A Review of Training and Assessment for Queensland's Security Industry

A follow-up to the 2016 Report

Report to the Minister for Employment and Small Business and Minister for Training and Skills Development

Office of the Queensland Training Ombudsman
September 2018

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Purpose of the Report

On 9 August 2016, the then Attorney-General, Minister for Justice and Minister for Training and Skills directed the Office of the Queensland Training Ombudsman (OQTO) to undertake a review of the quality of training and assessment in the security industry and the interface between the attainment of a qualification and the issuing of a licence.

The OQTO has worked closely with stakeholders from the security industry to address the issues raised in 2016 and to encourage the stakeholders to drive the agenda towards improved vocational education and training (VET) outcomes for the security industry.

This report has been developed for the Minister for Employment and Small Business and Minister for Training and Skills Development as an update on the training environment for the security industry since the 2016 Report and to consider if further action is necessary.

Background and Scope

The key findings of the 2016 report were:

- greater industry leadership is required
- a review of the training package is fundamental to addressing issues of concern
- Registered Training Organisations (RTO) use varied approaches to the delivery of quality training
- Queensland, through the Office of Fair Trading (OFT), is reliant on the Australian Skills Quality Authority (ASQA) regulation of RTOs
- there is an industry perception that ASQA is an ineffective auditor of RTOs in the security industry
- there is confusion created by different licence requirements across jurisdictions.

This report will focus on the key findings made in the 2016 report and identify improvements made and the changes that are occurring either directly or indirectly as a result of recommendations made in the 2016 report.

This report will provide comment on the current status of:

- training and assessment in Queensland's security industry
- OFT's approach to the interaction of licensing and training
- actions taken by ASQA in the regulation of training in the security industry
- the current impact of the use of mutual recognition on licensing
- role of industry in improving training and the industry generally
- changes to the Property Services Training Package and its implications for training and assessment in the security industry
- VET investment in the security industry
- the role of the Queensland Security Industry Training Forum (QSITF).

The Security Industry in Queensland – Snapshot as at June 2018

Chart 1 below shows continued growth of the Employment of Public Order and Safety Services industry in Queensland, of which the security industry is a subset. Based on the security sector representing 26% of the total public order and safety services industry, the sector currently employs approximately 10,500 workers. This is up from the 10,140 persons identified during the 2016 review and aligns to industry feedback regarding the size of the workforce.
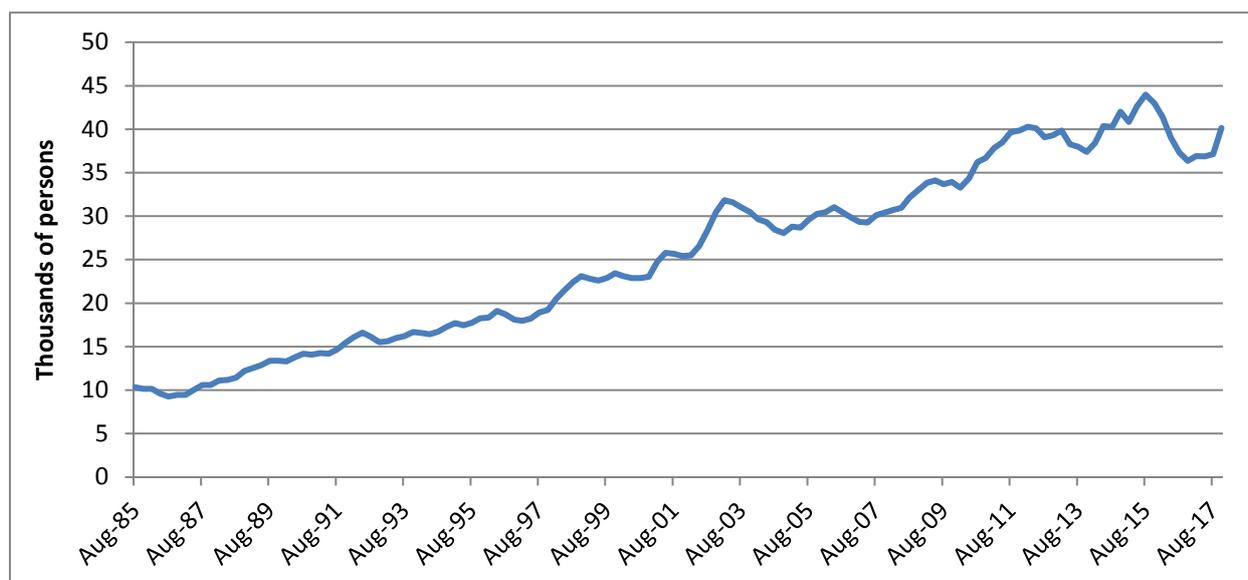
Chart 1: Employment of Public Order and Safety Services Industry: Aug-85 to Nov-17 - **Source**: Labour Force Statistics, 6291.0.55.003, ABS, data cube EQ06, Nov 2017 qrt, released 21 December 2017

