**Australian Government**

**Department of Infrastructure and Regional Development**

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Senate Rural Regional
Affairs and Transport
Committee

*File Reference: 16/637*
*Contact: Sachi Wimmer*

Senator Glenn Sterle
Chair
Senate Rural and Regional Affairs and Transport References Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Senator Sterle

**Inquiry into airport and aviation security – request for further information**

I refer to your letter of 10 December 2015 requesting further information on certain aviation security matters. As you note in your letter, the aviation security environment is constantly evolving. The Department of Infrastructure and Regional Development, through the Office of Transport Security, continues to monitor it closely to ensure that the regulatory framework we manage is appropriate.

Please find following our response to the Committee's questions:

1. *In an answer to a question on notice provided in February 2015, the department stated that overall the number of incidents reported by aviation industry stakeholders through the voluntary reporting scheme had remained consistent since the release of information to Network Seven in July 2014 under the* Freedom of Information Act 1982. *Can the department provide the committee with an update on the voluntary reporting rates? In particular, can the department provide a month by month comparison of the reporting rates for the period January 2014 to December 2015?*

   The total number of reports (i.e. both voluntary and mandatory) received from industry participants in 2015 was consistent with the number received in 2014. However, no voluntary statistical reports have been provided under a deed of confidentiality since the release of the FOI information to Channel 7 in July 2014.

2. *In evidence given at the public hearing, the department noted that the aviation industry sector had communicated concerns to the department following the release of documents under the Freedom of Information (FOI) request. Has the department since been made aware of further concerns from aviation industry stakeholders on this matter? If so, what was the nature of those concerns?*

   A number of concerns have been expressed about the release of information provided to the Department by industry since February 2015. Industry participants have expressed concerns that the public release of voluntary reporting information has security, reputation and legal consequences for them as it could be exploited to circumvent preventive security measures and measures for detecting breaches of security with clear implications for public confidence in their business. A number of industry participants have also verbally advised that this has led to them ceasing to provide voluntary reports to the Department, which they acknowledge is likely to prejudice the continuous improvement of aviation security in Australia.

3. *The department noted at the hearing that, owing to industry unhappiness over the release of information, there had been threats from some stakeholders of a cessation of reporting under the voluntary scheme. Additionally, in an answer to a question on notice provided in February 2015, the Australian Airports Association informed the committee that in a survey of 26 airports taken in February 2015, three airports indicated that they had ceased voluntary reporting, citing the successful Network Seven FOI request as the primary reason for the cessation. Can the department confirm whether some stakeholders have ceased to participate in the voluntary reporting scheme since February 2015?*

   No voluntary statistical reports have been provided under a deed of confidentiality since the release of the FOI information to Channel 7 in July 2014. A number of stakeholders – both with and without deeds of confidentiality – have verbally confirmed that they have ceased voluntary reporting.

4. *Can the department provide further information on the voluntary reporting scheme, including when the scheme was established, the number of stakeholders participating in the scheme, the reporting framework (i.e. frequency and format of reports) and any written guidelines given to participants?*

   The voluntary reporting scheme was originally established as a means of encouraging the reporting of security-related events that are were not required to be reported under the *Aviation Transport Security Act 2004* (ATSA). The ATSA obliges industry participants to report any acts of unlawful interference with aviation, or threats of unlawful interference with aviation, to the Department. Acts of unlawful interference with aviation, as defined in the ATSA, include: taking control, or threatening to take control, of an aircraft by force; destroying an aircraft or damaging it in such a way that puts the safety of the aircraft or any person at risk; committing an act at an airport that puts the safe operation of the airport, or the safety of any person at the airport, at risk.

   This mandatory reporting ensures that the Government has access to the range of information needed to manage a crisis and to plan effective response and recovery actions. However, while essential, mandatory reporting is generally only reactive, as reporting is only produced when an incident is threatened or has occurred. This limits the Department's ability to work with industry to prevent an incident by identifying and addressing possible weaknesses in the security framework before an act of unlawful interference with aviation occurs.

   The Department sought to augment the legislative arrangements by encouraging industry to report other security-related events such as sterile area breaches, unauthorised access to transport facilities and detection of prohibited items at screening points. The purpose of this was to strengthen the link between security events and occurrences with intelligence analysis, targeted compliance activity, policy development and provision of information to industry.

   The voluntary reporting scheme commenced with a trial period in late 2010 that involved seven large aviation industry participants. Ultimately, formal deeds of confidentiality were agreed with 9 airports and one airline. Other industry participants also provided 'voluntary reports', although they did not sign deeds of confidentiality. The intent behind the deeds was to encourage reporting by creating enforceable protections for the handling of voluntary reporting data.

   Industry participants with a formal deed of confidentiality were asked to provide monthly statistical reports on certain types of information (for example prohibited items voluntarily surrendered at security screening points), but others (such as damage to a security fence) were to be reported in detail as soon as possible. Industry participants without deeds, who provided information that was considered 'voluntary reporting' (i.e. information which did not fall within the mandatory requirements set out in the ATSA), tended to provided it in a more ad hoc fashion.

   Reports were generally provided in the form of an excel spreadsheet, although there was no set format. There were no formal guidelines other than the terms set out in the deeds.

5. *In an answer to a question on notice, the department stated that it had negotiated deeds of confidentiality with seven airports and one airline to cover the data produced under the voluntary reporting scheme. Noting that these confidentiality deeds did not prevent the disclosure of such*

*data under the Network Seven FOI request, do the agreements with those eight stakeholders still stand? Has the department received further requests for deeds of confidentiality (or requests for updated provisions of existing deeds) from industry stakeholders? If so, have these requests been granted?*

The Department has not received any further requests for deeds of confidentiality or changes to the existing deeds.

The existing deeds of confidentiality still stand. However, a number of drafting deficiencies have been identified and the Department is currently reviewing the terms of the deeds as well as looking into other mechanisms to ensure that relevant information is provided by industry, and that such information is appropriately protected.

6. *Has the department completed the post-implementation review of visitor identification cards mentioned in evidence at the February 2015 public hearing? If so, can the department please provide a copy of the review and its outcomes to the committee?*

The visitor identification card (VIC) post-implementation review has been finalised. It confirmed that the VIC enhancements had been integrated into the daily management of visitors with relatively few issues. It recommended a number of minor changes be made to make visitor management smoother.

In 2015 the Department clarified the use of VICs for screening officers. The Department confirmed with all screening authorities that screening officers must hold and display a valid ASIC at all times while on duty. Persons training to be a screening officer, who have applied for an ASIC, and are not making independent screening decisions, and are constantly supervised by a qualified screening officer, are able to use a VIC.

It is expected that those recommendations which require amendments to the Aviation Transport Security Regulations 2005 (ATSR) will be implemented before the end of July 2016.

A copy of the report is attached.

