



**Australian Government**

**Department of Infrastructure, Transport,  
Regional Development and Local Government**

# **GUIDE TO PREPARING TRANSPORT SECURITY PROGRAMS (TSPs)**

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## *For Prescribed Air Services*

### **Contents:**

This document details important information that you should consider when preparing your Prescribed Air Service Transport Security Program.

*Disclaimer: This document is designed to provide general guidance to prescribed air service operators, operating under arrangements according to the Aviation Transport Security Act 2004 (the ATSA) and Aviation Transport Security Regulations 2005 (the ATSR) in developing Transport Security Programs (TSPs) for submission to the Secretary of the Department of Infrastructure, Transport, Regional Development and Local Government (The Department) for approval. This guide should not be used by prescribed air service operators as a substitute for obtaining independent professional advice (including legal advice) regarding their TSP and the TSP's compliance with the requirements of the ATSA and the ATSR. This document is subject to change. The Department is not responsible for the consequence of the use of any outdated version of this guide.*



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## PREFACE

This guide has been developed for use in the preparation of TSPs. It is designed to provide general guidance for aircraft operators to meet their TSP obligations under the *Aviation Transport Security Act 2004* (ATSA) and *Aviation Transport Security Regulations 2005* (ATSR).

Division 4 of Part 2 of the ATSA sets out the general requirements for TSPs for aviation industry participants (AIPs). Section 16 of the ATSA describes the required content of TSPs and section 17 describes the required form of TSPs. Additional content and form requirements which apply to aircraft operators are outlined in Part 2 of the ATSR, especially Division 2.3 – Operators of prescribed air services.

## ABBREVIATIONS

The following abbreviations are used in this document:

<b>AIP</b>	(Aviation Industry Participant)
<b>ANA</b>	( <i>Air Navigation Act 1920</i> )
<b>ASC</b>	(Airport Security Committee)
<b>ASI</b>	(Aviation Security Inspector)
<b>ASIC</b>	(Aviation Security Identification Card)
<b>ATSA</b>	( <i>Aviation Transport Security Act 2004</i> )
<b>ATSR</b>	( <i>Aviation Transport Security Regulations 2005</i> )
<b>CBS</b>	(Checked Baggage Screening)
<b>CERHOS</b>	(Ceremonies & Hospitality Branch, Dept of Prime Minister & Cabinet)
<b>The Department</b>	(Department of Infrastructure, Transport, Regional Development and Local Government)
<b>ETD</b>	(Explosive Trace Detection)
<b>MTES</b>	( <i>Methods, Techniques &amp; Equipment to be used for Screening</i> )
<b>OTS</b>	(Office of Transport Security)
<b>Reg.</b>	(One of the <i>Aviation Transport Security Regulations 2005</i> )
<b>RACA</b>	(Regulated Air Cargo Agent)
<b>SCO</b>	(Security Contact Officer)
<b>SSD</b>	(Special Security Direction)
<b>TSP</b>	(Transport Security Program)

## BACKGROUND

The ATSA and ATSR came into force on 10 March 2005, replacing Parts 3 and 3A of the ANA, and Part 7 of the *Air Navigation Regulations 1947*. The ATSA established a new regulatory framework to safeguard against unlawful interference with aviation, and the ATSR provides the details necessary for the ATSA to operate as intended.

The changes in the law strengthened Australian aviation transport security systems and enabled a broader and more inclusive approach to aviation security. The ATSA

and ATSR emphasise the need for AIPs to demonstrate awareness of their general responsibility to contribute to the maintenance of aviation security: ATSA s.16(1)(a). The ANA imposed a large number of prescriptive measures, while the ATSA and ATSR focus more on outcomes.

An AIP's TSP must detail measures and procedures for aviation security based on an AIP's assessment of its own risk environment.

Note: As a result of amendments to the ATSR, airside facility operators are no longer required to have a TSP.

## CONTENT AND FORM REQUIREMENTS FOR TSPs

ATSA s. 16(1) states that a TSP for an AIP (which includes an aircraft operator) must demonstrate that the participant:

- is aware of the participant's general responsibility to contribute to the maintenance of aviation security; and
- has developed an integrated, responsible and proactive approach to managing aviation security; and
- is aware of, and has the capacity to meet, the specific obligations imposed on the participant under the ATSA and the ATSR; and
- has taken into account relevant features of the participant's operation in developing activities and strategies for managing aviation security.

ATSA s. 16(2) states that a TSP for an AIP must set out the following:

- how the participant will manage and co-ordinate aviation security activities within the participant's operation (*you should consider what communication and control procedures are in place; whether the roles and specific tasks of AIP management staff are defined clearly; whether the communication and control arrangements appear likely to enhance security measures;*); and
- how the participant will co-ordinate the management of aviation security with other parties (including Commonwealth agencies) who have responsibilities for, or are connected with, aviation (*consider whether other government agencies are involved with security; whether the duties of these agencies are clearly outlined in the TSP; which management positions are represented on the Airport Security Committee; and which position has overall responsibility for management of the TSP*);
- the technology, equipment and procedures to be used by the participant to maintain aviation security (*have standard operating procedures been formulated and implemented?*);
- how the participant will respond to aviation security incidents (*measures may include communication and control, implementation of security measures,*

*public safety and continuity of essential operations. Are the response roles of other agencies clearly described?);*

- the practices and procedures to be used by the participant to protect security compliance information (*you should consider document (paper and electronic) control/protection, identification and classification, access control, email classifications, and document distribution and destruction*);
- the other AIPs who are covered by, or operating under, the program (*are there effective communication and control procedures to ensure all AIPs covered under the TSP can implement their responsibilities under the TSP? 'Covered by, or operating under, the Program' does not imply that an aircraft operator can be covered by another aircraft operator's TSP*);
- the consultation that was undertaken with other AIPs who are covered by, or operating under, the program

Further, ATSA s.17 provides that the TSP must be in writing and prepared in accordance with any requirements set out in the ATSR. When reviewing an aircraft operator TSP for approval, the Department of Infrastructure, Transport, Regional Development and Local Government (the Department) will assess whether, overall, the TSP satisfies the requirements of ATSA s. 16(1) and (2) and the ATSR, and that there is sufficient evidence that the participant has undertaken the informative, consultative, planning and investigatory processes inherent in those requirements. Under the ATSA, if the Secretary is not satisfied that the TSP adequately addresses the relevant requirements, the Secretary must refuse to approve the TSP (s. 19(2)).

