

April 1<sup>st</sup>, 2010

Ms. Lisa Kool  
Registrar/Director  
Private Security and Investigative Services Branch  
Ministry of Community Safety and Correctional Services  
777 Bay Street, 3rd Floor  
Toronto, ON M5G 2C8

**RE: Private Security and Investigative Services Act, Training and Testing Regulation**

Dear Ms. Kool,

We are writing to you as the leaders of five leading industry associations in Ontario: ASIS International Canada, the Association of Professional Security Agencies (APSA), the Canadian Security Association (CANASA), the Canadian Society for Industrial Security Inc. (CSIS), and the Council of Private Investigators – Ontario (CPIO). In response to your memorandum of February 25<sup>th</sup> to Private Security Stakeholders, we have held detailed discussions with our respective members and we would like to share the highlights of those discussions with you and your staff. We feel our information will be helpful to you as there are few security guards and private investigators in this province that are not either members of our associations or employed by member companies.

We would like to begin by thanking you and your staff for your efforts to bring the training and testing regulation into effect. If there is one unanimous sentiment within our industry, it is the wish to elevate the standards to which our front-line members are held. We applaud your team's work in bringing this legislation into action and we are interested in supporting your implementation efforts and working collaboratively with you in the weeks and months to come.

The discussions with our members have surfaced four areas of concern. We feel that you may want to address these items and we would be pleased to meet with you and your staff to discuss them.

- 1. Ongoing Collaboration.** As we are all striving to do what is best for Ontarians and the industry, we believe the best product will be achieved by continued dialogue. We would welcome the opportunity to review and comment on any proposed legislative changes (or other topics) and we would offer you comments from a senior representative industry group within 10 business days of any PSISB request.
- 2. Training Development.** The best systems have review and improvement mechanisms built in. Once the training and testing regulations are in full swing, challenges that will necessitate changes by the PSISB will surface. We would like to work with the PSISB as it expands and documents the curricula, introduces trainer requirements and further refines the knowledge level required for security guards and private investigators.
- 3. Transparency in Testing.** We feel it is critical for those who have failed to be notified of where they have erred so that they may improve their knowledge for the next time they take the test. Several other industry certification exams group questions into domains and show each applicant a relative grade for each domain. In this regard, applicants are able to improve that one domain in which their knowledge may be weak. Not only does this assist the applicant when they re-write the test, but it ensures a well-rounded security guard or private investigator once licensed.
- 4. Internet-based Training.** One issue that we feel would offer a significant concession to our members is that of Internet-based training. Organizations across Canada have made good use of computer technology for economic and efficiency gains. Indeed, as you are aware, your counterparts in the BC provincial government have embraced this technology for effective program delivery. As well, Internet-based delivery of training has become commonplace in all environments from corporations to post-secondary institutions. We would like to see Internet-based training permitted by the same organizations authorized to deliver such training in person.

Our members have also expressed concern regarding a cross-section of issues ranging from increased costs to grandfathering of existing licensees. For many of these issues, we believe the collaboration we are proposing will help us to help our members understand the reasoning behind these decisions. This may reduce the calls and e-mails to which your staff must respond.

Lastly, one other topic surfaced strongly in our member consultations and we feel it should be mentioned in this letter. Our members have told us that the delay in processing routine licence applications has grown over the years. We understand the constraints of the current fiscal environment in which all Ontario government departments work; however, when there is a delay in processing a renewal or new licence application, the subsequent impact to both the business and the applicant can be severe. After the first two years of testing, your agreement with Serco DES allows a maximum of 17 business days for processing. If you account for the training prior to the test and the time it takes to apply for and receive the licence, this could represent a delay of a month or more. We may be able to help your team find ways to reduce this delay to ensure adequate servicing of demand for security guards and private investigators.

It is our sincere interest to work collaboratively with the PSISB and moving forward, our goal is to work in solidarity and represent the industry with a common voice. We are confident that our collaboration will lead to a better PSISB program which will benefit us all. As association leaders, we invite you to contact any of us listed below at any time. Thank you for your time and we look forward to working with you in the future.

Best Regards,

Jason Caissie, PSP, CPP, CISSP  
Assistant Regional Vice President (Ontario)  
ASIS International Canada  
[www.asisonline.org](http://www.asisonline.org)  
[jason.caissie@rbc.com](mailto:jason.caissie@rbc.com)



Ross McLeod, MA, CPP  
President  
Association of Professional Security Agencies (APSA)  
[www.apsacanada.com](http://www.apsacanada.com)  
[rmcleod@intelligarde.org](mailto:rmcleod@intelligarde.org)



Jean-Francois Champagne  
Executive Director  
Canadian Security Association (CANASA)  
[www.canasa.org](http://www.canasa.org)  
[jfchampagne@canasa.org](mailto:jfchampagne@canasa.org)



Bob Marentette  
Executive Director  
Canadian Society for Industrial Security (CSIS Inc.)  
[www.csis-scsi.org](http://www.csis-scsi.org)  
[csisinc@sympatico.ca](mailto:csisinc@sympatico.ca)



Debbra Macdonald  
President  
Council of Private Investigators – Ontario (CPIO)  
[www.cpi-ontario.com](http://www.cpi-ontario.com)  
[debbra@c3investigation.com](mailto:debbra@c3investigation.com)

