

**GUIDANCE
FOR
KNOWN CONSIGNORS**

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GUIDANCE FOR KNOWN CONSIGNORS

Introduction

This guidance will help you to assess your existing security arrangements against the required criteria for Known Consignors as described in Regulation (EC) No 300/2008 of the European Parliament and of the Council on common rules in the field of civil aviation security and its implementing acts. This should enable you to ensure that you meet the requirements before arranging a validation visit.

Once you are ready to apply please send your completed application form to current.cargovalidations@dft.gsi.gov.uk

The Purpose of the Scheme

The Known Consignor scheme is voluntary. There is no legal requirement for any air cargo to be despatched from the shipper as SPX (Secure) cargo; unknown cargo may still be shipped, although it will be subject to additional security measures before it can be allowed to fly. However, once approved as a Known Consignor you must comply with the requirements outlined in the Regulations.

Once approved, Known Consignors are permitted to ship cargo as SPX from source. Such cargo may be transported by air without the need for any further security measures being applied.

DfT contact details

Known Consignor Scheme
Cargo Compliance
Department for Transport
3rd Floor, Fry Building
2 Marsham Street
London, SW1P 4DF

E-mail: current.cargovalidations@dft.gsi.gov.uk

Legal Basis

Regulation (EC) No 300/2008 (EC 300) establishes the framework for aviation security across the EU. More detailed supporting legislation is published under EC 300 and contained in Regulation (EU) 185/2010 (EU 185) and Decision (2010)774. In the UK, the Department for Transport (DfT) is responsible for implementing aviation security legislation and as such issues Directions to air carriers and regulated agents, instructing them on the circumstances in which they can accept cargo as secure. The EU Regulations set the baseline security standards with which Known Consignors must comply. Decision

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(2010)774 is Restricted. This document provides known consignors with information on what requirements apply to their operation.

The Known Consignor Scheme

In order to be approved as a Known Consignor members of the Known Consignor scheme are inspected annually. This inspection is known as a validation and is undertaken by an independent Validator. The Validator will look at all the relevant processes being undertaken, and decide whether the organisation meets the required standards for shipping SPX cargo.

The Validators are aware that different consignors operate in different ways. The Validator will seek to recognise procedures that are already in place, perhaps for anti-theft, stock control or quality assurance purposes, and look at existing access control measures to the warehouse and other relevant areas. In addition, the Validator will check that Known Consignors meet the recruitment and training criteria as listed below.

The Validator

The people undertaking validations of Known Consignor sites are known as Validators. These Validators are independent but accredited by the Department for Transport for this purpose.

The Validation Process

Arranging a Validation

Existing or prospective Known Consignors should apply by e-mail to current.cargovalidations@dft.gsi.gov.uk. An application form is included at Annex E, it is important that all sections of the form are completed before submitting it.

How much does it cost?

Each validation inspection costs £400 per site, plus the Validator's travel expenses, whether it leads to a successful validation or not. This will normally be payable in advance. Where a consignor fails to be validated and requires further inspections in order to gain a certificate, each new visit will incur a further fee of £200 plus travelling costs. Eligible travelling costs are standard surface public transport fares or 40 pence per mile where the Validator elects to use his own or another vehicle. Use of taxis and airfares must be by previous agreement with the customer.

Some Validators offer a pre-validation service. Costs for these will vary considerably, although DfT guidance is that they should not be in excess of £200, if you wish to have a number of Validators to contact please e-mail current.cargovalidations@dft.gsi.gov.uk

Revalidation visits following a failed inspection may be carried out by the same Validator who made the original visit. However, Validators are not normally allowed to inspect the same site more than once in three years unless they have written approval from DfT.

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February 2012

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Access To Premises And Availability Of Staff

It is important that the Validator talks to the correct people during the validation visit (including the person responsible for security and the person responsible for recruitment of staff). A checklist will be used to record the Validator's assessments. The checklist is not publicly available and is for the Validator's use only. Once the validation checklist is completed, the information it contains will be handled as classified information.

Suitability For Validation

The cargo must be originated by your company on the site to be inspected. This covers items manufactured on the site and pick and pack operations where the items are not identifiable as air cargo until they are selected to meet an order.

You will have to determine at which point a consignment of cargo/mail becomes identifiable as air cargo/mail and demonstrate that you have the relevant measures in place to protect it from unauthorised interference or tampering. This will include details concerning the production, packing, storage and/or despatch.

