

UK SECURITY UPDATE

What this paper is about

To update delegates on developments in the UK on airport security issues including:

- The Review of Airport Policing and the Policing and Crime Bill – para 4
- Foreign Nationals and Criminal Records Checks – para 11
- UK Identity Cards – para 16
- E-Borders – para 18
- Laptop Computers – para 21
- Full Body Scanners – para 23
- Charges for Security Services – para 35
- Relaxing the Restrictions on Liquids in Hand Baggage – para 44
- One-Stop Security – para 46

Points for Discussion

- *Paras 11/15 - Foreign Nationals – Criminal Records Checks:* The meeting may wish to discuss whether to respond to the Department's consultation document and, if so, on what basis. – see para. 14 for suggestions.
- *Para 16/17 – UK Identity Cards:* The meeting may wish to consider whether the early imposition of ID cards on those requiring airside passes is acceptable.
- *Paras 18/20 – E-Borders:* The meeting may like to discuss whether the planned developments in surveillance are acceptable in terms of our civil liberties
- *Paras 23/33 – Full Body Scanners:* Members may like to consider whether the use of these scanners in the UK is acceptable and, if so, whether there should be restrictions on their use.
- *Paras 35/43 – Charges for Security Services:* The meeting may like to consider whether such charges are acceptable.
- *Paras 46/48 – One Stop Security:* Should UKACCs be pressing the UK government to join in these arrangements at least at European level?

Points for Possible Action

The meeting will wish to decide whether to submit any representations in respect of the various matters listed above as points for discussion

Introduction

1. Fortunately there have been no security alerts of the same severity as those which occurred at Heathrow on 10th August 2006 and at Glasgow on 30th June 2007. But airport security continues to be a major pre-occupation at airports across the world.
2. In an effort to speed up the security process most airports have increased the number of security staff, and to provide more passenger search facilities, in order to cope with the extra security requirements. Even so there are still periods of delay from time to time in some places.
3. The restriction limiting passengers to one piece of carry-on hand luggage was finally brought to an end on 7th January 2008. But there is still confusion and difficulty over the restriction that liquids, gels and aerosols are only allowed in hand baggage in individual containers of 100ml. All containers must fit comfortably in one, transparent, re-sealable bag no larger than 20cm x 20cm (e.g. a freezer bag). And many passengers still find it irksome to have to remove laptop computers from hand baggage so that it can be separately scanned and to have to remove coats and jackets, belts and shoes and metal accessories in preparation for a personal scan/search.

Review of Airport Policing

4. At present only those airports designated by the Secretary of State under section 25 of the Aviation Security Act 1982 for the purposes of policing are *obliged* to make a contribution towards the cost of airport policing. There are currently nine such airports - Heathrow, Gatwick, Stansted, Birmingham, Manchester, Prestwick, Edinburgh, Glasgow and Aberdeen. The primary responsibility for policing activity at these airports lies with the Chief Constable and the airport manager must make such payments in respect of policing the airport as the manager and the relevant authority may agree. If they cannot agree, the Secretary of State may be required to determine the amount to be paid to the police by the airport manager (section 26(3)). The Civil Aviation Act 2006 made provision for *Police Services Agreements* at designated airports and it is understood that such agreements have been entered into for the policing of Heathrow, Gatwick and Stansted airports. The position at the other designated airports is not clear.
5. Members will recall that in November 2005 the Government announced it had commissioned an independent, wide-ranging review of policing at airports. The review aimed to identify a sustainable approach to airport policing which takes account of the roles and responsibilities of all stakeholders in protecting an airport and in particular addresses the need for funding arrangements that are objective and transparent. The review was also asked to compare the present method of policing airports with that of other modes of transport to establish any differences or similarities in policing approaches, roles, responsibilities and accountabilities which may apply. The Review team were also asked whether the principle of designation for the purposes of policing under section 25 of the Aviation Security Act 1982 could be made to work and, if not, to propose alternatives.
6. The report of the Review was submitted to the Department for Transport in July 2006. It recommended that the system of "designation" should be discontinued and that policing costs should generally be met by the industry on the basis that policing forms part of an agreed airport "community" response, that costs should be clear and transparent, and that policing at airports should be brought within the mainstream policing agenda.
7. For security reasons the Report was not published and apart from two Government statements¹ nothing more was heard until the new *Transport Security Bill* was published in May 2008. The Bill included provision for implementing the Review. In announcing the new Bill the Department for Transport promised a public consultation on the proposals and details of this were published on 16th July 2008. The consultation can be seen on the Department's website² along with Government's response to the points made the consultation which was published early in January 2009.

