

Director, Aviation White Paper Project Office  
Aviation White Paper  
Department of Infrastructure,  
Transport, Regional Development,  
Communications and the Arts  
GPO Box 594  
CANBERRA ACT 2601

**Subject: Aviation Green Paper Submission**

Dear Director

CW Aviation Security Consulting and Accreditation Group are pleased to provide a joint submission on the Aviation Green Paper.

CW is an aviation security and facilitation company that advises governments and industry on strategy, governance, oversight and training. It is based in Australia, but primarily undertakes capacity development work in overseas markets, focusing in particular on developing states and distressed regulatory environments.

Accreditation Group is a third party accreditation company established to assist the transport industry meet their Department of Home Affairs Cyber and Infrastructure Security Centre (CISC) aviation, air cargo and maritime screener accreditation requirements in accordance with the CISC Screener Accreditation Scheme.

This submission addresses Aviation Green Paper Section 8.6 Security Screening, and in particular, the Department of Home Affairs CISC Screener Accreditation Scheme introduced on 1 January 2023.

Under this scheme, security screening officers are required to pass annual accreditation testing to confirm they are competent to undertake the essential task of screening passengers, baggage and cargo to ensure they do not pose a security threat to aviation.

Given the critical nature of their role, and the human and economic implications if they fail to perform these functions correctly, it is essential that such accreditations are undertaken in an independent and unbiased manner.

The independence of the accreditation process is also an international requirement. The International Civil Aviation Organization (ICAO), the United Nations specialised agency that establishes standards for safe and secure operations of civil aviation, requires security screening officers to be independently certified as competent. This requirement is established in ICAO's Annex 17 to the Convention on International Civil Aviation, Section 3.4.4, to which Australia is a signatory.

Under the current CISC Screener Accreditation Scheme, security screening service providers, these being the organisations that recruit, train and operationally deploy security screening officers, are allowed to conduct their own in-house accreditation of those officers. This has led to a situation where the screening service providers are effectively allowed to mark their own homework.

Under the Scheme, screening service providers have cross-trained supervisors and trainers as accreditors, and these staff are undertaking accreditations as well as their usual training or supervisory activities. In practical terms, this means supervisors and trainers who are in charge of the training and the day-to-day management of security screening officers are also being tasked with determining whether these same officers meet the CISC accreditation requirements.

Such a system, by its very design, creates a variety of conflict-of-interest issues.

The trainer (or at least the screening service provider as the training organisation) has both a strong confirmation bias, and a human resource and financial incentive to confirm the training they delivered resulted in competent security screening officers. An accreditation failure would suggest a failure of training, and would necessitate additional training, resulting in time and financial costs, and lost operational hours.

Similarly, a supervisor who is accrediting their own staff has no incentive to ensure impartiality of their judgement, as an accreditation failure would impact on staff rostering and time lost for re-training, as well as possible professional and personal implications for the relationship between the screening officer and the supervisor.

At its core, there is no incentive for in-house accreditors to do other than ensure staff pass accreditation testing, with multiple incentives for in-house accreditors to bias towards confirming skills rather than providing independent assessment.

Furthermore, at a time when the aviation security industry is experiencing high staff attrition rates, imposing additional accreditation KPIs on existing supervisory staff exacerbates staff turnover, with experienced security screening supervisors being lost and replaced by those with less experience.

To eliminate this fundamental weakness in the Scheme, it is proposed that the Scheme be amended to stipulate all screener accreditations must be undertaken by an independent third party accreditation provider. In doing so, Government will ensure the purpose of the CISC Screener Accreditation Scheme; that of independently confirming security screening officers are competent to perform the task of screening passengers, baggage and cargo to ensure they do not pose a security threat to aviation, is properly served.

Thank you for the opportunity to provide a submission to the Aviation Green Paper.

Yours sincerely



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28 September 2023

**Attachment A:** Options for ensuring independence of security screener accreditations

## **ATTACHMENT A**

### **Options for ensuring independence of security screener accreditations.**

1. Direct contract between third party accreditor and security screening service provider

The security screening service provider enters into a direct contract with a third party accreditor. This direct contractual relationship allows for immediate feedback and clear communication, and is the simplest mechanism to establish.

However, it also creates a potential contractual conflict of interest for the accreditation company. As accreditation failures mean additional training and lost operational hours, the screening service provider may be less inclined to renew the contract of an accreditation company that continues to fail screeners, creating a bias within the accreditation company towards confirming skills.

2. Home Affairs undertakes all screener accreditation in-house

While this option gives Home Affairs full control of the accreditation process, it puts the cost of the Scheme onto Government. The cost of employing government employees to conduct accreditations would be substantially higher than the cost of this service being delivered by industry. Industry would likely resist a cost-recovery model arguing, quite correctly, industry can conduct the accreditations more cost effectively itself.

3. Direct contract between accreditation company and screening authority

This is likely the most effective option. The screening authority, which is usually the airport company or the local council that owns and operates the airport, enters into a direct contract with a third party accreditor.

As the screening authority will already have a contractual relationship with the security screening service provider for the provision of qualified security screening officers, the screening authority has a vested interest in ensuring all screening officers are accredited correctly. The contract between screening authority and screening services provider will include key performance indicators regarding screening performance, and may have a mechanism to impose a financial penalty on the screening service provider where they fail to deploy appropriately accredited and competent security screening officers.

The screening authority is also ultimately responsible for security screening being undertaken in accordance with national regulations and international standards, and thus will be motivated to ensure all security screening officers are accredited and competent.