TRAINING AND SETTING STANDARDS FOR
FRAUD INVESTIGATORS

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1 Peter Roberts was formerly the Head of the Fraud Policy Unit, Office of Law Enforcement Coordination and chaired the project committee which developed the Fraud National Competency Standards for Fraud Prevention, Detection and Investigation.
This paper is written from the perspective of a training provider and addresses a variety of issues related to the setting of competency standards and training to those standards. The first issue is an examination of the current competency standards that are relevant to fraud and to draw some conclusions about their adequacy. The second, and related, issue is the degree to which training providers in this area can fulfil the needs of the organisations which require their staff to be trained up to the competency levels currently agreed, and, the extent to which this training fulfils the aspirations of the individuals involved. The paper argues that the process of setting standards and developing a training regime for fraud control has gone into a dead end and that concerted action by the industry, including the training providers, is necessary to reach a workable solution.

Even though the title of this paper is limited to the training of fraud investigators, the paper encompasses the training of individuals in the area of fraud prevention and detection. The reason for this extension of scope is that the competency standards were developed as a package of fraud prevention, detection and investigation with two qualification streams: fraud investigation and fraud prevention and detection. The project committee in determining this structure, recognised that there were strong links between investigation and detection. Also, the committee was aware that in many organisations there were structural links between the functions of the fraud investigators and the functions of fraud prevention and detection. Consequently, from a training perspective, it makes sense to deal with all three elements together.

The paper is divided into four parts:
- a cursory look at training and education in the workplace and the structure of the vocational and educational training system in Australia;
- how the fraud control competencies were developed within that structure and the advantages and disadvantages of locating fraud training there;
- some comments about the role of the higher education sector in vocational and educational training; and
- an examination about the current state of the standards and training in fraud control.

Training and Education

Even the busiest manager is very conscious that training of staff is an important long-term investment in the individuals that make up the organisation and that it takes up considerable resources – both in money and time. For those reasons alone, it is therefore worth going back to the basics and asking some fundamental questions, eg:

- Will it enable the staff involved to do their job better?
- Is it more cost-effective to buy in the skills from the market place?
- Is it better to send staff on external courses or develop in-house programs?
- Will the staff see the training as being in their own interests?
- Will the completion of the training encourage staff to utilise the increased marketability of themselves and leave the organisation?
To answer these questions, a good place to start is a definition of training and education. The United Kingdom Manpower Services Commission (MSC) in 1981 defined the terms as follows:

*Training*: a planned process to modify attitude, knowledge or skill behaviour through learning experience to achieve effective performance in an activity or range of activities.

*Education*: activities which aim at developing the knowledge, skills, moral values and understanding required in all aspects of life, rather than knowledge and skill relating to only a limited field of activity.

*Development*: the growth or realisation of a person's ability through conscious or unconscious learning.

This paper concentrates on the training dimension of fraud control. From the perspective of a tertiary education institution, it presumes that the individuals involved in fraud control already have some of educational achievement which can be built upon.

This is not the occasion to go through any detailed exposition of the theories of learning. However, it is useful to go through some of the commonly used terms when talking about training in the workplace so as to develop some common understanding of the theoretical foundations of training in the workplace. Also, this examination will enable a critical assessment of the competency standards for fraud prevention, detection and investigation against those theoretical foundations.

The term ‘adult learning’ is one we are all familiar with, as it has been used since John Dewey published his influential work *Experience and Education* in 1938. Dewey popularised the notion of progressive education whereby individuals did not cease learning once they had left the disciplined environment of the schools but continued to learn and grow throughout their lives. This approach was carried forward in the 1940s by the psychologist Carl Rogers. Rogers, in reaction to the mechanistic theories of the behaviourists, coined the term ‘facilitator’ to describe a person who assisted individuals in fulfilling their learning potential, as distinct from a traditional teacher who was (then) seen as providing a highly formalised teaching environment.

A more contemporary thinker on adult learning is Malcolm Knowles, who in 1984 coined the term ‘andragogy’ to describe the way adults learn, as distinct from ‘pedagogy’ or the way children learn. Knowles set down the following conditions for effective adult learning.

