



Submission to

National Competition Policy analysis 2025

12 June 2025



About the Australian Security Industry Association Limited (ASIAL)

ASIAL is the peak national body representing security professionals in Australia. As at 31 May 2025, the Association was comprised of 2,735 members ranging from large corporate entities to small and medium sized operations.

ASIAL is:

- a Federally Registered Organisation of Employers under the *Fair Work* (Registered Organisations) Act 2009;
- an Approved Security Industry Association under security legislation in the Australian Capital Territory, Queensland and Victoria;
- an accredited Registrar under the Australian Communications & Media Authority (ACMA) *Cabling Provider Rules*.

Introduction

The Australian Security Industry Association Limited (ASIAL) welcomes the opportunity to provide this submission to the Productivity Commission as it prepares advice to the Treasurer to support continued pro-competitive reform under the National Competition policy.

As the peak national body for the security industry, ASIAL represents 2,735 members who account for approximately 85% of the industry in Australia. With a workforce of over 200,000 (including 167,530¹ licensed security personnel and 13,220 licensed security firms), the security industry plays a key and growing role as part of Australia's national security mix.

ASIAL's members provide a broad range of services including protective security (guarding and patrols, aviation and maritime security, cash management, crowd control/event security), technical security (access control, alarms, Biometrics, CCTV) and physical security (locks, fencing, barrier security) to every sector of the Australian economy.

Executive Summary

The security industry provides essential services protecting critical infrastructure, crowded places, government and corporate facilities, major events, shopping centres, licensed premises, airports, ports, hospitals, through to small businesses and the homes of millions of Australians.

Given the industry's role in contributing to the safety, resilience, and prosperity of our nation, it is important that we have in place a robust, nationally consistent framework that promotes continuous improvement, increased productivity and professionalism.

In summary, ASIAL suggests the following:

- **Delivery of occupational mobility for licensed security personnel** across Australian jurisdictions through harmonisation of national regulatory standards;
- **Championing continuous improvement and professionalism** by establishing nationally consistent regulatory standards through a Model Security Act;
- **Supporting commercial outcomes** by reducing regulatory complexity and inconsistency, and appropriately funding enforcement by industry regulators.

¹ [2025 ASIAL Security Industry Licensing Report](#) (2025)

Which occupations would be best suited to a national licensing scheme

From a national security and productivity perspective, the private security industry is well suited to a national licensing system.

In July 2008, there was agreement by the Council of Australian Governments (COAG) to work toward a nationally consistent approach to the regulation of the private security industry, focusing initially on the guarding sector of the industry, to improve the probity, competence and skills of security personnel and the mobility of security industry licences across jurisdictions.

COAG tasked the Ministerial Council for Police and Emergency Management, in consultation with the Security Industry Regulators Forum, to undertake further work on minimum regulatory standards for the technical sector of the industry by mid-2009, as well as proposals for a possible national system for security industry licensing by mid-2010.

Whilst progress has been achieved in aligning training competencies across all jurisdictions, nationally consistent security licensing standards have yet to be achieved.

Since 2008, numerous inquiries and reports have concluded that regulatory inconsistencies are not conducive to achieving optimal security outcomes for Australia. In this time the number of licensed security personnel has grown by 70%. Given the increasingly important role the security industry performs in contributing to the safety, resilience, and prosperity of our nation, it is vital that there is a regulatory framework in place that provides for continuous improvement and increased professionalism.

What would be the first steps towards a national licensing scheme for selected occupations?

Developing a national licensing scheme for the security industry would require engagement between Government (State/Territory/Federal), industry and other key stakeholders to arrive at a solution that builds industry capability, capacity, professionalism and productivity.

Why did previous attempts at a national licensing scheme, such as the National Occupational Licensing Scheme, fail? How could a renewed attempt overcome the barriers to a national licensing scheme?

The failure to achieve a nationally consistent approach to licensing can in part be attributed to a lack of national leadership in driving change, and concern among some jurisdictions of a loss of regulatory control of licensed security personnel working within their jurisdiction.

