SCEC

Australian Government
Security Construction and
Equipment Committee

SCEC-approved locksmith scheme
Policy

Handling instructions

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Inquiries

Inquiries should be addressed to:

Chair
Security Construction and Equipment Committee
GPO Box 1508
Canberra, ACT, 2601
Ph: 02 6234 1217
Email: scec@scec.gov.au

Release history

Version No.	Release date	Amendment
1.00	01-AUG-2010	First version
2.00	08-NOV-2019	Formatting update, separate code of conduct and application forms

Official

Contents

Official

1   Introduction

The Security Construction and Equipment Committee (SCEC) approved locksmith scheme (the scheme) provides Australian Government agencies with approved locksmiths who have demonstrated that they have the necessary locksmithing skills as well as having met the high standards of integrity, honesty and confidentiality required of personnel working for, or on behalf of, the Australian Government. SCEC administers the scheme on behalf of, and with the approval of, the Government Security Committee (GSC). SCEC-approved locksmiths are approved by SCEC to maintain and/or install the below items at the request of Australian Government agencies:

a)   SCEC-approved security containers, security doors and their locking hardware;

b)   SCEC-approved keying systems; and,

c)   Door hardware in security zoned facilities.

SCEC approves individual locksmiths only, and not the company or business employing that locksmith. A locksmith's participation in the scheme does not:

- Confer a security clearance; or,

- Guarantee that a security clearance will be, or is likely to be, granted by the Australian Government.

This policy sets out the approval criteria and process to be used by SCEC in assessing applicants for the scheme, and sets out the rights and responsibilities of the applicants.

Approval is dependent on meeting the application criteria, and being assessed as a 'fit and proper' person (see section 4).

2   Procedural fairness

All decisions to reject a locksmith's application will be subject to procedural fairness, consistent with national security requirements. Applicants will be advised verbally of any concerns that SCEC may have regarding their application, or continuing participation in the scheme. If the concerns are not mitigated verbally, the Chair of SCEC will advise the applicant of the concerns in writing and the applicant will then be given reasonable time to address the concerns before a final decision is made.

3   Application process:

All applications for the scheme must include the documentation set out in section 3.1. Applications should be sent to SCEC in hard copy, posted to:

> Chair - Security Construction and Equipment Committee
>
> GPO Box 1508
>
> Canberra ACT 2601

3.1   List of required documentation and supporting material

Applicants must provide the below documentation:

1) A completed *SCEC-approved locksmith scheme – application*, found at www.scec.gov.au;

2) Certified copies (Copies must be certified by a Justice of the Peace or other person as defined under the *Statutory Declarations Act 1959*) of:

   a. The locksmith's current security license(s) to practice locksmithing in the State(s)/Territory(s) for which approval is sought (unless the State/Territory does not issue security licenses to Locksmiths);

   b. Evidence of locksmithing qualifications (such as a trade certificate, or academic transcripts from the relevant trade school); and,

   c. A certified passport-sized photograph.

AND

   d. A national police check completed by the Australian Federal Police (AFP) only (state police checks, or those offered by any other provider, are not acceptable). Under Section 8 of the *AFP National Police Check Form*, 'Purpose of Check', please select 'Code 40 – Other Commonwealth Purpose ONLY', a fingerprint check is not required, and there are no exclusions under the spent convictions scheme;

   e. A signed letter from the applicant's current employer describing:

      1. The length of service with the employer and the nature of their current position, in particular whether the locksmith has worked with combination locks and commercial grade hardware in their daily duties and, if so, for how long. Or, if the locksmith has not been working with combinations locks and commercial grade hardware in the past six months, the applicant must provide evidence of previous work in this area;

      OR

      2. If the applicant is self-employed, please provide a signed Statutory Declaration in place of the signed letter from an employer. Two references must also be included from businesses for whom the locksmith has performed commercial work using high security locks and keying systems.

3.2   Applications for re-approval

The approval status of SCEC-approved locksmiths will expire after five years. Locksmiths wishing to remain in the scheme must submit a completed *SCEC-approved locksmith scheme - application for renewal* found at www.scec.gov.au.

The below documentation must be included with the application for renewal:

1) Certified copies (copies must be certified by a Justice of the Peace or other person as defined under the *Statutory Declarations Act 1959*) of:

   a.   The locksmith's current security license(s) to practice locksmithing in the State(s)/Territory(s) for which approval is sought (unless the State/Territory does not issue security licenses to Locksmiths);

   b.   A certified passport-sized photograph; and,

   c.   A national police check completed by the Australian Federal Police (state police checks, or those offered by any other provider, are not acceptable). Under Section 8 of the *AFP National Police Check Form*, 'Purpose of Check', please select 'Code 40 – Other Commonwealth Purpose ONLY', a fingerprint check is not required, and there are no exclusions under the spent convictions scheme;

AND

   d.   A signed letter from the applicant's current employer describing:

   1.   The nature of their current position, in particular whether the locksmith has undertaken work for an Australian Government agency using SCEC-approved devices, since gaining SCEC-approved locksmith status;

   OR

   2.   If the renewal applicant is self-employed, a reference from an Australian Government department for whom the locksmith has performed work using SCEC-approved locks or keying systems.