Although participants are required to comply with all sections of the ATSA and ATSR that apply to them, their TSPs need only contain the information that the ATSA and the ATSR require to be set out in a TSP. TSPs should not contain measures and procedures that are inconsistent with the ATSA or ATSR.

The body of the TSP is not intended to be an operations manual describing how to do things in minute detail, but rather an outline of an AIP's security risk environment, and what things (ie. measures and procedures) they will do to deter and detect unlawful interference with aviation. However, TSPs submitted to the Department often do not contain a level of information likely to be sufficient for the Secretary to be satisfied that the AIP meets all that is required under the ATSA, particularly ATSA s. 16. This is particularly the case where reference has been made to other documents, but those documents are not provided with the TSP. Such issues might be overcome through the attachments of the relevant document, or alternatively through greater detail in the TSP, without necessarily attaching the separate document (see 'TSP Accompanying Documents' below).

The TSP must meet the form and content requirements as stipulated by the ATSA and ATSR. For example, where a Regulation says the TSP 'must set out' certain measures and procedures, the TSP must state or explain its measures and procedures systematically within the body of the TSP. The participant may wish to provide more detailed measures and procedures in an accompanying document, as additional information, but must still meet the basic requirements as set out in the Regulation.

## PREPARING A TRANSPORT SECURITY PROGRAM

When preparing a TSP, you should consider:

- Whether you have individually tailored the TSP to take account of your airline's specific local risks and the scope of your operations, with security measures and procedures reflecting risk mitigation strategies identified from the assessment of your security risk; and
- Whether the TSP meets the content and form requirements of the ATSA and ATSR.

The Department recognises that each Regulation relating to TSPs may be open to interpretation in the context of each participant's operation. It also recognises that the ways in which aircraft operators will meet their legislative obligations with respect to TSPs will be relative to their unique operations.

When the Department assesses your TSP, it will:

- Identify any areas with missing data;
- Ensure accuracy, consistency and standard of spelling, grammar and data;
- Assess TSP compliance/non-compliance with the ATSA and ATSR.

### General Guidance

- TSPs should always use correct terminology. It should be internally consistent throughout the TSP and between maps and text; terminology should be consistent with the legislation.
- Terminology such as 'airside', 'security restricted area' (SRA), and 'sterile area' is correct. TSPs may state that the 'airside security zone' equals the security restricted area, and that 'landside security zone' equals the sterile area.
- Terms like 'security restricted zone', 'security cleared zone', 'non-airside' and 'non-landside' should not be used. Also, the terminology of legislation other than the ATSA and ATSR should be avoided.
- Use of the correct tense is important. The TSP should be in the present tense, describing the measures that are *currently* in place, not near future proposals.
- However, near future proposals are acceptable when proposals will complement existing measures and procedures.
- TSPs should not state timeframes that contradict those which are set out in relevant legislation.

- TSPs should focus on the AIP's own responsibilities, and not cite other AIPs as having responsibility for certain measures or procedures.
- If referring to security measures carried out by other AIPs with whom you interact, you should be aware that such references do not bind that other participant; they should be the subject of consultation and are not a substitute for the obligations of the TSP holder under the ATSA and ATSR.
- As highlighted below under 'TSP Objective', the TSP should reflect the security risk context statement, and vice versa. The body of the TSP could bring to light an issue that should be included in the risk context statement.
- If the Regulations call for 'measures' and 'procedures', then the TSP must spell out nothing less than *measures* and *procedures*. If the Regulations call for measures to 'deter and detect', then details of the measures for deterrence and detection must be set out in the TSP.
- Where AIPs have additional plans (such as ASIC plans, CBS plans, airport emergency plans etc.), which comprehensively address the content and form requirements of specific regulations, the AIP may attach such plans to the TSP, as accompanying documents, to meet those regulatory requirements. However, AIPs should be aware that if additional plans are attached they will form part of the TSP. Please refer to the section on "TSP Accompanying Documents" for more details.
- The TSP must reflect current regulatory reality, and not an anticipated reality. AIPs must complete their TSPs by using the current ATSA and ATSR found at <http://www.comlaw.gov.au>. Industry will be advised of any regulatory changes.
- Where the TSP discusses incident reporting, the information must be clear (citing to whom reporting will be made), and cannot contradict the *Notice About How Incident Reports are to be Made*.
- Some aircraft operators may have several facilities. They may also be Regulated Air Cargo Agents (RACAs) with RACA facilities, and may have aircraft as well as aircraft facilities. Such TSPs need to spell out procedures for evacuation from each facility. For example, to describe evacuation procedures from their aircraft alone would not be sufficient.
- If the aircraft operator has satisfied Reg. 2.32(2), and would like to implement additional measures as part of their TSP, the aircraft operator should note that it will be held accountable for all of the additional measures included in their TSPs. If the aircraft operator fails to meet those additional measures identified in the implementation timetable, the aircraft operator must have a reasonable excuse to avoid enforcement action.
- If the aircraft operator has not satisfied Reg. 2.32(2), the aircraft operator is to identify when specific measures and procedures would be implemented. If approval of the TSP is given prior to that time, the Department will not

enforce the provisions of the TSP until after the deadlines specified in the implementation timetable.

When the Department reviews a TSP, the Department will consider and assess whether, overall, the TSP satisfies the requirements of ATSA ss.16 and 17, and the relevant provisions of the ATSR. Under ATSA s. 19, if the Secretary is not satisfied that the TSP adequately addresses the relevant requirements, the Secretary must refuse to approve the TSP. Where this is the case, the Secretary must also give the participant a written notice of the refusal.

Finally, where AIPs have recruited consultants to develop content for TSPs, you should be aware that the Department assumes that AIPs who submit TSPs for assessment have sufficient intellectual property rights to do so.

### **Security Classification of TSPs**

Some industry participants give their TSPs security classifications, which are neither national security classifications nor non-national security classifications. The Department advises aircraft operators that TSPs should generally be classified 'IN-CONFIDENCE'.