The MySkills website identifies the following information regarding security qualifications:

Qualifications	Average Course fee	Average duration	Employed or in further study	Satisfied with training	Enrolled in further study
Certificate III in Security Operations	$1100	12 days	79.3%	92.1%	24%
Certificate II in Security Operations	$750	14 days	79.1%	93.1%	28.2%

Table 1: MySkills National information regarding Security Qualifications (as at 30 June 2018) - **Source**: Myskills.gov.au

The number of individuals undertaking training in relevant security qualifications is outlined in **Table 2** and clarifies that the majority of activity in Queensland occurs at the Certificate III level.

Qualification Level	2014	2015	2016	2017
Certificate I	9	-	16	1
Certificate II	4,175	4,279	3483	3117
Certificate III	5,768	6,718	6802	7650
Certificate IV	38	58	75	68
Diploma	198	520	282	150

Table 2: Queensland Total VET Activity – Security Industry - **Source**: Department of Employment, Small Business and Training

It is interesting to note that this differs from national activity levels as outlined in **Graph 1** which highlights that the majority of enrolments are at the Certificate II level.

Qualification level

Security and Investigation-related qualifications: number of program enrolments by qualification level, 2016

Graph 1: National program enrolments – Security and Investigation-related qualifications - **Source**: nationalindustryinsights.aisc.net.au
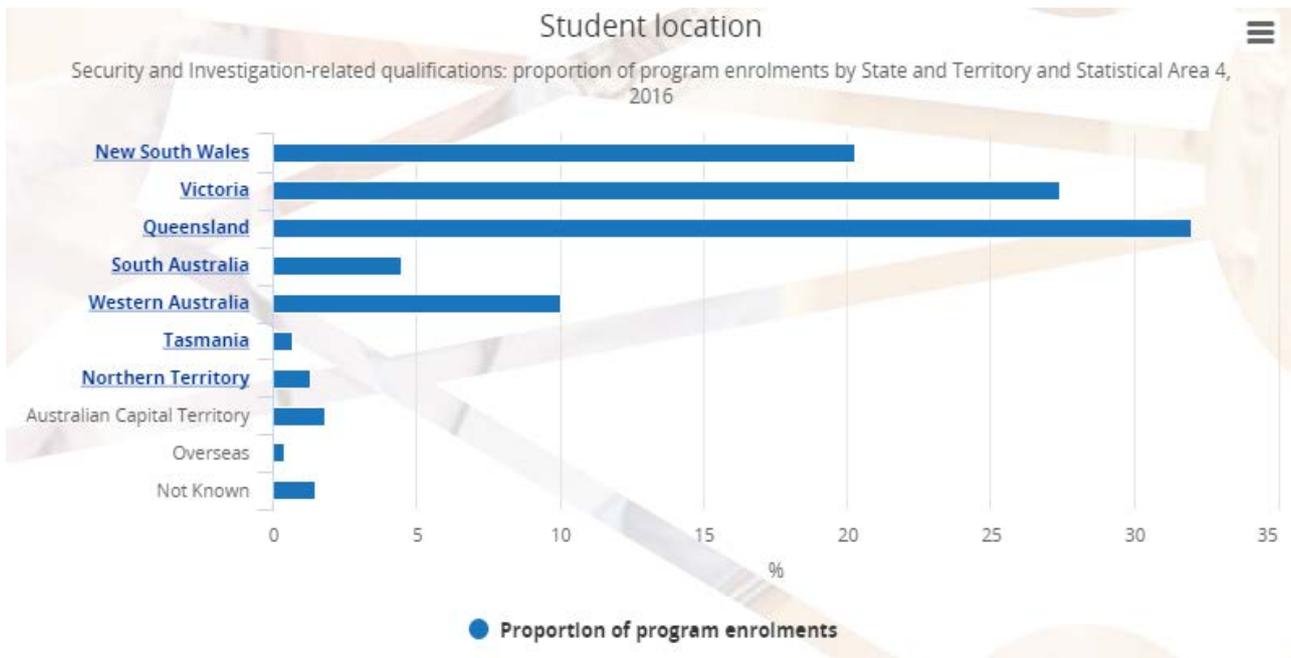
While the number of RTOs has reduced overall, it is concerning that the percentage of RTOs who have reported to ASQA an intent to deliver in Queensland has increased, highlighting a need for close monitoring of RTO activity in Queensland.

