



**Australian Government**

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

## AVIATION SECURITY SCREENING REVIEW

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Consultation Paper: Overview of issues

July 2008

**Submissions to the Review close on 19 September 2008**

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## 1 INTRODUCTION

This summary document is intended to provide the background to, and progress of the Aviation Security Screening Review. It lists the four broad objectives of the Review, and outlines the Review's scope as broken down into six main subject areas. Key issues and findings to date are provided against each of these subject areas, as well as leading questions. The Review Taskforce invites comments or suggestions on any or all of the key issues. Individuals and organisations wishing to provide a submission may use this document's leading questions as the basis for their submission.

Planning for the Review commenced in late 2007 with an industry consultative forum attended by key aviation industry participants. The purpose of the forum was to allow industry to identify and discuss the issues and concerns that should be included in the Review. Industry participants were asked to consider how the issues they raised could be approached and addressed and also, to put forward ideas for improving the screening process whilst still achieving the security outcome. This forum provided the basis by which the Review proceeded in January 2008.

During the first half of 2008, the Screening Review Taskforce within the Office of Transport Security undertook significant consultation and research to inform the Review, and this is detailed in Item 5 of this summary document. This work has been supported by a high level External Advisory Group, whose membership was agreed by the Minister for Infrastructure, Transport, Regional Development and Local Government. During the second half of 2008, the Screening Review Taskforce will develop interim findings and formulate draft recommendations. There will also be a final consultation phase specifically focussing on regional Australia. The timeframe for completion of the report to the Minister is the end of December 2008.

## 2 PURPOSE OF REVIEW

The purpose of the Review of Aviation Security Screening is to examine currently mandated screening requirements and practices within the broader context of the regulatory regime, including the legislative framework.

The broad objectives of the Review are:

1. To ensure that the security outcome from Australian aviation security screening is agreed and clearly articulated,
2. To ensure that the approach to and delivery of Australian aviation security screening is nationally consistent,
3. To ensure that the regulatory regime is appropriate to the agreed security outcome, and
4. To ensure Australian aviation security screening operates in a manner which achieves the agreed security outcome in an efficient and effective manner.

### 3 BACKGROUND

In December 2002 the Australian Government announced a complete restructure of the aviation security system in Australia – including security regulation of regional airports. It introduced a new legislative framework, the *Aviation Transport Security Act 2004* (ATSA) and *Aviation Transport Security Regulations 2005* (ATSR), which integrated the aviation security provisions of the *Air Navigation Act 1920* into a single, cohesive package, and provided a revised regulatory model for international and domestic aviation security. The new model also served as the basis for introducing a broader range of aviation security measures as part of an ‘Enhanced Aviation Security Package’ and brought Australia’s aviation security settings into alignment with the revised International Civil Aviation Organisation (ICAO) standards.

During the time this regime has been in place, a number of events and growing trends – within the international as well as domestic arena – have impacted, or will impact, the aviation industry in Australia. These events and trends have acted as drivers for the Review. They include:

- the growth in tourism and the aviation sector, which drives the need to ensure that an appropriate security outcome continues to be delivered, despite the increasing economic and operational pressures on the aviation industry;
- expansion of the security regime to smaller industry participants (e.g. the recent extension of checked baggage screening to all airports with screened air services);
- labour market pressures impacting recruitment and retention of staff, particularly screeners, and
- recent changes to legislation, which have impacted the regulatory regime and in turn aviation security screening, including:
  - liquids, aerosols and gels (LAGs) screening;
  - implementation of 100 per cent domestic checked baggage screening (CBS) at the 11 major airports; and
  - extension of the requirement for 100 per cent domestic CBS to all airports with screened air services by 1 December 2008.

Other factors driving the need for a broad security screening review included:

- the Department’s requirement to conduct ongoing review of the legislative framework;
- a number of related development and implementation projects being undertaken across the Department; and
- other events that impact aviation security screening, including the Wheeler Review, the Ombudsman’s Report on complaints handling at airports, and the Inspector of Transport Security’s report on an aviation security incident at Sydney Airport.

## 4 CONSULTATION AND GOVERNANCE

### 4.1 Consultation

During the course of the Review the Screening Review Taskforce will conduct comprehensive and far reaching consultation both within Australia and internationally. Some of the activities are listed below:

- visited airports and consulted with the aviation security industry at 21 locations throughout Australia;
- visited Canada, France, New Zealand, The Netherlands, United Kingdom, Singapore and the United States to consult with government agencies and private aviation security corporations;
- directly consulted with over 1,600 air travellers in Australia;
- observed over 2,400 passengers passing through 26 screening points at 15 Australian airports;
- regularly presented to major aviation industry participants through the Aviation Security Advisory Forum and to regional aviation industry participants through the Regional Industry Consultative Meeting;
- sought and obtain specific data from 47 Australian airports and from all screening authorities and screening providers; and
- Consulted widely at all Australian capital cities and with regional Australia at such locations as Albury, Argyle Airport, Ayers Rock Airport, Broome, Cairns, Coffs Harbour, Coolangatta, Kalgoorlie, Karratha, Launceston, Mt Isa, Newcastle, Port Hedland, Port Lincoln, Ravensthorpe, Rockhampton, and Maroochydore.

### 4.2 Governance

A Screening Review Advisory Group was established by the Minister to provide external governance to the Review and to ensure that its activities remained relevant to industry. The advisory group is chaired by Mr P Retter, Executive Director, Office of Transport Security, and will report the findings and recommendations of the Review to the Minister. The members, who are senior members of the Australian aviation industry or international counterparts, are:

1. Mr G Askew, Group General Manager Security, Qantas Airways Limited;
2. Mr D Blackwell, General Manager, Rockhampton Airport;
3. Mr M Everitt, General Manager, Aviation Security Service of New Zealand;
4. Mr J Nahyna, General Manager, Operations Australia Pacific Airports (Melbourne) Pty Ltd;
5. Mr T Roche, Managing Director, SNP Security; and
6. Mr G Woods, General Manager Airport Operations, Sydney Airport Corporation Limited.