Organisation And Responsibilities

You will be required to provide details about your organisation (name, VAT or Chamber of Commerce number or Corporate registration number if applicable), address of site to be validated and main address of organisation (if different from the site to be validated). The date of the previous validation visit and last unique alphanumeric identifier (if applicable) are required, as well as of the nature of the business, the number of employees on site, name and title of person responsible for air cargo/mail security and their contact details.

Physical Security

It is essential that access to the area where air cargo/mail is processed or stored, is controlled. You will be required to demonstrate how your site is protected (e.g. a physical fence or barrier) and that appropriate access control procedures are in place. Where applicable, you will be required to provide details of any possible alarm- and/or CCTV system. All doors, windows and other points of access to air cargo/mail need to be secure or subject to access control.

Staff Recruitment Procedure

You will be required to provide details of your recruitment procedures for all staff (permanent, temporary or agency staff and drivers) with access to identifiable air cargo/mail. The recruitment procedure shall include a pre-employment check or a background check in accordance with Regulation 185/2010. The validation visit will involve an interview with the person responsible for the recruitment of staff, who will need to present evidence to substantiate the company procedures.

Annex A describes the recruitment procedure in detail.

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Staff Security Training Procedure

You will need to demonstrate that all staff (permanent, temporary or agency staff and drivers) with access to air cargo/mail have received the appropriate aviation security training. This training shall take place in accordance with Regulation 185/2010. Individual training records should be kept on file. In addition, you will be required to show that all relevant staff have received training or recurrent training in accordance with Regulation 185/2010.

Annex B provides further information on training.

Production (where applicable)

You will need to demonstrate that access to the production area is controlled and the production process supervised. If the product can be identified as air cargo/mail in the course of production then you will have to show that measures are taken to protect air cargo/mail from unauthorised interference or tampering at this stage.

Packing (where applicable)

You will need to demonstrate that access to the packing area is controlled and the packing process supervised. If the product can be identified as air cargo/mail in the course of packing then you will have to show that measures are taken to protect air cargo/mail from unauthorised interference or tampering at this stage.

You will be required to provide details of your packing process and show that all finished goods are checked prior to packing.

You will need to describe the finished outer packing and demonstrate that it is robust. You also have to demonstrate how the finished outer packing is made tamper evident, for example by the use of numbered seals, security tape or special stamps. You will need to show that these are held under secure conditions when not in use.

Storage (where applicable)

You will need to demonstrate that access to the storage area is controlled. If the product can be identified as air cargo/mail while being stored then you will have to show that measures are taken to protect air cargo/mail from unauthorised interference or tampering at this stage.

Finally, you will have to demonstrate that finished and packed air cargo/mail is checked before despatch.

Despatch (where applicable)

You will need to demonstrate that access to the despatch area is controlled. If the product can be identified as air cargo/mail in the course of despatch then you will have to show that measures are taken to protect air cargo/mail from unauthorised interference or tampering at this stage.

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Documentation

The Validator will check that the consignor produces a Consignment Security Certificate (CSC/CSD) in the correct format. The Validator will check that the person signing the CSC/CSD is aware that he is accepting responsibility for ensuring that no prohibited items are contained within the consignment. If the signatory is not present when the cargo is prepared, the consignor will have to explain how the signatory is in a position to confirm this. The Validator will also check that the CSC/CSDs are prepared or stored securely. Preparing CSC/CSDs in advance or remotely is not acceptable.

A copy of the CSC/CSD format is at Annex C.

It is important that the CSC/CSD is completed correctly and the original copy travels with the consignment. If it is not, the consignment is liable to be declared Unknown which means it may be delayed whilst it is security screened. This will also incur an additional cost for the consignor. Faxed copies of CSC/CSD's are not acceptable.

Transportation

You will have to provide details concerning the method of transportation of cargo/mail to the regulated agent.

If you use your own transport, you will have to demonstrate that your drivers have been trained to the required level. If a contractor is used by your company, you will have to ensure that a) the air cargo/mail is sealed by you and b) the haulier declaration has been signed by the haulier. The UK requires an additional declaration that the cargo will not be inappropriately handled. A template Haulier Agreement is at Annex D. The original agreement should be retained by your company, however, the haulier should also provide their drivers with a copy of this agreement which they should be able to produce if asked when delivering SPX cargo.