¹ <http://www.ukaccs.info/issues.htm#policereview>

² <http://www.dft.gov.uk/consultations/closed/airportpolicing/>

8. Among the issues covered in the consultation was the question of the funding of policing cost by airport operators. This has long been a contentious issue with some airports facing demands to meet the costs of policing over which they had no say and which seem to be disproportionate as between one airport and another. For example when expressed as a charge per passenger the amount demanded of London City Airport is four times that levied at London Heathrow. There are also concerns that the ordinary costs of policing at airports are included in the Business Rate paid by all airports and therefore that in respect of some of the costs airports were being expected to pay twice. Finally there were questions flowing from the fact that some police forces are not always very good at quantifying their local costs and whether it was reasonable to expect airports and their passengers to meet the costs of guarding against possible terrorism, a threat for which they were not responsible. The new arrangements proposed in the Policing Review and the planned new legislation go some way to meeting a number of these concerns but others remain.
9. In the event the proposed legislation was included in the *Policing and Crime Bill* announced in the Queens Speech on 3rd December 2008. If passed the Bill will establish new arrangements for airport security on the lines recommended by the Review. The two principal objectives are to:
 - ensure that the majority of airports in the UK agree a local airport security plan with their key stakeholders, based upon an agreed multi-agency threat and risk analysis; and
 - ensure that, where it is agreed under the terms of an airport security plan that a dedicated policing presence is required at an airport, the airport operator will make payments in respect of the dedicated policing services provided.
10. At the time of writing the Bill is in its final stages in the House of Commons.

Foreign Nationals – Criminal Records Checks

11. This issue, raised some time ago by the Manchester Airport Consultative Committee (MACC), was discussed at the Annual meeting at Heathrow last year. The meeting was concerned that there appeared to be a disparity between UK and foreign applicants in that British citizens seemed to undergo a more stringent vetting process the Liaison Group considered that any person working airside should have to undergo the same stringent checks. It was agreed that a letter be sent to the DfT expressing concern about the inconsistency of arrangements.
12. The Secretariat subsequently wrote to the Government and the response was circulated to all members on 16th December 2008 along with MACC's most recent correspondence with the Department on this issue. The correspondence can be seen on the UKACCs website³.
13. Then on 11th February 2009 the Department for Transport launched a consultation seeking views on proposals to implement overseas criminal record checks for certain transport posts. The consultation documents can be seen in full on the Department's website⁴ but at Annex A1 there are extracts outlining the issues covered by the consultation, the Departments options for dealing with perceived problems and the questions in respect of which the Department is seeking answers. At Annex A2 is a useful summary which the Department for Transport sent to a UKACCs member committee at the end of April.
14. This is, perhaps, a consultation to which the Liaison Group might like to respond? Among others things the Group may like to record its dismay that notwithstanding the fact that at least one Consultative Committee, and the Liaison Group, have been in correspondence with the Department about this issue, there are no Consultative Committees on the list of consultees. And the Group might like to reiterate that for security reasons foreign workers should not be employed airside unless they can be checked in the same way that British workers are.

³ <http://www.ukaccs.info/issues.htm#CRC>

⁴ <http://www.dft.gov.uk/consultations/open/crc/>

15. The closing date for comments is 29 May 2009.

UK Identity Cards

16. It was announced in March 2008 that the Government's planned scheme for ID Cards would begin in November 2008 with introduction of identity cards for some categories of non-EEA foreign nationals. Then, starting in the second half of 2009, the scheme would be extended to UK citizens with the first ID cards being issued to people working in specific sensitive roles or locations where verification of identity will enhance the protection of the public. The announcement said the first cards would be issued to those working airside in the country's airports. The first such cards will be issued at London City and Manchester Airports. This will be in the nature of a trial which, if successful, will lead on to the issue of ID cards to airside employees at other airports.
17. This focus on airports has given rise to a certain amount of consternation. The Heathrow Airport Consultative Committee has already expressed its disquiet while BALPA, which represents British pilots, has written to Manchester and London City airports warning that pilots would not cooperate with the introduction of the ID cards.

