel, a VET statement of attainment.

A decision to enter details on the register under subsection 216(4).



What is the process for reconsidering a decision?

In most cases, an ASQA Commissioner or ASQA staff member, who was not involved in making the original decision, will reconsider the decision.

If an ASQA staff member made the original decision, only a Commissioner or more senior member of staff may reconsider the decision.

The person reconsidering the decision has the authority to affirm, vary or revoke the decision.

As part of the reconsideration process, ASQA will consider the reconsideration application, any additional information provided with the application and the evidence on which the original decision was made.

How long does it take for a decision to be reconsidered?

It may take up to 90 days from the day a complete 'Application for reconsideration of reviewable decision' is received for ASQA to make a decision about the application.

The RTO will be advised in writing of ASQA's decision, and receive a statement of reasons for the decision, within 30 days of the decision being made.

Further rights of review

The <u>Administrative Appeals Tribunal</u> (AAT) provides independent review of a wide range of administrative decisions made by the Australian Government (and some non-government bodies).

The AAT aims to provide fair, impartial, high-quality and prompt review with as little formality and technicality as possible. Both individuals and government agencies use the services of the AAT.

The AAT has the power to set aside decisions made by ASQA, including decisions made as part of the reconsideration process. An application can also be made to the AAT for a stay of ASQA's decision.

An appeal to the AAT must usually be made within 28 days of receiving ASQA's decision.

If you submit an 'Application for reconsideration of reviewable decision' to ASQA and apply to an external review body such as the AAT before ASQA has made its reconsideration decision, ASQA will stop the reconsideration process and affirm its original decision.

Additional information

Freedom of information

An RTO has the right to obtain access to documents about the decision under the *Freedom of Information Act 1982*. Information about how to make an application to ASQA to access documents is available from the 'About' section of ASQA's website.



Interpreting services

If an interpreter is required, please call the Translating and Interpreting Service (TIS National) on 131 450 for the cost of a local call. Tell the operator the language you speak. Ask the TIS to telephone the ASQA Info line on 1300 701 801.

Cantonese

若你需要口譯員,請致電131 450聯絡翻譯和口譯服務署(TIS National),要求他們致電 1300 701 801 聯絡 ASQA 。我們的工作時間是 9.00am – 7.00pm Monday – Friday AEST。

Mandarin

如果你需要口译员,请致电131 450联系翻译和口译服务署(TIS National),**要求他**们致电 1300 701 801 联系 ASQA 。 我们的工作时间是9.00am – 7.00pm Monday – Friday AEST 。

Greek

Αν χρειάζεστε διερμηνέα, παρακαλείστε να τηλεφωνήσετε στην Υπηρεσία Μετάφρασης και Διερμηνείας (Εθνική Υπηρεσία TIS) στο 131 450 και ζητήστε να τηλεφωνήσουν ASQA στο 1300 701 801 . Οι ώρες λειτουργίας μας είναι 9.00am – 7.00pm Monday – Friday AEST.

Korean

통역사가 필요하시면 번역통역서비스 (TIS National)에 131 450으로 연락하여 이들에게 1300 701 801 번으로 ASQA에 전화하도록 요청하십시오. 저희의 근무시간은 9.00am – 7.00pm Monday – Friday AEST입니다.

Persian

شماره ASQA شماره 131 450 – تلفن كنيد و از آنها بخواهيد به (TIS National)اگر به مترجم شفاهي نياز داريد لطفاً به "خدمات ترجمه كتبي و شفاهي" ماره 1300 701 801 – تلفن كنند. ساعات كار ما 801 801 700 701 801

Russian

Если вам нужен переводчик, то позвоните в Службу письменного и устного перевода (TIS National) по номеру 131 450 и скажите переводчику, что вам нужно позвонить в ASQ по номеру 1300 701 801. Наш распорядок работы: 9.00am – 7.00 pm Monday – Friday AEST.

Serbian

Ако вам је потребан тумач, молимо вас да позовете Службу преводилаца и тумача (Translating and Interpreting Service - TIS National) на 131 450 и замолите их да позову ASQA на 1300 701801 Наше радно време је 9.00am – 7.00 pm Monday – Friday AEST.

Spanish

Si necesita intérprete, llame al Servicio de Traducción e Interpretación - Translating and Interpreting Service (TIS National) al 131 450 y pídales que llamen a ASQA al 1300 701 801. Nuestro horario de atención es 9.00am – 7.00 pm Monday – Friday AEST.

