

10 May 2022

Mr Michael Minns,
Assistant Secretary Capability
Cyber & Infrastructure Security Centre
Department of Home Affairs
CANBERRA ACT 2600

Via email: screeenerreform@homeaffairs.gov.au

Dear Michael,

Consultation on the Draft Secretary's Determination for Stage 2 Screener Accreditation Reform

I am writing to you to today regarding the Department of Home Affairs' (the Department's) Draft Secretary's Determination for Stage 2 Screener Accreditation Reform (Draft Determination).

The Australian Airports Association (AAA) is concerned the Department's Draft Determination does not account for the continued constraints facing airports in maintaining an appropriately accredited and trained security screener workforce. The constraints exposed in the Draft Determination remain largely the same as those identified 12 months ago by the AAA in its submission to the initial reforms to screener accreditation (Attachment A). In particular, the following areas in the Draft Determination remain as issues of concern:

Screener qualifications (section 6) – The requirement for new screeners to obtain a primary qualification of the Certificate II in Transport Security Protection (Cert II TSP). This comes at a significant time and money cost to potential screeners, at a time when the Vocational Education and Training (VET) sector continues to lack the capability to deliver the qualification, particularly in regional Australia.

However, the AAA does acknowledge the mitigation where new screeners may also hold "a qualification that the Secretary is satisfied will enable the holder to carry out the duties of a screening officer under the Act" (s. 6.1) as a sensible approach to deal with the constraints on screening providers and the VET sector to deliver the Cert II TSP. The similar mitigation on qualifications for existing screeners in section 6.2 of the Draft Determination is also noted as a constructive measure.

Training and Continuous Professional Development (sections 7 – 8) – As noted in the Attachment A, security screening providers still face constraints in having sufficient trainers on hand to provide initial training and continuous professional development (CPD) for security screeners. This has been one of the more hidden effects of the 'churn' of experienced personnel who have left the aviation security sector during the pandemic. This has been compounded at some airports by the need to have trainers available who are competent to train and assess staff in their competencies on both the existing Standard 2 and new Standard 3 screening equipment for passengers, checked baggage and luggage.

Aviation Security Identification Cards (section 9) – The AAA is concerned about the effect on the timely issuing of Aviation Security Identification Card (ASICs) to new or returning security screeners) from the unintended consequences of the Department's policy. Efforts to tighten up personnel security vetting processes through the recent *Transport Security Legislation Amendment (Serious Crime) Regulations 2022* and the current bottlenecks at Auscheck for criminal records checking have led to reports by airports and security screening contractors of significant delays in the issue of new or renewed ASICs. This situation is expected to worsen over the next few years as the Department's decision to transition

to a single ASIC issuing body moves towards implementation and bottlenecks in ASIC issuance are likely to shift from Auscheck to the issuing body.

In conclusion, the need for the Department to issue its Draft Determination to give regulatory effect to the next phase of screener accreditation reform is well understood. However, the AAA is of the view the Department has given insufficient weight to the effects of other regulatory decisions on the accreditation process, along with a misreading of the conditions of the aviation industry as it continues its recover from the COVID demand shock.

Should you require further information, please contact Mr. Scott Martin, Director of Policy and Research on 0437 285 739 or at smartin@airports.asn.au.

Yours sincerely

James Goodwin
Chief Executive