

# Airport ID Pass Scheme Standards

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## Section 1: Joining the Edinburgh Airport ID Pass Scheme

### 1.1 Joining the Edinburgh Airport ID Pass Scheme

1.1.1 Companies wishing to apply for Edinburgh Airport ID passes must first register to join the ID pass scheme.

1.1.2 All applications for membership must be supported by either:

Evidence of a contract with Edinburgh Airport or any other company operating at the airport or

Evidence that the company is undertaking a regulated aviation security or other statutory activity at the airport.

All applications for membership must be supported by a written justification of their business operational need.

### 1.2 Nominated Officer

1.2.1 Each organisation joining the ID Pass Scheme must have a nominated Officer who should be a senior executive with authority to allocate resources as necessary.

1.2.2 It is the responsibility of your Nominated Officer on behalf of your company to ensure:

- a. Organisation meets the obligations under the Edinburgh Airport ID pass Scheme terms and conditions;
- b. Sufficient authority for assuring the organisation's employment screening policies and procedures;
- c. An understanding of the risks associated with insiders and the importance of risk mitigation measures;
- d. The authority to require the removal of an Airside Pass of any employee who is no longer considered suitable to hold an Airside Pass.

1.2.3 Nominated Officer will be asked to designate the organisation's Authorised Signatories.

### 1.3 Role of the Authorised Signatory

1.3.1 The authorised signatory may apply for passes for anyone employed by your company who will require access to the relevant part of the airport.

The authorised signatory can also apply for passes for individuals who are sub-contracted to work for your company.

- 1.3.2 It is the responsibility of your authorised signatory on behalf of your company to ensure:
- a. All applications for ID passes meet the standards detailed in this document;
  - b. That the background check conducted on an applicant is done to a satisfactory standard and in accordance with these guidelines;
  - c. Sponsoring and submitting a pass application only after being satisfied that the person is a suitable person to hold an airside pass;
  - d. Establishing a person's legitimate need for airside access and providing an indication for the appropriate access level to the decision maker at the airport operator;
  - e. All requirements relating to the ongoing membership of the ID pass scheme, and the management of ID passes are met, including those issued to third party staff sponsored by your company;
  - f. All investigations or audits undertaken by Edinburgh Airport receive full cooperation, and any identified deficiencies or need for additional controls are addressed.
- 1.3.3 Any applicant for the position of Authorised Signatory must either:
- a. Hold a valid Edinburgh Airport issued ID pass or
  - b. Have successfully completed a background check as required for security restricted area pass applications. Further details on these requirements can be found in Section 2.
- 1.3.4 Authorised Signatories will be required to attend training provided by Edinburgh Airport.
- 1.3.5 Being an authorised signatory is a responsible role requiring:
- a. Excellent organisational skills
  - b. Attention to detail
  - c. Sound judgement
  - d. The highest standards of probity.

## Section 2: Making an Application for an ID Pass

### 2.1 Selecting an airport ID pass

#### 2.1.1 Edinburgh Airport issue two types of ID passes:

- a. Airport ID passes that allow unescorted access to the Critical Part of the Security Restricted Area (CPSRA), landside areas, staff parking and working areas.

Applicants will be given access only to those areas of the airport necessary to carry out their official duties.

Passes are normally issued for a duration of five years; however, this will be shortened where the contract duration is less than five years, or where the applicant or company can no longer meet any requirement placed upon them as detailed in this document.

- b. Escorted ID passes that allow escorted short-term access to the Critical Part of the Security Restricted Area (CPSRA), and landside areas. Escorted passes are only valid when under escort by a permanent ID pass holder and have limitations of number of days they can be used within a rolling year. Full guidance on the different types of Escorted Passes can be found on our website: <https://corporate.edinburghairport.com/doing-business-with-us/id-centre/id-pass-regulation>

#### 2.1.2 ID pass applications are applied for through IDGateway™.

### 2.2 Identification Requirements

#### 2.2.1 Applicants for both types of ID passes must hold an acceptable form of identification.

#### 2.2.2 The original identification document must be presented by the applicant on collection of their ID pass from the ID Centre. The only exception to this is where there is evidence that the original identification has been lost or stolen. In these cases, a new identity document conforming to the requirements of 2.2.5 can be presented at the ID Centre, providing you have given a written explanation and a confirmation that you have seen the new identification document.

#### 2.2.3 The name on an application must match exactly the name on the applicant's identification document. The first and last name will be displayed on the ID pass.

#### 2.2.4 Where an applicant has recently lawfully changed their name but has yet to update their identification documents an exception to this may be made provided suitable evidence of this name change is submitted with the application. Information on what constitutes suitable evidence can be found in Section 4.

**2.2.5 Only the following documents are considered acceptable forms of identification for British nationals:**

- a. A valid full passport
- b. Valid British photo-card driving licence.

**For EU nationals:**

- c. A valid full EU Member State passport
- d. National Identity Card.

**For all other Nationalities:**

- e. A full valid passport
- f. Identity Card for Foreign Nationals issued by the Home Office or UK Border Agency including UK travel documents issued by the UK Border Agency to persons with asylum status, humanitarian protection status or discretionary leave to remain.

**2.2.6 It is important that you are satisfied that:**

- a. The identity presented by the applicant is genuine and relates to a real person;
- b. The applicant owns and is rightfully using that identity.

**2.2.7 See sections 3.1.12 - 3.1.14 for supplementary requirements for temporary ID pass holders.**

## **2.3 Security Interview**

### **Aims and Objectives**

**2.3.1** It is important that there is an initial assessment made as to the applicant's eligibility and suitability to hold an airside pass. You are required to ensure that a security interview is conducted with the applicant. The security interview is the perfect opportunity to question and obtain any necessary supporting information that may be required to substantiate what the applicant is stating.

**2.3.2** Information supplied by an applicant must not be accepted at face value by the authorised signatory.

**2.3.3** The purpose of the security interview is to ensure that:

- a. The applicant has a valid form of identification that can be checked;
- b. All periods over the previous five years can be accounted for, and references and other supporting information can be provided as evidence;

- c. The applicant is able to meet the requirement for a relevant criminal record check and has no convictions that would disqualify them from holding an airside pass;
  - d. The applicant is fully aware of the checks that will be done to verify the information provided by the applicant and provides all necessary consents;
  - e. There are no indications that the applicant may not be a suitable person to be given unescorted access to the security restricted areas of the airport.
- 2.3.4 During the course of the interview if you believe an applicant has travelled to countries or parts of countries which the Foreign and Commonwealth Office advise against all and all but essential travel to, advice should be sought from the ID Centre prior to submitting the application. Up to date information on travel advice can be found here:

<http://www.fco.gov.uk/en/travel-and-living-abroad/travel-advice-by-country?action=noTravelAll#noTravelAll>

### **Important Steps to Take**

- 2.3.5 A face to face security interview should be conducted with the applicant.
- 2.3.6 The security interview should be conducted by the authorised signatory or another person who has been suitably trained for the purpose.
- 2.3.7 The applicant should be advised at the start of the interview that knowingly or recklessly making a false statement in connection with an application for an airside pass is a criminal offence under the Aviation Security Act 1982 (as amended) and will lead to the automatic refusal of the application.
- 2.3.8 The interviewer should obtain consent from the applicant for the employer and the airport operator to contact previous employers, other potential referees, and other airside pass issuers.
- 2.3.9 The applicant should be advised that where considered appropriate further enquiries may be made to establish or verify facts which may include checks on their online presence, previous airside pass-holding history, reasons for leaving employment and may involve passing information to the police or other security agencies.
- 2.3.10 The interviewer or the authorised signatory and the applicant should sign a declaration confirming that the security interview has taken place face to face (incorporated in airport declaration form).
- 2.3.11 Please refer to Annex C for guidance notes on structuring a Security Interview.