7. *Can the department outline for the committee the work it is currently undertaking in conjunction with other government agencies (for example, the Australian Federal Police and the Attorney-General's Department) to strengthen the aviation security identification card regime and compliance with it by industry stakeholders?*

The Department, in collaboration with partner agencies, is currently progressing the following key initiatives to strengthen the aviation security identification card (ASIC) scheme:

- Tightening eligibility criteria: The Department, with support from the Attorney-General's Department (AGD), is revising the eligibility criteria that underpin the ASIC scheme. The new criteria will shift the focus onto more serious criminal offending and high risk criminal activities and aims to reduce criminal influence at Australia's airports and seaports. The Transport Security Amendment (Serious or Organised Crime) Bill 2016, which will establish the framework for these changes, is expected to be introduced in the Autumn 2016 Parliamentary sittings.

- Issuing body process enhancements: The Department is in the process of amending the ATSR to improve the administration of the ASIC scheme and address risks associated with current issuing body practices. These amendments will include the introduction of in-person verification to confirm an applicant's identity, and are designed to meet the National ID Proofing Guidelines Level of Assurance 4. It is expected that the regulatory amendments will be made this year.

- Enforcement: The Aviation Transport Security Regulations 2005 were amended in July 2015 to allow eligible customs officers to enforce the display and use requirements of ASICs at security controlled airports. In January 2016 the Department, in conjunction with the Australia Federal Police and the Australian Border Force, commenced a trial targeting offences for improper display and validity of ASICs. Infringement notices will be issued for offences. The

Department may refer unsettled infringement notices to the Commonwealth Director of Public Prosecutions.

Should you have any enquiries regarding the above please contact me by telephone on 02 6274 6217, or by email at <*sachi.wimmer@infrastructure.gov.au*>.

Yours sincerely

Sachi Wimmer
Executive Director
Office of Transport Security

10    February 2016

**Australian Government**

**Department of Infrastructure and Regional Development**

# Visitor Identification Card Enhancements
# Post Implementation Review

Maritime, Identity and Surface Security

Office of Transport Security

2014

# Contents

# 1. Introduction

The Visitor Identification Card (VIC) scheme, which supports the Aviation Security Identification Card (ASIC) scheme, is a part of everyday business at Australia's security controlled airports. In 2006 it was established as the formal management mechanism of visitors when the ASIC scheme was extended to include airports receiving regular public transport (RPT) services.

In November 2011, as part of the Government's commitment to strengthening the Aviation Security Identification Card (ASIC) scheme, changes to the Aviation Transport Security Regulations 2005 (the Regulations) were made to enhance the visitor management requirements at security controlled airports.

The enhancements were announced in the National Aviation Policy Statement and supported a response to a recommendation of the Australian National Audit Office (ANAO).

The enhancements introduced a number of changes to visitor management including a 28 day limit rule, centralisation of issuing, identity verification and enhanced record keeping.

Since the introduction of the enhancements, aviation industry participants have had time to refine operations and reflect on how they administer their responsibilities in regards to visitors. There has been sufficient time for industry to observe any complications, gaps in regulation or unintended consequences of the enhancements.

The Department of Infrastructure and Regional Development (the Department) has conducted a Post Implementation Review (PIR) into the VIC enhancements of 2011 to:

1) Examine the practical application of the enhancements by stakeholders; and
2) Evaluate the impact of the regulatory changes on visitor management.

This report provides an evaluation and summary of these findings and makes a number of recommendations for future policy work and/or amendments to the Regulations.

This report assumes the reader has a working understanding of the ASIC and VIC schemes.


# 2. Background

## 2.1 Drivers for the VIC enhancements and the PIR

### The Aviation White Paper

On 16 December 2009, the then Minister for Infrastructure, Transport, Regional Development and Local Government launched the National Aviation Policy Statement – The Aviation White Paper. The White Paper contained a series of measures to strengthen and enhance the ASIC scheme and streamline its administrative processes. The Government committed to strengthening the ASIC background checking scheme through implementing a range of measures which included tightening the provisions for the associated visitor management scheme.

### Australian National Audit Office Recommendation No. 3

ANAO Report No. 39 2010-11, titled Management of the Aviation and Maritime Security Identification Card Schemes, highlighted the importance for the Department to assess the outcomes of the then impending implementation of the 2011 VIC enhancements. Importantly, Recommendation No.3 sought that following implementation of the VIC enhancements, that the Office of Transport Security monitor the actual usage of VICs and use this information to inform the ongoing development of the ASIC scheme and compliance activity. In its response, the Department committed to undertake the post implementation review (PIR) and during the review seek depersonalised data on a range of VIC matters.

Risk context

Visitor supervision requirements largely mitigates many of the risks associated with allowing non-background checked individuals into secure areas. Also, as visitor management is essential to ensure the continuity of airport operations, previous policy focus in this area resided with ensuring those requiring unescorted access were adequately background checked. However, it became evident over time that in some cases VICs were being used to avoid background checking requirements. In response, the Department in cooperation with industry, undertook a policy development process to identify and implement polices to significantly strengthen visitor management, culminating in the enhancements to the Regulations.

Regulatory best practice

In line with Government best practice and as part of the regulatory life cycle, a post implementation review provides an opportunity to evaluate the effectiveness of the enhancements to ensure that the changes have been appropriate, effective and efficient. The review targets the impact of the enhancements and provides an opportunity to highlight achievements and to inform future policy if considered necessary.

## 2.2 Summary of key changes to visitor management

28 day rule

Limiting the number of days a person may be issued a VIC to a total of 28 days in any 12 month period (for any one airport) ensures that frequent or non-genuine visitors to secure areas of airports are background checked. The 28 day rule also ensures the VIC scheme is not used to circumvent ASIC requirements. Subject to exceptional circumstances, the effect of the 28 day rule means that when 28 days is reached a person must apply for an ASIC or access is denied.

Centralisation of VIC issuing

The primary authority to issue VICs was revoked from airport tenants and centralised to only the airport operator, with two exceptions being Customs and Secretary Approved VIC Issuers (SAVIs). The concept of SAVIs (currently only Qantas), was developed to support organisations with a significant presence and control of terminals at multiple airports. Qantas is the second largest issuer of VICs nationally.

VIC issuers (other than Customs) are able to authorise agents to issue VICs on their behalf provided it is specified in their Transport Security Program (TSP), and, managed in conjunction with enhanced record keeping requirements (see below).

The centralisation of VIC issuing supports the 28 day rule by providing the airport operator with primary control and visibility of all visitors seeking and obtaining access.

Proof of identification

The enhancements introduced a requirement for all visitors to prove their identity before being issued with a VIC. This enhancement sought to better formalise access and provide clarity to the

airport operator of who was coming and going. Furthermore, this change aids in the accurate calculation of the number of days that an individual has been issued a VIC to support the 28 day rule.

Approved forms of identification include either a primary or secondary identification document containing a photo e.g. licence or passport. Alternatively, a visitor can show two forms of identification (e.g. Medicare card and credit card) one of which has a signature that must be verified by replicating the signature.

Enhancing record keeping requirements

While VIC issuers have always been required to maintain VIC registers, the enhancements introduced a single centralised register for each airport (with the exception of Customs and SAVIs) with more detailed information about VIC usage including details of VICs issued by agents. This now includes details of the visitor and supervising ASIC holder, identity documentation, reasons for entry and relevant declarations such as confirmation that the individual has not been refused an ASIC.