### **TSP Accompanying Documents**

A distinction is drawn in the ATSR between circumstances where a TSP 'must be accompanied by a document that sets out' certain information and circumstances where a TSP 'must set out [certain information] in an accompanying document'.

The Department takes the view that there is a difference in meaning between the one Regulation (for an aircraft operator) which provides that the TSP must be 'accompanied' by a certain document [Reg. 2.31(3)], and the Regulations which provide that 'the TSP must set out, in an accompanying document, [certain information] ...' [Regs. 2.28, 2.31(1), 2.49].

The Department interprets these Regulations as follows:

- Where the Regulations provide that 'the TSP must be *accompanied by a document*' the information provided is to be treated as a separate document from the TSP. This document is not subject to the same formal variation and revision requirements as the TSP.
- Where the Regulations provide that 'the TSP must *set out, in an accompanying document*, [certain information]' the information provided, although in a separate document, is to be treated as constituting part of the TSP. This document is subject to the same formal variation and revision requirements as the TSP.

The practical effect of this distinction is that AIPs may need to consider whether the documentary material which has been provided with their TSP lodged for assessment is material that is required by the Regulations to form part of the TSP or is instead material which is separate to the TSP.

While the Department recognises that at this point in time it is not necessary for AIPs to have supplied all of the accompanying material not forming part of the TSP to the Department, the Department is aware that in a number of cases AIPs have in fact done so or intend to do so. TSP assessors have therefore been requested to consider whether any material submitted in addition or as a supplement to the TSP may in fact satisfy the requirements set out in those Regulations requiring that the TSP be 'accompanied by' a document setting out prescribed information.

Assessors have also been requested to consider any material that has been submitted to address those Regulations requiring that certain information be set out in an 'accompanying document'. In circumstances where such information has not been provided, this will be relevant to the consideration of whether the TSP can, as a matter of fact, satisfy the requirements of s.16 of the ATSA.

Finally, the Department notes that, in some circumstances, an AIP may have chosen to submit certain information by way of a separate document, rather than in the body of the TSP. The Department wishes to advise AIPs that this information will nevertheless form part of the body of the TSP for assessment purposes if it is information that must be 'set out' in the body of the TSP, in accordance with the ATSR. Any such documents, although they may be physically separate from the TSP, will also be subject to the TSP variation and revision requirements set out in the ATSA.

## CONTENT OF A TSP

### Scope of TSP

The TSP must cover all your operations to, from or within Australia. The TSP should include details of your operations at security controlled airports. It should also address on-board security requirements while your aircraft are in Australian territory. The TSP must cover all aviation security-related activity that is relevant to your operations, including significant facilities on security controlled airports. The TSP can refer to other AIP's responsibilities for security arrangements. In such a case, the AIP should be given the relevant part of the TSP that applies to them.

### Statement of Undertaking (ATSA s16(1); Reg. 2.05)

Under ATSA s16(1), AIPs have certain obligations. The TSP for an AIP must demonstrate that they:

- are aware of their general responsibility to contribute to the maintenance of aviation security (*consideration should be given to your local risk context*)
- have developed an integrated, responsible and proactive approach to managing aviation security (*the TSP should be inclusive of other AIPs where necessary*);
- are aware of, and have the capacity to meet, the specific obligations imposed on the AIP under the ATSA; and

- have taken into account relevant features of their operation in developing activities and strategies for managing aviation security (*you should consider factors including your local risk context, inclusion of AIPs within the TSP, remoteness of your operations if applicable, risk categories*)

Also, under Reg. 2.05, a TSP must contain a ‘Statement of Undertaking’, signed by the participant. When the participant signs, the participant is stating that the participant believes that the TSP gives effect to the above obligations. This is not a statement that the participant will implement a TSP. An appropriate person should sign the Statement, and include it in the TSP.

You should ensure that your security risk assessment is not outdated, such that there are changes in circumstances that may change your security measures and procedures.

### **TSP Objective**

The TSP must contain an outline of the objectives of the TSP and must be accompanied by a document which contains a local security risk context statement (this document may be attached as an appendix (Reg. 2.28)).

The local risk context statement is to include a statement outlining your local security risk context, including consideration of location, seasonal and operational factors. If you feel that no seasonal factors have security implications for your operations, a brief note to that effect should suffice.

The accompanying document must also include:

- a) a list of general threats and generic security risk events to people, assets, infrastructure and operations; and
- b) an outline of the people, assets, infrastructure and operations that need to be protected.

The TSP should reflect the risk context statement, and vice versa. If the security risk assessment reveals a significant body of threat affecting the AIP, the TSP should spell out measures and procedures appropriate to counter that threat. Similarly, a small regional AIP, situated far from large population centres, may have a much smaller risk environment. The measures and procedures cited in its TSP should also mirror that environment. The TSP should always specify satisfactory mitigating strategies to reflect the AIP’s current security risk assessment.

AIPs are not required by legislation to complete a full security risk assessment, nor to attach a risk assessment plan to their TSP. The ATSR only require participants to set out, by way of an accompanying document ‘a statement outlining the local security risk context of the [AIP] including consideration of its location and seasonal and operational factors’.

It may be appropriate for an operator to adapt the executive summary of its risk assessment plan and utilise it for the local security risk context statement.

## PROCEDURES FOR MANAGING SECURITY

### Security Management

(Security Contact Officer (SCO), staff, other agencies/contractors, training, awareness)

Under Reg. 2.29(1), TSPs for aircraft operators must set out the procedures for managing security at the operator's facilities, including:

- a) organisational structures and security management arrangements; and
- b) the roles and responsibilities of security contact officers, security staff, contractors and responding agencies; and
- c) the roles and responsibilities of other staff who have been assigned security duties and responsibilities; and
- d) the roles and responsibilities of other Commonwealth, State and Territory agencies, and local authorities, with security duties at the facility.

AIPs must include their organisational structures and security management arrangements in their TSPs to show where their security functions are within their organisation. The entire organisational structure of the operator does not need to be included; TSPs should focus on the main security function within the operator. Operators may include a diagram to demonstrate this. You should ensure that the TSP contains contact details for yourself (both during hours and after hours) and the SCO (in this context, there must be a 24-hour security contact number) (Reg. 2.31(3)).

