

**CHUBB SECURITY PERSONNEL**

**SUBMISSION TO**

**JOINT COMMITTEE OF PUBLIC ACCOUNTS AND AUDIT**

**REFERENCE: REVIEW OF AVIATION SECURITY IN AUSTRALIA**

**Preface**

Chubb Security Personnel is a wholly owned division of Chubb Security Australia Pty Ltd in Australia. Chubb itself is entirely owned by United Technologies Corporation, a US based company. In addition to providing a myriad of security services to a variety of Industries in every Australian State, Chubb is a major stakeholder in the Aviation Security sector.

Chubb Security Personnel's Aviation contracts include, amongst many other services, passenger and baggage screening which will be the primary focus of our submission. Our decision to provide this formal submission to the Joint Committee of Public Accounts and Audit was made following statements made to the Inquiry by the LHMWU (Mr Jeff Lawrence) which we believed to be erroneous, and misinformed. It is our intention, therefore, to provide our account of the issues raised in that particular submission, namely training standards, equipment standards, the introduction of Trace Explosive Detection technology, control of Aviation screening, turnover rates, staffing, and sub-contracting.

**Screener Training Standards**

Contrary to the statements made by Mr Jeff Lawrence to the Committee on October 2, there is a National Training Standard in Australia set forth in the *Department of Transport and Regional Services (DoTaRS) Instrument on Screener Training, the Air Navigation Act 1920*. These training standards are also stipulated in the *Manner and Occasion of Screening, the Air Navigation Act, November 2000*. Further, the *Manner and Occasion of Screening* also contains the National standards for passenger and baggage screening within Australia.

This National Training Standard requires **all** passenger screeners in Australia to hold a "*Certificate II in Security Guarding with Special Application to Aviation Screening*." In addition this document defines the requirements for Initial on-the-job training, as well as recurrent training.

**Development of the National Standard**

Certificate II in Security Guarding with Special Application to Aviation Screening was developed by a joint industry-government *Aviation Screening Project Group*. The project group was chaired by Ansett Australia and included Qantas and Sydney Airport as members. The project group also included the Department of Transport and Regional Services, and was advised by the training consultant Kangan Batman TAFE. Importantly,

in designing the course, the project group drew upon the expertise of the whole of the industry.

Prior to the development and implementation of Certificate II in Security Guarding with Special Application to Aviation Screening, Australia did not have a national training standard. The training course and designation was therefore designed to enhance screeners' performance and professionalism – promoting a uniform and high standard of screening across Australia. A quote from the project brief at the time stated that “Screeners will be invested with a valuable and transferable skill. In particular, screener training has been developed under Australia’s prevailing arrangements for vocational training qualifications. The course will provide screeners with a nationally-recognised qualification – a Certificate II in Security (Guarding) with special application to Aviation Screening.”

It is worth noting that the project was actually started in 1997, with the implementation of the new standards in 2000. Long before the tragedy of September 11<sup>th</sup>, the Industry in Australia had undertaken continuous improvement initiatives and continues to do so today.

### **Obtaining the National Standard**

To assist the Commission in understanding the comprehensive and robust training program that individuals must undertake prior to being employed as an Aviation Screener, we provide the following summary for your information.

Chubb, and undoubtedly the other providers of screening services, take the implementation of the training requirements very seriously. Quite simply, we cannot afford to jeopardize our business due to non-compliance with the requirements, nor would we ever want to compromise the integrity of the program in any way.

### **To Obtain the Certificate II in Security Guarding with Special Application in Aviation Screening:**

#### **Category 1: Individuals currently holding a normal Certificate II in security guarding**

Individuals in this category will have obtained their Certificate II from a Registered Training Organization (RTO) after completing the Australian National Training Authority (ANTA) approved requirements to achieve this designation. Certificate II comprises eight core modules and five electives. The five elective modules may vary from State to State to meet State security guard licensing requirements, however, the eight core modules are the same in each State.

In order to “upgrade” to a Certificate II with special application to aviation screening, the individual must complete the following:

- Recognition of Prior Learning for the certificate, and then complete any additional necessary elective modules which must include Module 10A “Screen baggage and people to minimize security risk”. Module 10A must be done using the materials developed by the joint industry-government *Aviation Screening Project Group*, and supplied by Kangan Batman TAFE. Module 10A is conducted in a classroom environment using a computer based program. It is not done “on the job”.
- Successful assessment by a qualified workplace assessor.