## 5 CURRENT RESEARCH

A range of research that has been commissioned by the Department in relation to the Review is outlined below. Results of these studies will contribute to consultation discussions, findings and eventually final recommendations of the Review.

### 5.1 Security Risk Assessment

Prior to commencement of the Screening Review, intelligence-based advice on the security risk to civil aviation in Australia was provided to the Review Taskforce. The overall level of threat to aviation interests in Australia has not changed since the new legislation came into effect in 2005. The National Counter-Terrorism Alert level remains at Medium, that is, a terrorist attack could occur.

### 5.2 Cost model

An important component of the Review is the development of a cost model that will identify current costs and cost drivers associated with aviation security screening.

The Department has contracted Deloitte Touche Tohmatsu to prepare a cost model of the provision of aviation security screening services. The results of this work will inform both the Review and the Aviation Green and White Papers and the end result will be a baseline cost model of screening. The cost model was developed using the Australian Standard Geographical Classification system and passenger throughput in order to determine alike groups of airports.

Developing a robust cost model will clarify the costs incurred by screening authorities in meeting required security outcomes, and will provide the Government with a more accurate and transparent basis for analysing the true cost of providing screening services.

### 5.3 Screening point observation

The Review has been tasked to determine how to achieve maximum efficiency at screening points while maintaining the security outcome by quantifying the specific factors that contribute to both the effective and ineffective screening point design and screening outcomes. To inform those considerations, the Review has undertaken observations of people-specific screening operations at selected airports to quantify movement by person and their hand baggage through screening points.

Up to one hundred persons and their hand luggage were observed at each of 26 separate screening points around Australia, including the range of activities surrounding Walk-Through Metal Detectors (WTMD), X-ray and Explosive Trace Detection (ETD), and screening for liquids, aerosols and gels (LAGs) at international screening points. The observations involved screening points at major metropolitan airports, as well as regional and more remote airport locations.

Observation statistics will be used as a baseline for developing any future surveys, and as a benchmarking tool to compare and contrast the efficiency and effectiveness of screening as technology and methods evolve. The data will also be harvested as

required to develop evidence-based information to inform the work of the Screening Review.

## 5.4 Passenger survey

An understanding was required of how travellers and the general public feel about current screening methods, what they understand about who and why these processes are undertaken, how this knowledge impacts their behaviours and attitude towards airport security.

Colmar Brunton Social Research (CBSR) was contracted by the Department to conduct research into the customer experience of the airport security screening process.

The objectives of this research were to:

- understand the customer experience of screening;
- identify the positives and negatives with screening, including to understand fears and concerns associated with airport screening practices and any resultant behavioural impacts (i.e. behaviours undertaken immediately prior to screening or in preparation for screening);
- gauge current levels of knowledge and understanding around screening more generally; and
- understand awareness of, and satisfaction with, complaints procedures.

The results of this research will enable the Review to take an independent snapshot of the travelling public's opinion of screening. The research consisted of intercept surveying of passengers after they had undertaken screening at nominated airports, computer-aided telephone interviews and focus groups. Intercept surveys were conducted at Adelaide, Brisbane, Melbourne and Sydney airports, and computer assisted surveying was conducted across Australia, with results analysed by geography of residence. The results will provide empirical input to inform overall findings and recommendations of the Review.

Focus groups were also held with screeners, front of house airport staff, travel agents and staff involved in complaints handling at airports.

Key findings from the passenger survey are listed below.

- The traveller experience with Airport Security Screening in Australia is positive and inline with their expectations. The findings from this research are consistent with results of the Australian Competition and Consumer Commission (ACCC) "Quality of Service Monitoring Reports". Three quarters (74 per cent) of travellers thought their last experience was as they would have expected and one fifth (21 per cent) considered the experience to be better than expected. Only four per cent of respondents expressed dissatisfaction with the overall experience or staff.
- Consistency of processes, understanding of requirements, understanding of selection method and specific procedures cause limited concern to travellers. Current frustrations include queues and surrender of items.
- Travellers are very supportive of security screening in Australia for general safety purposes. Most increases to security levels are attributed to ongoing upgrades as a result of 9/11.

- There is broad knowledge and perceived understanding of most requirements and processes. This leads to many travellers preparing in advance of reaching security screening checkpoints by removing items from pockets and laptops from bags.
- While there is limited knowledge regarding the organisations involved in conducting security screening (only 30 per cent believe private contractors conduct the screening), there may not be a need to communicate this point. Travellers are relatively unconcerned about knowing this information. A potential positive of communicating such information could be that travellers are more aware of where to direct any complaints.

## 5.5 KPI workshops

Following a request to screening providers to provide the Department with a variety of performance data, the Department conducted a series of three workshops in May and June 2008 with screening providers, screening authorities and select operators of screened airports, to examine and discuss the potential for the Department to introduce aviation security screening performance measures at a national level.

The workshops were to determine and identify:

- Outcome 1: Industry's strategic view of the importance, relevance and role of performance measurement in aviation security screening and the role that the Department should consider playing in measuring performance;
- Outcome 2: Whether the Department's current performance measurement regime was agreed and clearly articulated; was nationally consistent; was appropriate to the agreed security outcome; and operated in a manner that achieved the agreed security outcome in an efficient and effective manner; and
- Outcome 3: The key performance criteria that industry considered as critical to the future successful operation of aviation security screening in Australia taking into account the objectives and drivers of the Aviation Security Screening Review.

This work will combine with the Department's own research on performance measurement and form part of the Review.