E-Borders

18. Also of concern is the UK Government's 'eborders' and 'border management' programmes which represent a radical re-organisation of border and travel surveillance policy.
19. These programmes will mean the collection of biometric data at borders (fingerprints, iris scans), the collection of passenger-information from airlines, the profiling of passengers before they arrive or depart the UK, the retention of personal information for an indeterminate amount of time, and the sharing of this information with a number of agencies for the purpose of general policing.
20. The Government says these measures are being introduced to counter terrorism and to combat crime. Many organisations believe they open the way for those with more sinister motives. In any event the shift from "targeting" suspected individuals to placing everyone's movements under surveillance raises all kinds of privacy and data protection issues. The scope of system is presented as necessary for countering terrorism and serious organised crime but it can very easily be extended to cover all crime or all suspected crime however minor.

Laptop Computers

21. Current EU law requires that all laptops should be removed from bags at airport screening points. But for 18 months the UK - with permission from the EU – carried out a limited technology trial at two airports – Heathrow and Glasgow - where laptops were permitted to remain in bags at screening points. This was made possible by sophisticated scanners which could see deep inside a bag or briefcase.
22. As originally agreed with the Commission the trial came to an end in February 2009. The results are being evaluated. The new technology does provide an amount of easement in terms of passenger preparation when passing through security. According to British Airways the trial was well received by passengers. However, as the trial has now reached the end of the period agreed with the EU, passengers at Heathrow and Glasgow are now required to revert back and comply with the current EU regulations and present large electrical items such as laptops outside of their cabin bags before screening.

Full Body Scanners

23. One possible method of screening persons at airports is by use of machines known as 'body scanners'. In order to decide whether or not 'body scanners' should be allowed as a method of screening people at airports and if so, under what conditions, the European Commission earlier this year conducted a consultation on the impact of the use of body scanners in the field of aviation security on human rights, privacy, personal dignity, health and data protection. The closing date for contributions was 19th February 2009

24. Body scanners produce an image of the body of a person showing whether or not objects are hidden in or under his/her clothes. Depending on the technology the images are of varying resolution. For a person to be screened by a body scanner, he/she must stand in a certain position for a few seconds either inside the body scanner or directly in front of it (again, depending on the technology). At present there are three main types of body scanner under development and testing: :
 - millimetre wave, using radio waves equivalent to 0.01% of the permissible dosage for mobile phones;
 - backscatter, using low dosage x-rays equivalent to 2% of the dosage of radiation experienced by a passenger during a long-haul flight
 - t-ray, using terahertz radiation which lies between infrared light and microwaves on the electromagnetic spectrum.
25. The body scanner is being developed in response to a perceived weakness in aviation security today namely the detection of non-metallic items. All passengers normally pass through walk-through metal detectors (WTMD) which should ensure that guns and knives (and some other prohibited items) are detected. If the WTMD alarms, this is often resolved by a full hand search followed by an additional search with a hand-held metal detector (HHMD)
26. The combination of metal detectors and hand searches is currently the optimal means of detecting concealed prohibited items. However, the quality of hand searches is very variable at Community airports, as noted by the Commission in its compliance monitoring programme of airport inspections. Furthermore, passengers often find hand searches intrusive and upsetting to their dignity. Finally, the hand searching of passengers is time-consuming and labour-intensive, making it expensive to perform.
27. Since body scanners can detect any item concealed on a person's body or in or under his/her clothes, they could be used as an alternative to the existing means of screening passengers.
28. Body scanners are already in use in the USA where the *Transport Security Administration (TSA)* announced in February 2009 that it will pilot these "millimetre wave" scanners in place of the walk-through metal detector at six airports and will evaluate their operational efficiency. The airports are: San Francisco, Miami, Albuquerque, Tulsa, Salt Lake City and Las Vegas. It's also on the cards that the scanners will be used in other countries such as Netherlands, Japan and Thailand.
29. Passengers are said to be reacting positively to the millimetre wave technology pilots currently in operation at 20 airports around the US. The new scanners will remain voluntary for passengers; those who do not wish to receive millimetre wave screening will undergo the usual metal detector screening and a pat-down.
30. "Passenger privacy is ensured through the anonymity of the image" says the TSA, "the officer attending the passenger cannot view the image, and the officer viewing the image is remotely located and cannot see the passenger." Additionally, the image cannot be stored, transmitted or printed and is deleted immediately after being viewed. Finally, the facial area of the image is blurred to ensure privacy.
31. But some groups are not so sure. "Body scanners produce graphic images of travellers' bodies and are an assault on their essential dignity," said Barry Steinhardt, director of the ACLU's Technology and Liberty Project. "The safeguards announced by the TSA do not convince us that the technology is acceptable, and we question the supposed voluntary nature of these scanners."
32. During 2005/2007 DfT in partnership with BAA and Luton Airport conducted body scanner trials using both millimetre wave and backscatter technology. The results of these trials were very positive but further work is needed to resolve the associated logistical issues such as process time and space constraints.