4 Fit and proper person assessment

Applicants will be assessed against the following criteria based on documentary evidence provided by the applicant (see section 3.1), and other checks as detailed below.

Applicants must continue to be considered fit and proper persons. Failure to continue to meet the high standards expected of SCEC-approved locksmiths will lead to suspension and/or revocation of the SCEC approval.

4.1 Criterion One: Personal qualities

The applicant is to be of good reputation, integrity and character, including being honest, trustworthy, and mature. These characteristics are to be confirmed by referee report and results of the AFP Records check. The *Australian Government Personal Security Adjudicative Guidelines*, available from pspf@ag.gov.au, are to be used as a guide when assessing the applicant's suitability against the 'Whole Person'. Any mitigating factors as identified in the Adjudicative Guidelines should be considered prior to making an adverse determination against the applicant.

4.2 Criterion Two: Qualifications

The applicant must:

1) Hold a Certificate III or higher locksmithing qualification such as the four-year locksmithing technician course, or have successfully completed a four-year indentured locksmithing apprenticeship, or Australian Recognised Trade Certificate.

   a. Where the applicant does not hold the above proof of their qualification, they may apply to Trades Recognition Australia to undergo a skills assessment for an Australian Recognised Trade Certificate, or apply to the relevant TAFE institutes for recognition of prior learning for a Certificate III. Please note that only the results will be accepted by SCEC (not the application);

2) Have current experience of not less than six months working with combination locks, and commercial grade locks and locking hardware; and,

3) Hold security licenses to operate in all States and Territories that they are seeking approval to operate in, where those States and Territories require the locksmith to hold a security license.

Qualifications will be confirmed from documents provided, see list of required documents and supporting material at section 3.1.

If granted approval to the scheme the applicant must advise SCEC of any changes to their qualifications during the course of their participation in the scheme. Failure to advise of changes may result in revocation of approval, see section 6.

4.3 Criterion Three: Criminal offences

The applicant must not have been convicted of any offences:

1) Involving fraud, theft, or dishonesty; and/or,

2) Related to national security such as threat of terrorism, politically motivated violence, or threats against holders of high office.

Offences are to be declared in accordance with the Spent Convictions Scheme of the *Crimes Act 1914* (Cth). SCEC is not subject to any exclusions under the scheme.

A history of multiple or recent offences other than the types listed above may lead to a decision of the applicant being unsuitable under Criterion One (see section 4.1).

See the Adjudicative Guidelines: Guideline E: Criminal History and Conduct.

If granted approval to the scheme the applicant is to advise SCEC of any criminal charges laid against the applicant during the course of their participation in the scheme. Failure to advise of changes may result in revocation of approval, see section 6.

4.4 Criterion Four: ASIO assessment

All applicants will undergo an ASIO holdings check, conducted by ASIO, on behalf of SCEC. Where areas of concern are identified, an ASIO security assessment may be initiated. Any unresolved concerns from the ASIO security assessment may disqualify the applicant from the scheme.

4.5 Changes of circumstances

SCEC-approved locksmiths must advise SCEC, via the *SCEC-approved locksmith scheme - Change of circumstance form* found at www.scec.gov.au, of any changes in circumstances that may affect their continued approval within 14 calendar days, including:

1) No longer being employed as a locksmith;

2) Changes to security licences—new (additional states or territories), rejected, suspended, revoked or expired;

3) Being the subject of an official investigation by a government entity or law enforcement agency;

4) Being charged with a criminal offence;

5) Being convicted of a criminal offence; and,

6) Any changes in details as submitted in the application form including, but not limited to, changes in employer, address, or contact details.

Failure to report changes in circumstances may result in revocation of SCEC approval.

5   Conditions of approval

5.1   SCEC-approved locksmith briefing

Applicants must attend a briefing conducted by ASIO on behalf of SCEC. The briefing will include information relevant to the duties of a SCEC-approved locksmith, and will include a statement of ongoing responsibility under sections 70 and 79 of the *Crimes Act 1914* (Cth) and part 5.2 of the *Criminal Code* (Cth) covering the protection of official information. There will be an assessment at the conclusion of the briefing, which attendees must pass to be approved as participants in the SCEC-approved locksmith scheme.

5.2   SCEC-approved locksmiths Code of Conduct

All participating locksmiths must comply with the *SCEC-approved locksmith scheme - Code of conduct* (found at www.scec.gov.au) while participating in the scheme. All reported instances of non-compliance will be investigated by SCEC and, if found to be true, may lead to suspension and/or revocation of approval under the scheme.

