

Question:

What would be the benefit of the introduction of a national standard to Dog Force Australia's operations? Would Dog Force Australia expect the introduction of a national standard to have a commercial impact on its business?

The introduction of a national standard would be of benefit not only to Dog Force Australia, but to any company providing security and detection dog services. Although **AS:5350 Australian Standard for Security and Detection Dogs** is now under development with Standards Australia, until the project is finalised there has been no system or process by which handlers and dogs may be assessed as competent. With the increasing use of privately deployed security and detection dogs in the private sector, the need to have a competency-based standard by which handlers and dogs can be assessed and accredited is crucial for this service to be responsibly delivered. This reliance on privately deployed security and detection dogs is only expected to increase into the future.

Privately deployed security and detection dogs are used extensively in the United Kingdom as they are in other parts of the world. In January 2020 the UK Home Office introduced the *National Canine Training and Accreditation Scheme (NCTAS)* which provides new mandatory training and accreditation standards for law enforcement agencies to ensure national assurance of performance across all key operational areas of the UK. This accreditation was extended to include the privately deployed dogs and handlers (*NCTAS-P*).

As was indicated in the parliamentary inquiry submission by the United Kingdom Home Office....

“Using the same accreditation criteria contained within NCTAS, the Home Office, with partners, has developed a version for the private sector (NCTAS-P), bringing the NCTAS standards across to the private sector through its robust accreditation test. NCTAS-P takes a significant step towards improving the performance and reliability of the UK’s private sector EDD capability. While it will not be mandatory for private companies to sign up to NCTAS-P, they will have a competitive advantage in the sector by being government approved.”

It stands to reason that while no Australian Standard exists, the risk remains that an unreliable service could be delivered by unqualified operators.

Dog Force Australia is firmly of the opinion that if there is a sound industry led Australian Standard by which dogs and handlers can be accredited, evidence of compliance with such a standard will give that provider a competitive edge with prospective clients seeking security or detection dog services.

Further, we anticipate that Dog Force Australia, or any other provider of security and detection dog services, would experience a positive commercial impact in the marketplace if it can demonstrate compliance with a national standard.

Question:

The Australian Working Patrol Dogs Association already provides standardised certification for security and detection dogs. How might any new standard or certification be different to what is already available?

I am familiar with the Australian Working Patrol Dog Association standardised certification – which has been directly adopted from the *North American Police Working Dog Association*. It is our understanding that no broader consultation with either the Australian security industry nor animal health and welfare organisations has taken place in the adoption of this American standard.

In response to the question as to how will the new standard be any different – DFA can only compare this model with the proposed **AS:5350 Australian Standard for Security and Detection Dogs** which is nearing completion.

The difference between the proposed **AS:5350 Australian Standard for Security and Detection Dogs** and the adopted AWPDA Certification is that the Australian Standard has been significantly contextualised to the Australian security dog industry. In developing this standard, the Standards Australia Technical Committee have considered a combination of national industry expertise and stakeholders including the Australian Veterinary Association, RSPCA, Working Dog Alliance, Australian Federal Police, private detection dog representatives, associations and end-users.

In developing the proposed **AS:5350 Australian Standard for Security and Detection Dogs**, the Standards Australia Technical Committee have referenced and sought appropriate copyrights from relevant international best practice documents (such as British Standards Institution BS 8517-1:2016 & BS8517-2:2016, The UK Centre For Protection of National Infrastructure – CPNI, the Scientific Working Group on Dog and Orthogonal Detector Guidelines (USA), National Association of Security Dog Users (NASDU UK) and the UK Home Office.

The AWPDA is a standard which has been adopted without input or evaluation by Australian industry experts and is heavily contextualised around US legislation and includes significant differences in deployment strategies. While the adopted AWPDA is a well-constructed certification, it is based primarily on USA law enforcement requirements more so than private security dog certification requirements. This is no doubt due to the closer alignment and cooperation between private security and law enforcement in the USA.

Examples of this are assessments of “*off-lead and advanced obedience requirements*”. The Standards Australia Technical Committee determined that given there is currently NO standard, that it would be prudent to commence with a base level of obedience assessment relevant and sufficient to operational requirements of the Australian security industry.

Similarly, the adopted AWPDA “*criminal apprehension*” assessments involve handling a dog “off-lead” – which is prohibited by legislation (in public places) in all Australian state and territory jurisdictions.