## 2.4 Criminal Record Checks

### For Applicants Requiring Access to the CPSRA

- 2.4.1 A criminal background check must be undertaken for all individuals applying for an Airport ID pass giving unescorted access to the CPSRA. Applications must include the original criminal record certificate. This will be returned once inspected.
- 2.4.2 The original CRC document must be presented by the applicant on collection of their ID pass from the ID Centre.
- 2.4.3 The full name and date of birth on a criminal record certificate must match exactly the name on the applicant's identification document.
- 2.4.4 Where an applicant has lawfully changed their name within the previous 3 months, but has yet to update their identification documents, an exception may be made provided suitable evidence of this name change is submitted with any application. Information on what constitutes suitable evidence can be found in Section 4.
- 2.4.5 Applications will be refused where the criminal record certificate details a conviction for a disqualifying or similar offence. A list of the most common disqualifying offences can be found at Annex A (<https://www.caa.co.uk/Commercial-industry/Security/Regulation/Disqualifying-convictions/>)
- 2.4.6 Guidance should be sought from your local ID Centre for similar offences or overseas convictions where it is not immediately clear what the equivalent offence under UK law is.
- 2.4.7 Where a criminal record certificate details a conviction for a disqualifying or similar offence, the application should not be submitted. Applicants may apply to the Department for Transport for a certificate of disregard. Where successful, Certificates of Disregard should be submitted along with the original criminal record check as part of the application pack. Edinburgh Airport Ltd. play no part in the application process for a Certificate of Disregard and are unable to answer any queries relating to individual applications.
- 2.4.8 Valid criminal record certificates for all countries in which the applicant has been continuously resident or employed in for 6 months or more during the past 5 years must be obtained and submitted. Certificates that are not in English must be accompanied by a reliable translation.
- 2.4.9 In the UK, criminal record certificates should be obtained by applying to Disclosure Scotland for a basic disclosure certificate or if resident in Northern Ireland this can be obtained from Access Northern Ireland.
- 2.4.10 The application process for overseas country records varies. Country specific advice including local application procedures and information on commonly encountered difficulties is available from the following source:

<http://www.cpni.gov.uk/advice/Personnel-security1/Overseas-criminal-record-checks/>  
[www.sia.homeoffice.gov.uk/Pages/licensing-overseas-checks.aspx](http://www.sia.homeoffice.gov.uk/Pages/licensing-overseas-checks.aspx)

If the country in which the applicant was based is not listed on either of the two websites, you should contact that country's Embassy, High Commission or Consulate in the UK for advice. Contact details can be found via the Foreign and Commonwealth Office (FCO) website. Please ensure the additional time this may take is factored into your procedures.

- 2.4.11 Criminal record certificates are valid for a maximum of 10 weeks from their date of issue subject to the exception detailed in 2.4.14 below.
- 2.4.12 An overseas criminal record certificate issued more than 10 weeks before the date of pass application will still be considered valid provided that:
  - a. The applicant has not returned to that country since the date of issue and
  - b. The certificate was issued after they had left the country or no earlier than 10 weeks before that time.

### Exceptions

- 2.4.13 If the applicant was based abroad whilst serving in HM Armed Forces, we can accept an extract from their service record in lieu of an overseas criminal record certificate provided it explicitly states that they have no criminal convictions in that country.
- 2.4.14 If a person has spent time overseas working on a cruise ship, a criminal record certificate should be obtained from the country of their main residence and a check done with their employer to confirm whether they committed a criminal offence during their time on the ship.
- 2.4.15 Where there are exceptional reasons as to why an overseas criminal record certificate cannot be obtained, the following documentation may be submitted as an alternative:
  - a. A sworn oath by the applicant witnessed by a Commissioner for Oaths; and
  - b. A personal reference from a referee meeting the criteria in 2.5, explicitly covering the period for which no criminal record check can be obtained; and
  - c. Written confirmation that the guidance for obtaining a criminal record certificate detailed in 2.4.9 has been followed; and
  - d. Written explanation, with supporting evidence, as to why it is not possible to obtain the criminal record certificate.
- 2.4.16 The above alternative will only be accepted in cases where a government's administration has collapsed to a point where no credible official sources of information exist, there is a credible risk to the individual's personal safety if they make contact with that country, for example where an individual has asylum status in the United Kingdom, where any requests for such information need to be individually supported by the UK government or where a request is

declined due to local policies – often the case where residency is disputed by the appropriate authority e.g. tour operator staff.

- 2.4.17 Authorised Signatories must ensure that any convictions that are disclosed to the employer during the life of the ID pass are communicated promptly to the ID Centre.

### **How to Verify Criminal History is Genuine**

- 2.4.18 You should examine the original CRC and:

- a. confirm that the date of issue of the Criminal Record Certificate is recent - it usually needs to be received by the airport operator within 10 weeks of the date it was issued by the relevant authority;
- b. confirm that the CRC corresponds to the applicant - the full name and date of birth on the CRC must match exactly the name on the applicant's official identity document;
- c. take reasonable steps to verify that the CRC is genuine and check for any signs of tampering or counterfeit.

### **How to Verify an Overseas Criminal History is Genuine**

- 2.4.19 In the absence of a verified original copy, it may be difficult to establish with all certainty that an overseas CRC is genuine, however there are some steps that the authorised signatory can be advised to take:

- a. where possible, apply direct for the certificate from official government, embassy or consular sources – consent from the candidate may be required;
- b. authenticate a certificate obtained by an applicant by contacting the issuing authority to verify the certificate serial / reference number;
- c. obtain a reliable translation where the certificate is not written in English - free web-based translations are not satisfactory;
- d. compare the certificate with examples provided in the guides above (such as CPNI and SIA web sites).

- 2.4.20 Another challenge is to interpret the criminal record check information that is presented on the certificate. Convictions that are listed may not easily correlate to the UK list of disqualifying convictions and some listed convictions may be considered 'spent' under UK legislation. The authorised signatory may need to make their own judgement as to whether the information presented may suggest that a person might pose a risk.

- 2.4.21 In complex cases, the authorised signatory may seek your advice before submitting an application. You may find it helpful to consider the following aspects:

- a. age of the conviction

- b. seriousness of the offence - based on the sentence handed down for each conviction
- c. nature of the conviction
- d. pattern of offending or multiple convictions
- e. any mitigating factors – this would require information to be put forward by the applicant.

#### **For Applicants Requiring Access to Landside Areas Only**

- 2.4.22 There is no requirement to obtain or supply a criminal record check for applicants who only require access to landside areas such as buildings, offices and staff car parks.

#### **For applicants for a temporary ID Pass**

- 2.4.23 There is no requirement to obtain or supply a criminal record check for applicants requiring a temporary ID pass.

### **2.5 Accreditation Check**

- 2.5.1 Accreditation Check is a level of UK National Security Vetting clearance required for all those with an airside pass for the CPSRA.
- 2.5.2 Applications for AC are made through IDGateway and require applicant's full name, date of birth, National Insurance number and email address.
- 2.5.3 Before any such application is made, the applicant's identity must have been verified.
- 2.5.4 AC Clearance, once granted, is valid for up to 5 years.
- 2.5.5 Where a current AC Clearance expires, and it has not been renewed at or before the expiry, the person must immediately be removed from deployment on any activity or function for which AC Clearance is required.