SAVI's are required to share data monthly from their VIC register with the respective airport operator.

## 3.    The Post Implementation Review

The PIR sought to confirm outcomes of the VIC enhancements, identify unintended consequences (positive or negative), and confirm whether the regulatory settings as they stand, are appropriate or require adjustment.

### 3.1    Review Methodology

The review collected a range of information to address ANAO recommendation No. 3 and to contribute to establishing baseline information about visitor management in general. Most importantly, the review undertook a range of consultation and data collection activities to evaluate how the VIC enhancements have impacted visitor management arrangements at security controlled airports.

The review project was primarily conducted over two consultative phases:

Phase 1 - Qualitative data collection

Through face-to-face discussions and written questionnaires VIC issuers, employee and industry representative groups and other identified key stakeholders were invited to provide feedback.

The questionnaire sought to collect information about impacts of the four key principles of the VIC enhancements and to explore VIC management issues informally raised previously by stakeholders to the Department.

During this phase site visits to select VIC issuers were conducted in order to provide an opportunity for in depth discussion and to witness first-hand the implementation of VIC management.

Office of Transport Security - Transport Security Inspectors contributed to the review via written feedback and through a face-to-face workshop. This provided an opportunity to identify VIC compliance audit issues or concerns encountered by Inspectors in the field.

Phase 2 - Statistical data collection and follow up from phase 1

The second phase involved the collection of national statistical data on VIC usage. Stakeholders were also provided with an opportunity to comment on the enhancements in general. This phase contributed to the Department's commitment in response to the ANAO's recommendation.

### 3.2    Stakeholders and Engagement

The Department sought formal input from airports, airlines and other stakeholders on the VIC enhancements over the course of the PIR. Consultation took place through industry forums such as Aviation Security Advisory Forum (ASAF), Regional Industry Consultative Meeting (RICM), targeted internal workshops, questionnaires, statistical data collection and a number of site visits to different category airports.

Some of the key stakeholders for the PIR included:

- VIC issuers including:
  o Over 170 security controlled airports;
  o Australian Customs and Border Protection Service;
  o Qantas (SAVI);
- non-VIC issuing ASIC issuing bodies;
- employee and industry representative groups; and
- internal OTS Transport Security Inspectors who undertake VIC audit and compliance activities.

### 3.3    VIC reporting regulatory amendment

To support the PIR a regulatory amendment was introduced to assist development of an accurate picture of VIC usage across Australia, and enable routine VIC data collection. The amendment prescribes statistical information regarding the issuing of VICs as 'aviation security information' and is relevant to section 111 of the Aviation Transport Security Act 2004 (the Act).

The VIC reporting amendment allows the Secretary to request depersonalised VIC information from issuers on an 'as needed' basis, and was utilized during the second phase of the PIR. This reporting mechanism assists in efficiently obtaining comprehensive national data about VIC usage. It also enables the fulfilment of the ANAO report recommendation 3, which recommended that VIC usage at security controlled airports be effectively monitored to inform ongoing development of the ASIC scheme and compliance activity. Data collection assists general understanding of the difference in the levels of issuing across the categories of airports and has supported the findings and recommendations of this report. The Department is also now using this information to inform policy work as recommended by the ANAO.


## 4.    Evaluation of Key VIC Enhancements

The VIC enhancements are now part of everyday business for most major industry participants and are largely operating well, having been seamlessly integrated into the daily management of visitors and instigating relatively few issues or difficulties.

However, the review has identified a contrast in impacts at different sized airports. As such, it is important to appreciate the operational context of the various categories of airports with regards to the application of VICs to understand the key findings and rationale for the report's recommendations.

### 4.1    Operational Context

The scope of the ASIC scheme was expanded in January 2006 to include ASIC display requirements at all security controlled airports with Regular Public Transport (RPT) operations, encompassing at that time over 180 airports nationally. Prior to this, the scheme only applied in the security restricted areas of major airports. The ASIC and the associated VIC scheme therefore now apply to a wide variety of airport operating environments with ranging operational, physical and economic differences.

For the review and this report, Australia's VIC issuers are categorised as follows:

Large airports/VIC issuers

Designated airports (also known as category 1 airports) reflect the highest security risk and include high capacity RPT international and domestic operations. These airports are located at major Australian cities and are generally large economic hubs with significant infrastructure, large numbers of employees, employers, retail outlets, high traffic volumes and passenger numbers. They generally have dedicated security managers and ASIC/VIC issuing staff. These airports include Sydney, Melbourne, Perth, etc.

Category 2 airports are international gateway airports, though the size and risk profiles can vary. These airports include Hobart, Sunshine Coast, Broome etc.

For the purposes of this report, Category 1 and 2 airports are referred to as large VIC airports. Customs and the single SAVI are also included in references to large airports/operators due to the size of their VIC issuing operations.


Medium sized airports

Category 3, 4 or 5 airports generally have major domestic operations and are located in regional cities/towns (e.g. Townsville/Coffs Harbour) or have fly in/fly out operations associated with mining (e.g. Mt Isa). They have significant passenger numbers and receive relatively large RPT aircraft.

Smaller/remote airports

Category 6 airports have no screening requirements and operate comparatively smaller RPT aircraft. This category does represent a variety of airports including:

- *Remote basic airports* – whose infrastructure consist only of a runway and fence (to keep wildlife at bay), and may have no onsite employees, refuelling or terminal facilities and only a handful of RPT flights per week. Furthermore, council employees are often responsible for the airport operations coupled with numerous other responsibilities in the township.
- *Regional, flight training hub, or in close proximity to a capital city* – some category 6 airports have terminal buildings and can be located in or near major cities or be a busy regional centre, some may also have substantial flight training businesses. However, even at these busier airports an onsite manager may only be present during business hours.

## 4.2    VICs at smaller/remote airports

Out of a total of 339,490 visitor passes issued in 2012, only 4,777 were issued by 55 category 6 airports. This is less than 2% of the VICs issued in Australia and almost half of these were issued by Moorabbin, a category 6 airport in close proximity to Melbourne.

Due to the physical and operational differences amongst security controlled airports, the introduction of the VIC enhancements has had a contrasting impact on different airport types. During the development of the VIC enhancements, efforts were made (in consultation with industry) to apply more tailored arrangements at smaller airports. However, despite these efforts the enhancements have had an unintended effect on these smaller airports. Industry feedback suggests that at these airports, the requirements can be demanding and generally restricting on the management operations of the airport due to staffing levels.

Since the rollout of the enhancements and the categorisation of airports, there has been further work on risks at smaller/remote airports. The current aviation risk context statement's risk weightings confirm that category 6 and general aviation airports do not make inherently attractive terrorist targets. The more likely risk events for these types of airports would be the unlawful interference with smaller aircraft by acutely disaffected persons.

The absence of screening at category 6 airports also represents their lower risk profile, and while personnel are required to hold ASICs, a passenger may take unscreened baggage onto any RPT aircraft.