## 5.6 DEEWR survey of airport screening employers

A survey conducted in December 2007 by the Department of Education, Employment and Workplace Relations, in partnership with the Department of Infrastructure, sought to provide quantitative evidence on the extent and nature of recruitment difficulties in the aviation security sector, as well as identify their key causes.

The main findings from the survey indicated that employers in airport screening have become increasingly unlikely to be able to meet all their labour requirements from traditional sources. It suggests that industry needs to address issues regarding skill level/experience of applicants as well as employer expectations, and that retention and recruitment strategies should be developed.

This survey was supported by the Department's development of an Aviation Security Training Framework.

## 5.7 Airport screener survey

Having investigated the employers' perspective of the recruitment difficulties of employers operating security controlled and passenger screened airports, the Department sought to understand the employees' perspective of the issue. It contracted Jigsaw Strategic Research to conduct research focussing on airport screening staff, which included group discussions and in-depth interviews.

The objective of the research was to gain an understanding of:

- the reasons airport screening employees are initially attracted to airport screening jobs;
- how they were recruited for the job;
- the reasons current screening staff chose to stay with the job; and
- for those that have left the role, the reasons they chose to leave the job.

The results of this research will be incorporated into the Review's overall findings and recommendations, when they are finalised.

## 5.8 Commissioned Papers

The Department commissioned two international subject matter experts to prepare several specialist papers to inform the Review:

- Intelligent Risks – a specialist management services company providing strategic security, risk management and security intelligence related advice to governments and private corporations in over 50 countries, and
- Green Light Limited – a security training and consultancy company who is a leading proponent of Passenger Profiling and a supplier of solutions to in-flight security issues especially in the realm of Hijacker and Disruptive Passenger Management and Restraint.

## 6 ISSUES FOR DISCUSSION

As a first step in the Review, the Department held a consultative forum in late 2007 to allow industry members to identify and discuss issues and concerns they thought should be included in the review process. Participants came up with a fairly large 'shopping list' of issues and possible solutions. A number of key issues were identified, which roughly fall under six major subject areas. Each of these subject areas – and the key issues contained within them – intersect with the broad objectives of the Review, cross-cutting them on a number of levels, from high-level strategic policy to daily operations.

### 6.1 Purpose of screening

The purpose of the aviation security framework is to prevent unlawful interference with aviation. As a layer in this framework, aviation screening of persons, goods and vehicles is the means by which it can be assured that no one or thing is able to get on board an aircraft without being cleared – and remaining cleared.

In order to ensure that the intent of the security framework is clearly understood and articulated, the following issues should be considered:

#### Is aviation security screening meant to be preventative or deterrent?

The Explanatory Memorandum to the ATSA talks specifically about the *deterrence, detection and prevention* of attempted acts of unlawful interference. Although detection appears to be a 'given' in the screening process, deterrence is also a worthwhile aim. While it is widely acknowledged that no aviation security regime can eliminate all threats and vulnerabilities and it could be argued that 100 per cent success in deterrence is not a practical reality, effective deterrence strategies will result in a smoother and more efficient screening process overall.

Suggested strategies that could be used for the purpose of deterrence, thereby decreasing the dependence on detection and prevention might include:

- an increased ability to detect terrorist or other criminal activity during planning stages;
- the introduction of passenger behavioural assessment;
- the introduction of new passenger imaging technologies (e.g. millimetre wave);
- increased police presence at screening points; and
- public awareness and education programs.

#### Question

1. Are there strategies that could be used for the purpose of deterrence, thereby decreasing the dependence on screening for this purpose?

#### Are we protecting aircraft, or people, or both?

The focus of aviation transport security documentation tends to be on acts able to cause mass casualties, such as sabotage or hijacking. However, the screening

regime in Australia also requires screening for specific items that would be unlikely to provide for such an outcome, such as crochet hooks and nail files.

On this basis, and considering the language used in the definition of unlawful interference with aviation in the ATSA, it seems that the focus of aviation security measures in Australia is on the safety of aircraft and people. That is, aviation security measures aim to not only prevent unlawful acts which could bring an aircraft down or be used as a weapon, and in that way cause mass casualties, but also prevent, as far as possible, injuries/death to individuals either on-board an aircraft or in the sterile area beyond the screening point.

Comments from industry generally agree that although the purpose of screening should be to stop acts of unlawful interference that could cause mass casualties and stop harm to individuals, the principal focus should be on preventing mass casualties. It has been pointed out that there may be other supporting public safety or criminal legislation, including State/Territory/Federal Police, Occupational Health and Safety (OH&S) legislation, and the Civil Aviation Safety Authority (CASA) Act and Regulations that are also major contributors to the prevention of harm to individuals.

The following definition may assist in more clearly articulating the purpose of screening:

*The purpose of aviation security screening is to contribute to the protection of aircraft and critical aviation infrastructure against acts of unlawful interference through the deterrence, detection and prevention of acts of unlawful interference; thereby protecting people from the consequences of such acts of unlawful interference.*

### Question

2. What should the focus of security screening be: to stop acts of unlawful interference that could cause mass casualties, or to stop harm to individuals, or both?

### **Should the list of prohibited items be rationalised?**

Prohibited items are outlined in the table at clause 1.07 of the ATSR. While the list of prohibited items is not exhaustive, it does include examples of the sorts of items that are prohibited. Currently, Australia's list of prohibited items is more stringent than that of ICAO and other member states. For example, Item 2 of the table at 1.07 ('Sharp things that are not weapons') includes *knitting needles, crochet needles, pointed metal nail files and corkscrews*. These items are not included as prohibited items by the Transportation Security Administration (USA), the Department for Transport (UK), the Canadian Air Transport Security Authority or the European Commission (EC). In addition, ICAO does not include these items, although corkscrews and knitting needles are listed as '*additional prohibited items for flights assessed at higher risk*'.

The lists of weapons of these authorities are largely the same as the weapons described under the ATSR.