### **2.6 Referencing Procedure**

#### **For applicants requiring access to the CPSRA**

- 2.6.1 Applications for an Airport ID pass giving unescorted access to the Critical Part of the Security Restricted Area (CPSRA) and other airside areas must include references for the applicant covering all periods of time of over 28 days within the preceding 5 years. References should continue up until no earlier than 28 days prior to the date the application is submitted.
- 2.6.2 References submitted with applications can be:

- a. Original handwritten documents signed by the referee. These should be presented on company headed paper or stamped with a company stamp, or accompanied by a company compliments slip, where available. Note that verification of references provided without one of these may take longer than references that meet this requirement.
- b. Emails - These are only acceptable when covering periods of employment or education, originating from an official company domain email address, e.g. [personnel@edinburghairport.com](mailto:personnel@edinburghairport.com).

Note that verification of email references may take longer than original documents and may result in a delay in clearing your application.

- 2.6.3 The first and last name on any reference must match exactly the name on the applicant's identification document.
- 2.6.4 Where an applicant has lawfully changed their name, but has yet to update their identification documents, within three months of change, an exception may be made provided suitable evidence of this name change is submitted with any application. Information on what constitutes suitable evidence can be found in Section 4.
- 2.6.5 When requesting references from referees, it must be made clear to them that they are giving references for security purposes and that to knowingly give false information could lead to prosecution under the Aviation Security Act 1982, as amended by the Aviation Maritime Security Act 1990.
- 2.6.6 Where references are not written in English, the original un-translated reference should be supplied along with a copy translated into English. The translator's signature, name and contact details should be provided for verification purposes.
- 2.6.7 All references must adhere to the following standards:
  - a. Contain the first and last name of the applicant as it appears on their identification document\*
  - b. Contain the full name, telephone number, company address and job title of the author (if employed).
  - c. Clearly state the period of time covered by the reference, and the whereabouts or activities of the individual during this time.
  - d. Contain the date of issue.

\*subject to provision 2.4.4.
- 2.6.8 The use of correcting fluid is not prohibited but may cause a significant delay in the processing of any application and may lead to refusal if used in a manner which may bring into question the authenticity of the reference.

- 2.6.9 The authenticity of each reference should be verified, and checks undertaken to ensure the reference complies with the requirements in 2.5.7. Any anomalies or errors discovered during verification must be addressed. If just one aspect of 2.5.7 is non-compliant, an explanation can be provided in 'supporting notes' to explain the mistake and the correction made. If more than one aspect of 2.5.7 is incorrect, the referee should be requested to re-supply the reference with the details corrected.
- 2.6.10 A reference containing basic errors in spelling, poor grammar or incorrect details may be signs that the reference has been faked. This must be followed up by contacting the referee, supporting notes should be made as a record of the additional contact.

### **Periods of Education and Employment**

- 2.6.11 References must be obtained from the applicant's previous educational and employment establishments by authorised personnel. Where a referee declines to provide a reference, a reference can be obtained from HM Revenue and Customs (HMRC) to confirm the applicant's employment dates. Evidence of the refusal must be submitted with the application.
- 2.6.12 For periods of self or family employment, references must be obtained from the relevant company solicitor or accountant. These references should contain sufficient information to confirm the applicant's employment dates. However, if not available we will accept an HMRC document to confirm employment. If HMRC is used to cover a period of self-employment a Gap style reference must also be obtained to confirm applicant's activities and whereabouts during that time.
- 2.6.13 Where a company has ceased trading, a reference must be obtained from HMRC that confirms the applicant was employed during the period of time in question. Supporting evidence and an explanation must be submitted with the application.
- 2.6.14 In the case of agency employment, the reference must originate from the agency. All periods of time between placements exceeding 28 days must be declared. Please see section 2.5.18 for further requirements relating to agency employment.

### **Periods of Registered Unemployment**

- 2.6.15 References for periods of registered unemployment must be obtained from the Department for Work and Pensions or HMRC, this will only be accepted if claiming Job Seekers element. Where someone has claimed any other element (e.g. ESA), this must be backed up with a gap reference. Also, for applicants that have claimed Job Seekers for large periods, or up to the full background period, a personal (gap) reference may also be expected.

### **All Other Periods of Time**

- 2.6.16 Where an applicant has not been continuously employed, in education or registered as unemployed for an uninterrupted period of 28 days or more, a personal reference (Gap) for that period should be obtained and submitted with the application stating what the individual was doing during the period to include where they were living and how they were supporting themselves.

Personal referees should have known the individual in a personal capacity for a minimum of two years including during the period that the reference covers.

**2.6.17 Personal referees must not be:**

- a. Family members of or in a close personal relationship with the applicant;
- b. Under the age of 16;
- c. Residing at the same address;
- d. Employee of sponsoring company.

**2.6.18 In the case of agency employment, the agency should be asked to declare all periods of time between placements exceeding 28 days.**

**2.6.19 Normal academic holidays during periods of time already covered by an educational reference are not subject to this requirement however other periods of extended leave over 28 days, such as sabbaticals and gap years are.**

**2.6.20 Periods of extended travel must be supported by a personal reference (for example independent travel) and an applicant statement supported by tickets, passport stamps and hotel bills may be accepted as an alternative provided these are examined and verified by close questioning at the security interview stage.**

**2.6.21 Periods of maternity leave may alternatively be supported by production and submission of the child's birth certificate.**

**For Applicants Requiring Access to Landside Areas Only**

**2.6.22 There is no requirement to obtain and supply references for applicants who require access to landside areas only.**

**For Applicants Requiring a Temporary ID Pass**

**2.6.23 There is no requirement to obtain and supply references for applicants requiring a temporary ID pass.**

**2.7 Assessing the Suitability of an Applicant**

**2.7.1 In addition to the background check, regulations require that the applicant must have a legitimate operational need to access security restricted areas at the airport.**

**2.7.2 Checks on an applicant have an important security value and cannot be approached in a mechanistic manner; an element of judgement will often be required. Conducting checks will often be a time consuming and complex procedure. It is therefore important that an assessment is made at an early stage that the applicant is likely to be able to meet all the criteria for an airside pass.**

**2.7.3 Authorised signatory must be satisfied with the suitability of the applicant before they submit any application for an airside pass. In some cases, the referencing procedures may reveal gaps**

or adverse information. There may be the need to interpret criminal record history or inconsistencies in a person's employment history. The authorised signatory should ensure that all anomalies have been adequately addressed. In complex cases, decisions on suitability should involve the business areas that have a vested interest. Consideration should be given to the role that the applicant will be undertaking and their integrity.

#### 2.7.4 **Sub-Contracting Elements of the Background Check**

- 2.7.1 The authorised signatory may delegate, or sub-contract tasks associated with the background check to another person or a third party (for example, the obtaining of references or holding a security interview with the applicant). However, the organisation registered on the pass scheme retains accountability for any elements that are sub-contracted. For this reason, the authorised signatory must maintain oversight of the subcontracted elements and be satisfied that all requirements have been met in full.

This includes being satisfied that the procedures mitigate the risks of deception either by pass applicants or the persons completing the checks themselves. Quality assurance arrangements and service level agreements should be considered as part of any contract for service.

### 2.8 **Security Awareness Training**

#### **For applicants requiring access to the CPSRA**

- 2.8.1 Applicants for ID passes giving unescorted access to the Critical Part of the Security Restricted Area (CPSRA) must hold a General Security Awareness Training (GSAT) certificate before an application is submitted and must continue to hold a valid GSAT certificate for the duration of their pass.
- 2.8.2 Applicants must sign a declaration on the application form confirming they received their GSAT certificate.
- 2.8.3 GSAT certificates are valid for a maximum period of 5 years.
- 2.8.4 GSAT training may only be conducted once the applicant has successfully completed their reference and criminal record check requirements.
- 2.8.5 The Department for Transport hold a list of all approved GSAT training providers. Details can be found here by visiting [www.dft.gov.uk](http://www.dft.gov.uk).

#### **Exemptions**

- 2.8.6 The following categories of applicant are exempt from the GSAT requirements.