ASIAL's support (and that of the industry more broadly) over the past two decades has remained unchanged for the introduction of a national licensing scheme.

As a catalyst for change, ASIAL has drafted a Model Security Act² to advance a harmonised approach to industry regulation.

ASIAL's Model Act provides a nationally consistent regulatory framework to advance professional standards, enhance public safety outcomes, support worker mobility and raise productivity, whilst providing states and territories the ability to maintain oversight of licensed security personnel working within their jurisdiction.

What benefit would a national licensing scheme provide over an expansion of the automatic mutual recognition scheme?

There is no cohesive national framework governing the operation of the security industry in Australia. As a result, the current patchwork of security regulation imposes significant and unnecessary red tape and compliance management costs on businesses operating across multiple jurisdictions. This creates artificial barriers to competition, restricts workforce mobility and limits the industry's ability to rapidly deploy personnel to meet demand due to emergencies and major events.

The benefits of a national licensing scheme result primarily from the reduction in red tape due to inconsistent regulation, ensuring alignment in requirements for businesses and individuals, and facilitating greater labour mobility.

Within the security industry Automatic Mutual Recognition has failed to realise its aims. Industry licensing data (as at 31 December 2024) shows that 88% of individual security industry licence holders reside in jurisdictions where exemption from Automatic Mutual Recognition has been sought. New South Wales, Victoria and West Australia have all sought exemptions on public safety grounds, whilst Queensland is not participating in Automatic Mutual Recognition.

The benefits of implementing a national licensing scheme include:

- **Strengthened security capability, capacity and professionalism** through the establishment of nationally consistent definitions and eligibility requirements
- **Improved workforce mobility** by enabling individual security licence holders to work across multiple jurisdictions to perform their day-to-day duties.
- **Increased productivity** by supporting commercial outcomes through reducing the regulatory complexity, duplication and red tape businesses face to raise productivity.

A strong and robust security industry is vital to the safety, resilience and prosperity of the nation. Building industry capability requires a consistent regulatory framework that provides for continuous improvement and increased professionalism.

Regulatory inconsistencies are not conducive to achieving optimal security outcomes for Australia.

² [*A Model Act for the regulation of the Private Security Industry* \(2024\)](#)

Why don't we have high nationally consistent regulatory standards?

Despite broad support for nationally consistent regulatory standards being in Australia's national security interests, strong national leadership has been lacking in driving towards achieving an outcome widely recognised as being in Australia's national interest.

Overcoming the barriers to greater harmonisation requires strong federal government leadership and a collective commitment to strengthening Australia's national security mix.

What is the impact of a lack of harmonisation?

The lack of harmonisation between jurisdictions means that operators in the security industry have to navigate a patchwork of inconsistent regulatory obligations, resulting in unnecessary duplication, complexity, red tape and an onerous compliance burden.

The lack of harmonisation also creates inherent security vulnerabilities, as evidenced by the jurisdictions of NSW, VIC and WA seeking exemption on of public safety grounds from Automatic Mutual Recognition.

The lack of harmonisation could have an impact on the 2032 Brisbane Olympic and Paralympic Games. With security a major priority for Games organisers, an estimated private security workforce of 15,000-20,000 will be required. With a significant portion of this workforce expected to be sourced from interstate, the lack of harmonisation will create an unnecessary barrier restricting the mobility of security personnel to seamlessly move to where they are required.

Building security industry capability and capacity through implementation of nationally consistent licence standards is not only for the Olympic Games, but for the future security of the country as a whole.

Embracing technological innovation

One of the findings of the *Security 2025*³ report is that with the heightened terrorism threat, increased demand for security services and slowing pace of workforce growth, the security industry has to transform, to increase productivity and make the job requirements less human-intensive.

Policy initiatives and processes must support the adoption of new technologies and encourage innovation across all sectors of the security industry. Providing incentives to encourage the adoption of innovative technologies such as Artificial Intelligence to augment human security personnel, provide an opportunity to transform operating models and to deliver improved security outcomes.

³ [Security 2025 – A Roadmap for the Future](#) (2021)