While the enhancements have served to better promote a strong security culture, maintaining the current arrangements at smaller/regional airports would continue to restrict their ability to apply more appropriate, tailored security measures which can have a similar security benefit but reduce the cost burden on industry.

Operational considerations of smaller/remote airports

Many smaller airports have extended shutdown periods and may only operate during normal business hours.  Outside of business hours there may be no staff on duty at the airport to monitor or issue VICs, making the enforcement of VICs at these airports difficult.

Some airports face the difficulties of adhering to VIC requirements when the airport is manned by a limited number of staff.  Various airports have indicated that the current regulations make it difficult, if not impossible, to supervise visitors and also conduct their operational duties relating to incoming aircraft.  It was noted that due to the low number of airside workers at smaller airports (in some cases there was no one airside at all), non-authorised persons on an airfield can be very easy to identify and challenge.

It has been found that the complex requirements have discouraged compliance at some airports. Particularly those which are run by council employees who are often not permanently placed or responsible for the airport, and whose duties are coupled with numerous other responsibilities in the township, which might take greater priority for them.

An important aspect of the feedback was that the requirement to supervise visitors away from a core area, has the potential to inadvertently decrease the security outcome at that airport. Supervising some visitors may be considered fraught in small towns and at smaller airports where contractors or visitors can be well known to the airport operator as there may be very few people in the town capable of doing the work, etc.  The issue being that in some circumstances, a staff member may be required to leave the higher risk apron area with a parked RPT aircraft in order to supervise the work of a well-known contractor who needs to fix a perimeter fence far from the terminal, leaving the apron area (and aircraft) potentially unmonitored.  While this issue was not created by the enhancements, the recent focus on airport visitor management has highlighted the issue.

Views regarding smaller/remote airports

A number of small airports commented that they found the enhancements to be overly complicated, and in turn some airports appear to have become disengaged with the VIC requirements.  At one site visit to a local council run airport it was found that despite good intentions of purchasing software and VIC passes, the council had never opened the box or implemented their VIC management system due to there not being a computer at the airport.

Despite the desire to comply, without adequate funding to support implementation in smaller or more remote locations (including for staffing or equipment) or the ability for more widespread auditing activities, it may be difficult for communities with little understanding of the complexities of identity security to carry out required duties.

Additionally, with little likelihood of compliance activity taking place at remote airports, some see VIC requirements as unnecessary.

Private Pilots

For some time the general aviation industry has provided a number of airport operators with ASIC/VIC challenges.  These include itinerant pilots from non-security controlled airports who arrive without ASICs.  Typically, these pilots will be allowed to quickly refuel and be on their way without being issued a VIC.

Another challenge relates to local hobbyist pilots, who may bring their friends to socialise at the airport of a weekend without concern for security requirements and without obtaining VICs for their

visitors. On occasion and depending on the airport, there may not be anyone on site to issue VICs in any case.

This issue has been reported as relating largely to smaller/regional airports.

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**_Recommendation 1:_**    It is proposed that policy work be undertaken to consider better options around visitor management at smaller/remote airports which would empower them to manage visitors as appropriate to their airport environment and remove a formalised VIC scheme.

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Possible options for deregulation of VICs at smaller/remote airports

As per the recommendation above work should be conducted to consider the possible options to reduce the scope of the VIC scheme and reduce the regulatory burden on smaller/remote airports. This work should include consideration of the merits of taking an airport category approach to revoking or reducing VIC requirements from security controlled airports at categories 3 to 6.

While there are a range of possibilities/options to achieve this one example would be that at:

- Category 1-2 – there would be no change and airports would retain the current VIC requirements.
- Category 3-5 (and higher risk category 6) - would have the operational areas requiring VICs reduced to the RPT apron and relevant terminal/landside areas. VICs would not be required at the remainder of the airport.
- Category 6 – VIC requirements would be removed completely from Category 6 airports. Airports would still be required to maintain their own access control and unauthorised individuals should still not be allowed on the airport. Higher risk category 6 airports retain the same requirements as category 3-5, that is the operational areas requiring VICs are reduced to the RPT apron and relevant terminal/landside areas.

This approach relies on the current categories assigned to airports according to their aircraft size and passenger numbers and therefore screening requirements. These categories were assigned to airports in 2011 and included consideration of risk ratings. Taking an approach that uses these categories would provide clarity as to where VIC requirements are required and how.

Aside from airports in close proximity to capital cities, most category 6 airports pose a much lower risk to the unlawful interference of aircraft from terrorism than larger airports. The removal of VIC requirements from the category 6 airports would not unduly increase security risks associated with category 6 airports generally due to the lack of screening on RPT flights, operations and remoteness of the airports.

The removal of the requirement to register or supervise visitors will also have an impact in the ASIC scheme in these deregulated areas. Therefore, the reduction of the VIC scheme should be considered concurrently with a reduction in the scope of the ASIC scheme at these airports.

Options on this have not been dealt with in this report, which is more appropriately dealt with through another project currently being discussed with industry into the scope of the ASIC scheme.

Cost benefits

A reduction in the scope of the VIC scheme would see a cost saving for businesses in administration and compliance. There would also likely be a saving to businesses and individuals who may no longer need to apply and pay to hold an ASIC as the 28 day rule for visitors would no longer apply at these airports.

Despite the potential cost savings there are some sensitivities. Primarily that many airports have invested on VIC control programs and systems.

As part of the evaluation of options to reduce the VIC scheme at smaller/regional airports further detailed analysis on cost benefits should be undertaken.

## 4.3    The 28 day rule

The 28 day rule has all but eliminated people using VICs to circumvent the ASIC scheme.  The 28 days provides a generous allowance for infrequent visitors to access the airport within a 12 month period.

Respondents in Phase One of the PIR indicated that they were not aware of anyone who had tried, or succeeded, in obtaining a VIC for greater than the maximum period allowed.  The 28 day rule is generally supported and has been noted as important to supporting general employment at airports. It facilitates probationary periods for new industry employees and gives VIC issuers and the employee 28 days in a role before having to apply and pay for an ASIC.

A small number of VIC issuers did note that due to their high turnover of staff and standard three month probationary periods for employment that the 28 days should be extended, most airports indicated though that the 28 days is sufficient and works well with their operations.

| | |
|---|---|
| ***Recommendation 2:*** | On the whole, 28 days is considered to be an appropriate length of time for a person to visit or be employed at an airport before having to apply for an ASIC.  This provides balance between probationary periods of new employees and the risk of supervision of that VIC holder becoming lax due to the familiarity of the visitor to other ASIC holders. As such, it suggested that the 28 day is appropriate and should be maintained. |

Reduction in the number of non-background checked people in secure areas

The introduction of the 28 day rule resulted in a reported reduction of non-background checked people working or accessing secure areas of airports.  It is noted that immediately upon the rollout of the enhancements ASIC applications increased as people previously operating on VICs were encouraged or required to undertake background checks.

Most large operators observed an increase in ASICs following implementation of the enhancements. Conversely, the lower the airport category the less likely they were to have observed an increase. This general trend is most likely due to the low employee numbers at category 6 airports and therefore low levels of ASIC holders.