## **Category 2: Individuals NOT currently holding a normal Certificate II in security guarding**

Individuals in this category who wish to obtain a Certificate II with special application to aviation screening must:

- Complete all mandatory training modules using materials developed by the joint industry.-government Aviation Screening Project Group, and held by Kangan Batman TAFE. The mandatory modules for this qualification are the same as the eight core modules for the normal Certificate II as outlined above. There are also five electives required in this process, however, individuals must complete module 10A (screen baggage and people to minimize risk) in order to obtain the qualification. In the Certificate II with special application to aviation screening training package, all the scenarios for the qualification are aviation based, whereas in the normal Certificate II, they are not. However, the competencies for the eight mandatory modules are the same for both certificates.
- Successful assessment by a qualified workplace assessor.

All of the above training must be done by a Registered Training Organization.

### **In addition to the above, any individual who wishes to work as a screener must also:**

- Hold a valid security guard license;
- Satisfy the requirements for the issue of an aviation security identification card;
- Complete Dangerous Goods Awareness Training (CASA requirement per Air Navigation Regulations);
- Complete 40 hours supervised on job training (one on one);
- Be assessed by a qualified workplace assessor who is also a qualified screener or is assisted by a qualified screener.

**Recurrent Training** – All screeners must complete annual assessments in accordance with the Department of Transport and Regional Services Instrument on Screener Training. This assessment must be conducted in compliance with the Assessment Resource for Assessors of Aviation Screening developed by the joint industry-government *Aviation Screening Project Group*.

Dangerous Goods Awareness Training must be completed every two years.

### **Supplemental Training**

We also note that in addition to the aforementioned required training, some clients also ask that we provide supplemental training in areas of customer service, conflict resolution, and effective communication. Chubb is committed to providing high quality customer service at our screening points across Australia.

### **Chubb Training and Compliance Program**

Under the direction of a National Training and Compliance Manager, Chubb have developed, implemented and validated the *Chubb Aviation Screening Training and Compliance program* which incorporates all legislative requirements, client expectations,

and Chubb standards and processes. Each Chubb Port manages their program according to the National Chubb standard. Our program includes quality control mechanisms such as electronic training records “real time” data bases, systems tests, and a formal auditing program.

### **Screeener Improvement Group**

Chubb is an active participant in an Industry Screeener Improvement Group comprised of Airport Operators, Airlines, Government and Suppliers. This Group’s mandate is to review the current instrument on the Manner and Occasion of Screening (which stipulates the National standards for screening in Australia) and the Instrument on Screeener Training with a view to providing feedback to the Department of Transport and Regional Services for updating the documents in view of changes to the Industry. Although the Government has a mechanism in the issuance of “Additional Security Measures” for making changes to current procedures when the risks and threats change”, the dynamic nature of aviation security means that the relevant Instruments should be reviewed from time to time. The level of industry involvement in this current review has been, in Chubb’s opinion, very high and we applaud the support for this initiative. Further, it is worth noting that Chubb is very pleased to have been invited to participate in this group as it makes good sense that the people who are responsible for implementing the program are also part of its development. This is a relatively new initiative and Chubb sees the involvement of contractors as a positive step.

### **Trace Explosive Detection Implementation**

The implementation of Trace Explosive Detection Systems at the passenger screening points is another example of continuous improvement within the Industry. It is one more tool within the established screening process, adding another layer of security for the traveling public.

Chubb is training all screeners on the use of this new equipment, and will rotate screeners through the position as with any other screening position (ie. X-ray, Walk Through Metal Detector). As of November 13, 2003, the majority of Chubb screeners had received training. In their statement, the LHMWU alluded to the fact that not all screeners would receive this training, nor was the training provided consistent in terms of time frames. As indicated, all Chubb staff will have received training, with most already completed.

In regard to the method of facilitation, Chubb conducted the training using workplace assessors who had undertaken a “train the trainer” course from the equipment manufacturer. It is our understanding that the training for this equipment is outcomes based, and accordingly our trainers ensured that sufficient time was spent in order for screeners to properly perform their tasks. In some cases this may have taken longer than others, but the outcome was the same; that is the screener was able to competently perform the required task. Each screener was also assessed before being permitted to use the equipment, and in keeping with our training and compliance commitments, Chubb will regularly audit performance in regards of this new procedure.

## **Equipment Standards**

It is Chubb's contention that equipment standards are set by the Department of Transport and Regional Services in their Instrument on Equipment Testing, and subsequent Additional Security Measure on equipment testing. Nationally, all equipment must pass designated standard tests set forth by the Government, and accordingly any equipment that does not meet the standard must not be used. Screening Authorities have the option of selecting their preferred manufacturer, however, all equipment must pass the national testing standards. In contrast to statements made by the LHMWU, Chubb is satisfied that the equipment used by its staff in Australian Airports is sufficient, regularly maintained, and tested in accordance with requirements. It is the responsibility of the screening authority to ensure that the equipment meets the necessary standards.