Persons who have successfully completed security training courses that meet the requirements of Department for Transport training syllabuses for:

- a. Ground security staff and supervisors

- b. Aviation security managers
- c. Aircrew
- d. Air cargo security, In-flight supplies and Airport supplies where the Airport GSAT Supplementary Training has been provided.

The following persons who are deemed to have received equivalent security awareness training:

- a. Civil Aviation Authority Inspectors, Auditors, and operational staff.
- b. Department for Transport (DfT) certificated aviation security instructors.
- c. Officers of HM Revenue & Customs.
- d. Personnel of the Defence Courier Service (DCS) or British Forces Post Office.
- e. Personnel of the Department for Environment, Food and Rural Affairs (DEFRA) and its agencies.
- f. Personnel of the Department for Transport bearing a Transport Security Inspector card or a Transport Security identity card.
- g. Personnel of the Ministry of Defence Protocol Office.
- h. Personnel of NATS (En Route) plc.
- i. Personnel of Border Force.
- j. Personnel of Visas and Immigration.
- k. Police Community Support Officers.
- l. Police Officers.

#### **For Applicants Requiring Access to Landside Areas Only**

- 2.8.7 Applicants requiring access to landside areas must have read and understood a General Security Awareness leaflet before an application is submitted. Copies of this leaflet are available for download from the ID Centre website.

#### **For Applicants for a Temporary ID Pass**

- 2.8.8 There is no requirement for General Security Awareness Training (GSAT) for applicants requiring a temporary ID pass.

### **2.9 Is the Application for an Airside Pass Ready for Submission?**

It is important that the authorised signatory is satisfied that the history appears credible and that there is nothing to suggest that the person may present a threat.

- a. Has the person's identity been verified through a document or database check?
- b. Has a valid and genuine criminal record certificate been obtained and examined for any disqualifying convictions?
- c. Do employment references come from legitimate sources and do they appear genuine?

- d. Do all the dates align so there is documentary evidence to cover the full 5-year period with no gaps of over 28 days?
- e. Where an applicant is registered with an agency (or may be employed on a zero-hour's contract with more than one company) is there some independent supplementary evidence to illustrate how often the applicant was working (e.g. personal reference or bank statements)?
- f. Where the applicant has provided the referee contact details, has someone tried to verify the authenticity of the referee and the reference provided?
- g. Where a personal reference has been provided, is there evidence to show how the person knew what the person has been doing or any other supporting evidence?
- h. Is the content of the references consistent with information supplied by the applicant?

## **2.10 Collection of Full ID Pass**

Appointments must be made through IDGateway. The applicant must present the same ID document and CRC certificate that were used for the application, only the original documents will be accepted.

## **2.11 Cancellation of Passes**

### **For Full ID Pass Holders**

- 2.11.1 Sponsors must ensure that all ID passes no longer required are retained and returned to the ID Centre for cancellation if:
  - a. employment is terminated
  - b. the pass holder changes employer
  - c. the pass holder no longer requires access to the areas for which authorisation has been given
  - d. the airside pass expires.
- 2.11.2 Sponsors must review monthly all 'parked' ID passes, to ensure any passes no longer required are returned to ID Centre for cancellation.

## Section 3: Using an Airport ID pass

It is your responsibility to ensure all pass holders are made aware of their personal responsibilities with regard to the proper use of an ID pass and as instructed in Chief Executive Directions and must adhere to all Airport Security Protocols, Byelaws, and CENs and CEDs in force.

### 3.1 Responsibilities of an ID Pass Holder

- 3.1.1 ID passes must always be clearly visible when in the airside security restricted area and at places of work. All pass holders are expected to challenge anyone else who is not displaying an ID pass in a non-public area.
- 3.1.2 Whenever entering or leaving an airside security restricted area pass holders must show their pass to the airport security officer on duty. It will be checked visually and by electronic verification system. If asked, secondary identification must be shown. If the security officer advises that there is a problem with an ID pass, the holder may be denied access and presented with a written caution notice advising what steps need to be taken.
- 3.1.3 Whilst on any airport premise, holders must show their pass on demand to any police officer, UK Border Agency officer or any other official of Edinburgh Airport who may need it to check that you are allowed to be within that area.
- 3.1.4 Passes must not be used to access the security restricted area for personal reasons. Holders must only enter when on duty or, for employee discount shopping, only when on a break from duty that day or immediately after finishing or starting work.
- 3.1.5 Passes may be withdrawn if any condition of issue can no longer be met. Pass holders charged with, or convicted of, a criminal offence must notify their manager immediately. Failure to declare any such charge will be handled with in accordance with the company's disciplinary procedures and may result in the withdrawal of the pass.
- 3.1.6 Security restricted area passes are issued to staff members who require on-going and regular access to the security restricted area. Passes must be used at least once every 60 days, otherwise the pass will be "parked" and will not be valid to access airside again until such time that it has been un-parked.
- 3.1.7 Holders must not allow access to someone else unless that person has been issued with a temporary ID pass and is under their escort. Whilst conducting escort duties, the pass holder must:
  - a. ensure that all temporary pass holders remain in their line of sight at all times
  - b. take all reasonable steps to ensure that temporary pass holders do not breach any security requirements
  - c. ensure that all temporary passes are returned to a sponsor signatory upon expiry and shredded.

- 3.1.8 A sponsor must apply to ID Centre with any changes to applicant's personal details including (but not limited to) changes to job title, name, and appearance. Any training arranged by EAL must be attended when asked to do so.
- 3.1.9 Passes must only be used to access areas to which the holder has been authorised to enter. Access rights can be established by looking at the colour and numbering on the pass. Further details can be obtained from the ID Centre.
- 3.1.10 Lost or stolen passes must be reported immediately upon discovery to the local police and to airport security. The loss must also be reported as soon as possible (subject to opening hours) to the ID Centre and your Authorised Signatory.
- 3.1.11 Passes that are subsequently recovered must be returned to the ID Centre.

#### **Supplementary Requirements for Temporary ID Pass Holders**

- 3.1.12 Temporary ID pass holders must abide by all the conditions of use detailed above plus the following additional requirements.
- 3.1.13 Anyone holding a temporary ID pass must also carry secondary identification as stated on the pass and present this to the security officer on entry to and at any time upon request whilst inside security restricted areas
- 3.1.14 Temporary ID pass holders will only be permitted into the CPSRA when escorted by a person holding an Edinburgh Airport issued ID pass. Whilst airside, they must remain in line of sight of their escort at all times. They will have the same access levels as their escort.

## **Section 4: Ongoing Pass Management**

### **4.1 Renewing a Pass**

- 4.1.1 An airport ID pass may be renewed for a further 5 years on expiry so long as there is an operational need for the pass, application must be made through IDGateway™. If a renewal application is received within 28 days of an existing pass expiry the applicant will be exempt from supplying any further references. All other application requirements contained in Section 2 relating to identification documents, criminal record checks and security training will continue to apply and must be completed prior to any renewal being granted.
- 4.1.2 Failure to renew an airport ID pass within 28 days of the existing pass expiry, will result in a full application being required.

### **4.2 Employment with More Than One Employer**

Where an existing pass holder is subsequently employed by another on-airport company, a second pass may be obtained. Written confirmation from both companies must be obtained to agree multiple passes can be held.

### **4.3 Changing a name**

- 4.3.1 Where an applicant or existing pass holder has changed name, a replacement airport ID pass must be obtained, and acceptable proof submitted with the application. Only original documents will be accepted:
- a. For married people, we will need to see a marriage certificate.
  - b. For civil partners, we will need to see a civil partnership certificate.
- 4.3.2 If the person has gone back to their maiden or unmarried name, we will need to see:
- a. A birth certificate;
  - b. A signed statement from the person saying that they have gone back to their maiden name for all purposes;
  - c. Proof of the history of names (a decree absolute showing both names, a marriage certificate showing both names or a formal name change document).
- 4.3.3 For name changes due to a change in gender we need to see a change of name deed and one of the following:
- a. A letter from a doctor stating that they expect the change of gender to be permanent
  - b. A gender recognition certificate
  - c. A new birth certificate.
- 4.3.4 In all other cases, we need to see a change of name deed.