If you are responsible for the transportation of air cargo/mail, you will have to show that the means of transport are securable, either through the use of seals, if practicable, or any other method. Where numbered seals are used, you will have to demonstrate that access to the seals is controlled and numbers are recorded; if other methods are used you will have to show how cargo/mail is made tamper evident and/or kept secure. In addition you will need to show that there are measures in place to verify the identity of the drivers of vehicles collecting your air cargo/mail. You will also need to show that you ensure that cargo/mail is secure when it leaves the premises. You will have to demonstrate that air cargo/mail is protected from unauthorised interference during transportation.

You will not have to provide evidence about driver training or a copy of the haulier declaration where a DfT approved Regulated Agent has made the transport arrangements for collecting air cargo/mail from your premises.

Annex F provides a list of useful websites with advice on protective security and security of premises.

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February 2012

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Consignor's Responsibilities

You will need to declare that you will accept unannounced inspections by the DfT's Aviation Security Compliance Inspectors for the purpose of monitoring these standards.

You will also need to declare that you will provide DfT with the relevant details promptly but at least within 10 working days if:

- a) The overall responsibility for security is assigned to anyone other than the person named
- b) There are any other changes to premises or procedures likely to significantly impact on security
- c) Your company ceases trading, no longer deals with air cargo/mail or can no longer meet the requirements of the relevant EC legislation.

Finally, you will need to declare to maintain standards of security until the subsequent validation visit and/or inspection.

You will then be required to accept full responsibility for the declaration and to sign the validation document.

EC Regulated Agent and Known Consignor Database

Information about your organisation will be entered into the EU Cargo Database (RAKC) which will be accessed by Regulated Agents and Air Carriers in all Member States. As some of this information is personal data, this section will detail our obligations under the Data Protection Act, by providing information to the individuals whose personal data will be held on the UK National Database.

A Known Consignor cannot be considered 'approved' until its details are listed in the "EC database of Regulated Agents and Known Consignors". The Department for Transport (DfT), as the Appropriate Authority for the UK, is required to enter into the database the necessary details of approved Known Consignors.

Users accessing RAKC

The following users will be able to log into the RAKC database:

- Regulated Agent User
- Known Consignor User
- Member State Administrator (e.g. UK DfT)
- Super Administrator (European Commission)
- Security Manager (of a Regulated Agent or Known Consignor)
- Commission Inspector
- National Inspector (e.g. UK DfT Inspector)
- (A Helpdesk User, who will be responsible for uploading the various guides in the RAKC application will also have access to the database).

Each of these users will be able to perform different functions on the database.

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February 2012

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If they search the database to check the validation of a known consignor, they will be able to view the following information about your company:

- name of company
- alternative name of company
- site address;
- status
- registration number (Unique Alphanumeric Identifier), and
- expiry date.

In addition, as Member State Administrator, the DfT will also be able to view the following information:

- name of the security manager
- email address of the security manager, and
- name(s) of RAKC users within the company.

Accessing RAKC

The RAKC database can be used to locate Listed Regulated Agents to facilitate the transportation of SPX cargo. All Known Consignors will need a user account to access the RAKC database; you should already have received the account details by e-mail. If you have not yet received your user account details, please email us at TRANSEC.RAKC@dft.gsi.gov.uk. To ensure a prompt response, please title the e-mail "RAKC user account not issued".

Website Address

The RAKC website is located at <https://webgate.ec.europa.eu/ksda/login.htm>.

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February 2012

NOTES

Explosive and incendiary devices

Assembled explosive and incendiary devices may be carried in consignments of cargo if the requirements of all safety rules are met in full. Explosive and incendiary devices, whether assembled or not, shall not be carried in consignments of mail.

The following are prohibited articles:

- (i) Any explosive or incendiary device;
- (ii) Any explosive or incendiary components, which by themselves or in conjunction with other items can result in an explosion or fire;
- (iii) Any article manufactured or adapted (whether in the form of a bomb, grenade or otherwise) so as to have the appearance of being an explosive, whether it is capable of producing a practical effect by explosion or not, or any article marked or labelled so as to indicate that it is or contains an explosive;

Unless it has

- (a) Been declared as part of the consignment; and
- (b) Been subjected to the applicable safety measures.

Consignments from other sources

A known consignor may pass consignments which it has not itself originated to a regulated agent, provided that:

- (a) they are separated from consignments which it has originated; and
- (b) the origin is clearly indicated on the consignment or on accompanying documentation.

All such consignments must be screened before they are loaded on to an aircraft.

Standards for the recruitment of staff with access to SPX or SCO air cargo.