Given that larger airports/operators have significantly greater number of people employed on site, they are naturally more likely to have higher employee turnover rates and previously were more likely to have issued higher number of VICs for frequent visitors to secure areas[1].

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[1] ANAO suggested that the larger airports were issuing high volumes of VICs to the same people each year. No references were made to smaller airports.

**Did background check applications increase?**

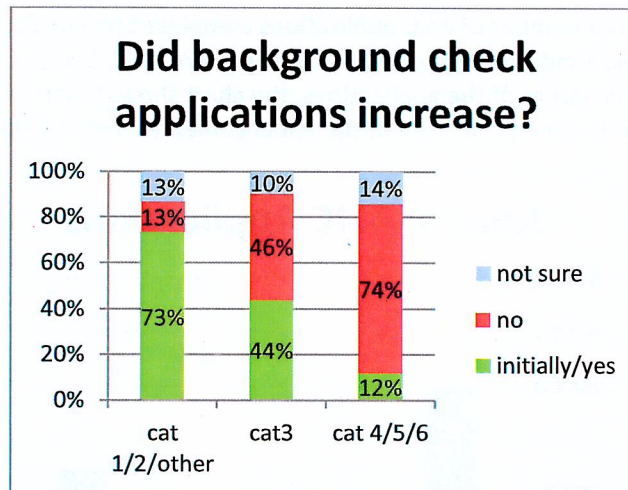| Category | initially/yes | no | not sure |
|---|---|---|---|
| cat 1/2/other | 73% | 13% | 13% |
| cat3 | 44% | 46% | 10% |
| cat 4/5/6 | 12% | 74% | 14% |

Figure 1 Respondents answers to whether they noticed an increase in ASIC applicants after the introduction of the enhancements

Figure 2 below shows the number of ASIC applications completed by AusCheck in the previous four financial years. This chart indicates a two yearly cyclic pattern of ASIC applications. While taking into account the cyclical nature of the applications, the chart shows a nominal increase in ASIC applications of around 9% during the time of the enhancements over and above 2 years previously.
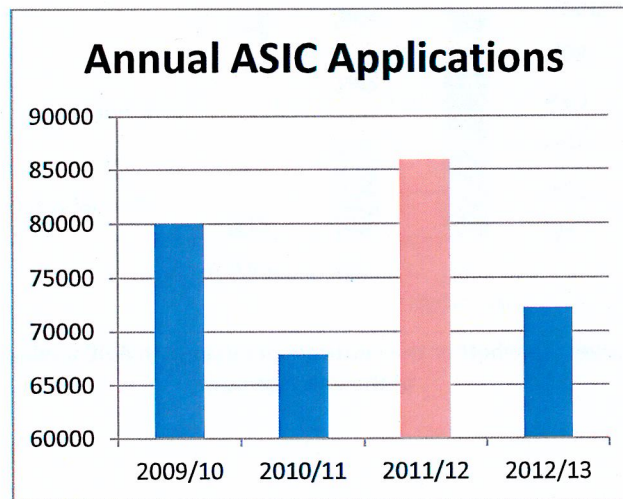
## Annual ASIC Applications



**Figure 2** ASIC applicants in the 2011/12 financial year was at its highest level since early 2009

This increase is supported by the anecdotal evidence of the larger airports that the 28 day rule led to a responding increase in ASIC applicants who may have been previously operating on VICs.

Airports encouraged regular visitors to apply for ASICs prior to the implementation of the Regulations to ensure their compliance with the Regulations. Applications for ASICs increased in Oct/Nov of 2011 and peaked a few months after implementation of the enhancements. While there is the possibility of external factors contributing to the increase (e.g. economic reasons or terminal/runway upgrades), it is still considered to be representative of an indicative increase in background checks in response to the enhancements.

Breaches of the 28 day rule

The greatest risk of a person exceeding the 28 day limit comes from software data entry errors. Such errors include incorrect names, spelling or use of different identification when applying, this potentially leads to a person being recorded in a VIC register as multiple individuals and the 28 day rule being inadvertently or even intentionally breached. This is a common issue across electronic VIC registers. As such it is important that OTS audit activities continue to review VIC registers as part of airport audits, specifically targeting duplicate identities.

Potential increase in non-returned ASICs

The ANAO report noted that there is a high level (30%) of non-returned ASICs that has been an ongoing non-compliance issue for many years. The non-return of ASICs is an issue currently being considered as part of another project looking into card formatting and issuing body production practices which is considering alternative ways of making cards more visibly redundant upon expiry.

It was suggested that due to more contractors (for example tradespersons working on capital projects) now requiring ASICs, there is likely to be an increase in the non-return of ASICs. This was highlighted because ASIC issuing bodies, who were previously issuing primarily to people employed at their airport, are now required to issue ASICs to a broader group of people who were previously categorised as visitors only.

The concern of non-returned ASICs included the return upon expiry as well as when there was no longer an operational need. The PIR could not identify whether these are real and wider issues across the cohort, but this affect should become evident in the ASIC annual reporting statistics over the next few years.

<u>Expansion of operational need definition</u>

The enhancements somewhat removed the discretion of an airport/issuing body over who can hold an ASIC.

A person can only be issued an ASIC if they have an operational need. Prior to the enhancements an operational need existed when a person required *'frequent access to all, or part, of a secure area of an airport for the operation of that airport or an aircraft'*.

This gave the ASIC issuing body/airport operator some flexibility over who could hold an ASIC (depending on their definition of frequent) and limited the number of people able to apply for ASICs. For example diplomat drivers who may only enter the airport to pick up ambassadors on the tarmac would not have been entitled to hold an ASIC as they were not involved in the operation of the airport or an aircraft.

The introduction of the 28 day rule meant the definition of operational need had to be expanded so that a person whose occupation or legitimate business interest required access could be considered to have an operational need.  It has also given definition to the term 'frequent' meaning greater than 28 days.  But overall, there are increases on those who have by default obtained an operational need and been required to obtaining an ASIC, where previously the airport was happy with maintaining them as visitors to ensure they were escorted.

## 4.4    *Proof of identity*

<u>Determining if a VIC applicant has applied for an ASIC</u>

One of the amendments to the Regulations enables a person who has applied for an ASIC to operate under a VIC (in excess of 28 days if required) while they await the outcome of their ASIC application.

VIC issuers are using appropriate methods to confirm that a person who claims to have applied for an ASIC is in fact an ASIC applicant.  While the method of confirmation is not regulated, issuers use a range of effective ways to confirm an applicant's ASIC status including:

1.   using their own records if they are also the ASIC issuing body and employer; and
2.   contacting the relevant employer or relevant issuing body to confirm that an ASIC application is in progress.

There would be little value in specifying in regulation allowable methods of ascertaining a person is an ASIC applicant and like with the confirmation of operational need for ASIC issuing bodies, maintaining the onus on the issuer to satisfy themselves of this.

One other approach some airports have adopted is the restriction of multiple day VICs only to personnel who have ASIC applications lodged with them.  While this can make it difficult for contractors using alternative ASIC issuing bodies, it simplifies the process for the airport in question and ensures that if a background check reveals that an applicant has an adverse criminal record they are immediately informed.