Qualification	Total RTOs - 2016	RTOs with intent to deliver in Qld - 2016	Total RTOs - 2018	RTOs with intent to deliver in Qld - 2018
Certificate II in Security Operations	136	93 (68%)	135	99 (73%)
Certificate III in Security Operations	127	86 (68%)	120	89 (70%)

Table 3: RTOs delivering Security Qualifications - **Source**: training.gov.au

ASQA has advised there has been reduced interest from RTOs in adding security qualifications to their scope, with only 12 applications since 1 July 2017.

Graph 2 identifies that over 30% of all students enrolled in security and investigation-related qualifications are in Queensland, reinforcing the high level of activity of RTOs in Queensland.

Student location

Security and Investigation-related qualifications: proportion of program enrolments by State and Territory and Statistical Area 4, 2016

Graph 2: Student locations - **Source**: nationalindustryinsights.aisc.net.au

The Department of Employment, Small Business and Training (DESBT) publishes an Annual VET Investment Plan that outlines the Queensland Government's funding programs and priorities. Funding for the security industry is primarily delivered through the Certificate 3 Guarantee program, with supplementary funding available for community projects that support disadvantaged learners through Skilling Queenslanders for Work.
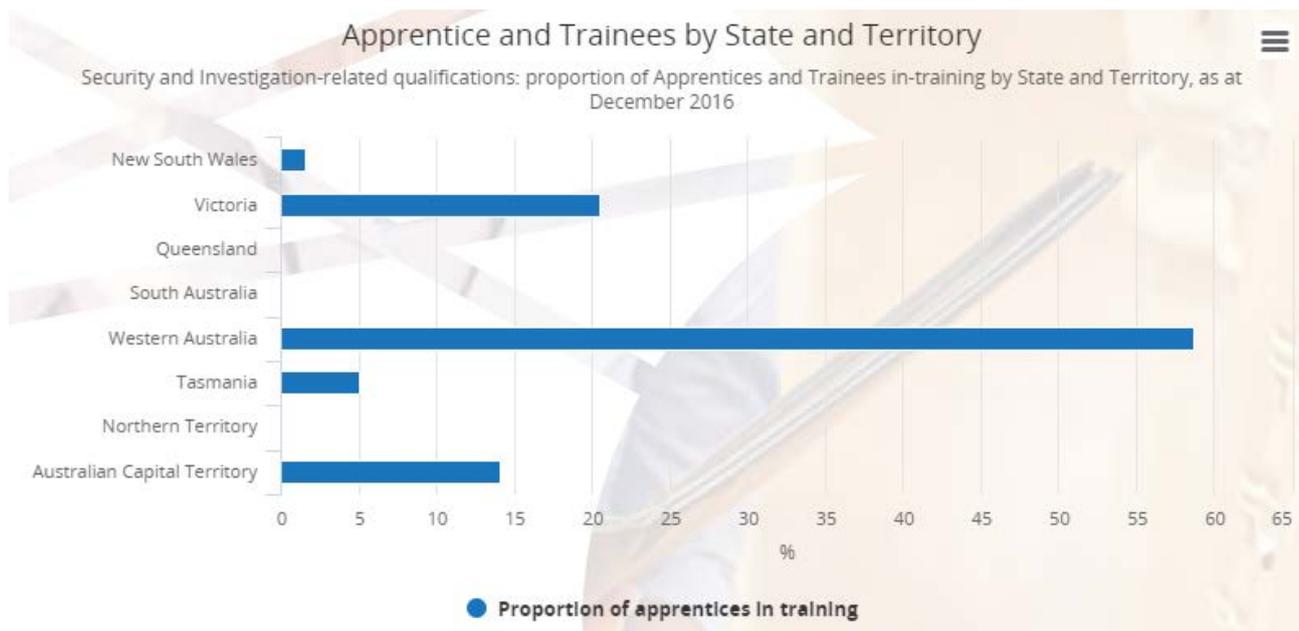
Delivery of subsidised training in 2015/16 and 2016/17 is outlined in **Table 4** below:

Qualification	2015/16 Expenditure	2015/16 Students	2016/17 Expenditure	2016/17 Students
CPP20212 Certificate II in Security Operations	$550,125	452	-$11,125	115
CPP30411 Certificate III in Security Operations	$5,666,977	4,153	$6,171,713	4255
CPP30607 Certificate III in Investigative Services	$27,654	29	$9,012	22
Total	**$6,244,756**	**4,634**	**$6,169,600**	**4,381**

Table 4: Queensland Subsidised Training (Certificate 3 Guarantee) – Security Industry **- Source**: DESBT

As at 31 May 2018, DESBT has engaged 26 RTOs as Pre-qualified Suppliers (PQS) to deliver the Certificates II and III in Security Operations qualifications for 2017/18 (down from 35 in 2016/17). In 2015/16, there were 42 PQS showing a gradual reduction in the number of PQS approved by DESBT, despite overall numbers of RTOs remaining constant.

As outlined in the 2016 review, there have been no traineeship commencements in the security qualifications in Queensland since 2014. However, traineeships are still being utilised in a number of other jurisdictions as reflected in **Graph 3**.

Graph 3: Apprenticeships and Traineeships by State and Territory – Security and Investigation-related qualifications - **Source**: nationalindustryinsights.aisc.net.au

Licences

OFT advised that, as at 31 March 2018, there were 29,643 individual licensed security providers in Queensland comprising of:

- 16,190 crowd controllers
- 5,009 body guards
- 1,049 private investigators
- 19,922 unarmed security guards
- 691 dog patrol security guards
- 4,919 cash-in-transit guards
- 13,537 security monitoring
- 3,165 security advisers
- 3,584 security equipment installers
- 1,822 security firms.

Over 75% of security providers hold more than one licence.

Mutual recognition

One of the key issues identified leading up to, and during, the 2016 review related to a higher than expected number of New South Wales residents undertaking training in Queensland, successfully applying for a security licence in Queensland and then seeking a licence in New South Wales under mutual recognition principles. Mutual recognition is a fundamental component of occupational licensing in Australia. However, concerns were raised that a number of mutual recognition applications received in New South Wales were not supported by quality training. **Table 5** below has been provided by OFT and reflects a significant decline in Queensland licence holders seeking a licence in New South Wales under mutual recognition principles.

Application dates	2016/17 Financial Year	2017/18 Financial Year
16 July – 15 August	108	59
16 August – 15 September	118	45
16 September – 15 October	189	30
16 October – 15 November	228	23
16 November – 15 December	34	29
16 December – 15 January	17	10
16 January – 15 February	21	27
16 February – 15 March	22	15
16 March – 15 April	26	17
16 April – 15 May	23	13
16 May – 15 June	26	22
16 June – 15 July	60	

Table 5: Mutual recognition applications in New South Wales from Queensland licence holders - **Source**: Queensland OFT

Observations Since the 2016 Report

As a result of the changes recommended in the 2016 Report and the ongoing work and consultation undertaken since the Report by the OQTO and various government and industry stakeholders, the concerns that led to the initial Review being undertaken appear to have lessened. There are signs of renewed confidence among stakeholders that progress has been made towards a more cohesive approach to the regulation of training and licensing requirements within the Queensland security industry.