In his review of Aviation Security in 2005, Sir John Wheeler recommended that the Australian Government revise the aviation regulations in relation to some carry on and on board aircraft items in light of the additional security measures such as

hardened cockpit doors on regular public transport (RPT) air services with a seating capacity of over 30, and the presence of air security officers on selected flights. This has not been undertaken to date.

Industry representatives have commented that the current list of prohibited items may actually diminish the security outcome, in that screeners are required to identify and respond to a large number of what could be considered low risk items. This causes extra stress to screeners, possible inconsistency in application, and frustration to passengers.

#### Question

3. Should the list of prohibited items be amended to remove low risk items?

## 6.2 National consistency

### Defining national consistency

Demonstrable consistency in achieving security outcomes is an important factor contributing to effectiveness, efficiency and public confidence in the aviation industry. Consistency in aviation security screening at the national level is an objective of this Review. Australia is also committed to pursuing harmonisation between our arrangements and those in place overseas.

Consistency can be defined narrowly or very broadly. According to the *Macquarie Dictionary*, consistency means:

- agreement, harmony or compatibility, and
- agreement among themselves of the parts of a complex thing.

The first part of the definition is generally what drives public perceptions and expectations, as it deals with the procedural details of screening that travellers are exposed to every day. This aspect of consistency is associated with uniformity of process and experience as well as levels of effectiveness and efficiency.

To the travelling public there appear to be several manifestations of inconsistency in the process of screening, so that passing through one screening point can be a predictably different experience to another screening point at a different airport or terminal. Such observed inconsistencies include:

- apparent variations in equipment type, calibration and performance;
- differences in procedures and practice, in divestment of clothing and other items, in use of hand wands, in conduct of frisk searches, etc;
- inconsistencies in screening for international and domestic flights;
- inconsistencies between screening at major and regional airports; and
- absence of a standard screening point design.

The result can be confusion, dispute, delay, and loss of confidence in the efficacy of screening.

However, the experiential issues raised by passengers are more about process than outcome. Australia employs an aviation security model which pursues security outcomes through a risk-based approach which by definition is not identical in every

respect. Perfect uniformity ('one size fits all') is inappropriate if the required security outcome is not delivered, and it can be wasteful of resources if disproportionate controls are applied to treat lower rated risks.

Consideration of national consistency is therefore a more complicated undertaking than it may first appear. The Review must also take into account the second part of the definition outlined above, in that it needs to look more deeply at what constitutes a nationally consistent screening framework, as a complex whole.

#### Question

4. In pursuing the goal of national consistency how should we define its parameters?

### **Aligning the screening process with the level of risk**

An underlying principle of the current regulatory framework is that a risk based approach should be taken to aviation security, allowing industry greater flexibility in how it achieves the security outcomes. To realise consistency in screening, however, there needs to be consensus about the nature and significance of security risks, and about the most appropriate equipment and techniques to mitigate them. In a changing security environment, faced with resourceful and determined attackers and a long period to bring new screening technology from concept to operational deployment, it is difficult to ensure that screening methodology remains appropriate and effective.

Changes in screening methodology since September 2001 (and other measures designed to protect aircraft, passengers and crew) have been substantial. However, evolution of screening has been essentially reactive, as evidenced by the introduction of LAGs restrictions after the interception of the Heathrow plotters in August 2006.

It could be suggested that the present approach to screening passengers and their carry-on items may be based on priorities and techniques which have been overtaken by developments, and that screening may not therefore be fully consistent with assessed risks. In seeking to move to a more proactive screening strategy, a reasonable working assumption must be that new kinds of threat will emerge with minimal warning. A flexible and adaptable model is desirable, and attention should be devoted to identifying the threats we may face and how they could be countered.

#### Questions

5. Is amendment needed to the current approach to screening passengers and carry-on items for explosives (in particular to increase the proportion of passengers tested for explosive trace), to make screening more consistent with assessed security risks?
6. Are there 'over the horizon' risks, potentially capable of defeating current screening methodology, which deserve attention now?

## Screened airports

Difficulty in achieving national consistency – if it is taken to mean uniformity of process – is most readily apparent when considering optimal screening solutions for airports of varying size and for aircraft of different types.

The Australian Government has moved away from formal categorisation of airports, other than designating 11 major airports as Counter-Terrorist First Response (CTFR) airports. A *de facto* 'second rank' of airports comprises those which handle jet RPT services but are not CTFR airports, and a further class of unscreened security controlled airports sits at a third level. The basis for these distinctions is not as clear cut or widely understood as it might be.

The changing pattern of airport usage has brought into question whether clearer criteria should be developed for establishing whether an airport should be a screened airport, the nature and extent of screening appropriate to the risks, and the circumstances which should trigger consideration of transition.

Anxiety has been expressed by the industry that any further extension of screening requirements could impose such a burden on regional aviation that continuation of services is no longer viable. A key consideration, therefore, is to identify defensible criteria for requiring that a particular class of airport should be screened, and to include a test of cost benefit in mitigating security risks.

### Questions

7. Should screening requirements be the same at all screened airports irrespective of risk or differing local configuration?
8. Do smaller regional airports and low cost carriers have the capacity – in terms of skills, labour and affordability – to conduct screening to the consistent standards expected? If not, how should this be addressed?

## Performance targets and measures

The current legislation sets out the minimum requirements for aviation security screening, and the Aviation Security Training Framework (ASTF) includes a number of performance standards for security personnel at a security controlled airport. However, for the present there are no regulated national performance targets or measures for screening, nor is there an international standard. The absence of such a framework is a significant impediment to national consistency.