### **4.4 Changing Employer**

- 4.4.1 Where an existing pass holder ceases to be employed by their current employer and takes up employment with another company at the airport, the existing airport ID pass must be returned, and an application made for a new airport ID pass to be issued.
- 4.4.2 The background check requirements as detailed in section 2 will apply, with the following exception:

Where the existing pass holder is transferring company under the Transfer of Undertakings Protection of Employment Regulations 1981 (TUPE), there is no need for a new criminal records check. The new airport ID pass will be issued up to the expiry date of the original pass unless a new criminal record check is obtained.

## **4.5 Returning passes**

4.5.1 An airport ID pass must be returned to the ID Centre:

- a. If we request it
- b. If employment is terminated
- c. If the pass holder changes employer
- d. If a pass holder no longer requires access to the areas for which authorisation has been given
- e. If the ID pass expires
- f. If we withdraw or cancel the ID pass.

4.5.2 Airport ID passes must be returned to the ID Centre within 60 days. Failure to do so may result in a penalty charge to the company.

4.5.3 You must ensure that temporary ID passes are returned by the pass holder or escort on expiry.

## **4.6 Flexible Working**

4.6.1 Where an existing airport ID pass holder wishes to take a sabbatical or period of paid/unpaid leave of over 60 days, you must:

- a. Notify the ID Centre to put a stop on the pass giving your reason;
- b. Withdraw the pass from the holder and store it securely until next required;
- c. Apply for the pass to be reactivated when the person returns to the airport.

4.6.2 For re-activation following a sabbatical or period of paid/unpaid leave, you will need to obtain a reference conforming to the requirements of section 2.5 to evidence what the pass holder has been doing during the period away from the airport and make a declaration that the person has been continuously employed by you. Re-activation is also subject to section 4.6.6.

4.6.3 Where a seasonal worker (e.g. on zero hours contract) has no operational requirement to access the CPSRA, you must:

- a. Notify the ID Centre to put a stop on the pass giving your reason;
- b. Withdraw the pass from the holder and store it securely until next required;
- c. Apply for the pass to be reactivated when the person returns to the airport.

- 4.6.4 For re-activation of a seasonal worker's pass, you will need to obtain a reference conforming to the requirements of section 2.5 to evidence what the pass holder has been doing during the period away from the airport and make a declaration that the person has been continuously employed by you. You must additionally provide a new criminal record check certificate, dated within 10 weeks of issue. In the case of the seasonal worker gaining employment with another company on airport, a second pass will be issued to the pass holder in respect of the second employment, subject to the requirements of 4.2. Re-activation of the original is also subject to section 4.6.6.
- 4.6.5 Where a pass holder completes a fixed term contract and ceases employment with you, the airport ID pass must be returned to the local ID Centre unless you think that you will employ the person again on a new fixed term contract within 12 months. In this case, you must:
- a. Notify the ID Centre to put a stop on the pass giving your reason for not returning the pass;
  - b. Withdraw the pass from the holder and store it securely until next required;
  - c. Apply for the pass to be reactivated when the person returns to the airport.
- 4.6.6 For re-activation on return of a fixed term contractor, you will need to obtain a reference conforming to the requirements of section 2.5 to evidence what the pass holder has been doing during the period away from the airport. You must additionally provide a new criminal record check certificate, dated within 10 weeks of issue. Re-activation of an ID pass in these circumstances will not be possible where the period of absence is greater than 12 months and a new pass application will be required.
- 4.6.7 Where a pass holder completes a fixed term contract and you are not able to place them immediately at the airport but are able to find the person a placement away from the airport temporarily, you must (if you do not want to cancel and return the ID pass):
- a. Notify the ID Centre to put a stop on the pass giving your reason
  - b. Withdraw the pass from the holder and store it securely until next required
  - c. Apply for the pass to be reactivated when the person returns to the airport. For activation, you will need to provide an employment reference conforming to the requirements of section 2.4 to evidence what the pass holder has been doing during the period away from the airport and make a declaration that the person has been continuously employed by you. Re-activation of the original is also subject to section 4.6.6.
- 4.6.8 For agency workers, where the pass holder completes a work assignment at the airport and you are able to find the person a placement away from the airport, the requirements of section 4.6.7 apply.

- 4.6.9 If the period of absence from the CPSRA is greater than 24 months, the airport ID pass must be returned to the ID Centre for cancellation and a new pass application made on return of the employee.

#### **4.7 Lost or Stolen Passes**

- 4.7.1 Lost or stolen passes must be reported immediately upon discovery to the local police and to airport security. The ID Centre should be notified as soon as possible (subject to operating hours).

Passes that are subsequently recovered must be returned to the Edinburgh Airport ID Centre.

- 4.7.2 An original identity document, conforming to the requirements of section 2.2 must be presented to the ID centre in order to obtain a replacement pass.

#### **4.8 Suspension and Parking of a Pass**

- 4.8.1 Airport ID passes that are not used for 60 days or more will be suspended from the electronic verification system. This means access through electronically controlled doors with access to the CPSRA will be denied until such time that the pass is reactivated.
- 4.8.2 Airport ID passes may only be reactivated when confirmation has been received that the holder has been continually employed during the period of pass suspension and assurance has been given that there is an on-going requirement for the pass.
- 4.8.3 In the case of seasonal workers and contractors who have not been continually employed at the airport, you will be required to obtain and submit appropriate references compliant with the requirements detailed in section 2 for the period of time that person has not been continually employed at the airport.
- 4.8.4 Airport ID passes suspended for 12 months or more will be cancelled unless a justification can be provided to evidence the need for the pass, such as long-term sickness or maternity leave. Once cancelled, these passes cannot be reactivated, and it will be necessary to complete a fresh application should a pass be required again.

#### **4.9 Misuse**

All ID pass holders are required to adhere to security regulations in force. We reserve the right to suspend or withdraw any ID pass as a result of or in order to investigate incidents of misuse. In accordance with our terms and conditions, we reserve the right for Edinburgh Airport Ltd to withdraw or refuse to issue an ID pass on the grounds that we believe the pass holder not to be a suitable person.

#### **4.10 Data retention**

All information relating to the application for an Airport ID pass including copies of identification documents, references, evidence of a security interview, evidence and results of a criminal record check and security training records must be retained securely and made available for inspection by Edinburgh Airport Ltd for a minimum period of six years.

## Annex A: Disqualifying Offences

A person shall fail the criminal records check where it reveals a conviction for a disqualifying offence which has been received within:

- The last five years where the disposal was other than a term of imprisonment.
- The last seven years where the disposal was a prison term of six months or less.
- The last ten years where the disposal was a prison term of between six months and two and a half years.
- Within any time period where the disposal was a prison term of more than two and a half years.

Disqualifying convictions shall include but shall not be limited to convictions for the type of offences listed below.

### **Terrorism**

Preparing for, training for or assisting terrorism

Committing terrorism Directing terrorist acts

Failing to disclose information of material assistance in preventing terrorism

Disseminating or possessing articles or information likely to be useful to terrorism

Fundraising, using money or property for the purposes of terrorism.

