

10 September 2013

Dr Malcolm Roberts  
Chairperson  
Queensland Competition Authority  
GPO BOX 2257  
BRISBANE QLD 4001

Dear Dr Roberts,

In accordance with the role of the Office of Best Practice Regulation to investigate instances of regulatory burden, duplication and inconsistency, CCIQ would like to officially register a Red Tape issue on behalf of our members.

This matter relates specially to duplication in licencing requirements under the Child Guardian Act 2000 and the Security Providers Act 1993 affecting the security service providers where they are engaged to provide services in 'child-related' environments (defined as individuals under the age of 16 years).

Under the Security Providers Act 1993, business operators and employees of security service providers/advisors and equipment installers are required to apply for and hold a current security providers licence. This licence attracts a fee of \$385 per 3 years and includes the mandatory requirement for a criminal history check (additional \$35.90 fee) and mandatory finger printing (additional \$100 fee). The licence application/renewal requires the provision of a "certified" 100 point identification check and supply of a certified photograph of the applicant (all at the additional expense/administration of the applicant). Applicants can be disqualified on the basis of convictions and offences under the Criminal Code.

However businesses who intend to offer security related services and products to other businesses in 'child-related' environments have been advised that recent clarification of the Child Guardian Act 2000 extends the requirement to hold a 'Blue Card' to these business owners and their employees. The security providers industry believes this requirement directly duplicates administration and fees/costs associated with the security providers licence. The annual blue card application/renewal requires the provision of "certified" personal identification, the payment of a fee (\$76) and defines a disqualified person as an individual with a conviction or offence under the same provisions of the Criminal Code applicable to the security provider's licence. Copies of both licence application forms have been attached with this letter.

CCIQ members have requested that this regulatory matter be investigated further by the Queensland Government as an opportunity for red tape reduction. Where employers in the security industry typically are expected to meet the training, licencing and renewal costs for their employees, this regulatory matter can represent a significant ongoing cost to small and medium businesses. The industry believes that duplication and red tape could be reduced if there was opportunity for the security providers licence (which carries a higher level of scrutiny) to be recognised as meeting child safety requirements under the Child Guardian Act 2000.

CCIQ appreciates the opportunity to bring this regulatory matter to your attention and welcomes your consideration of opportunities to reduce red tape in this instance. Should you have any questions regarding this matter please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Nick Behrens', with a long horizontal flourish extending to the right.

**Nick Behrens**  
General Manager - Advocacy