While screening authorities are regulated, they often do not provide the security screening themselves. Contracted screening providers whose personnel perform screening have their performance targets and measurement frameworks set in commercial contracts. Consequently:

- there is little sharing, or overall visibility to the Government, of performance data compiled by screening authorities and screening providers;
- since contracts are confidential it is not possible to judge how much consistency there is between performance frameworks operating at Australian airports;
- consistent with overseas experience, there is reported to be difficulty in constructing appropriate performance measures which capture the core deliverables, and measure the effectiveness, of screening services;

- Key Performance Indicators (KPIs) in current use are measuring inputs (i.e. resources) and others capture outputs (i.e. activity), but few are suited to measuring outcomes (i.e. effectiveness); and
- because performance measures are set in commercial contracts, there is potential for confusion about the relative priority of achievement of effective security and facilitation of positive customer service.

Appropriate performance targets and measures are needed to underpin a continuous improvement strategy, if the quality and consistency of security screening is to be increased. Measures should be realistically achievable and consider international bench-marking. Transparency in the measures being used is desirable, provided issues of commercial confidentiality can be overcome, as a step towards developing national standards. Sharing of performance data with the Government could also be considered, to contribute to building statistically valid datasets for detailed analysis and identification of gaps and inconsistencies, and therefore targeted intervention. For example, pooling the results of audits conducted by the Department's officers, the screening authorities, and the screening providers themselves, could also be of value in targeting of coaching and training.

#### Questions

4. Would the industry be receptive to development (in partnership with the Department) of nationally consistent screening performance standards and KPIs? Should such a framework be regulated?

### **Achieving consistency between different providers of screening services**

Under the current structural arrangements for delivery of aviation security screening three impediments to national consistency of process are apparent:

- there are multiple screening authorities, each of which independently directs the operational detail of screening delivery;
- commercial competition acts in a number of ways to hamper optimisation of screening performance; and
- screening requirements, as outlined in the legislation, are not always clear and unambiguous enough to ensure different entities conduct their operations in a nationally consistent manner.

Some of the inconsistencies in process are reported at different screening points operated by the same screening provider, so there is work to be done within as well as between screening providers to improve standards and levels of performance.

#### Question

10. Where aviation security screening is not actually conducted by the relevant screening authority, but rather by a contracted third party screening provider, should the regulated screening requirements be extended more specifically to the screening provider as well?

### **Who should screen?**

In terms of who provides screening at Australian airports, the current legislation only stipulates that there must be at least one screening authority at a screened airport,

and that the screening authority is appointed by the Secretary of the Department. Under the present arrangements,:

- one screening provider claims to have over half of the national market;
- another screening provider is seeking to grow its business nationally, beyond its historical geographical base;
- following the decision of a third large player to exit the market, at least two other security contractors plan to enter the aviation security market;
- the labour pool remains small and shallow, so that if one screening provider wins a contract previously held by another, most of the 'new' workforce generally transfers from the previous incumbent;
- while one screening provider has an effective monopoly in some areas, with attendant risks to the industry should that provider fail or exit the industry, there does appear to be the prospect of continuing vigorous competition (albeit with a tight focus on pricing); and
- there remain multiple screening authorities: support for a reduction in the number, in the interests of greater consistency, seems to be universal.

In contrast to the current screening structure, there are precedents (e.g. Air Traffic Control and other services delivered by Airservices Australia) for coordinating aviation services through a single, government-owned and industry-funded structure.

#### Question

11. Is there action the Australian Government could or should take to facilitate an increase in the number of providers of screening services and / or to reduce the number of screening authorities?

## 6.3 Technology

### Minimum standards and specifications for equipment

Existing legislation does not prescribe particular types or models of screening equipment, nor generally does it mention specifications: the emphasis is on defining regulated outcomes, not on the precise means and measures for compliance.

Industry input to the Review has included a request for minimum equipment standards to be specified within the legislation. The Department has acquired some insight through research and trials of new screening technology, but it is uncertain whether sufficient expertise is available and can be maintained to prescribe technical specifications.

The industry has also called for regulated or recommended parameters and minimum requirements for testing of screening equipment. The lack of such parameters, and of appropriate testing equipment, is a problem with currently deployed technology.

Initiatives to expedite research and operational trials of new and next generation technology, before committing to procurement, need support and sharing of test results between government and industry participants. The deployment of new screening equipment will require a consistent and cohesive approach also involving both government and industry participants. Decisions on selection of optimal

security technologies and equipment should also be made with due attention to other technology-enabled advances occurring in passenger facilitation and baggage processing to be able to more easily accommodate and integrate these innovations.

### Questions

12. Is it appropriate for minimum equipment standards and specifications to be government mandated?
13. How much expertise should the Department maintain in relation to research and development of technology for screening?
14. How can we ensure that additional technological requirements in the short term are not 'bolt on' solutions, but rather as integrated and ergonomic as possible?

### Technology-related factors

Current non-integrated technologies present significant obstacles to good screening point design. It is likely that in moving forward there will be an intermediate stage, where next generation equipment is introduced but remains non-integrated, before any goal of integrated screening portals is reached. The delay before commencement of that intermediate stage will be an important determinant of how much effort to apply in the short term to standardisation of screening point design.

Unless new passenger imaging technologies and LAGs screening equipment (for example) are likely to be widely deployed within the next year, it could be cost-effective to proceed with model designs on the basis of today's screening technology, including provision for adjustments to best practice when new equipment is rolled out. The prospect is for the basic elements of the screening point to change only incrementally in the immediate future, with a radical redesign – such as one benefiting from the advent of an integrated single portal – unlikely to become feasible for several years. Given the evident difficulties in requiring prohibitively expensive next generation technologies to be implemented for all screened air services, irrespective of airport size or throughput, a possible two-track approach might therefore look as follows:

- short term – continuation of high intervention, low technology model;
- intermediate stage – higher technology, lower intervention (major airports); progressive introduction of some higher technology, still high intervention (smaller airports); and
- long term – integrated portals, low intervention (major airports); retention of lower technology, less than fully integrated model (smaller airports).