While VIC issuers are using appropriate methods to determine that a person is an ASIC applicant, if a person is refused an ASIC there may be lag time between an issuing body refusing an ASIC and a VIC issuer discovering that refusal (if the ASIC and VIC issuers are different parties).

While it is an offence for a VIC to be issued to a person who has been refused an ASIC, there is no clear cancelation provision requiring a VIC already issued be cancelled upon a person being refused an ASIC (although this is generally common practice).  There have been previous instances where a discretionary ASIC applicant was found to still be working with a VIC despite having been refused an ASIC and unbeknownst to their employer/VIC issuer that they had been recently refused on their initial ASIC application.

| **Recommendation 3:** | A new provision be introduced into the Regulations that requires a VIC to be immediately cancelled if the holder's ASIC application is refused. |
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## Identification documentation

Respondents in Phase One indicated that most visitors generally have identification with them and have experienced limited issues regarding proof of identification. There is a general consensus that proof of age cards (currently not supported as acceptable identification in the Regulations) should be considered an adequate form of identification. Proof of age cards, or their state equivalent (e.g. NSW photo cards), are issued by State Governments, after relevant identity checks, it is appropriate that these cards be considered as adequate proof of identity when issuing a VIC.

| **Recommendation 4:** | The Regulations be amended to allow Proof of Age cards (or state equivalent) as acceptable proof of identification for the purposes of obtaining a VIC. |
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Separate policy work being undertaken within OTS is seeking to improve identification requirements for ASIC applicants based on the Gold Standard, which is considered national best practice. For simplicity and consistency, consideration could be given to tie the VIC identity requirements with these Gold Standard descriptions.

This could occur by proposing that a single category B identification document would be sufficient evidence to identify a VIC applicant. A category B identification document is a document issued to the person by a Government Department or agency that provides photographic proof and includes the person's signature (e.g. Australian drivers licence, most Australian proof of age cards or passport).

VIC applicants without adequate category B identification could use a combination of two documents comprising of at least one category C (evidence of operating in the community) with another either a category A, C or D document providing one of the documents had a signature of the applicant which they verified in front of the VIC issuer. This would allow the person to show a combination commonly carried for example;

- *a Medicare card and a credit card; or*
- *a bank card plus a rates notice*
- *a government ID (if no signature) and credit card; or*
- *a tertiary ID card with a bank account card.*

## 4.5    VIC registers

### Use of electronic databases

The majority of respondents had at the time of review adopted an electronic VIC register. This included registers capable of calculating 28 days automatically. However, category 6 airports largely comprised those that who hold non-electronic registers and would manually calculate the 28 day limit (around half of these issue less than 50 VICs per year).

As the regulations came into effect a range of innovative IT solutions were made available to, or created by, airports. As an example, some innovative features for VIC issuing systems developed include self-serve kiosks and portable iPad VIC issuing applications.

However while it is positive that airports have adapted their own IT systems, it is important to note that future regulatory changes to the VIC scheme could require system changes attracting additional costs and requiring time to implement.

Although not required by the regulations, a number of VIC issuers (who are also ASIC issuing bodies) have set up innovative 'black list/watch list' features that alert them if a VIC applicant has been refused an ASIC. This has resulted in higher visibility of persons that may have adverse circumstances or may not be eligible to hold a VIC.

Other issuers have reported incorporating other customised features such as 20 day alerts for VICs issued to individuals at their airport.

VICs should be issued by ASIC holders

Only ASIC holders are able to be involved in the issuing of ASICs, however it is not specified in regulation that a person who issues a VIC must also be an ASIC holder. Despite this 90% of VIC issuers only allow ASIC holders to issue VICs on their behalf. Of the issuers that don't have an ASIC holder issue VICs, their reasons include:

- *New employees (who are ASIC applicants, hold a VIC themselves and are supervised by an ASIC holder)*
- *Temporary employees*
- *Administration staff trained to issue VICs but don't need access to secure areas*
- *VIC applicants are accompanied/supported by an ASIC holder*

| ***Recommendation 5:*** | A regulatory amendment be made to clarify that those involved in the issue of VICs should be ASIC holders. |
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Return of VICs to the issuer

There is no evidence of systemic issues with the non-return of VICs. Based on the responses received, out of almost 340,000 VICs that were issued during the 2012 calendar year only 1,102 (0.3%) VICs required to be returned, were not.

Observations of operators at a number of site visits indicated that airports were very proactive in chasing VICs and therefore had minimal cards outstanding. Others commented in their response that they seek and receive statutory declarations for non-returned VICs.

The non-return of VICs appears not to be an issue. A refresher communications campaign reminding VIC issuers of their responsibility may be of some use to support airport operations on this requirement.

Residential addresses of members of office on VIC register

The Regulations currently provide an exemption to law enforcement officers, or ASIO or APS employees from having their address recorded on a VIC register. However it was brought to light that Ministers, Senators or other members of office should also be exempt from this requirement as their personal information/address is seen as sensitive.

| ***Recommendation 6:*** | A regulatory amendment be made to extend the VIC register exemption to members of office alleviating them from having to provide personal address details when applying for a VIC. |
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## 4.6    Centralised VIC management

Large airports mostly agree that the move to centralised management has been beneficial.  Given that larger airports are more likely to run numerous agents for VIC issuing on their behalf, they report that centralisation has enabled them to achieve more visibility and control over VIC issuing.

Of those reporting that centralised arrangements have not assisted with visitor management; an increase in administration times associated with entering information into VIC registers is seen as the reason.  However, some airports have invested in technology to overcome this concern (such as equipment capable of scanning driver's licences etc.).

VIC shopping

A person can exceed the 28 day rule by getting VICs through an airport and subsequently (upon reaching their limit) seeking VICs through the SAVI (Qantas).  This is because here is no requirement for the airport to share information about the issue of VICs with a SAVI at their airport.

The Regulations only require that SAVIs share information about their issue with the airport operator but not the other way around.  A person could obtain VICs for up to 56 days, although this is considered an unlikely scenario.

Compatibility of shared VIC data

SAVIs are required to share data monthly from their VIC register with the respective airport operator.

While largely industry has negotiated appropriate ways to ensure the data sharing requirement of the regulations are met, it has not been without some system compatibility issues.  This can be attributed to regulations not mandating any specific VIC management system, and allowed the airports to determine the best system for their operations.

This has resulted in different systems being used which, in turn, has meant that the SAVI (Qantas) has to provide information in various formats.  A small number of airports are not uploading the information shared by Qantas into their VIC register.  But of those that do, individual approaches to this have been taken.  For example, at Darwin airport Qantas uses the airport's VIC issuing system directly.  At Adelaide, Brisbane and Perth the shared information is uploaded automatically through system compatibility, while Sydney currently enters the data shared manually.

Three airports currently do not upload the data, these include:

- Canberra – cross references the information provided by Qantas but does not upload it due to the format it is provided in;
- Avalon – has assured OTS that they would investigate uploading the data into their register; and
- Melbourne – Qantas currently provides information but is not in a format compatible with Melbourne's system, requiring manual cross referencing of information from Qantas. Requests have been made of Qantas to provide the data in a set format, requiring dates of issue so that information can be accurately recorded in their database.