Industry Leadership

Industry has responded well in regards to addressing short term issues linked to the review of the Property Services Training package and responding to demands created through the 2018 Commonwealth Games. However, there is still a need for a longer term workforce development approach for the sector to ensure it has access to a skilled workforce during demand peaks and troughs.

It is noted that Jobs Queensland has only just commenced engaging with the security industry regarding the 2016 recommendation relating to the need for long term workforce planning.

Training Package Review

As outlined in the ASQA review and the 2016 review by the OQTO, the review of the Property Services Training Package provides an opportunity for:

- better engagement with industry
- greater alignment between qualifications and licences
- better alignment between qualifications and the Australian Quality Framework (AQF)
- greater harmonisation of licences across Australia.

It was anticipated that the review would be a priority for Artibus and the Australian Industry Skills Council. Due to the complexities involved, it is envisaged the new training package will be approved for implementation in late 2018.

Artibus stated that its objectives with the new training package are to:

- standardise training package components so they are directly associated with occupations
- harmonise jurisdictional regulations with the scope of activities
- strategically align qualifications with the Standards for Training Packages to address assessment requirements, language, literacy and numeracy issues and workplace safety and skills (ie safe restraint techniques).

Artibus is to be commended for ensuring their leadership of the review of the security qualifications within the Property Services Training Package has provided all of the opportunities outlined above. Artibus has advised that:

- there has been extensive consultation with industry
- the Certificate II in Security Operations should be the mandatory qualification for a security officer
- better alignment with the AQF will promote upskilling and professional development within the security industry, with security guards able to access higher level qualifications
- revised qualifications will more accurately reflect the work of security guards
- there will be greater consistency across jurisdictions
- a Certificate III in Close Personal Protection will be added to the suite of qualifications available.

Furthermore, Artibus advised that the Property Services Training Package companion volume implementation guide will articulate industry expectation of minimum auditable training hours for the Certificate II in Security Operations.

Recent Activities of the Australian Skills Quality Authority (ASQA)

In 2016, there was a perception that ASQA was a poor regulator of RTOs within the security industry. This perception was created due to concerns that:

- ASQA had not taken responsibility for shortcomings identified in its review of the industry
- gaps in relation to ASQA auditable benchmarks identified by industry and the benchmarks ASQA could actually audit against
- a perceived lack of communication, particularly into actions taken by ASQA since the release of their review.

These concerns have now been addressed by regulatory actions and procedural changes implemented by ASQA over the last 18 months.

ASQA changed its compliance process to a risk based model, which included audits being organised around five key stages of student interaction; customised audits of each RTO based on improved risk intelligence; better targeted audits; and more timely and effective regulatory action.

Security qualifications are listed by ASQA as a training product of concern which lifts the industry's profile in terms of audit activity and requires these qualifications to be sampled on every regulatory activity conducted on RTOs with security on their scope. ASQA indicate they are still seeing issues with poor quality training and assessment, including courses being offered for short durations.

ASQA has cancelled the registration of several RTOs operating in the security industry including Peacemakers, Sage Academy and Premier Training. They also cancelled some student qualifications as a result of their findings against these RTOs. This fresh approach has been welcomed by stakeholders within the security industry.

ASQA has also enhanced its communication through timely publishing of audit outcomes.

In its 2016 report, many of ASQA's recommendations focused on changes to the Property Services Training Package, with ASQA concluding that greater specificity in the training package would enable a higher level of regulation. Initial drafts indicate changes made to the training package will give the regulator the scope to enforce beneficial changes within the industry.