Job Application Form

1. Candidates must complete the consignor's job application form giving full details of their education, training and employment during the preceding 5 years or since they reached the age of 16, whichever is the shorter period.
2. The form must include:
 - a) a declaration that the information given is complete and accurate;
 - b) a declaration that the candidate has no criminal convictions (including any convictions outside the UK) other than any treated as spent under the provisions of the Rehabilitation of Offenders Act 1974
 - c) a declaration of acceptance that any misrepresentation of the facts is a ground for refusal of employment or disciplinary proceedings (and, in appropriate cases, criminal charges);
 - d) an authorisation for approaches to be made to former employers, educational establishments, government agencies and personal referees for verification of the information;
 - e) the requirement for provision by the candidate of their national insurance number.
3. The completed form must be signed by the candidate.

Interview

4. The candidate should be interviewed by a person who has been specifically trained for the task.
5. The interviewer must:
 - a) Check that the candidate understands the full implications of paragraph 2a), b), c), d) and e) so far as is applicable to them;
 - b) Work through the record with the candidate, seeking to obtain any further information that may be relevant (e.g. reasons for leaving previous employers) and ensuring that no periods are unaccounted for;
 - c) Verify the national insurance number; and
 - d) Inspect proof of identity:

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- (i) In the case of British nationals, either a full ten-year passport or a British photo-card driving licence with counterpart;
- (ii) In the case of EU nationals, a full EU Member State passport or National Identity Card;
- (iii) In the case of all other nationals, a full passport together with an original Home Office document confirming the individual's right to work in the United Kingdom; or
- (iv) National Identity Card, Identification Card or Identity Card for Foreign Nationals issued by the Home Office or their agencies.

Where the interviewer is satisfied the person whose identity is to be established cannot reasonably provide the documentation required under paragraphs (i) – (iv) above, the person shall be required to supply the following original documents:

- (a) Birth or adoption certificate; or
 - (b) Registration or naturalisation document; and
 - (c) Proof of residence in the UK; and
6. A passport sized photograph endorsed on the back with the signature of a JP, medical practitioner, officer of the armed forces, member of the clergy, teacher, lecturer, lawyer, bank manager or civil servant who has known the candidate for a minimum of 3 years. This shall be accompanied by a signed statement from the signatory giving their full name, position, address and telephone number and confirming the period that they have known the candidate.
7. Any gaps of more than 28 days should be explained by the applicant, and, where there is any cause for doubt, written confirmation should be sought from the educational establishment concerned, the person's employer or from another source capable of confirming the reason for the gap. Regular academic summer holidays of more than 28 days, should generally be disregarded. Gap years, however, may NOT be considered as regular academic holidays. A statement regarding maternity leave may be supported by the child's birth certificate or a family allowance book. Travelling periods may be supported by tickets; hotel bills etc but if these are not available travelling periods may also be verified by close questioning at the interview stage. A record of such questioning should be retained.

Verification (to be carried out after the interview and completed before the employee is tasked to carry out any duty)

8. This should be verified through written references or by a written confirmation from the educational establishment or employer or from a government department. School reports and some educational certificates may be taken into consideration where they

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February 2012

clearly cover relevant periods

Background Checks

9. In addition to the checks required above, those with overall responsibility for security at a Known Consignor site and taking up that role on or after 29 April 2010 require a CRB disclosure. See the DfT website (<http://www.dft.gov.uk/pgr/security/crb/>) for more information.

Training: Information for Prospective Known Consignors

Training

All relevant staff are required to have training in air cargo security. In the case of known consignors, relevant staff are those who have access to identifiable air cargo, or information about it. The minimum level of training is determined by the employee's job function.

From 06 June 2011 all staff with access to identifiable air cargo will need to hold a valid Level D certificate. The Security Manager / Person responsible for security at each site will need to hold a Level G certificate. Your drivers must also be trained if they are to transport your cargo, this should be to a minimum of Level B although Level B is only suitable for drivers who do not load, unload, have access or otherwise handle the cargo. Level D training is required for drivers who handle the cargo.

All of these courses can be found in the Air Cargo Security Training syllabus dated July 2009 and upon successful completion are valid for a maximum of two years.

Courses must be accredited by the DfT and must be delivered by a DfT accredited air cargo security trainer. A list of trainers is available at <http://www.dft.gov.uk/pgr/security/aviation/aviation-security-training/>

Some trainers offer public courses to which you can send employees. Alternatively, many trainers will deliver courses at your site. There is no fixed fee for training, so consignors may wish to contact several providers to compare quotes.