TSPs must include a description of the roles and responsibilities of SCOs, security staff, contractors and responding agencies. An SCO should be the first point of contact for security matters. The roles and responsibilities of the SCO should include:

- facilitating the development, implementation, review and maintenance of the TSP; and
- undertaking liaison with other AIPs and responding agencies (eg, Police, Fire Brigade, Emergency Services etc) on aviation security matters.

A comprehensive description of the SCO's roles and responsibilities should be provided in the TSP, as well as any responsibilities delegated to others within the organisation (Reg.2.29(1)(b))(see Reg. 2.02 for SCO roles and responsibilities).

TSPs must include a description of other persons (other than the SCO and security staff) who have been assigned security duties and responsibilities (Reg 2.45(2)). Employees should be specified by position, and not by their names, as names will change with staff turnover. Contractors' positions must be included. The duties and responsibilities of such employees, contractors and other persons should be described, in addition to the knowledge, skills and experience required for the security-related

aspects of their positions and the training or qualifications that satisfy the requirements of the position (Reg. 2.45(3)).

TSPs must also include a description of the roles and responsibilities of other Commonwealth, State or Territory agencies and local authorities that have security duties at the facility (eg. local councils, State or Territory Police, government agencies or statutory authorities). The operator should outline how these duties relate to the TSP, and demonstrate the processes in place to call on these authorities during a heightened security alert (Reg. 2.29(1)(d)).

TSPs should contain descriptions of the training that an SCO would be required to undertake, as well as criteria for their selection (Reg. 2.45(1)). Any aviation security training programs provided to others with security roles should be described.

To maintain a robust security culture in the aviation industry, AIPs should conduct security awareness training to meet the requirements of Regs. 2.43(2)(e) and 2.45(4), which highlight the importance of alertness to security threats, and responsibility to report incidents. This security awareness training should be demonstrated in the TSP: the training course content is not required; mention of the type of training will suffice.

## **Consultation**

TSPs need to reflect an integrated, coordinated and proactive approach to aviation security. Consultation between participants is a significant practical step in ensuring this outcome.

Inclusion with TSPs of evidence that such consultation has occurred will provide OTS with an assurance that participants have consulted with other relevant AIPs in relation to those parts of the TSP that affect them. This does not have to be advice of agreement between the parties, but is illustrative of appropriate sharing of information between participants.

To ensure consistency within and between different types of AIPs, examples of evidence might include:

- minutes from a meeting of stakeholders (eg the Airport Security Committee)
- registered mail receipt evidencing information being provided
- evidence of consultation with representative bodies (eg BARA)
- signed letters from individual AIPs confirming consultation
- proof of emailing of relevant material

## **Security of Information**

ATSA s.16(2)(e) requires that a TSP must set out the practices and procedures to be used by the AIP to protect security compliance information. In addition, Reg. 2.29(3) requires that a TSP must set out measures to ensure that the TSP and other security information are protected against unauthorised access, amendment and disclosure. the

Department suggests that together with measures and procedures for protecting the TSP from unauthorised access (eg. safe storage of hard and electronic copies etc.), aircraft operators should describe how relevant people who have access to information are made aware of their security obligations. It should be noted that a person can be prosecuted for breaching Reg. 2.06. In addition, aircraft operators need to consider a range of circumstances when information might in fact need to be shared. This could include external auditors scrutinising the material.

Operators should outline procedures for controlling and protecting the TSP and other security information, including compliance information. Such measures could include:

- Safe storage of the TSP, for both hard and electronic copies of the document, such as computer security policies;
- Reference to the security classification of the document;
- Who is authorised to access the information in the security risk assessment and TSP;
- Who is authorised to issue copies of the TSP;
- Who is authorised to amend the TSP;
- Measures for returning and destroying outdated TSP documentation (both hard and electronic copies); and
- Measures to record the issue of copies of the TSP (both hard and electronic copies).

An example format for recording the issue of TSP copies is provided below.

<b>TSP DISTRIBUTION RECORD</b>			
<b>Copy No.</b>	<b>Held By</b>	<b>Organisation</b>	<b>Contact Details</b>
1	General Manager	ABC Flying	0400 111 222
2	Station Commander	DEF Police Station	(02) 4235 1111
3	OTS	Department of Infrastructure, Transport, Regional Development and Local Government	(02) 6274 xxxx

## **PROCEDURES FOR QUALITY CONTROL**

### **Procedures**

A TSP must set out quality control measures, including a schedule of, and procedures for, internal security program audits and reviews. This is required under Reg. 2.30.

### **Audits**

An audit is defined in Reg. 2.01(2) as an examination by an AIP of security measures under their TSP to find out whether the measures have been correctly implemented. An audit should involve an in-depth examination of all aspects of an AIP's TSP, to determine whether they are being implemented continually and to an appropriate standard.

Audits should be undertaken regularly, in accordance with clearly defined procedures and parameters. You should ensure that the TSP (Reg. 2.30(1)(a) – (b)) includes:

- a schedule of audits; and
- the process for selecting an auditor.

Information about the AIP's schedule of security audits may include frequency of the audits, the types of audits undertaken, and the staff involved. They could be regular scheduled audits, unscheduled spot audits, internal or external.

The TSP should show that the AIP has taken into account the potential for conflict of interest if internal auditors are used. It is preferred that audits be conducted by external, independent persons. However, if this is not possible, a person from within the organisation may be selected, provided they are not directly responsible for the implementation of the TSP.

### **Reviews**

A review of an AIP's TSP is defined in Reg. 2.01(2) as an evaluation by the participant of security measures or procedures under its TSP to find out whether the measures and procedures are adequate.

The aim of the review is to assess how effective the current TSP is in meeting the ATSA's objectives. Reviews should be undertaken regularly, with clearly defined procedures and parameters. You should ensure that the TSP includes a procedure for consultation to be undertaken to ensure security measures and procedures are adequate and the TSP is being appropriately implemented (reg.2.30(1)(c)).

The AIP's review procedures should also describe the circumstances that will require a review of the TSP (eg a change in the security environment), including those surrounding an occurrence of an aviation security incident (Reg. 2.30(1)(d)). The

review procedures should include adequate consultation with other AIPs, recognising that security outcomes are reached through the cooperation of all participants.