Recent Activities of the Office of Fair Trading (OFT)

As identified in 2016, OFT, in its role as the licensing authority for the security industry in Queensland, was heavily reliant on the role of ASQA. This led to a large number of RTOs delivering in Queensland and licence applications being approved even if OFT had some concerns regarding the quality of training delivered by some RTOs. OFT and other stakeholders were critical of ASQA in not addressing their concerns.

OFT now challenges the entitlement to a licence where circumstances indicate the certificate may have been issued by an RTO that OFT has concerns about, including when the RTO is under investigation by ASQA.

Additionally, as raised above, one of the concerns in 2016 was that New South Wales residents were using brokers to gain a Certificate II in Security Operations qualification and a licence in Queensland, to then enable them to gain a New South Wales licence under mutual recognition so they could work in Sydney.

OFT, in conjunction with ASQA and the New South Wales Security Licensing Enforcement Directorate, have been able to arrest this practice of "shopping and hopping" for licences between the states. As mentioned previously, applications from Queensland licensees seeking mutual recognition in New South Wales have reduced from a monthly high of 278 to an average of 24 per month.

OFT is continuing to play a critical role in harmonisation of licensing requirements nationally through the Security Industry Regulators Forum.

Greater Cohesion in Approach by Regulators

ASQA and OFT are to be commended for implementing renewed approaches to regulation within the security industry and it is pleasing to note that a cohesive approach is now employed to regulate the security industry in Queensland.

OFT and ASQA have worked collaboratively to deal with non-compliant RTOs and have achieved good results as evidenced by regulatory action taken against RTOs; revoked qualifications, and reduction in mutual recognition licence applications to a level that OFT considers to be the genuine level of interstate transfers.

Both ASQA and OFT have indicated this cohesive approach to regulation is delivering benefits.

Queensland Security Industry Training Forum (QSITF)

While a fresh approach to regulation by ASQA and OFT, greater harmonisation between jurisdictions in regards to competency requirements, and review of the Training Package are pleasing developments, the full impact of these changes will take time to be fully realised. It will be necessary to implement an effective engagement strategy with stakeholders to monitor activity and address concerns identified.

In 2016, it was recommended that a forum be established so regulators, industry and other stakeholders could regularly meet to discuss relevant issues and develop strategies to address any concerns. In 2018, DESBT established the QSITF. Membership of the forum includes:

- OFT
- ASQA
- DESBT
- OQTO
- United Voice
- Australian Security Industry Association
- Artibus.

This forum provides a vehicle for the ongoing monitoring of activities, and enables a co-operative approach to addressing any identified issues.

Key Findings

The environment for training in Queensland's security industry is very different in 2018 compared to 2016.

While industry has demonstrated commitment to training its workforce through involvement in development of the new Property Services Training Package, there is still a need for longer term workforce planning for the security industry in Queensland to ensure peaks and troughs for skilled workers can be effectively managed.

Implementation of the new qualifications within the Property Service Training Package in late 2018 provides an opportunity for a renewed effort that builds upon the cohesive regulatory approach implemented since 2016. This provides an opportunity for DESBT, OQTO and OFT to work closely together to implement a targeted approach to the selection of PQS authorised to deliver funded training for the new qualifications so that students are trained to a standard that meets the requirements of the licensing authority.

The number of RTOs indicating an intent to deliver in Queensland, supported by the high number of students enrolled in security qualifications in Queensland, is of concern and will require close monitoring. This means that, despite actions that may be taken in relation to PQS arrangements for funded training, there will still be a very active fee for service market for security training within Queensland.

The QSITF provides a platform for all stakeholders to monitor activities and take necessary action to address concerns identified through a consolidated and cohesive response.

Recommendations

1. Jobs Queensland and the security industry in Queensland should work collaboratively to progress long term workforce planning.

2. DESBT, OQTO and OFT should work collaboratively to implement revised PQS arrangements aligned to the implementation of the new qualifications within the Property Services Training Package.

3. QSITF should continue to meet regularly, ensuring stakeholders have access to a suitable forum to identify issues arising with the delivery of training in the security industry, and to develop and implement strategies to address concerns identified.