### Question

15. How should the timeline for introduction of next generation technology affect decisions about model designs for screening points?

## 6.4 Screening point design

Screening points at Australian airports generally adhere to a similar design, with minor variations, though there is no prescribed model and no explicit regulatory guidance. The elements of screening point design are driven by the mandatory

requirement to detect weapons and prohibited items, and to accomplish this in a manner consistent with the Methods, Techniques and Equipment to be used for Screening (MTES) notice issued under the legislation.

Because achievement of desired screening outcomes requires the application of several different technologies and processes, screening necessarily comprises a sequence of complementary actions. The order in which those processes are completed, and the usual lay-out of equipment at a screening point, means that airport users encounter a recognisably similar design irrespective of the location and size of an airport, the identity of the screening authority and provider, or any other varying local environmental factors. The sequence depends on the two parallel strands of passenger screening – for people and their belongings. Design of a screening point leaves little scope for divergence or innovation because of the need to separate people from their belongings and to subject each to discrete processes (metal detection and X-ray examination) before they are reunited.

Most of the shortcomings in screening effectiveness and efficiency are attributable to one or more of the three elements of screening – People, Process and Equipment. Good design is able to reduce the adverse effects of some causes of ineffectiveness and inefficiency; bad design will generally exacerbate them. Common symptoms include: insufficient space to cope with peak throughput; lack of provision of space and facilities for secondary and special needs screening; and poor positioning of the screening point in relation to optimal passenger flow through the airport.

The most fundamental design decision to be made about a screening point is where to locate it. Relevant factors include the size of the airport, the nature and volume of throughput, and the terminal configuration. Most modern airports of any size use concourse screening points; gate and holding area screening points are generally appropriate to smaller point-to-point airports. Further variations occur at large airports, with some operating a centralised screening model (the current trend) and others preferring a decentralised arrangement with more screening points.

### Question

16. What are the implications of the 'front-of-house' threat for identifying best practice for the location of screening points?

Expansion of screening point functions and space requirements (e.g. for the implementation of LAGs restrictions) has exacerbated effectiveness and efficiency difficulties attributable to limited space. The allocation of sufficient floor-space to cope with current and foreseeable additional needs is therefore an important aspect of best practice design. It is essential that the screening point 'footprint' should enable the establishment of a contained and controlled environment to preclude any mixing of cleared and uncleared people and items.

### **Physical configuration**

Form should follow function: the design of a screening point requires detailed analysis of the security and facilitation requirements for screening. The screening process can be broken down into a series of separate but interdependent steps. Analysis is needed of scenarios for different actions, with varying impact on flow, depending on the screening outcome (cleared or not cleared) at each stage.

Configuration is heavily influenced by the equipment employed. Processing of people who do not alarm the WTMD and whose bags and personal items raise no X-

ray issues should continue uninterrupted. Rapid progress of these people (some 90 per cent on average of those presenting at a screening point according to the Department's Observation Program) should not be impeded by others undergoing secondary or tertiary screening. Delays become cumulative if all people behind a person who causes an alarm are delayed. Screening point lay-out must therefore allow for the minimum of mixing and confusion between different flows of people being processed.

There are obvious merits in a consistent design that will adhere to agreed best practice and will ameliorate the facilitation issues through passenger familiarity. However, there are two particular arguments against imposition of an identical physical configuration for all screening points:

- what is appropriate at a constantly busy international terminal may not be appropriate at a small regional airport; and
- an identical lay-out and process can mean predictability and hence vulnerability to an attacker who studies the operation of a screening point.

A practical approach to dealing with widely divergent operating environments may be to develop two (or more) model configurations which retain the maximum practicable commonality and consistency. ICAO offers examples of a basic, two level screening point and an advanced three level design.

#### Questions

17. Should there be two or more recommended configurations of screening points, aligned with local operating environments?
18. Should there be deliberate variations in screening point lay-out, and change without warning, in order to increase the challenge for an attacker wishing to bring through weapons and prohibited items without detection?

## 6.5 Human factors in screening - passenger facilitation

### Passenger demographics and facilitation

In order to ensure an appropriate balance between achieving the security outcome and efficient facilitation of passengers at a screening point, it is important to understand firstly, who the users of screening are; and secondly, what are the barriers that impact a smooth facilitation through the screening point.

The number of passengers on Australian international flights has increased to 22.3 million in 2006-07, up 4.7 per cent on the previous year. Growth is driven mainly by Australian residents travelling overseas rather than the arrival of international visitors. The number of international flights has also increased by 1.3 per cent to around 120,000 per annum. Australia's domestic airline industry continues to operate at high levels with a record 45.3 million passengers carried in 2006-07, 6.0 per cent higher than 2005-06.

The number of passenger movements through all Australian airports is forecast to increase by 4 per cent a year over the next 20 years. This will mean that air passenger movements will double by 2025-26, so that 63 million passengers will be moving through Sydney Airport, 46.4 million through Melbourne Airport, 30 million

through Brisbane Airport, 17.7 million through Perth Airport; and 11.7 million through Adelaide Airport.

Given these projected numbers, the problem of how to reconcile the often conflicting imperatives of effective security and passenger facilitation will become more acute.

Ensuring smooth and efficient movement of passengers through screening points is important for facilitation reasons, but even more so in order to achieve good security: queues create a potential target and congestion can undermine the integrity of the security process.

Effective facilitation requires that the number of discrete screening processes should be reduced. That is not an imminent prospect but there are some opportunities available.

- New technology may bring more automation, less intervention and hence a more self-managed (rather than directed) experience.
- Differentiated screening regimes, e.g. for known frequent travellers, may assist in expediting the flow of low risk people and their belongings.
- Convergent passenger processing systems may be of assistance, e.g. by exploiting biometric technology (introduced for ticketing, passenger processing and improved border security) to target screening according to risk.