### **Offences against the person**

Administering poison

Assault occasioning actual bodily harm

Assault with intent to resist arrest

Assaulting a police officer

Attempted murder

Attempting to choke

Causing bodily injury by explosives

Child abduction

Cruelty to a child

Endangering safety of railway passengers

Endangering the safety of an aircraft

False Imprisonment

Fear of violence including harassment or stalking involving fear of violence

Grievous bodily harm

Ill treatment of a mental patient Kidnapping

Manslaughter

Murder

Racially or religiously aggravated harassment

Sending explosive substances

Threats to kill

Unlawful wounding

### **Theft & Dishonesty**

Aggravated burglary  
Aggravated vehicle taking  
Assault with intent to rob  
Blackmail  
Burglary  
Dishonest representation for obtaining a benefit or advantage  
Dishonestly retaining a wrongful credit  
Evasion of liability by deception  
False accounting  
Forgery  
Fraud and fraudulent acts, including possessing, making or supplying articles for use in frauds, obtaining property, services or pecuniary advantage by deception  
Handling stolen goods  
Making off without payment  
Robbery  
Theft

### **Sexual offences**

Abuse of children through prostitution or pornography  
Attempted rape  
Exploitation of prostitution  
Indecency with a child  
Indecent assault  
Living on the earnings of prostitution  
Procuration of a woman to become a prostitute  
Rape  
Possessing, taking, distributing or publishing indecent photographs or pseudo photographs of children  
Trafficking for sexual exploitation  
Sexual activity, assault or rape of a child  
Unlawful sexual intercourse

### **Controlled or illegal drugs**

Assisting the production, supply, import or export of controlled or illegal drugs  
Import or export of controlled or illegal drugs  
Production or supply of controlled or illegal drugs

### **Criminal damage**

Arson

Attempt to cause explosion

Causing an explosion likely to endanger life or property

Conspiracy to cause explosion

Destroying or damaging property

Making or possession of explosive

Making, supplying, or obtaining articles for the unauthorised modification of computer material

Unauthorised access to a computer with intent to commit an offence

Unauthorised acts of computer misuse causing or risking serious damage

Unauthorised modification of computer material

Threats to destroy or damage

### **Firearms**

Carrying any loaded firearm in a public place

Non-compliance with conditions of firearm certificate or licence

Possession of a firearm without a certificate or licence Selling firearm to person without a certificate or licence

Shortening a shotgun or other smooth bore gun

Trading in firearms without being registered as a firearms dealer

### **Immigration**

Assisting unlawful immigration

Unlawful immigration

### **Bomb and threat hoaxes**

Communicating false information alleging the presence of bombs or threats

Placing or dispatching articles to cause bomb or threat hoax

### **Offensive weapons**

Manufacture or distribution of offensive weapons

Possession of an offensive weapon

### **Public order**

Riot

Violent disorder

### **Administration of justice**

Perjury

Perverting the course of justice

Threatening or Intimidating

Witness or Witness Revenge

## Annex B: Quick Check Guide for Authorised Signatories

ID type	Validity	ID requirements	Criminal record checks	References	Security Interview	Security Training
<b>Permanent security restricted area pass</b>	Maximum of 5 years  This will be shortened where the applicant or company can no longer meet any requirement placed upon	<b>For British nationals:</b> A full ten-year passport or British photo-card driving licence  <b>For EU nationals:</b> A full EU Member State passport or National Identity Card  <b>For all other nationalities:</b> A full passport	A valid criminal record certificates for all countries in which the applicant has been continuously resident or employed for 6 months or more during the past 5 years	Written references for the applicant covering all periods of time of over 28 days within the preceding 5 years including employment, education, and personal referees as appropriate.	Interview required between employing company and applicant to ensure that applicant has a valid form of identification, all references comply with requirements and criminal record checks are complete	Applicants must hold a general security awareness training (GSAT) certificate before an application is submitted and must continue to hold a valid certificate for the duration of their pass.
<b>Permanent landside pass</b>	As above	As above	Not required	Not required	EAL Applicant Declaration and Security Interview form must be completed	Not required
<b>Temporary Escorted security restricted area pass</b>	<b>Visitor Pass</b> 1-7 days, with maximum of 14 days in 1 rolling year.  <b>Employment Pass</b> 1-60 maximum in 1 rolling year.	As above	Visitor - Not required  Employment - Required	Not required	Not required	Not required

## Annex C: Security interview – Example

### Pre-Employment Security Interview

The purpose of a pre-employment Security Interview is to ensure that:

- the applicant has a valid form of identification that can be checked;
- all periods over the previous five years can be accounted for, and references and other supporting information can be provided as evidence;
- the applicant is able to meet the requirement for a relevant criminal record check and has no convictions that would disqualify them from holding an airside pass;
- the applicant is fully aware of the checks that will be done to verify the information provided by the applicant and provides all necessary consents;
- there are no indications that the applicant may not be a suitable person to be given unescorted access to the security restricted areas of the airport.

**As the Interviewer, you are required to satisfy yourself on each of the above points, before the application for an Airside Pass is submitted to the Airport ID Centre. At the point of submitting a request for an Airside ID Pass, you will be required to indicate this Security Interview has taken place and will be required to upload a soft copy.**

**It is important to read the relevant Guidance Notes as you work through this Security Interview, and initial to confirm that you have undertaken the steps required. The relevant Guidance Note number is shown as GN with a numeric in each section e.g. GN1**

## Pre-Employment Security Interview

### Part A Basic Information GN1 (to be completed by Authorised Signatory or their agent)

Applicant Name: \_\_\_\_\_ Candidate DoB: \_\_\_\_\_

Employer Name: \_\_\_\_\_

I confirm this interview has taken place in a face-to-face setting on \_\_\_\_\_ (dd-mm-yyyy)

Signature of Interviewer: \_\_\_\_\_ Print Name \_\_\_\_\_

Authorised Signatory  or Agent

### Part B Disclosure GN2 (to be completed by Applicant)

This statement must be read to the Applicant, at the commencement of the Interview.

*The information I will provide in this Interview is the truth, and I acknowledge that to make any false statement in connection with an application for an Airside ID Pass, is a criminal offence under the Aviation Security Act 1982 and will lead to an automatic refusal of the application.*

Signature of Applicant \_\_\_\_\_ Print Name \_\_\_\_\_

### Part C Identity Check GN3 (to be completed by Authorised Signatory or their agent)

**Proof of Identity** you must record information relating to the Identity document(s) provided, together with your confirmation that documents appear genuine and are owned by the Applicant.

**Document Produced – must be Originals** and not copies, tick which document has been produced

British Nationals: Passport  or Photo Card Driving Licence

Document No. Date of Issue \_\_\_\_\_

EU & Swiss Nationals: Passport  or National Identity Card

Document No. Date of Issue \_\_\_\_\_

**All other Nationalities:** Passport

Nationality \_\_\_\_\_

**and** Confirmation of Home Office – Right to Work in UK

Date of Issue \_\_\_\_\_

**Interviewer: Insert your initials to confirm document authenticity/ownership** \_\_\_\_\_

**Part D Five Year Background Check GN4** (to be completed by Authorised Signatory or their agent). Subject to Recruitment Process, this section maybe pre-populated and simply verified within the applicant at Security Interview.

The purpose of this section is to ensure that the applicant has a checkable 5-year background record. Refer to GN4 to for guidance on gap periods.

**Referee 1**

Period From: \_\_\_\_\_ To: \_\_\_\_\_

Employment or Personal? \_\_\_\_\_

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Address:

Tel No:

Reason for Leaving:

**Referee 2**

Period From: \_\_\_\_\_ To: \_\_\_\_\_

Employment or Personal? \_\_\_\_\_

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Address:

Tel No:

Reason for Leaving:

**Referee 3**

Period From: \_\_\_\_\_ To: \_\_\_\_\_

Employment or Personal? \_\_\_\_\_

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Address:

Tel No:

Reason for Leaving:

**Referee 4**

Period From: \_\_\_\_\_ To: \_\_\_\_\_

Employment or Personal? \_\_\_\_\_

Name: \_\_\_\_\_ Position: \_\_\_\_\_

Address:

Tel No:

Reason for Leaving:

If further referees are required to satisfy the end to end 5-year check, then continue to record this information on a separate sheet within this pack.