Turkish

Tercümana ihtiyacınız varsa, 131 450 numaralı telefondan Yazılı ve Sözlü Tercüme Servisini (TIS National) arayınız ve sizi 1300 701 801 numaralı telefondan ASQA ile görüştürmelerini isteyiniz. Çalışma saatlerimiz 9.00am – 7.00 pm Monday – Friday AEST.

Appendix 7: General Direction Transition and Teach Out

ASQA issues 'General Directions' to provide further guidance to providers on specific issues. ASQA-regulated providers are required to comply with all General Directions. ASQA's *General Direction—Transition and Teach Out* (1 January 2014) notes that the *Standards for NVR Registered Training Organisations 2012* require RTOs or applicant RTOs to manage the transition from superseded training packages within 12 months of their publication on the national register <u>training.gov.au</u>, so that they only deliver currently endorsed training packages. The period of 12 months is defined as the 'transition period'.

An additional complication involved the revised first aid unit. The unit *HLTAID003 Provide first aid* was released on <u>training.gov.au</u> on 1 July 2013. It is not equivalent to the previous first aid unit *HLTFA311A Apply first aid*, which is in both the CPP11 and CPP12 qualifications. Licensing authorities in some cases had also not revised licensing requirements to reflect the new first aid unit.

It should be noted that there are pending changes to the *General Direction – Transition and Teach-out* to reintroduce some flexibility in teach-out arrangements.⁸⁰

⁸⁰ For further information on pending changes to the *General Direction- Transition and Teach-out*, see http://www.asqa.gov.au/news-and-publications/publications/general-directions/general-directions.html, accessed 3 November 2014.





GENERAL DIRECTION

Transition & teach-out

Newly endorsed equivalent training package products (qualifications and/or units of competency) will now be automatically added to your RTO and CRICOS scope of registration without requiring an application or a fee. This process applies to all providers with a training package product listed on their scope that has been superseded with a new training product that is deemed equivalent. Further information is available on the ASQA website.

This is a general direction made under section 28(1) of the *National Vocational Education and Training Regulator Act 2011* (Cwlth) (the Act).

A general direction may be given by ASQA, as the national VET regulator, on the way in which the VET Quality Framework and other conditions defined in the Act are to be complied with.

It is a condition of registration that an ASQA RTO must comply with any such general directions.

Purpose

The purpose of this general direction is to guide ASQA RTOs in implementing the requirement (refer <u>Standards for NVR Registered Training Organisations</u> 2012 **25**).

The general direction also guides RTOs in managing the transition from superseded and deleted training package qualifications and units of competency, and expired accredited courses, as well as describing arrangements to teach-out students enrolled in superseded or deleted qualifications or expired accredited courses.

The Standards for NVR Registered Training
Organisations 2012, require registered training
organisations (RTO) or applicant RTOs to manage the

transition from superseded training packages within 12 months of their publication on the national register and from superseded accredited courses so that they only deliver currently endorsed training packages and/or currently accredited courses.

This general direction applies to all NVR registered training organisations and ASQA will not grant exemption upon request.

The responsibility of compliance sits with the RTO at all times.

This general direction should be applied in conjunction with ASQA's fact sheet on <u>Registering for revised</u> training packages.

Terms and definitions

ASQA: Australian Skills Quality Authority

Cancelled: if a course has had its accreditation cancelled (either by the course owner or by ASQA or another VET regulator), the course is referred to as a 'cancelled accredited course'.

Current student: a student who has commenced training and/or assessment in a VET course as at the date the VET course replacement is published on the national register.

Deleted: when a qualification or unit of competency is removed from a training package without being replaced by another qualification or unit of competency, the qualification or unit is referred to as a 'deleted training package qualification or 'deleted unit of competency'.

Expired: when the accreditation of a course expires (courses are accredited for a finite period) the course ceases to be nationally accredited and recognised within the Australian Qualifications Framework and is referred to as an 'expired accredited course'.

