



18 September 2020

Parliamentary Joint Committee on Law Enforcement:

An Australian Standard for the training and use of privately contracted security and detection dogs

Re: AWPDA Position Statement

The Hon. Mr Craig Kelly MP

The purpose of this document is to clarify the position of the AWPDA in relation to the new terms of reference, and outline our vision for implementation.

We acknowledge that our first submission included a significant amount of detail relating to training and certification of security and detection dogs, but did not clearly outline our vision or strategy. We would like to take this opportunity to address this issue, and the other submissions made to the committee to date.

The AWPDA board currently consists of security dog handlers, police and corrections dog handlers, breeders of working dogs, and fire and rescue officers with an interest in search and rescue and arson detection. We have members in four states (ACT, NSW, VIC and QLD). Approx. 70% of memberships are held by current security dog handlers, with the remainder consisting of current or former law enforcement officers.

We have a membership strategy which involves an Annual Conference and short seminars which have been cancelled due to COVID-19 restrictions. We have held a number of webinars for members on decoying, bite development and explosive detection dogs which have been well received.

We recognise that quality training for current private sector handlers and helpers is limited, and some of what is available is of dubious quality. Dog Force Australia, one of the largest and most reputable RTO's in this sector provide training which is awesome, but largely unaffordable due to course fees and length of time away from work.

We submit that the roll-out of the national standard will require Government subsidies to ease the financial costs associated with achieving certification. Remembering that the security industry is one of the lowest paid sectors in the country, and dog handlers are no exception.

If we are to adopt best practice of handlers owning their own dogs and kennelling them at home when they are not working, then the Security Industry Award needs to be looked at to take the associated costs into consideration.

We agree with the Police Federation of Australia, Dog Force Australia and other submissions that identified a need to prevent any outcomes of this committee affecting police, corrections, defence and other government agencies who utilise working dogs. It should be clear that the national standards apply to private security dogs only, and should not impede, dilute, or cause any confusion regarding the standards adopted by those agencies.

Similarly, the submissions by bio-security dog experts indicate the need for clear delimitation.

The AWPDA prefers this approach as a sound risk mitigation strategy that will serve to protect all parties involved. It may reduce the likelihood, or severity of impact, of adverse liability arising from the use of private security and detection dogs in the future.

Regarding the submissions of the Australian Security Industry Association Limited (ASIAL), and the Security Providers Association of Australia Limited (SPAAL), we agree that the implementation of a national standard for security dogs is in the best interest of clients, including the Australian Government, and the security industry as a whole.

We call attention to the comments of ASIAL and SPAAL which highlight some of the more successful certification boards overseas, including the US National Tactical Police Dog Association, and the UK National Association of Security Dog Users, with particular note that these bodies are also not-for-profit associations, not unlike the AWPDA. It is our submission that a national association, who does not itself directly provide security dogs, is in the best interest of all parties.

Given the specialist nature of security dog handling an association whose sole purpose relates to the terms of reference is, in our view, the most preferable option.

As identified by ASIAL the most successful associations overseas enjoy support from the government and relevant law enforcement agencies. With a collaborative approach we are confident that we can replicate these models here in Australia.

AWPDA is looking forward to the release of standards for private sector patrol and detection dogs by Standards Australia. We recognise that partnership with Standards Australia will be an essential factor in our success, and agree with their submission that this approach will reduce the need for wholesale legislative changes. While membership and/or certification of the AWPDA, and adherence to standards is voluntary they would indicate to potential clients that the canine services meet the national standard.

In the future Australian Government clients could rely on this certification, and make reference to it in any tender process, in the knowledge that Companies, Individuals and Dogs certified by the AWPDA have met rigorous standards developed by this committee.

The AWPDA supports the submission of the Australian Federal Police and recognises this agency as having a significant role to play moving forward. We appreciate that their resources are finite and in great demand. We also recognise that the shift to privatisation of roles typically reserved for law enforcement can give rise to concerns. We share those concerns and would relish the opportunity to collaborate on how the AWPDA could serve to mitigate those in the future.

We also agree there are issues around classified information and material, and the risk of information which may attract public interest immunity being released in any court proceedings. This is especially true in the deployment of detection dogs. We look forward to collaborating with the AFP in regards to the development of an education program for AWPDA members.

In response to concerns raised that use of private sector dogs, particularly in explosives detection, will result in unnecessary police attendances the AWPDA submits that this can be nullified to some extent by maintaining the highest standards of EDD certification, and the support of best practice to reduce the number of false indications, and to implement standard operating procedures for such incidents.

It is our submission that in terms of explosive detection the method of detecting the explosive matters very little. Whether the item of concern is located by a dog team, a security officer conducting a manual search of a vehicle or person, or a security patrol locating a suspicious package, the immediate response remains largely the same.

In the event of detection of a suspect in possession of a person-borne or vehicle-borne IED then naturally the police response becomes more critical, particularly in Australia where the majority of Government facilities and infrastructure are currently protected by unarmed security officers. From a risk management perspective if early detection prevents the IED reaching its intended target, or minimises the number of casualties, then the strategy has been successful.

We also note with great interest the submission from the UK Home Office. It is very clear from this, and other submissions, that there has been separation of aviation / cargo certification (NCTAS / FREDD) and general EDD certification (NASDU). We would welcome input from other committee members as to whether this division is preferred due to the special nature of the aviation sector?

The AWPDA looks forward to further collaboration with all stakeholders and would like to extend an invitation to members of this committee to represent their departments as board members of the AWPDA. Together we can establish an independent and suitably qualified association that will deliver robust certification of private sector handlers and dogs.

Kind regards,
AWPDA

AWPDA Mission Statement

“To enhance the quality of private sector security dog services.”

AWPDA Vision 2021

That our membership will grow to include board members from key stakeholders. The diagram below represents how we envision the board will look. Other key stakeholders include animal welfare organisations, security dog breeders, security dog trainers and dog equipment manufacturers.