### **Audit and Review Records**

It is mandatory that the records of each audit are kept for at least seven years after the audit is completed, and that the records of each TSP review are kept for at least three years after the review is completed (Reg. 2.30(2)).

## **DETAILS OF AIP's NAME AND OPERATIONS**

### **Operational details**

The operational details the aircraft operator needs to provide relate to the operations conducted to, from or within Australia. Details must specify aircraft types and numbers, and regular routes flown and airports served (Reg. 2.31(1)).

Operational facilities, for the purposes of Reg. 2.31, are facilities located within the boundaries of a security controlled airport at which occurs any measure or procedure that is outlined in the TSP to address any ATSA and ATSR requirements.

If you have operational facilities located within the boundaries of security controlled airports in Australia, you must include a map of the boundaries of those facilities (Reg. 2.31(1)(iii)). Where the TSP follows the the Department "*Template for writing a Transport Security Program (TSP) - Aircraft Operators*" format, the map may be set out at **Appendix C**.

Details should be included of the normal opening hours of the aircraft operator's facilities located within security controlled airports in Australia.

Operational details should include:

- the aircraft operator's registered name;
- the geographic location of each of your operational facilities located within a security-controlled airport in Australia, together with its normal hours of operation and procedures for security outside the facility's normal hours of operation;
- A description of aircraft operations you carry on that may require security consideration (eg. regular public transport, cargo, GA operations);
- Details of aircraft for each type of operation, including aircraft types and the number of aircraft of each type you operate; and
- Details of regular routes flown and airports served for each type of operation

The above information may appear in the body of the TSP or an accompanying document.

### ***Contact Details***

Under Reg. 2.31(3), the TSP for an aircraft operator must be accompanied by a document that sets out the following:

- a) aircraft operator's name;
- b) name of its chief executive officer or manager;
- c) aircraft operator's mailing address;
- d) aircraft operator's fax number;
- e) aircraft operator's contact telephone number, including an after-hours number;
- f) alternative contact person and number;
- g) name of the security contact officer and his or her business phone number, fax number, email address and a 24-hour security contact number.

### **Physical Security and Access Control**

Aircraft operators should detail their physical security and access control arrangements currently in place at each of their facilities.

The Department recognises that certain security measures are currently in place while other planned security measures are yet to be implemented. The ATSR allow operators to identify security measures that are yet to be implemented and the date for implementation. A timetable for implementation must be included in the TSP.

(Where the TSP follows the the Department "*Template for writing a Transport Security Program (TSP) - Aircraft Operators*", the timetable may be included in section 6.2 of the TSP).

The Department needs assurance that access to all aircraft and facilities is controlled. The TSP should include details of security measures and procedures applied to each of your facilities. If there are generic security measures implemented at all your facilities, you may describe the generic measures that apply to all your facilities in the TSP.

Under Reg. 2.32(1)(b), (c) and (d), you must provide details of generic security measures for the deterrence and detection of unauthorised access to airside areas, airside security zones and landside security zones, respectively. If you have implemented generic security measures at all your facilities, you may describe these generic measures in your TSP. This could include access control measures considered for when personnel are receiving security checks.

Under Reg. 2.32(1)(e), aircraft operators must include details in their TSP of security measures and procedures to be applied to unattended aircraft.

Under Reg. 2.32(1)(f), aircraft operators must include details in their TSP of what they will do if they find unknown substances within their operational facilities. Aircraft operators must demonstrate their measures and procedures to contact responding agencies, should this occur.

Under Reg. 2.32(1)(g), you must include details in your TSP of what you will do if you find unattended or suspect vehicles, aircraft or other objects (such as baggage and cargo) within your operational facilities. You must demonstrate your measures and procedures to contact responding agencies, should this occur.

The TSP should indicate your measures and procedures that ensure the security of passwords, keys and key lists, electronic access cards and other security privileges within your operational facilities at security controlled airports (Reg. 2.32(1)(h)).

## **Screening and Clearing**

Screening and clearing (under Reg. 2.35) is only required to be inserted in the TSP if the aircraft operator carries out passenger or crew screening.

### ***Regulations covered by the MTES***

Screening measures and procedures must comply with the applicable standards, as outlined in the document *Methods, Techniques and Equipment to be used for Screening* (MTES), which the Secretary of the Department may specify by written notice (Reg. 4.17). Many aircraft operators choose to articulate their screening measures and procedures by writing "As per the MTES", when completing a TSP. This can be problematic because not all Regulations are covered in the MTES. The Regulations listed below are indeed covered by the MTES, and aircraft operators may cite in their TSPs "As per Part x of the MTES" for the following Regulations:

Reg. 2.35(1)(a)(ii) – As per Part 2 of the MTES

Reg. 2.35(1)(c)(ii) – As per Part 2 of the MTES

Reg. 2.35(1)(a)(iii) – As per Parts 2, 3 & 7 of the MTES

Reg. 2.35(1)(c)(iii) – As per Parts 2, 3 & 7 of the MTES

Reg. 2.35(1)(f) – As per Part 2 of the MTES

Reg. 2.35(1)(g)(ii) – As per Part 2 of the MTES

Reg. 2.35(1)(g)(iii) – As per Part 2 of the MTES

Reg. 2.37(1)(a)(ii) – As per Part 6 of the MTES

Reg. 2.37(1)(a)(iii) – As per Part 6 of the MTES

Reg. 2.37(1)(e) – As per Part 6 of the MTES

***Regulations not covered by the MTES***

Aircraft operators will need to spell out their measures and procedures, in their TSPs, for the following Regulations:

Reg. 2.35(1)(a)(i)

Reg. 2.35(1)(b)

Reg. 2.35(1)(c)(i)

Reg. 2.35(1)(d)

Reg. 2.35(1)(g)(iv)

Reg. 2.35(1)(g)(v)

Reg. 2.35(1)(h)

Reg. 2.35(1)(i)

Reg. 2.37(1)(a)(i)

Reg. 2.37(1)(b)

Reg. 2.37(1)(c)

Reg. 2.35(1)(e)

Reg. 2.35(1)(g)(i)

Reg. 2.37(1)(d).