Qantas insists their template is compliant with the Regulations, however their Transport Security Program (TSP) states 'the particulars will be provided in an agreed format compatible for both Qantas and the specific airport'.  These are not considered to be unsurmountable issues and as such the airports and Qantas should be encouraged to find a workable solution themselves.

Reciprocal Data sharing

A small number of VIC issuers are currently providing Qantas with reciprocal information on their issue of VICs despite this not being a regulated requirement.  These VIC issuers suggest that reciprocal arrangements should be required to support the 28 day rule and ensure the ASIC scheme is not circumvented.

Of the airports who provide some form of reciprocal VIC information to Qantas, concern has been raised that if reciprocal data sharing is not legislated, or if 'authorised' in law but not required, then SAVIs may not be obligated to upload the information onto their register and utilise this information to assist the calculation of the 28 day rule.  However, all VIC issuers including SAVIs (excluding Customs) commit an offence if they knowingly issue a VIC to a person to who has held a VIC in excess of 28 days.  This is currently not considered to be an issue requiring regulatory rectification.

Privacy and data sharing obligations

Recent amendments to the *Privacy Act 1988* changed the privacy principles by combining the Information and National Privacy Principles into the 'Australian Privacy Principles' (APP).

In light of these changes a review of the information gathered and shared through the VIC Scheme was undertaken by the Department as part of the PIR.  Under part 6.2(b) of the APP, Qantas is able to share information about VIC holders to airport operators as they are required to do so by the Regulations.  As such there are no privacy issues associated with the collection and disclosure of visitor information from Qantas to relevant airport operators, provided it is in accordance with the Regulations and issuers adhere to their responsibilities under the APP.

As the provision of information from airport operators to Qantas is not stipulated in the regulations, the airport operator must not do this unless they either:

- gain the individual consent to the disclosure; or
- determine a permitted general situation exists (e.g. suspected unlawful activity).

Regardless of the information being shared, airport operators and Qantas in adhering with the APP should ensure they have an up to date privacy policy readily available to inform visitors of potential disclosures.

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| ***Recommendation 7:*** | A regulatory amendment be made to sub regulation 6.38EA(5) to reflect the introduction of the Australian Privacy Principles as it currently refers to the former Information Privacy Principles. |

Reduction in ASIC issuing bodies

A separate, although related project to the VIC enhancements saw the number of ASIC issuing bodies significantly reduced from over 180 to the current 46 active ASIC issuing bodies.  VIC issuing requirements were removed from ASIC programs and transferred into the Regulations severing the link between being ASIC issuing body and VIC issuer.  This assisted the centralisation of VIC issuing so that only airport operators (with the limited exceptions) could issue VICs.

The reduction of ASIC issuing bodies has had an overall positive impact on industry.  Airports with RPT services are no longer required to be ASIC issuing bodies, but can make a choice based on their own business needs.  Through this reduction administrative burden has been alleviated including removing requirements such as annual reporting, record keeping requirements and ASIC program maintenance.

## 4.7    Other key findings

Security culture at medium sized airports

During site visits, several VIC issuers commented that prior to the enhancements there was little management of visitors.  The VIC enhancement's focus on visitors and emphasis on the importance of the VIC scheme produced greater compliance and a better security culture within those airports.

<u>Supervision of VIC holders by individuals exempt from holding an ASIC</u>

A number of classes of people under certain conditions are exempt from holding ASICs and therefore VICs. This includes passengers, members of the Australian Defence Force, law enforcement officers, crew of foreign and state aircraft, persons facilitating cargo, minors, emergency personnel, etc. Some of these classes are exempt because of facilitation related reasons where issuing VICs would not be practical, while others represent groups of 'trusted' people deemed not to require an escort. This second group comprises law enforcement officers and Australian defence force members who, through their engagement in their respective professions, have undergone substantial vetting for employment and are considered to not pose a threat of unlawful interference with aviation.

While there are different risk profiles to those exempt from having to hold an ASIC/VIC they are all treated the same when it comes to their ability to escort VIC holders. This can be problematic as it is very reasonable that, for example, a law enforcement officer might be required to escort an individual assisting with an investigation, etc. Defence force members are also considered likely to be required to escort individuals at times, but the Regulations prohibit this requiring the assistance of an airport official in possession of an ASIC.

| *Recommendation 8:* | The Regulations be amended to allow Australian Defence Force members and law enforcement officers to be able to supervise VIC holders or other persons exempt from holding an ASIC or VIC (e.g. passengers) as required. |
|---|---|

<u>Persons in custody</u>

Technically, a person in custody who is in the secure area and is not classified as a visitor is required to display a VIC. Instances like this might occur at some airports where Commonwealth officers escort foreign deportees through the 'Enhanced Inspection Area' to airside holding cells before being boarded onto aircraft as passengers. While they sometimes will fall under the ASIC passenger exemption, there are times when their passage may not be considered 'moving reasonably directly between the aircraft and the terminal building'.

In these circumstances it would be unreasonable for the person in custody to be issued with a VIC for numerous reasons including that they may not want to be on the aircraft and might refuse to make relevant declarations or have a lack of identification.

| *Recommendation 9:* | The Regulations be amended to clarify that persons in custody under the Migration Act or other be exempt from holding a VIC provided they are appropriately escorted. |
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<u>Temporary Aircrew Cards (TACs)</u>

Airport operators have limited views on the use of TACs. The PIR found that most airport operators had never (or rarely) seen a TAC in use. However, aircraft operators that utilise TACs view them as an effective way to enable flight crew to continue their duties when they have lost or forgotten their ASIC.

Aircraft operators who use TACs have requested that TACs have their maximum expiry date extended from 7 days to 15 days in order to cover the maximum length of duty for international crew. Given that TACs are only able to be issued to ASIC holders or applicants, and that with a TAC the person must be escorted in any case, this request is considered reasonable.

One airport suggested that TACs should be able to be issued by airport operators, for private pilots and smaller airline staff that request them. However this is not considered appropriate at this time

given the unlikelihood that private pilots would land at an airport while accompanied by another ASIC holder.  Furthermore, if Recommendation 1 of this report is pursued, this would likely remove the requirement for VICs at smaller/regional locations and therefore TACs also.

| Recommendation 10: | The Regulations be amended to extend the maximum validity period for TACs to 15 days in order to cater for aircrew travelling internationally. |
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# 5.    Statistics and Trends

VICs issued during 2012

Almost 340,000 VICs were issued nationwide in 2012. 90% were issued by the 17 largest industry players (category 1 and 2 airports, Customs and the single SAVI).  9% were issued by category 3, 4 and 5 airports.  Only 1% by category 6 airports.