- the learners feel a need to learn;
- the learning environment is characterised by physical comfort, mutual trust and respect, mutual helpfulness, freedom of expression and acceptance of the differences;
- the learners perceive the goals of the learning experience to be their own goals;
- the learners accept a share of the responsibility for planning and operating a learning experience, and therefore have a feeling of commitment to it;
- the learners participate actively in the learning process;
- the learning process is related to, and makes use of, the experience of the learners; and
- the learners have a sense of progress towards their goals.

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2 This material is based upon Andrew Smith’s book *Training and Development in Australia, 2nd Edition*, Butterworths Sydney. Associate Professor Smith is the Head of the School of Management, Charles Sturt University
Some other terms that are used in talking about training are experiential learning and the concept of the workplace learner. Experiential learning occurs when experience is transformed into knowledge. This can happen either at the level of learning from a concrete, immediate experience or at a higher level where the experience is reflected upon and the implications digested.

The notion of a workplace learner is an idealised state where staff are empowered to take control of their own learning, given time to reflect on the experience with the freedom to critically evaluate it and to create their own learning environment. This clearly goes beyond what is normally thought of as training, and goes into issues of socialisation and the emancipation of the individual.

Having looked at the fundamentals, it is useful to look at how this has been translated into the vocational and education system that has been introduced in this country. To do this, it is necessary to look at some of the theories that have come into, and gone out, of fashion. In the 1950s there was a human capital theory that viewed investment in training staff the same way as investment in plant and equipment. The theory differentiates between general training that is transferable (eg. Fraud investigator training) and training which is job specific (eg, how the Centrelink databases are organised). The theory states that individuals will forgo income to receive the general transferable training because it increases their mobility and that organisations will fund the specific training because it raises their productivity. Unfortunately, research did not support the simplistic human capital theory – training was not directly linked to higher earnings nor directly to increased productivity.

In the late 1960’s and early 1970’s the dominant theory that held sway was internal labour market theory. Rather than looking at the relationship between an organisation and the external skills market, this theory focused on what was going on inside large organisations and the role training played. The theory stated that organisations were interested in employment stability and therefore tended to limit external entry to base grade entry, adjust wages to the internal supply of skills and linked wages specifically to rigid job classification structures. In this environment, training was usually provided in-house and specifically linked to the particular enterprise. This should be familiar as it is a good description of how Australian public sector (and large private sector) organisations operated until very recently.

The enormous and fundamental change, which has made all these theories outdated, has been the adoption of technological innovation and the way it has come to define the modern successful enterprise. In the mid 1980’s the OECD’s Centre for Education and Research analysed a wide range of manufacturing and service industries in the US, Europe and Japan. CERI found that the factors which defined the successful enterprises were the adoption of technology, the breakdown of hierarchical work structures and the move to competency based training, much of it externally sourced. More recently, a series of studies undertaken by the UK National Institute for Economic and Social Research looked specifically at the effectiveness of national vocational and educational training (VET) systems. The results of that research suggested that there was a cycle where a high commitment to VET lead in turn to higher qualifications, a more adaptable workforce which raised productivity, encouraged innovation, increased market share and the circle finished with more investment in VET. The NIESR saw that pattern in Germany, but the reverse in the United Kingdom. Up until recently, Australia was more like the UK than Germany.
There has been much theoretical debate about the relationship of training and skills to technological change. Empirical research in recent years has revealed a picture of some occupations experiencing an upgrading of skill as a result of technological innovation, while other jobs are de-skilled or disappear. It is clear that it is the introduction of new working practices and management techniques that has the most impact on training and development in organisations.

In Australia, training has also become a central issue in industrial relations since the advent of award restructuring in 1988. Under award restructuring, new training opportunities were created, especially for blue-collar workers. This has been continued under enterprise bargaining, with many enterprise agreements containing clauses on training and development issues. However, the incidence of training clauses in enterprise agreements appears to be diminishing as enterprise bargaining focuses on more traditional industrial issues.

Training is closely related to the rise of human resource management (HRM) in modern organisations. In most models of HRM, training is a key element increasing the competence and commitment of the work force. For this reason, training has been referred to as the litmus test of an organisation's commitment to HRM. Training also has a key role to play in the formulation of corporate strategy. New strategies require new sets of skills, and training is critical in ensuring the organisation retains and develops the core competencies on which it competes.

**The Australian Vocational and Educational System**

Having very briefly looked at the evolution of the VET system internationally, we can turn to the Australian system within which the fraud training will be occurring.