Genuine disadvantage: must be evidenced from the perspective of each affected student, not simply the convenience of the RTO. Genuine disadvantage assumes that the disadvantage to the student outweighs the advantage to the student being enrolled in and receiving the most current qualification upon completion. Below are situations that may result in a student experiencing genuine disadvantage and should be read in the

context of 'principles underpinning the direction' (over page). The below list is not exhaustive:

- o a requirement to undertake additional units of competency
- a fundamental change in the structure or content a training program
- o a significant change in training venue or delivery mode
- o an extension to the enrolment period
- o an additional financial expense
- o a change to apprenticeship/traineeship contract terms
- o a change to a student's residency visa status
- National register: training.gov.au
- **New qualification**: a new qualification or a new release version of an endorsed qualification.

- RTO: ASQA registered training organisation
- **New student**: a student who has not commenced training or assessment in a VET course as at the date the training product's replacement is published on the national register.
- Publication on national register:
- O For a training package, training package qualification, training package unit of competency or training package skill set: the 'Release date' as indicated in the 'Release history' on the national register for the relevant training package, training package qualification, training package unit of competency or training package skill set
- for an accredited course: the 'Currency period start' as indicated in the 'Accredited course details' on the national register for the relevant accredited course.
- Superseded: when a new training package qualification replaces an existing qualification, the existing qualification is referred to as a 'superseded training package qualification'. When a new unit of competency replaces a unit, the existing unit is referred to as a 'superseded unit of competency'. This rule also applies to units of competency constituting a skill set.
- o The national register may also use the term 'superseded' for a qualification or unit of competency that has been deleted from its training package without having been replaced. In this circumstance, no relationship mapping information will appear for the qualification or unit on the national register. Such products are considered 'deleted' for the purpose of this general direction.

- **Teach-out**: allowance to complete all training, assessment and qualification issuance of current students in an inactive VET course, following expiry of any applicable transition period of the VET course's replacement.
- **Transition**: all actions required to change the delivery operations of an RTO from an existing training product to a replacement endorsed or accredited training product; including resourcing, registration and transfer of students.

Principles underpinning the general direction

- When assessing compliance with 25, ASQA will apply an overarching principle that a student is entitled to receive the current (endorsed or accredited) training product, unless the student would be genuinely disadvantaged in transferring to that product under the prescribed transition arrangements. In these cases, an RTO is permitted a further period to teach-out the student in his/her existing qualification, but must be prepared to demonstrate, upon request, how the student would have experienced genuine disadvantage if made to transition earlier. A student must not continue training in any qualification, course or unit of competency beyond the combined transition and teach-out periods under any circumstances.
- An RTO must apply to have a new training package qualification, unit of competency and/or accredited course added to its scope of registration (by submitting an Application to change RTO scope of registration, accompanied by the required fee), if it wishes to deliver the new product. Approval of this application must be recorded on the national register (training.gov.au) before the RTO can commence delivery.

- RTOs must ensure that students are not enrolled in qualifications/courses that adversely affect their opportunities for employment, residency status and/or future study pathways.
- An RTO must provide timely and adequate advice and guidance to current students if the qualification or course in which they are enrolled is superseded/deleted/expired and ensure students are given the opportunity to transfer to replacement training package qualifications and accredited courses or other currently endorsed training packages or accredited courses Transfer of students must be undertaken in collaboration between the student and the RTO. Current students must not be required to transfer to new training package qualifications or new accredited courses where the genuine disadvantage to them in doing so would outweigh their continued training in, and issuance with, a qualification or statement of attainment for a superseded or deleted training package qualification or superseded or expired accredited courses.
- A registration application for a superseded or deleted training package qualification (or part thereof) or expired accredited course (or part thereof) will not be considered, unless the application is to renew the RTO's current scope and the product is still within the allowable transition period (refer below).
- An RTO does not need to apply to ASQA to teach-out a training package qualification, unit of competency or accredited course in accordance with this general direction.
- The table below sets out the arrangements for transition and teach-out to guide RTOs in managing their obligations when training packages and accredited courses are replaced, deleted or expired.