## **Control of Aviation Screening**

Much has been said by the LHMWU with respect to the USA and Canada in terms of Government involvement in the letting of security screening contracts, or taking it over all together. It is Chubb's belief that it is the responsibility of the regulator to set policy, regulate, and audit the program. It is the responsibility of the Airlines or Airport Operators to actually provide passenger screening, under the scrutiny of the regulator. It is Chubb's opinion that the Australian model works extremely well, and accomplishes the desired security outcomes.

There is little evidentiary evidence that the USA model referred to by Mr Lawrence is in fact accomplishing the anticipated security outcomes. In fact, it could well be argued that the estimated \$10 billion (USD) spent so far on security personnel and equipment has fallen well short of expectations. Recent surveys from the General Accounting Office of the USA point toward a deficiency in training, particularly recurrent and supervisory training, annual proficiency reviews, and annual certification programs. The interim reports have not been extremely favorable with many questions of quality still outstanding. It is also interesting to note that the TSA is currently running a pilot program in which they are assessing the possibility of returning the passenger screening function to private security firms. The point is that with the billions of dollars spent in federalizing passenger screening, it continues to be very questionable as to whether or not the system has dramatically improved. Perhaps the TSA should have considered the Australian model and spent more time and effort in creating National Training Programs and standards, as we have done in this country.

The same can be said of the Canadian model whereby the Government has chosen to not only regulate the industry (which certainly is its role) but to also let the security contracts. We believe that the focus in both the American and Canadian models is misdirected. Whilst the Government should surely take an active role in facilitating security enhancements (as our Government is currently doing with the introduction of Trace Explosive Technology and Tip Image Projection software), it should not actually control and/or manage the screening process. This function should remain with the Airlines and Airport Operators, as it currently does, under the watchful eye of the regulator. Security at Australian Airports is, in our opinion, consistent with world's best practice.

## **Turnover Rates**

Chubb's turnover rates in our Aviation business are about 50% less than the turnover rates in our general security business. The LHMWU have stated in their submission that turnover rates in aviation security are high and this is caused in part by the nature of the work. Chubb fundamentally disagrees with both statements. First, as indicated, the rates are not high. Secondly, we believe that screeners have a more favorable work environment than many of their colleagues in general security work. Certainly, with the introduction of the aviation allowance, they are better paid and they also have access to better working hours and more permanent posts. It is our experience that our screeners stay longer in the job than general security workers, and have a higher level of job satisfaction.

## **Staffing**

In their submission, the LHMWU have maintained that the use of casual screeners is a serious issue. We disagree with this statement, particularly as most of our screeners are permanent employees. Casual workers are required to cover absences from work of our regular screeners, and therefore a necessary and integral part of our ability to provide services. It is also important to note that many of our casuals actually work regular daily shifts (in Melbourne, for example, many casuals work every day however they work 4 hour shifts instead of 8 hours).

Casual or part time employees are also a necessary part of business in the Aviation Industry due to the nature of flight schedules. Our clients will not want to pay for eight hour shifts when in reality they only need the employee for peak periods of one or two hours, which generally occur early in the morning, or late afternoon. It is more cost effective to engage a screener for four hours in the morning, and then four hours in the evening, for example, than to retain unengaged resources throughout the day.

We point out, however, that casual employees are subject to the same standards of training as permanent employees, and it is the responsibility of the screening companies to ensure that we regularly monitor the performance of our casuals to ensure competency of their skills. We acknowledge the concern that a screener who only works occasionally may not have the same skill level as a permanent screener, however, we believe we address this issue with appropriate recruitment, effective supervision and coaching.

## **Sub-contracting**

It is Chubb's preference to use directly employed staff rather than sub-contractors, and accordingly the majority of our work is carried out by direct Chubb employees. In some remote, regional locations, however, Chubb does not have a permanent workforce and therefore uses local sub-contractors to provide the services.

We confirm, however, that all staff of the sub-contractor are subject to the same rules, regulations, policies, and procedures as direct Chubb staff, and our corporate quality assurance programs extend to them as well. It is our opinion that sub-contracting is sometimes necessary in order to provide service in remote locations, and that as all requirements are the same, there should be no prohibition against using sub-contractors if

they are held to the same standards. The performance management systems we have in place more than adequately provides assurances that our sub-contractors are able to meet all requirements and expectations.

## **In Summary**

Chubb is deeply committed to the Aviation Security Industry in Australia, and to ensuring that all National Standards are met or exceeded. We employ dedicated and specialist aviation management at the National level, including a dedicated resource to oversee our aviation training and compliance program.

It is our opinion that the current Australian Aviation Security Program, replicates “world’s best practice” and that our Industry supports continuous improvement initiatives in a proactive and responsible manner.