Since the mid-1980s, the Australian training system has been undergoing major change. The federal nature of the Australian Constitution has meant that the training system has been fragmented and slow to change in response to developments in the business environment. The former Federal Labor Government made training reform a central policy after the report of the ACTU/TDC Mission to Western Europe in 1987.

A number of reports paved the way for the changes to the training system which became known collectively as the National Training Reform Agenda. The Deveson, Finn, Mayer and Carmichael Reports advocated the opening up of the training system to market forces and the use of competency-based training to reform the system so that a more unified, national system would emerge.

It was clear that the Australian system was in need of reform. Here the results from Australian research examining the role of enterprise training carried out by researchers from the Group for Research in Employment and Training at Charles Sturt University and the University of Technology, Sydney, painted a picture of an underdeveloped and rather powerless function. This research shows that:

- training activities were not carried out in a systematic way in most Australian organisations;
- only the larger organisations supported a training specialist or training department;

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• training has been increasingly devolved away from training specialists and towards line managers;
• training specialists were largely brokers of training rather than direct trainers;
• training had very little connection to the business strategy of Australian organisations.

One of the first reforms implemented was the Training Guarantee Scheme in 1990. The scheme, however, drew much criticism and was suspended in 1994, and finally abolished by the new Coalition Federal Government in 1996.

The major elements of the National Training Reform Agenda included:
• the use of competency based training (CBT) as the basis for all accredited training in Australia;
• the establishment of industry competency standards for all occupations;
• the establishment of the Australian National Training Authority to oversee the funding of training and to develop training policy;
• the establishment of a framework for the recognition of training at a national level to ensure the portability of qualifications from one state to another; and
• the reform of entry-level, apprenticeship and traineeship training.

The diagram in the attachment to this paper sets out the relationship between the various entities in the Australian training system. Of particular note are the key players: the Ministerial Council at the peak with representatives form all governments in Australia, the Australian National Training Authority (ANTA) a Commonwealth statutory body in the Education and Youth Affairs portfolio, the array of Industry Training Advisory Boards (ITABs), the training providers and the students.

Computer based training has become the widely accepted standard for the delivery of training in Australia. However, the interpretation of what constitutes CBT can vary widely. In general, CBT uses industry competency standards to frame training design and is concerned with the maximisation of the flexibility of training through the involvement of industry in program design, the use of self-pacing, modularisation and giving recognition for prior learning.

In the Australian context, some or all of the following characteristics are generally found in CBT courses. They:
• are based on competency standards;
• are focused on outcomes, not on inputs;
• involve industry;
• recognise prior learning (RPL);
• are modularised;
• are self-paced;
• have assessment based on demonstration of skill rather than knowledge; have assessment which is criterion-referenced and ungraded;
• have flexible delivery;
• widely recognise competencies.
A key feature of the training reforms has been the creation of a more open training market. This would allow private training providers to compete more effectively with traditional public providers such as TAFE and so drive down the costs of training and make training more responsive to the needs of industry. As a result, the number of private providers has been growing and is likely to increase in the future.

Organisations participate in the training system in four ways:

- as employers of graduates of courses run by providers of vocational education and training (VET);
- as purchasers of training from VET providers;
- directly, by themselves becoming registered providers of VET courses which fit into the national training system;
- by using training processes or products such as competency-based training or national modules.

**Fraud Control Competencies**

The origin of the fraud control competencies was in the inquiry of the House of Representatives Parliamentary Committee on Finance and Government Administration into fraud control arrangements of Commonwealth agencies. The report of the Committee, *Focusing on Fraud* was issued in 1993 and one of the Committee’s key findings was that the standard of expertise of fraud investigators in Commonwealth agencies was patchy. As a result of this, and the very many other recommendations in the Committee’s report, a comprehensive Commonwealth fraud control policy was agreed to by the then Labor Government in December 1994. That policy made a commitment to the development of competencies for fraud investigators.

The inclusion of that commitment in the policy was a recognition of the changes that were occurring in training in the law enforcement environment in the early 1990s. The police forces in Australia had just commenced the process of setting down competencies for a variety of policing functions, of which investigation was a key component. One of the issues that had been recognised by the police forces was that traditional training had meant that many investigators had undertaken their training many decades before and that there was no systematic process for ensuring that individual investigators were keeping abreast of the changes in the law and technology.