Interviewer: Insert your Initials to confirm full 5-year period details recorded \_\_\_\_\_

**Part E Criminal Convictions Disclosure GN5** (to be completed by Authorised Signatory or their agent)

It is important the Applicant understands that a Criminal Record Check (CRC) will be completed for each country where the Applicant has been resident for 6 months or more.

If the Applicant is to undertake a role in Aviation Security, then a Counter Terrorism Check (CTC) will also be required.

<p><b>Do you have any Criminal Convictions?</b></p> <ul style="list-style-type: none"> <li>• If No, then proceed to Part F</li> <li>• If Yes, then complete the sections below</li> </ul> <p><b>Record any Criminal Convictions and Dates as disclosed by Applicant:</b></p>	<p><b>Yes / No (Delete as appropriate)</b></p>
--	--

**Interviewer:**

If the Applicant has advised they do not have any Criminal convictions, then tick this box. ☐

A signature will be obtained in the Declaration section, at the end of the Interview.

<p><b>Record <u>any</u> Questions / Concerns raised by Applicant in relation to this Section</b></p>
--

**Interviewer:** Take this opportunity to remind the Applicant that any future convictions must be notified to Employer and the ID Centre within 14 days. Initial when briefed ☐

**Confirm with the Applicant if they have ever held an Airport ID Pass at any other airport. If YES, then complete the details below**

<b>Airport</b>	_____
<b>Company Sponsor / Employer</b>	_____
<b>Airport ID Card No. (if known)</b>	_____
<b>Dates Valid</b>	_____
<b>Reason for Pass Cancellation</b>	_____

**If the Applicant has advised they have not previously held an Airside Pass, then tick this box** ☐

**Interviewer:** Throughout this interview, you should have found the Applicant to be open and willing to answer your questions. You should record below, any of the following behaviours if observed during the interview:

- **Making misleading or untrue statements**
- **Being evasive with answers**
- **Not answering questions seriously**
- **Making jokes about security**

<b>Notes:</b>	
---------------	--

**Part H Final Declaration GN8** (to be completed by both Applicant and Authorised Signatory or their Agent)

**Interviewer Declaration**

I am satisfied that the information provided by the Applicant during this interview, has been recorded within this pack and will now be subject to review prior to submission for Airside Pass.

**Signature**                      **of**                      **Interviewer:**                      **Date** \_\_\_\_\_ (dd-mm-yyyy)

\_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Applicant Declaration (1)**

I give my authorisation for approaches to be made to former employers, education establishments, government agencies and personal referees for verification of the information provided. I declare that I have no disqualifying criminal convictions other than any that are treated as spent under the Rehabilitation of Offenders Act 1974. I have given a true and accurate account of my personal, employment and criminal record history.

**Signature**                      **of**                      **Applicant**                      **Date** \_\_\_\_\_ (dd-mm-yyyy)

\_\_\_\_\_

**Applicant Declaration (2)**

[INSERT AIRPORT NAME] is committed to collecting and using personal information responsibly, securely and fairly. The information provided in this form will be stored electronically and will be used for the following purposes:

- to check the eligibility and suitability of applicants to hold an airport ID pass;
- to administer the airport ID pass scheme in accordance with regulatory requirements;
- to manage and record access to the security restricted areas;
- to investigate allegations of misuse of airport ID passes and misconduct at work;
- to prevent and detect crime and for the purposes of national security; and
- to research into airport surface access opportunities.

In order to fulfil these purposes, we may need to disclose information to employers, third party organisations, the police and government agencies. They will only use the personal information provided by us for these purposes and in some instances, this may require information to be transferred overseas but we will make sure that information remains protected and secure.

In the case of all disclosures we will always ensure the disclosure is legitimate and proportionate for the purpose. We keep personal information in line with our retention policy which ensures that we keep details on pass holders for no longer than is necessary. Information will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

You consent to us passing your personal data to other parties who are involved in the application, issue, control and monitoring of security passes and related permits. Such personal data may include your identity, contact details, employment history, references, criminal record data, driving licence data and any documents which may display such data.

**Signature of Applicant** \_\_\_\_\_ **Date** \_\_\_\_\_ **(dd-mm-yyyy)**

## ANNEX D: Pre-Employment Security Interview Guidance Notes

The purpose of a pre-employment Security Interview is to ensure that;

- the applicant has a valid form of identification that can be checked
- all periods over the previous five years can be accounted for, and references and other supporting information can be provided as evidence
- the applicant is able to meet the requirement for a relevant criminal record check and has no convictions that would disqualify them from holding an airside pass
- the applicant is fully aware of the checks that will be done to verify the information provided by the applicant and provides all necessary consents
- there are no indications that the applicant may not be a suitable person to be given unescorted access to the security restricted areas of the airport

Within this pack, are key guidance notes that will support the Authorised Signatory (or their appointed agent) with the completion of the Security Interview. Each note has a numeric reference that relates to the relevant section within the Security Interview pack.

### General

A Security Interview plays an integral part of the background check process for new applicants. It encourages the applicant to be honest and allows the employer to establish missing information which is relevant to the Pass Application process. There is also the opportunity for the employer to probe applicants about their responses and seek additional information, which will help to build a picture of the applicant and ultimately add to the overall assessment of the applicant's reliability and integrity

There is a risk that an applicant may lie to the interviewer, or present misleading information, or try and cover up something material that would otherwise prevent them from being suitable to hold an airside pass. While this may be considered unlikely, an applicant may even pretend to be someone else or present forged or counterfeit documents.

There is guidance below, designed to give the Authorised Signatory or another suitable trained person the best chance of detecting deception. However, any inconsistencies should be explored with the applicant sensitively as there may be genuine reasons why an applicant is not being completely open on all relevant facts.

Whilst completing the Security Interview pack, it is important you make comprehensive notes and clearly state answers provided and observations made. Outside of the Security Interview pack, you can make records using File Notes.

File notes are records of the time and content of meetings, telephone discussions and other interactions. They can be handwritten or typewritten and loose leaf pages are acceptable. File notes are a useful way for the Interviewer to update the Authorised Signatory to explain what action they took to address an anomaly or a follow up question. File notes should be retained for the duration of a person's contract, if employed.

Where the interviewer suspects fraudulent activity may be taking place, the Authorised Signatory should be immediately alerted. If the Authorised Signatory assesses that there is a cause for concern, the matter should be escalated in accordance with local procedures.

### **GN1 Basic Information**

Many organisations will incorporate the requirement for a security interview as part of their recruitment and pre-employment screening procedures. However, it is also acceptable for the security interview to be held once selection for employment has been made and a decision to apply for an airside pass has been taken.

Some organisations may fulfil a number of the steps required in this section in different stages and not as part of the security interview process. For example, by requesting information in writing or over the phone. However, it is important that the Security Interview takes place in a face to face meeting, in order to verify that the person really is who they claim to be.

### **GN2 Disclosure**

It is important the applicant understands the importance of the Security Interview and prior to answering any questions, is briefed on the potential consequences of either failing to disclose information or providing false information. Ensure the applicant signs this section before proceeding. You will use this signature as part of the verification for the next section. There are 2 additional signatures required from the applicant at the end of the Security Interview.

### **GN3 Identity Check**

There is a need to verify that the applicant's identity is genuine and that it belongs to the person.

The interviewer should ask the applicant for their original identity document and check that it is valid. For British nationals, acceptable documents are a passport or British photo-card driving licence. EU and may present a passport or a national identity card. All other nationals are required to have a passport plus Home Office verification confirming right to work in the UK.