Further Information

Further information about training for Known Consignors can be obtained from current.cargovalidations@dft.gsi.gov.uk

Letterhead
(including the address to which the validation refers)

Known consignor UAI:

Unique Consignment Identifier:

Destination:

KNOWN CONSIGNOR CONSIGNMENT SECURITY CERTIFICATE

On behalf of the above named company, I, the undersigned, certify that to the best of my knowledge:

The consignment to which this certificate refers has been prepared by a known consignor whose operations, premises and procedures have been certified as secure by a Validator accredited by the Department for Transport and the consignment does not contain any prohibited articles. Accordingly, this consignment can be considered SPX cargo.

I understand that the consignment may be examined for security purposes and that a false declaration may lead to legal action being taken.

Signed: Name (block letters):

Position in company:

Date: Time:

HAULIER DECLARATION

In accordance with Regulation (EC) No 300/2008 of the European Parliament and of the Council on common rules in the field of civil aviation security and its implementing acts,
When collecting, carrying, storing and delivering air cargo/mail to which security controls have been applied [on behalf of *name of regulated agent/known consignor/account consignor*], I confirm that the following security procedures will be adhered to:

- all staff who transport this air cargo/mail will have received security awareness training,
- the integrity of all staff being recruited with access to this air cargo/mail will be verified. This verification shall include at least a check of the identity (if possible by photographic identity card, driving licence or passport) and a check of the curriculum vitae and/or provided references,
- load compartments in vehicles will be sealed or locked. Curtain sided vehicles will be secured with TIR cords. The load areas of flat bed trucks will be kept under observation when air cargo is being transported,
- immediately prior to loading, the load compartment will be searched and the integrity of this search maintained until loading is completed,
- each driver will carry an identity card, passport, driving licence or other document, containing a photograph of the person, which has been issued or recognised by the national authorities,
- drivers will not make unscheduled stops between collection and delivery. Where this is unavoidable, the driver will check the security of the load and the integrity of locks and/or seals on his return. If the driver discovers any evidence of interference, he will notify his supervisor and the air cargo/mail will not be delivered without notification at delivery,
- transport will not be sub-contracted to a third party, unless the third party also has a haulier agreement with [same name as above of regulated agent/known consignor/account consignor, or of the appropriate authority which has approved or certified the haulier], and
- no other services (e.g. storage) will be sub-contracted to any other party other than a regulated agent or an entity that has been certified or approved and listed for the provision of these services by the appropriate authority.

I accept full responsibility for this declaration.

Name:

Position in company:

Date:

Signature:

Haulier Declaration, Additional Declaration

Cargo shall only be transferred between vehicles, stored, broken down, consolidated, repacked or otherwise handled by a regulated agent, and only at a regulated site.

Name:

Position in company:

Date:

Signature:

The original agreement should be retained by your company; however, the haulier should also provide their drivers with a copy of this agreement which they should be able to produce if asked when delivering SPX cargo.

APPLICATION FOR KNOWN CONSIGNORS

A	Company Name	
B	UAI (if already a Known Consignor)	
C	Expiry Date (if already a Known Consignor)	
D	Company Address	
E	Contact Name	
F	Contact Telephone Number(s)	
	Office	
	Mobile	
G	Contact Email Address	
H	Site Address (if different to details in Section D)	
I	Suitable Dates for Validation Visit	

Useful websites

<http://www.dft.gov.uk/topics/security/personnel-security/>

DfT website pages giving Information on personnel security in the transport sector, including national security vetting, risk assessments, recruitment, criminal record checks and ongoing personnel security.

<http://www.dft.gov.uk/publications/aviation-security-training>

DfT Training pages where a downloadable pdf file can be found containing a list of all accredited trainers and the Levels of training that they are accredited to deliver.

[www.eur-](http://www.eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:055:0001:0055:EN:PDF)

[lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:055:0001:0055:EN:PDF](http://www.eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:055:0001:0055:EN:PDF)

EU Regulation 185/2010

www.disclosurescotland.co.uk/

Disclosure Scotland, Basic CRB (Criminal Record Background)

www.mi5.gov.uk

MI5 Security advice, including document on personnel security.

www.cpni.gov.uk

Centre for the protection of national infrastructure (Security advice, including physical, personnel and electronic security measures)

FREQUENTLY ASKED QUESTIONS

REGULATIONS

1. To whom do the regulations apply?

The regulations apply to consignors who want to apply for Known Consignor Status.