The practical effects of not keeping investigator training up to date had been exacerbated in the units of fraud investigators that had been set up in the 1970s and 1980s. With very few exceptions, the Commonwealth sought its fraud investigators from the ranks of the police. Once these individuals were outside the police environment, the issue of the relevance of their skills over time became crucial.

In the formulation of the Fraud Control Policy of the Commonwealth, the Parliamentary Committee’s recommendations about fraud investigator training were extended to encompass fraud prevention and fraud detection. This extension was adopted in the recognition that fraud control was a much more complex process than merely investigating cases that came to the organisation’s attention and involved continuing efforts to ensure systems and procedures were not vulnerable to attack and the necessity of actively looking for evidence of fraud.
Under the aegis of the Commonwealth Law Enforcement Board, a group was created with the intention of developing the fraud control competencies. That group was made up of managers of investigation units in the large Commonwealth agencies along with the Australian Federal Police (AFP) and the Office of the Director of Public Prosecutions (DPP).

**National Competency Standards for Fraud Prevention, Detection and Investigation**

That group made a key decision to proceed to develop the fraud control competencies as a part of the then emerging national training framework. The reasons for that decision were:

- it was in line with the training policies of all Australian governments;
- it was in line with the steps Australian police forces were taking to develop competency standards to cover the major police functions, in particular, investigation;
- it would provide a set of qualifications which would be portable for the individuals;
- it enabled CLEB to step back from the role of approving training courses and pass that function on to a self-regulating system with in-built quality control; and
- ANTA provided funding for the development of the fraud control competencies.

At ANTA’s request what had commenced as a purely Commonwealth need driven by the Commonwealth’s fraud control policy was extended to include all jurisdictions. The project group was extended to include representatives of other jurisdictions, the relevant unions, the National Police Education Standards Committee and the Public Sector ITAB.

The actual work of putting the competencies together was undertaken by two experienced consultants who ran an exhaustive series of focus groups all over Australia to develop and validate the standards. The project committee worked hard to ensure that the competency standards had a ‘hard edge’ to them, in that they reflected all the relevant skills and knowledge necessary to undertake the various fraud control functions (particularly investigations). As a practical rule-of-thumb test, the question (for example) was continually put, would an individual who met this standard be capable of successfully completing a fraud investigation?

When the final draft was put to ANTA, the project group was advised that the standards were too narrow in scope to justify having their own training package. The standards were endorsed by ANTA in late 1996, along with a statement describing training pathways. It was made clear to the project committee that when a suitably comprehensive set of relevant competency standards was to be developed, those fraud control standards would be included in that training package.

The qualifications under the National Competency Standards for Fraud Prevention, Detection and Investigation are:

- Certificate IV Fraud Control (Investigations)
- Certificate IV Fraud Control (Prevention/Detection)
- Diploma Fraud Control (Investigations)
- Diploma Fraud Control (Prevention/Detection)
- Advanced Diploma Fraud Control (Management)

Before leaving the standards setting element of this paper, it is useful to look at how the fraud control competencies look four years later. A number of observations can be made. First, the fraud investigation component was always the strongest element. This is hardly surprising.
because, effectively, the competency standards process had done little more than take police training experience and convert it into the format necessary for approval. Within the Commonwealth, the fraud investigation component of the competency standards has been accepted as the standards for all non-police investigations. Anecdotal evidence also indicates that the fraud investigation component has become the de-facto standard outside the Commonwealth and even in the private sector.

The changes foreshadowed in the exposure draft of the revised fraud control policy include the option for agencies to subsume the fraud risk assessment process, and logically the fraud control planning process, into broader risk management which deals with all elements of an agency’s activities. Other policy changes are pushing Commonwealth agencies into broad ranging risk management processes. To a large extent if the fraud risk assessment process and the fraud control planning process are being performed by all managers, then the usefulness of the fraud prevention competency standards is significantly diluted. Besides fraud risk assessment and fraud control planning, the other units of competency dealing with fraud prevention like implementation and raising awareness are effectively main stream administrative functions.

Turning to the detection component of the fraud control competencies, it is fair to say that this is the least compelling element of the whole structure. One possible reason for this may be that, because, as all large organisations utilise sophisticated databases for analysing and storing transaction information, the competency standards are of necessity much more highly influenced by organisational context than by investigations and prevention. Thus the competency standards relevant to detection are at such a level of abstraction, that turning them into a training program would require a comprehensive analysis of the information systems of the particular agency.