Transition and teach out arrangements

Transition arrangements

RTO registration

Superseded training package qualification

or

Superseded training package unit of competency If an RTO has a training package qualification or unit of competency on its scope which has been superseded by a new training package qualification or unit **and is not equivalent**, the RTO must apply to have the replacement training package qualification or unit added its scope of registration as soon as it deems itself prepared but no later than 12 months from the release date of the **earliest** qualification that has replaced it on the national register (if it intends to offer and deliver the replacement qualification/ unit).

will remove a superseded training package qualification or unit of competency from an RTO's scope registration on the national register upon expiry of the 12 month period following publication of it having been replaced unless a provider specifically applies to ASQA have the qualifications/ unit removed earlier. The qualification or unit will then only appear in the 'Display History' section of the RTO's scope on the national register.

a student for a qualification that was superseded more [Note: A qualification or unit of competency that appears on the national register as 'superseded' but shows no relationship mapping information will not have been replaced by any new product and as such should be treated as 'deleted'.]

Continuing students

An RTO must transfer current students of the superseded qualification or unit of competency into the replacement qualification or unit as soon as practicable following granting of registration but no later than 12 months from the date of publication of it being superseded on the national register.

New students

Once a replacement qualification or unit of competency is published on the national register, an RTO may still commence training or assessment of a new student into the superseded qualification or unit, but only until the superseded qualification or unit is removed from its scope of registration on the national register.

Teach-out provisions

An RTO may continue to deliver training and assessment services and issue awards to current students of the superseded qualification who would have been genuinely disadvantaged if required to transfer to the replacement qualification, for up to 6 to months after the expiry of the transition period for its replacement.

No teach-out provisions apply to superseded units of competency.

Students who have not completed a superseded ASQA qualification within 18 months or a superseded unit of competency within 12 months following publication of of the item being superseded on the national register must be immediately issued with any eligible AQF testamur and transferred to a new qualification or new to RTO. Except to replace a testamur issued by the RTO

previously, an RTO must not issue an AQF testamur to

than 18 months ago.

During the teach-out period, the RTO must not enrol students and/or commence delivery in the superseded qualification.



Deleted If an RTO has a training package qualification or unit of training package, there is no qualification or unit of competency on the scope on the national register. Deleted training package unit of competency is deleted it will be immediately removed from an RTO's scope on the national register. Deleted training or package unit of competency is deleted it will be immediately removed from an RTO's scope on the national register. Or ASCA will change a deleted training package qualification or unit or expired accredited course on the national register or that a training package unit of competency that has expired will show as 'non-current' on the national register or unit or expired accredited course or into register or unit or expired accredited course or into register or unit or expired accredited course or unit or expired accredited or transition its register. Or ASQA will change a deleted training package qualification or or unit or expired accredited course or unit or expired accredited course or unit or expired accredited or transition or unit or unit or expired accredited or that an accredited or unit or unit or unit or unit or unit or unit or expired accredited or expired with the unit or expired stud		Transition arrangements			Feach-out provisions
training package package package, there is no qualification or unit of competency is deleted it will be immediately removed from an RTO's scope on the national register. Deleted training package unit of competency or course expires, there is no qualification or course for the RTO to transition its registration to. An accredited course or the training package unit of competency or course expires, there is no qualification or course for the RTO to transition its registration to. An accredited course that has expired will show as 'non-current' on the national register. Or ASQA will change a deleted training package qualification or unit or expired accredited course on an RTO's scope of registration to a 'non-current' status following publication on the national register of the qualification or unit or expired, and adequate advice accredited course will then only appear in the 'Display History' section of the RTO's scope on the national register. It an RTO has an accredited course on its scope and that course expires, there is no qualification or course for the RTO to transition its registration to. An accredited course that a training accredited course or that a training accredited course or the training and assessment and issue AQF testamurs to curse that a training on the national register of the qualification or unit of deleted or the course expiring. An RTO may to deliver training and assessment and issue adeleted qualification or unit of course for the package on the national register. Nonetheless, the RTO to must provide timely and adequate advice and a		RTO registration	Continuing students	New students	
to seek reaccreditation, prior to expiry of the course. In instances an accredited course that expired more than where an accredited course is reaccredited by the course owner, competency or an accredited course that expired more than months ago.	training package qualification or Deleted training package unit of competency or Expired accredited	If an RTO has a training package qualification or unit of competency on its scope that is removed from the training package, there is no qualification for the RTO to transition its registration to. When a qualification or unit of competency is deleted it will be immediately removed from an RTO's scope on the national register. If an RTO has an accredited course on its scope and that course expires, there is no qualification or course for the RTO to transition its registration to. An accredited course that has expired will show as 'non-current' on the national register. ASQA will change a deleted training package qualification or unit or expired accredited course on an RTO's scope of registration to a 'non-current' status following publication on the national register of its removal. The qualification or course will then only appear in the 'Display History' section of the RTO's scope on the national register. view to transferring the [Note: Accredited courses expire and do not transition to other accredited courses. It is the obligation of the course proponent to inform all RTOs registered for the course about its intention not to seek reaccreditation, prior to expiry of the course. In instances	There is no replacement qualification or unit or course for the RTO to transition students of a deleted qualification or expired accredited course to. Nonetheless, the RTO must provide timely and adequate advice and guidance to students if the qualification/ unit/ course in which they are enrolled is deleted or expired, with the unit or expired student to an alternative endorsed training package	Once the national register publishes that a training package qualification or unit of competency has been deleted or that an accredited course has expired, an RTO must not commence any training or assessment of the deleted qualification or	assessment and issue AQF testamurs to current students of a deleted qualification or expired accredited course for up to 18 months after publication on the national register of the qualification being deleted or the course expiring. An RTO may continue to deliver training and assessment and issue AQF testamurs to current students of a deleted unit of competency for up to 12 months after publication on the national register of the unit being deleted. Students who have not completed a deleted qualification or unit or an expired accredited course during this timeframe (ie. 18 months following publication of its removal from the national register) must be immediately issued with any eligible AQF testamur and transferred to a new qualification, unit or course or to a new RTO. Except to replace a testamur issued by the RTO previously, an RTO must not issue an AQF testamur to a student for a qualification or unit that was deleted or an accredited course that expired more than 18
an application for the new accredited course is not treated as a transition application and application evidence and full fee accredited course. buring the teach-out period, the RTO must not new students and/or commence delivery in the teach-out period, the RTO must not new students and/or commence delivery in the teach-out period, the RTO must not new students and/or commence delivery in the teach-out period, the RTO must not necessarily the teach-out period in		an application for the new accredited course is not treated as a transition application and application evidence and full fee	' '		During the teach-out period, the RTO must not enrol new students and/or commence delivery in the deleted qualification or unit or expired accredited course.