The first eleven in the above list are **NOT** covered by the MTES at all. The final three in the above list (Regs. 2.35(1)(e), 2.35(1)(g)(i) and 2.37(1)(d)) are only partially covered by the MTES, so they too will need to be fully addressed by aircraft operators' TSPs. The reasons are as follows:

- **Reg. 2.35(1)(e)** - Parts 2.7 and 2.8 of the MTES discuss the treatment of 'suspect' passengers, but no provision is made for how this may be done. The same applies to the screening of personal effects, under the same sub-regulation (Parts 2.24-2.28 of the MTES).
- **Reg. 2.35(1)(g)(i)** - The MTES contains information relating to diplomats and other VIPs. There is potentially more for operators to include in TSPs than the information found in Parts 2.16 and 2.17 of the MTES.

*Note: For more information about VIPs, see 'Information About VIPs', p. 25*

- **Reg. 2.37(1)(d)** relates to procedures to treat unattended and suspect baggage. This is alluded to in Part 6 of the MTES. However, further clarity from aircraft operators is needed on this issue.

## **Checked Baggage Screening (CBS)**

Under Reg. 2.37(2), if you do not carry out CBS at security controlled airports, you need only specify the screening authorities that carry this out on your behalf.

## **Control of Firearms, Other Weapons and Prohibited Items**

The categories of items that constitute firearms, other weapons and prohibited items are included at s.9 of ATSA and Regs. 1.07 and 1.09.

The aircraft operator's TSP must set out the measures to be used to deter the unauthorised possession of firearms, other weapons and prohibited items on-board aircraft and within operational facilities (Reg. 2.33(1)(a)). Measures may include displaying signs or verbal briefings to passengers and staff regarding the aircraft operator's firearms, weapons and prohibited items policies.

The TSP must provide details about procedures for dealing with surrendered firearms, weapons, or prohibited items (Reg. 2.33(1)(b)). It needs to demonstrate how you will secure these items once surrendered, and that procedures are in place for contacting relevant agencies for handing such items over.

The TSP must provide details of procedures for handling and moving firearms and other weapons (Reg. 2.33(1)(c)). It needs to demonstrate how you will maintain control over such items, during a flight, to prevent unauthorised access from the time possession is taken until its return to the person responsible for its secure onward carriage.

The TSP should provide details of procedures for carrying firearms and other weapons on-board prescribed aircraft (for definition refer to Section 9 of the ATSA) other than by air security officers (Reg. 2.33(1)(d)). You should demonstrate how you will ensure that unauthorised access to such items is prevented while the aircraft is on the ground and in the air. The TSP should address the period of time from when the item boards the aircraft to the time it is offloaded.

A description must be given of the methods used to ensure operational staff are aware of the restrictions on possessing and using firearms, other weapons and prohibited items within the airport (Reg. 2.33(1)(e)). Some measures may include, but are not limited to, posting signs at your facilities, or training staff on the restrictions of possessing and using firearms.

## **Check-In and Boarding Procedures**

An aircraft operator's TSP must describe procedures for passenger check-in and boarding of aircraft to protect against any unauthorised persons or baggage entering aircraft.

The TSP should describe passenger check-in and boarding procedures, demonstrating how you will ensure that only persons authorised are able to board aircraft. If a ground handler does this on your behalf, the TSP must describe the procedures the ground handler will carry out (Reg. 2.34).

## **Protection of Information about Passenger and Crew Movement**

Measures should be provided for protecting information about passenger and crew movements (Reg. 2.36). The protection of both hardcopy and electronic information should be addressed.

## **Passenger and Checked Baggage Reconciliation**

The TSP must describe passenger and checked baggage reconciliation procedures. It must demonstrate how the aircraft operator will ensure that the only baggage which is carried is that which can be matched to a passenger who has boarded the aircraft or properly checked in for, and departed on, an earlier flight. If a ground handler does this on your behalf, the TSP must describe the procedures the ground handler will carry out.

The TSP must provide information about measures, procedures and equipment for reconciling passengers and checked baggage (Reg. 2.34, 2.38(a)(i)). Information should be provided about measures to unload baggage that cannot be matched to a passenger, before the aircraft departs (Reg. 2.38(a)(ii)).

Under Reg. 2.38 (a)(iii), information should be provided about measures to clear unloaded checked baggage before it is reloaded onto an aircraft. The MTES describes the equipment that may be used for CBS other than by CBS in-line screening. This equipment includes:

- X-ray observation equipment or equipment capable of adequately performing the same function as x-ray observation equipment;
- Explosive Trace Detection (ETD) equipment;

Information should be provided about measures for identifying, handling and screening unaccompanied baggage (Reg. 2.38(b)).

## **Security of Aircraft**

*Please note that in relation to security of aircraft, you must ensure that the TSP is not inconsistent with Divisions 4.4 of the ATSR, in particular Regs. 4.71 and 4.72.*

The aircraft operator's TSP should provide information regarding the security measures that will be applied to aircraft both in the air and on the ground when operating in Australia.

Under Reg. 2.39(a)(i), (ii) and (iii), the TSP must describe procedures for conducting pre-flight security checks. It should address how:

- security checks are conducted on both the interior and exterior of the aircraft (see Reg. 4.69);
- security of the aircraft will be ensured after a pre-flight security check; and

- what action will be taken should a firearm, another weapon or a prohibited item be detected.

Under Reg. 2.32 (1)(e) and 2.39(b), the TSP should detail how you will ensure that, when aircraft is not under the continuous supervision of an authorised person, security measures and procedures are in place to deter unauthorised access to aircraft. The TSP should describe the security measures to be applied in all circumstances, including:

- when aircraft are stationed within security restricted areas at security controlled airports;
- when aircraft are off-line for maintenance; and
- at all other times whether or not stationed at security controlled airports.

The TSP must describe measures and procedures to ensure that access to the flight deck is controlled to prevent unauthorised entry at all times (Reg. 2.39(c)).

Descriptions should be provided of how the flight deck crew confirm the identity of persons attempting to access the flight deck, how cabin crew communicate with the flight deck, and the procedures used to ensure that the flight deck door remains closed and locked, when not in use.

Under Reg. 2.39(d) and (e), 2.32 (1)(f) and (g), the TSP should include details of what will be done if unknown substances or unattended and suspect items are found on-board aircraft; including procedures that will be required to be followed (eg notification and isolation) should such an item be found.