**Number of VICs issued in 2012**

| Category Airport | VICs issued 2012 | Respondents |
|---|---|---|
| Cat 1 | 243,275 | 9 |
| Cat 2 | 11,530 | 6 |
| Cat 3 | 28,596 | 45 |
| Cat 4 | 569 | 3 |
| Cat 5 | 112 | 2 |
| Cat 6 | 4,777 | 55 |
| Qantas (SAVI) | 45,550 | 1 |
| Customs | 5,081 | 1 |
| **Total** | **339,490** | **118** |

Table 1 – VICs issued by Category

Almost half (2,046) of the 4,777 VICs issued by category 6 airports were issued by a single airport. Meaning that in real terms only the smallest fraction of VICs are issued by non-screened airports across Australia.  Despite only 50% response rate from Category 6 airports (almost 100% from other categories) it can be assumed that the figures are still an accurate representation of issuing across Australia.
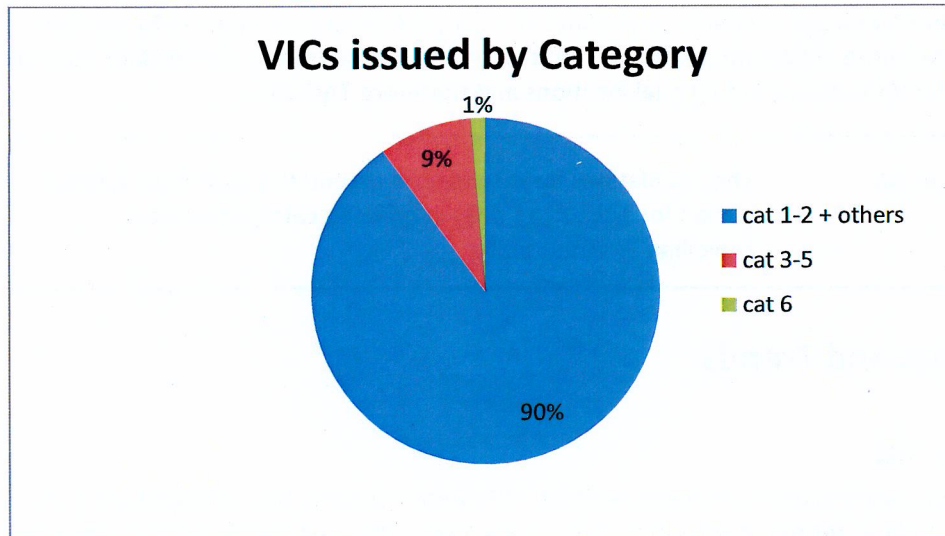
## VICs issued by Category



Figure 3 - Percentage of VICs issued by Category

Single Day VICs

A significant number of VIC issuers prefer to issue single day VICs citing a range of reasons for this preference including:

- optimising the use of the 28 day quota e.g. they don't want to waste days on weekends when visitors don't need their VICs;
- circumventing regulatory photo requirements for VICs issued for more than 24 hours (for designated airports) or 72 hours (other airports) due to technical capacity;
- maximising visibility of who is on airport on any given day; and/or
- is all that the visitor requires.
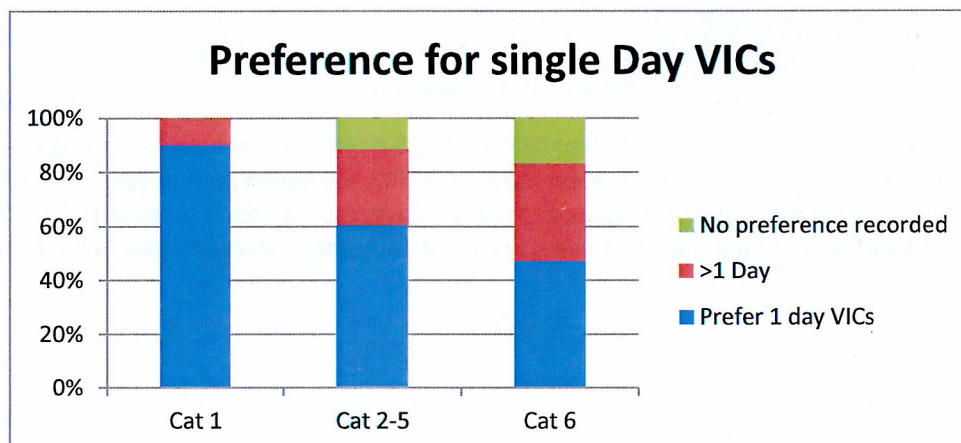
## Preference for single Day VICs



Figure 4 - length of VIC preferences by category

Those with a preference to issue longer term VICs reported doing so to alleviate the need for the administration of VICs on a daily basis or due to most of their VICs are issued to ASIC applicants that do not have a 28 day limit. The strong reported preference for issuing single day VICs has the unintended security benefits of;

- daily checking of a visitor's identity;
- daily monitoring visitors in secure areas;
- daily return of VICs; and
- visible daily audit trails of VIC use.

## VIC Agents

The larger the airport the more likely they are to have agents. 71% of large airports have agents compared to 33% medium sized and only 16% of category 6 (generally smaller or remote). The most common reasons for not having agents are due to the size of the airport not warranting an agent or for the operator wanting to maintain control of the area.

The most common reasons to have agents are due to distance between the airport operator and its tenants who can be located several kilometres from the main terminal. The time costs of having the visitor and the accompanying ASIC holder attend the main office for what is may only be a short term visit can be prohibitive. The second most common reason for having agents is for after-hours access where the airport operator may not have a person on site to issue VICs when required. Enabling some of those remotely located stakeholders to be agents encourages compliance as some may think twice about making a long trip to head office in order for a single VIC.

## Charging for VICs

Most VIC issuers do not charge for VICs (89%). Only eight VIC issuers currently charge and three are intending to. Of these, some charge a nominal fee to all visitors, some only charge contractors or visitors of other stakeholders or only for VICs that require a photo due to the increased administration involved. Fees range from $5 to $55, the average charge is around $24.

Some airport operators considered charging for VICs however reported that it seemed a false economy, as they expected to see the charges on the invoices of tradesmen, probably with an associated administration fee.

## Types of visitors to airports

Phase one and two investigated the types of visitors most likely to be issued VICs. Airports were asked to provide an estimate on the percentage of the different types of visitors between repairs and maintenance, new employees, contractors, deliveries and other.

Within the designated airports results were mixed with fairly even distribution of VICs being issued to different types of visitors. However, deliveries are considered a relatively small component of visitors comparatively. One airport that was an exception weighted 55% of their visitors to contractors, which can be explained by that airports significant recent terminal works.

Deliveries remained a relatively small proportion of VIC holders, particularly in Category 6 airports. Contractors also received a consistently minimal allocation of VICs across many airports with only a few exceptions.

Two of the four Category 2 airports showed a distinctly large proportion of cards were issued to others rather than the proposed categories. Within the explanation column it was identified that others included media and student groups.

Approximately 50% of responding Category 3 airports reported repairs as their main VIC holders, followed by 25% of airports reporting new employees as their most common VIC holders.

Approximately 70% of responding Category 6 airports reported Repairs as their main VIC holders.

Other common types of visitors include media/photography, council staff and students groups and student pilots.

It should be acknowledged that as a snap shot of allocations, some airports may have differing experiences over a longer period of time due to airport operations, development in their region or internal policies.