2. Why should I apply to be a Known Consignor?

Known Consignors status will provide assurances to carriers about security standards. This also means that regulated agents and air carriers will not need to carry out any further searching or screening. Overall it should facilitate the passage of cargo through airports which your business depends on.

3. Do I have to be a Known Consignor to move my cargo by air?

No. Consignors are not obliged to become Known Consignors. But if they elect not to, their cargo must be screened before being flown and they are responsible for paying the security charges levied by a listed agent or airline.

4. Will I be charged for becoming a Known Consignor?

Yes. A validation costs £400 plus travel expenses at 40p per mile.

5. What will it mean for me to become a Known Consignor with the Department?

Being a Known Consignor will mean that you will be subject to EU regulation, which require certain things to be done by law, and be subject to inspections. The aim of this is to ensure that appropriate security standards are set and maintained. On a positive note, your company will save money in the long term.

6. What will Validators be looking for?

Validators will be seeking to establish whether you comply or, initially, are likely to be able to comply with the procedures laid down in the EU regulation and the Guide for Known Consignors. Unsatisfactory areas will be brought to your attention for remedial action.

7. Can I publicise my Known Consignors status?

No. You should include the UAI number on the Known Consignor CSC/CSD only. You may freely publicise the fact that you are a Known Consignor, but you must not imply Departmental approval of your business, or use the DfT logo in advertising, on vehicles or in any other manner.

8. How can I apply?

An application form is available from the cargo team who can be contacted at current.cargovalidations@dft.gsi.gov.uk

9. Will I need to change the way I do business?

That depends on how effective your security procedures are at present. If a suitable security regime is already in place and you apply all (or many) of the security controls we require, then your operations will be largely unaffected by regulation:

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10. Will the regulated agents and air carriers know which Known Consignors are listed?

Yes. Regulated Agents and air carriers can verify the status of Known Consignors on a secure website.

11. Will all regulated agents be subject to the same requirements?

Yes. All regulated agents and air carriers operating in the UK are served Directions, which they must comply with.

12. Are there any changes that I will need to notify to the Department?

Yes. If at any time important details in the information you supplied in support of your application should change, you must notify the Department. Major changes should be notified 14 days in advance and other significant changes within 7 days.

SECURITY MEASURES AND ENFORCEMENT

13. Are there conditions for acceptance to be a Known Consignor?

Yes. You must provide the Department with an application form, be subject to a validation and sign the Declaration of Commitments to comply with the EU regulation 185/2010. You will then have to show that all of the premises where cargo is handled are physically secure and have appropriate security controls.

14. Can I employ agency staff to pack my cargo?

Yes. Agency staff can be used in any role involving air cargo provided that you have proof of identity and address and that you have obtained written references, a satisfactory work history and a declaration of any criminal convictions for the staff involved.

15. Can I be a known consignor if I send all my cargo to be packed by another company?

If the packer is already a DfT regulated agent then there are grounds for believing that the cargo will be handled and stored in a secure manner and packed by persons who have been properly recruited and trained.

If the packer is not a regulated agent the cargo becomes unknown (i.e. the integrity of the security chain is lost) and will need to be security screened prior to being flown.

16. I have packers carrying out packing at my factory - can I be a known consignor?

Yes. But you will need to demonstrate to the Validator that the staff undertaking the packing are recruited and trained in accordance with the regulations and are supervised by your own staff who are familiar with the packing process.

17. Do my employees packing air cargo need formal training?

Yes, see the section on training requirements.

18. Do I have to have a separate area for packing air cargo?

A segregated and access controlled area does contribute to a secure environment. You will be signing a cargo security certificate for the cargo you send and declaring that it has been prepared securely and can be classified as known cargo. If you are not able to

Not Protectively Marked

February 2012

Not Protectively Marked

control access to that area, you may feel that you would be liable to prosecution in the event that the cause of an incident affecting civil aviation was traced back to your premises. If access is not controlled you would need to convince the Validator that you had other measures in place to overcome the problem.

19. I do not have a specific place to store air cargo once it has been prepared - will this affect my validation?

It is essential that identified air cargo is kept secure until it is taken to the regulated agent or airport. Good quality, continuous supervision may be accepted as ensuring the security of stored cargo.

20. What is meant by tamper-evident?

Where it is evident from the packaging that an attempt has been made to interfere with the cargo. Making the cargo tamper-evident can include:

- sealing the box with plain tape and using a unique stamp across the tape or using company tape or tamper evident tapes or seals
- as above but supervisors signing across the tape after inspecting its integrity
- by using numbered one-time seals. The numbers of the seals can be transmitted to the receiving station so that the package can be checked on receipt.