Under Reg. 2.39(d), operators are not required to have staff trained to identify substances etc through analysis or other scientific means or to physically handle these items. Rather, it is the intention that operators and their staff are able to determine that an item is unusual or potentially dangerous. Subsequently, they should know how to inform and request the response of specialist agencies such as the fire brigade or law enforcement authorities and to minimise access to items by other people.

Measures and procedures to maintain the security of stores must be included (Reg. 2.39(f)). 'Stores' means items that are to be carried on board an aircraft for use, sale or consumption on the aircraft (see ATSA s.9).

## **Security of Aircraft Cleaning Operations and Stores**

The TSP should describe measures and procedures for ensuring the security of aircraft cleaning operations (Reg. 2.40). The TSP should describe the physical security controls in place for the security of cleaning operations. The TSP must also include measures and procedures to ensure the security of materials to be taken on board an aircraft and stored at facilities owned by the operator (Reg. 2.40). If a ground handler is contracted to do this on behalf of the aircraft operator, the TSP should describe the ground handler's actual functions, as provided in the contract relating to the cleaning operations and stores.

## **Security of Cargo**

In accordance with Reg. 4.45, security measures are required for cargo prior to transport by air.

If you operate a screened air service, and clear cargo yourself, under Reg. 2.41(1), the TSP must describe:

- the measures, equipment and procedures used for clearing air cargo;
- types of cargo exempt from clearing; and
- procedures and criteria for accepting courier articles, express parcels and mail, and procedures for receiving and handling them.

This could include ensuring cargo is held in a secure area, it is checked for tampering, and that it is inaccessible to unauthorised persons once on board an aircraft.

Otherwise, you should state 'N/A' in the TSP, and list the organisations that clear cargo on your behalf (Reg. 2.41(2)).

The TSP should describe the measures and procedures used to ensure the security of cargo from the time it is accepted for carriage to the time it is delivered (Reg. 2.41(3)).

The TSP should describe procedures to ensure security in receiving, carrying and delivering diplomatic mail. If you do not carry diplomatic mail, you could state in the TSP 'N/A', and provide a brief explanation as to why you do not carry diplomatic mail (Reg. 2.41(4)).

The TSP must detail what will be done if cargo is found to be suspicious (Reg. 2.41(5)). The TSP must demonstrate measures and procedures to contact responding agencies should this occur.

## **Security of Documents**

This section concerns operational documents such as baggage tags, boarding passes and tickets (Reg. 2.42).

The TSP must provide information about measures and procedures to control access to operational documents including those produced electronically.

The TSP could include details on:

- how operational documents will be physically protected;
- how operational documents will be protected through protection of the systems that store the information; or
- protecting the electronic or physical means of distributing such information.

## Heightened Security Alert

TSPs must address measures for heightened security alerts both:

- When the Australian Government formally raises the Australian national counter-terrorism alert level; and
- When specific threats occur to your operation.

The TSP should demonstrate that the aircraft operator has allowed for the national counter-terrorism alert level to remain elevated indefinitely. The operator should include measures immediately available, as well as measures for long-term implementation (Reg. 2.43(1)).

The TSP must provide information on procedures for responding to and investigating aviation security incidents, including threats and breaches of security (Reg. 2.43(2)(a)).

ATSA s. 99 defines an aviation security incident as:

- a) a threat of unlawful interference with aviation; or
- b) an unlawful interference with aviation.

The TSP must describe procedures for reporting aviation security incidents (Reg. 2.43(2)(b)). It should include not only internal reporting procedures but also procedures for reporting acts of unlawful interference with aviation to the Department.

Section 10 of ATSA defines 'unlawful interference with aviation' as:

(1) Any of the following done without lawful authority is an ***unlawful interference with aviation*** :

- taking control of an aircraft by force, or threat of force, or any other form of intimidation;
- destroying an aircraft that is in service;
- causing damage to an aircraft that is in service that puts the safety of the aircraft, or any person on board or outside the aircraft, at risk;
- doing anything on board an aircraft that is in service that puts the safety of the aircraft, or any person on board or outside the aircraft, at risk;
- placing, or causing to be placed, on board an aircraft that is in service anything that puts the safety of the aircraft, or any person on board or outside the aircraft, at risk;
- putting the safety of aircraft at risk by interfering with, damaging or destroying air navigation facilities;
- putting the safety of an aircraft at risk by communicating false information;
- committing an act at an airport, or causing any interference or damage, that puts the safe operation of the airport, or the safety of any person at the airport, at risk.

(2) However, ***unlawful interference with aviation*** does not include lawful advocacy, protest, dissent or industrial action that does not result in, or contribute to, an action of a kind mentioned in

paragraphs (1)(a) to (h).

The TSP should describe procedures for evacuation and emergency management in case of an aviation security incident, security threat or breach of security including:

- Aircraft hijacking, such as details of procedures for on-board aircraft communication and response, as well as procedures for notifying relevant agencies such as Air Traffic Control (Reg. 2.43(2)(c)(i));
- Bomb threats, (Reg. 2.43(2)(c)(ii));
- Critical security equipment failure, which may range from aviation security screening equipment to power sources that, if they fail, will have a negative impact on the security of operations. Contingency arrangements should be described for ensuring the security of operations in these situations. (Reg. 2.43(2)(c)(iii));
- External attacks on aircraft (Reg. 2.43(2)(c)(iv));
- The discovery of an unknown substance on an aircraft in flight, including details of how the substance will be isolated if necessary, and how cabin crew will notify flight crew and relevant responding agencies (Reg. 2.43(2)(c)(v)); and
- The discovery of an unauthorised person on board an aircraft in flight, such as details of how the individual will be isolated if necessary, and how cabin crew will notify flight crew and relevant responding agencies (Reg. 2.43(2)(c)(vi)).

ATSA s.67 sets out the circumstances when the Secretary may direct that additional security measures must be taken or complied with. A Special Security Direction (SSD) may be given directly by the Secretary to the operator. The aircraft operator should describe procedures for responding to any SSDs given by the Secretary.