5.3   SCEC-approved locksmith identification card

All participating locksmiths will be provided with a photographic SCEC-approved locksmith identification card. This card must be provided to Australian Government agency security personnel on request.

This identification card must be worn at all times when undertaking work as a SCEC-approved locksmith.

5.3.1 Lost or stolen SCEC-approved locksmith identification card

Where a SCEC-approved locksmith identification card has been lost, cannot be located, or has been stolen, the locksmith must complete the *SCEC-approved locksmith scheme - Lost and stolen identification card form* (found at www.scec.gov.au), and submit to SCEC as soon as practicable.

Once the *lost and stolen identification card form* has been received by SCEC, a new identification card may, at the discretion of SCEC, be issued to the participating locksmith.

5.4 Provision of services

SCEC-approved locksmiths are expected to remain current with changes in the industry, and provide security best-practice solutions, and the highest standard of work, to Australian Government clients.

SCEC-approved locksmiths are also expected to remain familiar with all other policy and guidance documents relating to SCEC-approved locking devices and keying systems, and working within Australian Government security zone facilities. These documents include, but are not limited to:

a) ASIO Technical Note 1/15 Physical Security Zones;

b) ASIO Technical Note 5/12 Zone 5 (Top Secret) areas;

c) ASIO Technical Note 7/06 Class A Secure Rooms;

d) ASIO Technical Note 8/06 Class B Secure Rooms;

e) ASIO Technical Note 9/06 Class C Secure Rooms;

f) Protective Security Policy Framework 15 Physical security for entity resources;

g) Protective Security Policy Framework 16 Entity facilities;

h) Security Equipment Evaluated Product List (SEEPL);

i) Class C keying system policy;

j) All relevant Security Equipment Guides; and,

k) ASIO locksmith bulletins

All policy and guidance documents of relevance to SCEC-approved locksmiths can be found at www.scec.gov.au and will be accessible once the locksmith has received SCEC-approved locksmith login access to the website.

6   Revocation of approval

SCEC may suspend participants from the scheme when it becomes aware of credible information that is relevant to whether a SCEC-approved Locksmith is a fit and proper person. If, following an investigation, the concerns are found to be true and are not otherwise mitigated, the locksmith's approval may be revoked. Grounds for revocation include:

1) Providing false or misleading information to any Australian Government agency, official, or representative, including during the SCEC-approved locksmith scheme application process;

2) Breaching any of the conditions of approval (see section 5);

3) Being convicted of an offence as listed in section 4.3;

4) No longer being employed as a locksmith;

5) Not having, or no longer having, the necessary state and/or territory security licenses; and

6) Where technological advancements warrant additional training or competency assessment. However, under this circumstance, SCEC will set a grace period for each locksmith to address the new training requirements and sit a competency assessment before revocation is considered.

All decisions to suspend or revoke approval are subject to procedural fairness unless there is a significant security concern (see section 2).

Participants who have their approval revoked must return their SCEC-approved locksmith identification card. SCEC will remove their details from the SCEC-approved locksmiths register and advise Australian Government agencies of the revocation.

7 Notification of application decision

SCEC will notify the outcome of all applications in writing within 28 days of the decision.

7.1 Acceptance

SCEC will notify all applicants who are selected to participate in the SCEC-approved locksmith scheme in writing. The notification will include:

1) The letter of acceptance into the scheme; and,

2) Joining instructions for the SCEC-approved locksmith briefing.

7.2 Rejection or revocation

SCEC will discuss any issues with applicants to the scheme prior to providing formal notification of rejection, unless they are unable to be disclosed for national security reasons. This will provide the applicant with an opportunity to address the identified issues.

The Chair of SCEC will provide all applicants who are found to be unsuitable for participation in the scheme with written advice stating the grounds for unsuitability, unless the information cannot be provided for national security reasons.

The written advice from the Chair of SCEC will include:

1) Advice on procedural fairness; and,

2) Details of the review process.

Participants who have their approval revoked must:

3) Return their SCEC-approved locksmith identification card; and,

4) Remove all references to participation in the SCEC-approved locksmith scheme from all marketing and promotional material.

SCEC will also:

5) Remove the participant from the SCEC-approved locksmiths register; and,

6) Advise Australian Government agencies of the revocation.

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8   Appeal process

To appeal an application rejection or a participant's revocation, the locksmith must submit the appeal request in writing to the Chair of SCEC, within 28 days of the decision date, and include all details the locksmith deems relevant to the appeal.

The Chair of the Government Security Committee (GSC), as the committee overseeing SCEC, may undertake a review of SCEC's decision.

The GSC will review the application, assessment process, and reasons for rejection or revocation, as well as any additional information provided in writing by the applicant. The reviewing officer may then:

1) Uphold the SCEC decision; or,

2) Overturn the SCEC decision.

The applicant will be notified in writing no more than 28 days after the conclusion of the appeal decision.

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