The Department's Observation Program has noted several points of interest:

- At small airports used frequently by employees of the resources sector, there can be good facilitation outcomes because the passengers are aware of requirements and will generally co-operate willingly with the screeners. Whilst they may not look like frequent business travellers, they are actually very experienced frequent fliers.
- At airports predominantly used by tourists the nationality of the passengers is usually a reliable indicator of their likely level of proactive co-operation with the screening process.
- Certain airports have a higher than average proportion of elderly and special needs passengers presenting at the screening point, who require personal attention and can involuntarily impede the efficient flow of other passengers.

### Special circumstances screening

For a variety of reasons, some people require special treatment and consideration prior to and during the aviation security screening process. Special circumstances screening is a particularly sensitive matter within aviation security. A key component is the balance between treating people with respect and dignity whilst at the same time ensuring security outcomes are met.

The aviation industry has commented that there currently exists considerable inconsistency and uncertainty as to the most appropriate and effective manner to clear a person who has special circumstances.

Special circumstances screening may apply to the following categories of people: the disabled, the elderly and children, those whose racial or religious traditions require special consideration in the screening process and those with little or no

comprehension of English who may not be able to understand what is required of them. Special circumstances screening might also apply in situations where the person to be screened has little or no travel experience and therefore lacks understanding of the screening process and what is required of them.

At this point in time, the definition of special circumstances screening and the members of the community it applies to has not been clearly articulated in relation to aviation security screening in Australia.

In the passenger survey conducted by Colmar Brunton, respondents were asked whether they would support dedicated 'specials needs' queues. The majority of respondents strongly agreed that they would support this suggestion.

The qualitative research indicated that travellers are supportive of this idea because it would improve the efficiency of the process for all travellers. Participants also recognised that these travellers do have a more challenging time proceeding through security screening points with the pressure to be streamlined through.

### Questions

19. Under what circumstances is special needs screening required?
20. Do you support the idea of a 'special needs' queue at screening points for passengers with special needs?
21. Is there some value in restructuring a typical screening point to include a dedicated customer service officer who can assist with the facilitation of persons subject to special circumstances screening?

### **Complaints handling**

The 2007 Commonwealth Ombudsman's report into Complaint Handling in Australian Airports brought the issue of complaint management at screening points to the fore. The report questioned the transparency, effectiveness and accessibility of feedback management systems in Australian airports.

Accurate information is a crucial ingredient in the process of constant improvement. At present, feedback management is addressed at screening points at Australian airports on a case by case basis. As a key area of concern in the Screening Review, the potential may exist to formalise arrangements in a nationally consistent way drawing on guidance from the Department. However, this mechanism is best developed in close consultation with industry and draft materials have been developed as a catalyst for discussions. It is anticipated that implementation would occur on a voluntary basis.

### Questions

22. Would there be value in aggregated complaints data being analysed nationally, and in having an industry wide database of screening related complaints?
23. Is guidance material regarding complaint handling at screening points from the Department an appropriate and useful tool?
24. Would a requirement for reporting complaints and the follow up actions create any additional burdens for an aviation organisation?

## 6.6 Human factors in screening - the screener vocation

Industry consensus is that recruitment and retention of aviation security screeners is becoming a critical issue. Low unemployment rates and the potential shift of labour resources to areas of high demand are having an adverse effect on the ability of the industry to recruit and maintain sufficient staff to ensure that aviation security requirements are met. This is most clearly a problem in the area of aviation security screening, a job which requires a relatively high level of proficiency and can be quite stressful, yet does not pay particularly well.

Problems recruiting and retaining aviation security screeners will be further compounded by the pressure brought to bear on industry from rapid growth in the aviation sector due to an increase in overseas and domestic tourists, introduction into the market of low-cost carriers, and expansion of short and long-haul routes between Australia and a number of overseas ports. These trends will continue into the future.

### Recruitment of screeners: appropriate selection processes

Industry members have identified the need for improved selection processes for screeners. Suggestions put forward included:

- developing a clearer understanding of what should be considered 'desirable attributes' for a screener;
- developing well defined skill sets for screeners;
- creating robust processes for assessing competency;
- utilising better targeted recruitment practices; and
- expanding the focus of the job to include customer service as well as physical security.

It is important to consider the personality requirements for screeners as well. This point is particularly relevant in Australia, where current labour market pressures coupled with the relatively low pay scale for screeners, should motivate recruiters to employ lateral thinking when developing recruitment targets and strategies.

For example, many people view the screening role as predominantly a security guarding role, and the position has traditionally attracted people who have a strong security guarding background. Although this is not necessarily inappropriate, these individuals will not necessarily have the cognitive abilities required to interpret x-ray images, or the customer service skills needed to deal with passengers. Screening staff interviewed in the screener survey felt strongly about this issue, stressing that inappropriate recruitment gave the impression that employment standards were low, which in turn had a negative effect on staff morale.

### Question

25. Given current labour market pressures, is it appropriate to widen the net when recruiting in order to attract a broader base of potential screeners? If yes, what strategies could be employed to better target appropriate staff?

## Retention of screeners: creating a career path

According to the recent DEEWR survey of airport screening employers, the rate of pay for screeners ranges from approximately \$15/hour to \$40/hour in a mining region. While it is clear that rate of pay is a key element in the successful recruitment and retention of aviation security screeners, it seems unlikely that pay will rise significantly in the foreseeable future. However, there are a number of other forms of compensation which should be explored when considering strategies to attract and keep the right people on the job. For example, retention of suitable screeners might be achieved – even with relatively low pay scales – by ensuring other kinds of compensation, including good physical working conditions, job security, benefits packages, increased status, and increased networking and professional development opportunities and activities.