An associated factor which may detract from the effectiveness of the detection component is the rapidly changing technology. It could be argued that even within the four years of the development of the standards, the technology, as well as the administration of that technology, has already changed to such an extent as to make some of the standards obsolete. For example, the learning outcomes of ‘understanding techniques of information systems design and analysis relevant to the agency’s fraud data collection system’ or ‘planning, designing, specifying, and justifying an agency’s fraud data collection systems’ may well be beyond the ability of the fraud prevention/detection officer and more in the realm of a systems designer.

Finally, there were two crucial elements left out of the fraud control competency standards. One was standards dealing with surveillance, which has been recognised by Attorney-General’s Department and steps are being taken to rectify the omission. The other omission is more problematical, that of ethics. The constitution of the project committee driving the standards contained a number of representatives of the unions. Those representatives successfully opposed the inclusion of ethics as an element of the competency standards. To an extent that omission has been rectified by the advent of PSP99 described below. However, ethics is only discussed in the public sector context and it can be argued that as the investigation standards in particular are likely to be used in the private sector, a more generic approach to ethics would be worthwhile.
Public Services Training Package (PSP99)

As mentioned above, the original fraud control competency standards were not considered broad enough to warrant a separate training package. The broader training package eventuated with the Public Services Training Package (PSP99) which was endorsed by ANTA in December 1999. PSP99 incorporated all the units from the National Competency Standards for Fraud Prevention, Detection and Investigation, virtually without change to their content. However, what had changed was the qualifications framework.

The five fraud qualifications in PSP99 became larger and were given different titles:

- Certificate IV in Government (Fraud Control Investigations) went from 5 units to 15 units;
- Certificate IV in Government (Fraud Control Prevention/Detection) went from 4 units to 15 units;
- Diploma in Government (Fraud Control Investigations) went from 8 units to 11 units;
- Diploma in Government (Fraud Control Prevention/Detection) went from 8 units to 11 units; and
- Advanced Diploma in Government (Fraud Control Management) went from 6 units to 15 units.

Given that the duration of the effort required to attain the qualifications will not change significantly, there must be some concern that it will not be possible to provide the same depth of content with the significant increase in the number of units. Consequently, the attraction of the qualifications as high quality technical courses could be substantially compromised.

Of greater concern is the change in content. All five fraud specialisation courses in the PSP99 now contain many units not related to fraud. From the perspective of training providers, the attractiveness of the courses lay in their focus upon high level technical skills valued by industry. The inclusion of a range of more generalist units creates practical issues of pulling the necessary units into a coherent whole.

Another issue is that both Diploma courses now put specialist fraud units as electives. The Diploma in Government (Fraud Control Investigations) has five specialist fraud units as electives, with only two required. The Diploma in Government (Fraud Control Prevention/Detection) has two specialist fraud units as electives, with only one required. This must raise reservations that individuals who complete that Diploma may not have the practical and technical skills to undertake investigation work at that level if they can omit what the original project committee saw as essential elements of the competencies.

For example, an individual could qualify for the Diploma in Government (Fraud Control Investigations) and not complete any three of the units: Interrogate Data (PSPFRAU401A), Receive and Validate Information (PSPFRAU402A), Gather, Manage and Present Evidence (PSPFRAU403A), Conduct Formal Interviews and Take Witness Statements (PSPFRAU404A) and Analyse Data (PSPFRAU406A). It is very difficult to take a qualification for a senior investigator seriously if, potentially, the individual had no knowledge of gathering, managing and presenting evidence, conducting interviews and taking witness statements.
In other words, the effect of PSP99 on the fraud control competencies has been to significantly water down the specific fraud control components and to make crucial elements of fraud investigator training optional.

The above analysis raises some interesting questions as to whether the Attorney-General’s Department is of the view that the qualifications in PSP99 will meet the policy aims of the Commonwealth’s Fraud Control Policy.

Also of great concern to the training provider, is the limiting of the previously generic qualifications to the public sector. There are three broad groups who are interested in vocational and educational training in the area of fraud investigation, prevention and detection:

1. employees of public sector organisations – particularly investigators;
2. individuals in the private sector who undertake work for the public sector – particularly investigators and those undertaking fraud control planning functions now required by legislation; and
3. employees in private sector organisations like financial institutions with investigatory or compliance responsibilities.