“Tracking” is another area which has far more relevance to law enforcement than security patrol dogs. The Standards Australia Technical Committee opined that any standard of a security patrol dog should be uncomplicated, relevant and sufficient to assess competence in the required environment. It was considered that “tracking” may be relevant to any future standard for “Urban Search and Rescue Detection Dogs” however “tracking” suspects should remain the responsibility of law enforcement agencies.

Furthermore, Australian law enforcement representatives have made their position very clear that any Australian Standard should in no way make reference to the competency based accreditation of law enforcement agencies.

Holistically it was the agreed position of the Committee that the UK legislation and deployment requirements were of more relevance to the Australian security dog industry.

Further, development of the **AS:5350 Australian Standard for Security and Detection Dogs** is subject to a robust and transparent process prior to any eventual approval.

The Standards Australia process which applies to the standard’s development is;

1. Project Proposal

Any proposal to develop, revise or amend an Australian Standard® comes from the Australian community. The proposal is required to go through Standards Australia’s project prioritisation and selection process.

2. Project Kick-Off

Once a proposal has been approved, it is assigned to a technical committee. Standards Australia reviews the constitution of all technical committees before commencing any new project work.

Standards Australia then holds a kick-off meeting with the technical committee to introduce the project. The committee discusses the approved project scope (and what is out of scope), drafting tasks, timeframes, and means of monitoring project progress.

3. Drafting the Standard

In this stage working groups provide the technical content to write the standard. These working groups report to the technical committee on the scope and timeliness of the work.

4. Public Comment

This stage ensures that the broader community has an opportunity to review the content and direction of the document prior to its completion. Drafts are available to the public for comment for nine weeks.

All comments from the public are considered in detail by the technical committee and, if necessary, further drafting is undertaken.

In some cases, the committee may propose to combine public comment and approval (ballot) of the standard. This depends on the extent and complexity of the proposals, and the level of consultation and review needed.

5. Ballot

Prior to publication, the committee votes on the final draft. Committee members may vote affirmatively (with or without comment) or negatively. To be considered, negative votes must be accompanied by technical substantiation.

For the standard to be published, consensus must be reached in accordance with the Standardisation Guides.

6. Publication

The standard is ready for publication once final approval is given by, or on behalf of, the Standards Development and Accreditation Committee (SDAC).

The *North American Police Working Dog Association Standard* has been directly adopted by the Australian Working Patrol Dog Association without consideration of broader national stakeholder consultation with either the Australian security industry or animal health and welfare organisations.

It is for the reasons stated above that an industry led Australian Standard for Security and Detection Dogs should be developed specifically to address the needs of the Australian private security industry inclusive of input from the relevant animal health and welfare organisations.

Question:

Some have argued that introduction of the Australian Standard for private security and detection dogs should be accompanied by establishment of a regulator. How might establishment of a regulator complement existing state regulation, licensing requirements and accreditation? Would there be duplication with existing structures and processes?

Since the public hearings on 21 September 2020 DFA have had the opportunity to meet with the Commander of the NSW Police Dog Unit, Superintendent Peter McErlain (who also gave evidence to the hearings on behalf of NSW Police). Superintendent McErlain has expressed a desire to work towards achieving a suitable outcome that represents both the interests of the NSW Police as well as the security industry. We discussed how a future standard may be transparently regulated and adequately satisfy the requirements of all stakeholders.

We agreed that the preferred option would be that the standard be regulated by an industry led national forum in preference to an individual state or territory based model.

In the written submission to the inquiry by the *Australian Security Industry Association Limited (ASIAL)* it was proposed by the ASIAL CEO Bryan De Caires that it would possible for the training, compliance and accreditation of security and detection dogs to be included under the charter of the *Security Industry Regulators Forum (SIRF)*, on which each state and territory is represented.

“Administration and enforcement of an established standard could be linked to the existing security licensing regime. Security Regulators through the Security Industry Regulators Forum (SIRF) and collaboration with peak security industry body representation, could ensure national implementation and compliance.”

SIRF is a national forum consisting of security industry representatives and stakeholders from each state and territory jurisdiction. Key to the role of *SIRF* is monitoring and regulating training and assessment across the Australian security industry.

It is proposed that ASIAL, as the peak national body representing security professionals in Australia, has indicated that *SIRF* has the charter and resources to oversee the training, accreditation and compliance of the wider security industry, that the addition of security and detection dogs could be satisfactorily managed in this forum.