21. I buy in stock and distribute it - can I be a known consignor?

Yes, provided that it is not possible that the stock you buy in can be identified as air cargo to a specific destination or on a specific flight. In some cases the end destination may be predictable by the wording on the carton etc. But as long as the information on when and how the product gets to its destination is not known to the supplier, it is unlikely that the cargo will have been interfered with.

22. I do not use my own vehicles to transport the cargo - can I be a known consignor?

Yes, provided that the drivers have been recruited and trained in accordance with EU regulation. The haulier must complete the Haulier Declaration agreement and confirm that their drivers are all trained to at least Level B or D. An example Haulier Agreement is in this guide.

23. Who can sign the consignment security certificate?

This document provides confirmation to the regulated agent or air carrier that all the security requirements have been met. As such it should be signed by a responsible person who can make such a statement on behalf of the company.

STAFF AND TRAINING

24. Will each Known Consignor need an appointed Responsible Person?

Yes. You will need to nominate a specific person, known as the person responsible for air cargo/air mail security to have responsibility for your companies' policy on security and be responsible for the implementation of all security procedures. The Responsible Person will need to understand the requirements of regulations and Guide for Known Consignors. Where air cargo is handled at more than one site, you will need to designate at least one

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February 2012

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person at each site, known as the Site Security Representative who will be responsible for the application and the supervision of the implementation of security controls.

25. Why do you want the name, address and phone number of a person to receive communications?

It is essential that we have a contact person within your organisation, this person will also receive (on behalf of your organisation) information on air cargo security from the Department.

26. Will I need to provide any training?

Yes. All staff involved in handling air cargo, whether directly employed or contracted.

27. Do I have to get written references for all my staff if I want to become a known consignor?

In the context of becoming a known consignor, Validators will only be interested in those staff with access to the air cargo. It is *essential* that you know who these people are and that you can demonstrate to the Validator that you have taken all reasonable steps to assess that they are of good character. We expect that such persons would have a verifiable work history of at least 5 years or back to full time education with any gaps in employment being accounted for.

The Validator will want to satisfy him or herself that you have a written recruitment procedure in place which includes taking up of references, an interview and the applicant signing a statement that they have disclosed any criminal convictions and that the statements they have made are true and correct.

APPLICATION

28. How long will the validation last?

UK Known Consignors are validated every 12 months; you can re-apply to the Department at least 4 weeks before it expires.

29. Can my application be refused?

Yes. The Department may refuse your application if it does not meet the conditions required.

30. Can my Known Consignor status be removed?

Yes. The Department is required to remove known consignors' status if the company does not meet EU regulations. If the Department decides to remove your Known Consignor status your company will be formally given written notice.

31. If I am removed from the Known Consignor scheme can I reapply?

Yes.

32. What if I forget to renew my Known Consignor status?

You may re-apply immediately. If your Known Consignor status has already expired then you will not be validated until your new application has been processed and a validation visit undertaken and your company obtains the UAI number (Unique Alphanumeric

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February 2012

Not Protectively Marked

Identifier). The Site Security Representative must obtain a Criminal Reference Check to comply with EU regulation.

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February 2012

UK KNOWN CONSIGNORS SECURITY OCCURRENCE REPORTING SYSTEM

PLEASE SEE OVERLEAF FOR GUIDANCE ON HOW TO COMPLETE THIS FORM AND WHERE TO SEND IT

Report From			
Name		Telephone	
Fax		Email	
Time		Date	
Signature			

Incident Details			
Time		Date	
Type of Incident		Exact location	
Details			

Follow up Action	
Details	

If Police Involved			
Name of		Telephone	

Contact				
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INCIDENT REPORT FORM - GUIDANCE NOTE

CONTACT DETAILS

Enter your contact details in this section and sign where indicated. This will provide a contact point for DfT if further information is required.

INCIDENT DETAILS

Enter the incident details in this section. The incident types are listed in Annex A to this letter. Under 'Details' you should be as specific as possible e.g. if an unauthorised access to an aircraft occurred which airline was involved? What aircraft was it? If known or suspected, how did the person/persons gain access to the aircraft?

Should the space provided prove insufficient feel free to continue your report on a sheet of A4 paper.