The previous qualification structure had applicability to both the public and private sectors PSP99 is now very heavily weighted towards the public sector. For example, the Certificate IV in Government (Fraud Control Investigations) now contains eight units, none of which have any relevance to fraud investigations. These include Uphold the Values and Principles of the Public Service (PSPETHC301A) and Comply with Legislation in the Public Sector (PSPLEGN301A). It is very difficult to see how such competencies are relevant to individuals in Group 3 above.

There is an argument that individuals in Group 2 above may be required to have these skills and information. However, common sense would dictate that persons brought in to undertake work on a consultancy or outsourced basis would be chosen on their particular technical skills, rather than a series of generic public sector competencies. It would appear that the individuals who assembled the qualifications framework for PSP99 presumed that everyone who dealt with fraud required the same set of knowledge, skills and abilities as raw recruits into the public service.

The importation of so many generic public sector competencies into the in the fraud control competencies (21 in all) has created real problems for the limited number of training providers who have traditionally worked in this highly specialised field. These providers have invested considerable resources in recruiting staff with skills in the particular area of investigations and to have to diversify into these generic public sector areas will be taking them out of what they perceive as their core business. Also, those training providers have been able to attract a considerable client base in the private sector and PSP99 has now made the fraud control qualifications virtually irrelevant to that client base.

The advent of PSP99 has been accompanied by some transitional arrangements which allow existing courses accredited under the previous regime to continue for 12 months.

Role of the Higher Education Sector

The final issue relevant to the training area is the role of the higher education sector. This sector has been self-accrediting and the traditional university qualifications structure has remained separate from the VET system. Some universities, like Charles Sturt University have become part of the VET system by registering as a Registered Training Organisation (RTO).
About 18 months ago, Charles Sturt University embarked upon a program to embed qualifications based upon the fraud control competencies in relevant graduate programs and to give credit towards CSU courses for individuals who had completed those qualifications. As of today, only one element of that program is in place. Students who complete the Graduate Certificate in Fraud Investigation program with Charles Sturt University qualify for the Certificate IV in Fraud Control (Investigations), ie, the qualification under the original competency standards, preserved by the transitional provisions in PSP99.

The University had intended that this relationship between the VET programs and the graduate courses would include all the fraud control competencies. However, the advent of PSP99 has delayed the process. The Commonwealth has not given any public indication as to whether the qualifications relating to the fraud competency standards meet the aims of the revised fraud control policy. The University is reluctant to make any financial investment in embedding VET courses into its graduate programs if there is going to be any further change. Were the PSP99 qualifications structure to be adopted as the standard for the Commonwealth, CSU has some difficult decisions to make. It has to decide whether it wishes to enter the arena of the broader public sector package, either by adapting its own courses or through some sort of partnership with an RTO which is working in this field.

CSU has recently commenced a Graduate Certificate and Diploma in Compliance. This program is aimed at the private sector to provide high level practical education in the legal framework underpinning compliance systems, risk management and the process of developing implementing and institutionalising a compliance program. Clearly, this program subsumes the fraud prevention competencies. However, the practical difficulties of embedding competency standards with such a heavy emphasis on the public sector into a program squarely aimed at the private sector are immense.

Conclusion

This paper has outlined the nature of the VET system in Australia and traced the development of the competency standards for fraud prevention, detection and investigation within that system. It is unfortunate that the final step in the process, the preparation and delivery of training courses against all those competencies has not been completed. There appears to be two primary reasons for this. The first is the subsuming of the competency standards in an inappropriate training package. The second is the delays by the Commonwealth, formerly the driving force behind the competency standards, in promulgating a clear policy statement of where the competency standards fit in the Commonwealth’s fraud control policy.

Those two factors have created such uncertainty that training providers in the field are reluctant to commit the financial resources necessary to convert the competency standards into a fully rounded training regime.

In 1993, the impetus for action was a Parliamentary Committee reporting that fraud investigation standards were inadequate. All elements of the public sector, as well as key parts of the private sector have a need for an effective regime of standards and training in this area. Now is the time for the industry to organise itself to finish the work started seven years ago.
Attachment

The Australian National Training Framework