Strategies which could be employed to improve retention of aviation security screeners, as well as improve overall job satisfaction and contribute to the development of a screener career path might include (but are not limited) to the following:

- increasing ongoing and/or full-time employment opportunities, as opposed to the mostly casual or contract shift positions currently available;
- improving physical working conditions, for example by introducing guidance and/or minimum requirements for optimal screening point design, and rationalising the screening process with better use of current and imminent new technologies;
- increasing the profile – and status – of security screeners, both within the aviation sector and with the travelling public;
- development of graduated pay levels, dependent on experience and demonstrated expertise;
- development of differentiation between screening jobs, increasing the number and types of levels or paths for screeners;
- development of ‘team structures’ in order to provide workers with a sense of security and solidarity with their colleagues; and
- introduction of other career development opportunities within the sector (for example with the introduction of explosive detection canines and behavioural analysis roles).

### Question

26. Other than a rise in pay rates for aviation security screeners, what strategies could be employed to attract and retain appropriate individuals, and to create a career path for them?

## Image and status

There is agreement that the role of an aviation security screener is not highly valued, and is not perceived as high profile. Screeners interviewed in the screener survey felt that they often suffer from a lack of respect from within the aviation community, as well as conflicts with the travelling public. Suggestions for removing the aggression and adversity from the passenger screening process, as well as improving the image of screeners overall, include:

- provision of public relations and customer service mastery training for screeners;
- development of a publicity campaign which not only informs passengers of screening processes and requirements to make the process more transparent, but underscores the important role that screeners play in ensuring aviation safety and security; and
- providing passengers with an experience that is more predictable and common across Australia.

### Question

27. How can we raise the profile, and improve the image, of aviation security screeners, both within the airport environment and with the travelling public?

### **The nature of the work**

Many industry members view the employment conditions for aviation security screeners as less than optimal. The work itself can be boring and repetitive, but at the same time quite stressful.

From a physical standpoint, screeners have complained that Occupational Health and Safety issues are often not given appropriate consideration, and that screening points are not always set up to accommodate the complex screening process and potentially large number of passengers coming through. This can lead not only to inefficient facilitation, but also increased stress and conflict between screeners and passengers.

These factors, together with the requirement for staff to work split shifts and/or long hours, the lack of after-hours services, and often inadequate amenities has led many screeners to view their jobs as temporary, until they can find more attractive work.

The environment within which screening staff operate is often perceived as hostile, due not only to the conflict and complaints generated by frustrated passengers, but also due to what has been described as its 'punitive' culture. It has been observed that a sanction-based approach to security mistakes has the potential to create a 'climate of apprehension, even fear' among screeners, and that if screeners are afraid to own up to errors, security outcomes are less likely to be achieved.

### Questions

28. Is there a serious level of conflict between aviation screeners and passengers, and if so, how can we decrease that?
29. Within the currently regulatory framework, what should be the respective roles and responsibilities of the Government and industry, in relation to recruitment and retention of aviation security screeners?

## 6.7 Current legislation

### Current level of prescription

The stated intent of the legislative framework is to ensure that all industry members at least to maintain minimum security requirements. Clarity of regulatory requirements is designed to allow industry to assess its performance against aviation security requirements. However, the legislative framework is designed also to allow the industry some discretion in the detail of how compliance is accomplished. The Department's 'intelligence-led, risk based and outcome-focused' methodology has facilitated this approach to implementation.

This methodology, which appears to have no overseas equivalents, could be represented as being both prescriptive and non-prescriptive. It strives to overcome the limitations and inefficiencies of universal minimum standards ('one size fits all'), by recognising that different levels of risk can be mitigated by different measures; in particular, the intent is to give effect to the Government's commitment to consultation and partnership with industry in order to enhance and maintain Australia's aviation security resilience.

In broad terms the ATSA and ATSR set out what is required (i.e. outcomes) but do not provide comprehensive detail about how the measures are to be implemented. More operational guidance is to be found in the Methods, Techniques and Equipment to be used for Screening (MTES), a notice issued by the Secretary under the powers granted by the Act and Regulations. There are varying degrees of prescription in the MTES – a good deal of detail is to be found concerning methods and techniques but comparatively little about equipment specifications or the design of screening points.

In keeping with the intent and regulatory philosophy of the legislation as a whole, the Australian screening model is less prescriptive than many overseas models. While consistent and compliant with the recommendations issued by the International Civil Aviation Organisation (ICAO), the Act, Regulations and MTES leave substantially more discretion to screening authorities in how they achieve compliance. There is an even greater contrast with US practice, as exemplified by the highly directive approach adopted by the Transportation Security Administration (TSA).

There is a consistent view, articulated by large and small entities, that screening needs a greater degree of precision and prescription. It is striking that the larger industry participants, who are willing and able to be proactive in risk mitigation in other areas of aviation security, share the same concerns as other participants about screening and are seeking prescription of more detailed uniform standards.

#### Question

30. Does the industry's call for more prescription in relation to screening carry implications for the risk-based approach underpinning the regulatory model?
31. What are the implications for the regulatory model of aiming higher than compliance with minimum standards at minimal cost?

## The role of the regulator

It was envisioned when the new Act and Regulations came into effect that they would be subject to ongoing review in partnership with industry, in a 'policy feedback loop' whereby the Government and industry would work together to consider future amendments to the regulatory framework as appropriate.

The close engagement with industry in the development of an Aviation Security Training Framework (ASTF) is an example of the partnering approach the Department has taken with industry participants. This approach means the clear divide between regulator and regulated has become more complex, with more consultation, more collaborative approaches to problems, and pursuit of new initiatives to encourage and enable industry compliance. Reversion to a more traditional prescriptive model could be perceived as inconsistent in some ways with the partnership strategy.

### Question

32. Under a more prescriptive regulatory model, what would be the implications for the Department's industry engagement and compliance audit strategies?