The aircraft operator's TSP should summarise any other contingency procedures and plans not covered above. They may include emergency evacuation procedures or response plans that will be put into action should an aviation security incident occur (Reg. 2.43(2)(f)).

## **Control Directions**

*Please note that in relation to control directions, aircraft operators must ensure that the TSP is not inconsistent with Division 4.6 of the ATSR.*

Aviation Security Inspectors (ASI) may direct the pilot in command of a prescribed aircraft in Australia to take certain action in relation to the aircraft if the ASI deems the action necessary to ensure compliance with the ATSA. Such a direction is called a compliance control direction. Such a direction may be issued directly to the pilot in command or through the aircraft operator. The TSP must describe procedures for passing compliance control directions to the pilots in command of the aircraft

concerned (Reg.2.44(1)), but the TSP will meet this requirement if it refers to another document that sets out the procedures (Reg. 2.44(3)), and is attached to the TSP.

If the Secretary of the Department reasonably believes that issuing an incident control direction is an appropriate or necessary response to an aviation security incident, the Secretary may direct the aircraft operator for, or the pilot in command of, an Australian aircraft or a foreign aircraft in Australian territory to take specified action in relation to the aircraft. This is called an incident control direction. The TSP must describe procedures for passing incident control directions to the pilots in command of the aircraft concerned (Reg.2.44(2)), but the TSP will meet this requirement if it refers to another document that sets out the procedures (Reg. 2.44(3)), and is attached to the TSP.

## **INFORMATION ABOUT VIPs**

### **Introduction**

#### *Importance of this issue*

Proper treatment of all VIPs when undergoing security screening is a critical issue for OTS. Previous incidents have shown that not only can these incidents have immediate aviation security concerns; a mishandled incident can affect Australia's broader bilateral relationships at a whole-of-Government level.

#### *What is a VIP?*

There is no one definition of what constitutes a VIP. Different categories of VIPs are entitled to different treatment, and they will all have different expectations of the security screening process. According to the ATSA, VIPs can include the Queen of Australia, the Royal Family, Heads of State, Heads of Government, other Guests of Government and their aides and entourage. Diplomats are also entitled to certain VIP-type privileges.

#### *Policy Position*

The Government's position is that all persons travelling on a screened air service must be screened and cleared. The ATSR provide one automatic exemption for the Queen of Australia.

The Act also provides the Secretary the capacity to exempt people from screening on a one-off basis<sup>3</sup>. However, the circumstances would have to be exceptional since exemptions only undermine the robustness of Australia's security arrangements. Accordingly, the Australian Government strongly encourages all VIPs to undergo normal security screening processes at Australian airports.

## **Screening Processes and Strategies**

### *Standard Screening Process*

The screening of passengers and carry-on baggage is a process designed to detect weapons and prohibited items, and prevent their entry into the sterile area and the screened air service.

Passenger and carry-on baggage screening consists of three stages – Primary and Secondary Screening and Explosive Trace Detection.

Screening and clearing is legislated by the ATSA and ATSR. The procedures are detailed in the notice specifying the MTES.

### *Screening Obligations and Requirements Generally*

Everybody has the right to be screened in a courteous and professional manner. Particular obligations placed on the screening process include:

- A screening officer must not use more force, or subject a person to greater indignity, than is necessary and reasonable.
- A person must not be screened unless they consent to being screened.
- A screening officer must not force a person to remove items of clothing.
- Where secondary screening techniques are required, a person has the right to request that this be carried out in a private room by a screening officer of the same sex.

### ***Particular Screening Issues for VIPs***

Screening of VIPs presents a number of unique challenges:

- Known/unknown departures
  - Not all VIP departures will be known in advance, and not all VIPs will be accompanied by CERHOS officers or other minders.
  - Not all requests for VIP treatment will be able to be verified on the spot.
- Entourage/Minders
  - Previous incidents have shown that while the actual VIP is prepared to undergo screening with a minimum of fuss, members of their entourage can create a situation by demanding particular treatment, and inflaming the situation.
- Inflammatory comments by Screeners
  - There have been reports of occasions where screeners have made comments along the lines of 'I don't care who you are' to VIPs and Diplomats who have questioned the normal security screening process.
  - While it is difficult to assess the validity of claims on the spot, a professional reiteration of the need for screening would generally defuse the situation.
- What is Dignity?
  - Dignity is not defined. What may represent an indignity to one person may be no problem at all to another.
- Cultural issues
  - Different cultural sensitivities will impact the type of treatment expected by particular VIPs.

- Other countries treat particular VIPs differently and may offer automatic exemptions for a wider group than Australia does.
- Diplomatic Immunity Implications
  - Certain parts of the screening process may be seen as problematic by persons with diplomatic immunity privileges.
  - Request to remove simple items of clothing, such as shoes or belts in public may impinge on dignity.
  - Frisk searches carried out in public areas may also impinge on dignity.
  - Inspection of carry-on baggage may also be seen as intrusive.
  - In the event of such a person entering the sterile area without being cleared there may be restrictions on the ability to restrain and detain them.
- ETD Issues
  - The random and continuous nature of the ETD process sometimes presents particular challenges to the VIP screening process.
  - Some VIPs (and people generally) may feel they have been targeted or treated unfairly if selected for ETD. This has been the cause of previous complaints and confrontations.
  - It is often exacerbated by the fact that the VIP's entourage will stand back and let them pass through screening first. As such, the VIP is often a prime candidate for ETD selection.
  - ETD is an integral part of the screening process, and individual exemptions can not be granted.

***Strategies for smooth VIP facilitation***

Planning ahead – being of aware of movements where possible:

- Ensuring that the appropriate people know.
- Sensitivity of the bigger picture:
- Being aware that this is an issue that can have large implications.

Awareness of VIP identity and privileges:

- Knowing what categories of people are eligible for particular privileges.

Prior arrangements:

- Agreeing to prior screening arrangements with CERHOS/Department of Foreign Affairs & Trade where possible.

Professional and courteous screener conduct:

- This should happen generally – but especially in response to a request for ‘VIP treatment’.

Flexibility in Screening:

- For example, use of private rooms, or involving the screening supervisor.

Keeping a calm head:

- Responding properly and professionally.

Getting the right people to respond:

- Knowing who to call if things go ‘pear-shaped’.