The interviewer should then:

- compare the photograph on the official identity document with the applicant presenting the document (in order to prevent instances of imposters, or 'look-a- likes');
- check that the person's first and last name and date of birth on the official identity document matches the information already provided by the applicant;

- ask the applicant to write their signature and check this against the official identity document;
- closely examine, in the presence of the applicant, the official document for alteration or signs that the photograph has been tampered with or replaced;
- where possible, have a genuine version (UK passport and driving licence) to hand and compare the documents (checking the feel of the paper, looking to see if the typeface is the same, tilting the document to reveal watermarks);
- take a copy of the document (for passports – the page containing personal biographical details and any other pages with visas or other endorsements) and hand the original back to the applicant, if a copy has not already been taken.

### Guidance to help establish if an official identity document is genuine

Some Authorised Signatories will want to learn more, and you could advise them of several sources of good information available on the internet:

- The Home Office [Guidance on examining identity documents 2016](#) provides examples of genuine and counterfeit documents and describes the basic checks that can be done.
- The CPNI [Good Practice Guide on Pre-Employment Screening – Document Verification](#) provides detailed guidance on document verification.
- This web site <http://www.consilium.europa.eu/prado/en/prado-start-page.html> shows examples and describes the security features that may be examined for passports and identity documents from EU member states, Iceland, Norway and Switzerland.
- UKBA's web site offers guidance for employers:  
<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

### GN4 Five Year Background Check

With the applicant's help, the interviewer should review the applicant's employment/educational record covering the previous five years in chronological order. The interviewer should note the position(s) held, duties undertaken, reason for leaving and any employment gaps, ensuring that no periods are unaccounted for.

All gaps over 28 days between periods of employment or training must be accounted for. If there are any gaps, in excess of the 28 days, the interviewer should ask the applicant for the names and addresses of persons who will be able and prepared to confirm, from their own personal knowledge, what the applicant was doing during the periods in question.

Personal references might be used by an applicant to mask actual activity undertaken, such as employment, and the interviewer should satisfy themselves that the proposed persons are appropriate to cover the period in question. The interviewer should ensure that these persons are not family members or in a close relationship with the applicant. Persons must have been in regular contact with the applicant during the period in question.

The interviewer should explore with the applicant what other supporting evidence might be available, in addition to the personal reference, to help verify what they were doing during the period in question. This is particularly important where there are extended gaps such as periods of extensive travel or work breaks such as maternity leave.

For example, periods of extended travel could be supported by proof of itinerary or travel documentation, a passport containing visa stamps for the countries they claim to have visited, suitable proof of residence for time spent abroad, e.g. document from landlord, hotel bills, bank/credit card statements showing spending overseas, letters or certificates from overseas employers or educational establishments, contact details for acquaintances met overseas, including dates and places of meeting. Periods of maternity leave could be supported by a child's birth certificate, a letter from the employer or child benefit claims.

It is important that the interviewer keeps a record of the questions and answers as these may be needed by the Authorised Signatory when assessing overall suitability for an airside pass and will need to be stored on the person's personnel file. The interviewer should advise the applicant that they should keep safe any supporting evidence discussed in case it is needed to be examined at a later stage, for example before an airside pass is issued.

### GN5 Criminal Convictions

The interviewer should ensure that the applicant has signed any necessary declarations and consent forms regarding criminal convictions.

The interviewer should check that the applicant understands that there will be a criminal record check for all countries where the applicant has been resident for 6 months or more and a counter terrorist check (where security listed duties are performed) if offered employment. The interviewer should make a note of any questions or concerns raised by the applicant.

Assessing whether the information provided by the applicant appears credible

The interviewer should make an overall assessment as to whether the referencing procedure is likely to be straightforward or whether there is anything in the person's history that will require investigation:

- Has the person been resident overseas during the past five years?
- Has the person done any unusual travelling such as visiting countries not recommended by the Foreign & Commonwealth Office?
- Has the person got significant gaps between periods of employment? Do all the employment dates align or do any overlap?

- Will references be sufficient, or will there be a need to obtain some independent supplementary evidence? What form of evidence will be needed?
- Will there be a need to verify the authenticity of a referee and the reference provided?
- Will a 'file note' be needed to explain something in particular to the Authorised Signatory or airport operator?

**Note:** Where the interviewer is tasked with obtaining information from the applicant but has not been trained to make their own assessments or recommendations over suitability, it is important that the Authorised Signatory takes responsibility for making this overall assessment before the applicant proceeds to the referencing stage.

### GN6 Previous Airside Pass Held

The interviewer should ask the applicant to confirm the details of any previous airside passes held (which airport, the company sponsor, the pass number if known) including reasons for cancellation.

### GN7 Applicant Suitability

The interviewer should expect the applicant to be open and willing to answer their questions. The interviewer should politely explain if questioned that they need to obtain information not only to assess the applicant's eligibility for employment (if appropriate) but their ability to meet the criteria for the issue of an airside pass.

The interviewer should make a note of any of the following behaviors if noticed during the course of the interview:

- Making misleading or untrue statements
- Being evasive with answers
- Not answering questions seriously
- Making jokes about security

These notes may not prevent the applicant's progression through the selection process but may be investigated later in the process as the applicant's suitability to hold an airport pass will be considered by the Authorised Signatory. The interviewer should keep their notes factual and be careful not to express an opinion. Any notes made may be disclosed to the applicant at a later stage.

### GN8 Final Declaration

It is important that both the Interviewer and the applicant sign the Pack at the end of the session. As an Interviewer you are signing and dating your confirmation that the Security Interview has taken place in full, and you are confident that you have obtained all of the necessary information.

The applicant is required to sign another 2 declarations – one around providing consent to the Airport to make contact with third parties to verify the individual's account of their history, and secondly around granting permission for information sharing in the context of wider security checks.

## **Annex E: Is the application for an airside pass ready for submission?**

### **Aims and objectives**

It is important that both you and the authorised signatory are satisfied that the history appears credible and that there is nothing to suggest that the person may present a threat.

### **Important steps to take**

Before an airside pass application is submitted, you should require the authorised signatory to review the full referencing pack for any anomalies or adverse information that may have come to light:

- Has the person's identity been verified through a document or database check?
- Has a valid and genuine criminal record certificate been obtained and examined for any disqualifying convictions?
- Do employment references come from legitimate sources and do they appear genuine?
- Do all the dates align so there is documentary evidence to cover the full 5-year period with no gaps of over 28 days?
- Where an applicant is registered with an agency (or may be employed on a zero-hour's contract with more than one company) is there some independent supplementary evidence to illustrate how often the applicant was working (e.g. personal reference or bank statements)?
- Where the applicant has provided the referee contact details, has someone tried to verify the authenticity of the referee and the reference provided?
- Where a personal reference has been provided, is there evidence to show how the person knew what the person has been doing or any other supporting evidence?
- Is the content of the references consistent with information supplied by the applicant?

### **Action on finding anomalies**

At this stage, any remaining discrepancies or anomalies can be followed up with the applicant. This should be done in a sensitive manner – there may be a reasonable explanation for apparent inconsistencies. A record of any conversation should be made and kept with the applicant's file. You may require the authorised signatory to provide a copy of such notes within the application pack.

If there is any suspicion of fraudulent activity the matter should be escalated in line with local procedures. Consideration can be given to alerting the police or other agency e.g. Border Force and that you are available for advice.

### **Record keeping for audit purposes**

In all cases you should ensure that the authorised signatory retains a record of the background checks conducted on airside pass applicants, including copies of the identity document checked, criminal record certificate, references used to support personal history and any file notes. These should be retained for the duration of the person's employment. Records may be retained electronically or stored in hard copy. Whichever method is used for storage, materials should be accessible if needed for audit and compliance purposes.

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