FOLLOW UP ACTION

Enter details of any follow up action in this section. This could include: fencing replaced, new CCTV camera installed, increased security patrols etc. Any action taken in regard to company employees should be entered e.g. verbal/written warning issued, staff retrained etc. If a suspect was taken into custody by police this should also be entered.

IF POLICE INVOLVED

Enter details of a police contact in this section if the police were involved in an incident.

SENDING COMPLETED INCIDENT REPORT FORMS TO DFT

You can email or fax completed incident report forms to DfT using the details below. Electronic versions of this form can be provided on request.

Weekdays 0900 - 1730 (UK time)

Transec Threats Office:

Telephone: +44 (0) 207 944 2870 / 2872

Fax: +44 (0) 207 944 2873

Email: TICB@dft.gsi.gov.uk

ALL other times

DfT Duty Office:

Telephone: +44 (0) 207 944 5999

Fax: +44 (0) 207 944 5369

Email: Duty.Officers@dft.gsi.gov.uk and TICB@dft.gsi.gov.uk

Completed forms and telephone notifications of incident should only be via the contact details listed above and not via your usual Transec policy or compliance contacts.

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UK KNOWN CONSIGNORS SECURITY OCCURRENCE REPORTING SYSTEM

Scope of reporting

The Known Consignor should report any actual or suspected act of unlawful interference or occurrence that may affect the security of civil aviation within their areas of operation to the DfT Threats Office. All reports should be submitted on the form above.

Reporting Priorities

In any reporting system, it is important that whilst information is relayed in a timely manner, the system should not become an unnecessary administrative burden on the reporting or recipient organisation.

Media Interest

As a matter of good practice, the DfT should be informed of any security incident or occurrence of which has, or is likely to receive imminent media attention and reporting. This will allow respective press offices to co-ordinate media messages about an incident.

Multi-Source Reporting

Where more than one element of the industry is involved in a security incident or occurrence, it is acceptable for one organisation to submit an agreed consolidated report on behalf of some or all of the entities involved. Equally individual organisation involved may opt to submit individual reports to DfT.

Reporting Procedure

Any incident which requires IMMEDIATE notification should initially be reported by telephone with a written report following within 24 hours;

Transec Threats Office: Weekdays 0900 - 1730 (UK time)

Telephone: +44 (0) 207 944 2870 / 2872

Fax: +44 (0) 207 944 2873

Email: TICB@dft.gsi.gov.uk

DfT Duty Office: all other times

Telephone: +44 (0) 207 944 5999

Fax: +44 (0) 207 944 5369

Email: Duty.Officers@dft.gsi.gov.uk and TICB@dft.gsi.gov.uk

Post-Reporting Action

All reports received are logged and a summary of incident occurrences will be provided to each meeting of the National Aviation Security Committee. Information will also be distributed on the number and nature of incidents to trusted industry contacts and training providers to aid staff awareness and security training and to JTAC and the Police as DfT deems appropriate.

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February 2012

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REPORTABLE OCCURRENCE

DESCRIPTORS

Event Type	Descriptor	Reporting Status
Improvised Explosive Device	Detonation of Improvised Explosive Device (IED), Person Borne IED, Vehicle Borne IED or discovery of same or component parts of improvised explosive devices.	Immediate
Sabotage	The deliberate sabotage, by whatever means (e.g. electronic or physical), of a Known Consignor installation/equipment.	Immediate
Armed attack	The use of arms against an aviation target (including staff and passengers)	Immediate
Chemical, biological, radiological or nuclear item (CBRN)	The use or suspected use of chemical, biological, radiological or nuclear agents in an attack against an aviation target, or discovery of such agents in suspicious circumstances.	Immediate
Discovery of Weapons	Firearms (including component parts and ammunition) and other weapons on passengers or in cabin	Immediate
Unauthorised Access to premises	Unauthorised access to any airside area(s) including the unauthorised use of a recognised authorisation, off - airport premises (including Catering facilities, Known Consignors, Regulated Agents);	24 Hours
ID Theft	Theft of Uniforms, identification card(s) or liveried vehicles.	24 Hours
Deception	Including impersonating staff, false declarations on ID applications, or where a person is suspected of knowingly attempting to deceive by issuing a document which purports to be issued by a person on a list of approved air cargo agents.	24 Hours
Hostile reconnaissance	Airports are required to have in place surveillance, patrols and other physical controls in order to identify suspicious behaviour of persons and to identify vulnerabilities which could be exploited to carry out an act of unlawful interference and to deter persons from committing such acts. Any such behaviour should be reported to DfT.	24 Hours

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February 2012

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February 2012