Interpreting services

If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450 for the cost of a local call. Tell the operator the language you speak. Ask the TIS to telephone the ASQA Info line on 1300 701 801.

Cantonese

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Mandarin

如果你需要口译员,请致电131 450联系翻译和口译服务署(TIS National),**要求他**们致电 1300 701 801 联系 ASQA 。我们的工作时间是9.00am – 7.00pm Monday – Friday AEST 。

Greek

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Korean

통역사가 필요하시면 번역통역서비스 (TIS National)에 131 450으로 연락하여 이들에게 1300 701 801 번으로 ASQA에 전화하도록 요청하십시오. 저희의 근무시간은 9.00am – 7.00pm Monday – Friday AEST입니다.

Persian

- ASQA شماره 131 450 – تلفن كنيد و از آنها بخواهيد به (TIS National)اگر به مترجم شفاهي نياز داريد لطفاً به "خدمات ترجمه كتبي و شفاهي" است. (TIS National) - تلفن كنند. ساعات كار ما 801 701 701 300 شماره

Russian

Если вам нужен переводчик, то позвоните в Службу письменного и устного перевода (TIS National) по номеру 131 450 и скажите переводчику, что вам нужно позвонить в ASQ по номеру 1300 701 801. Наш распорядок работы: 9.00am – 7.00 pm Monday – Friday AEST.

Serbian

Ако вам је потребан тумач, молимо вас да позовете Службу преводилаца и тумача (Translating and Interpreting Service - TIS National) на 131 450 и замолите их да позову ASQA на 1300 701801 Наше радно време је 9.00am – 7.00 pm Monday – Friday AEST.

Spanish

Si necesita intérprete, llame al Servicio de Traducción e Interpretación - Translating and Interpreting Service (TIS National) al 131 450 y pídales que llamen a ASQA al 1300 701 801. Nuestro horario de atención es 9.00am – 7.00 pm Monday – Friday AEST.

Turkish

Tercümana ihtiyacınız varsa, 131 450 numaralı telefondan Yazılı ve Sözlü Tercüme Servisini (TIS National) arayınız ve sizi 1300 701 801 numaralı telefondan ASQA ile görüştürmelerini isteyiniz. Çalışma saatlerimiz 9.00am – 7.00 pm Monday – Friday AEST.