33. If scanners of this kind are to be introduced in the UK there will no doubt be calls for safeguards to protect the privacy of passengers. There are also concerns that full-body scanners could slow down the screening process.
34. Meanwhile in an attempt to improve security and ease congestion, airline passengers at Manchester and Stansted are being screened with facial recognition technology rather than checks by passport officers. According to press reports 10 of these gates will be operating at major UK airports by August this year. The new gates are equipped to scan passengers' faces and match the image to the record on the computer chip in their biometric passports.

Charges for Security Services

35. Last year we reported that Liverpool airport was considering a charge for passengers to cover its security costs. The scheme would require people to pay to pass through a turnstile before boarding. Managers said the extra revenue would help meet the £3m cost of increased insurance and security.
36. In the event the scheme was introduced in June 2008 on a voluntary basis. Passengers have the choice of using the *FastLane* for which the charge is £3.00 from machines at the Airport or £2.50 if purchased in advance via the Airport Web Site. According to a report submitted to the airport's consultative committee in September 2008, some 10% and 15% of the passengers are using *FastLane*.
37. Similar facilities have also now been introduced at Bristol, Luton, Leeds Bradford and possibly other airports.
38. Meanwhile there is controversy over the practice of some airports in charging for the transparent, re-sealable bags which must be used by passengers carrying liquids, gels and aerosols in their hand baggage.
39. By way of a trial starting on 1 January 2009 passengers at Manchester Airport who needed such a bag are being charged for them. Round plastic containers holding 4 poly bags are being sold for £1. The Airport says the charges for plastic bags have been introduced to help "educate" passengers to bring their own and indeed there is a feeling that passengers should prepare themselves in advance.
40. The Airport Advisory Group (UAG) of Manchester Airport's Consultative Committee was concerned about the safety issues connected with empty containers, the cost to passengers who might only need one bag and the perception of the public in relation to the charge. UAG Members were concerned at the image of the Airport and suggested the possible use of a bag dispenser taking a 10p or 20p coin. The matter is to be further discussed
41. It is understood that similar arrangements have been introduced at Liverpool, Bristol and Luton and possibly other airports. The BAA says that at its seven airports the bags will continue to be supplied free of charge.
42. Meanwhile, at Europeans level the recent directive on Airport Charges 2009/12⁵ provides that the security charges made by airports should be used exclusively to meet their security costs, including the cost of financing necessary security facilities and installations, and expenditure on security staff and operations. There is also a very recent proposal issued by the Commission in May 2009 for a Directive on aviation security charges. The aims are to ensure transparency, non-discrimination and consultation with airlines when fixing the level of charges, as well as the "cost-relatedness" of security charges. It also proposes to establish an independent supervisory authority in each Member State.
43. The wider issue of charges for airport services is referred to in the *UK Aviation Update* paper to be considered elsewhere on the Agenda.

⁵ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:070:0011:0016:EN:PDF>

Relaxing the Restrictions on Liquids in Hand Baggage?

44. The restriction on liquids in hand baggage still gives rise to huge confusion among passengers and large quantities of these fluids are confiscated at airports every day.
45. But there are signs now that the restriction may be phased out. According to a press report in March 2009 this is thanks to new X-ray technology which can detect liquid bomb-making ingredients like hydrogen peroxide. A government source is reported as saying that the ban would be lifted at a limited number of airports, possibly as soon as this autumn. "The restrictions will start to be removed in six months to a year's time and passengers will be allowed to carry any size of bottle they like inside their hand luggage, just as they were before the summer of 2006. Airports will have to demonstrate that they have invested in the technology, so it will not be a blanket lifting of the restrictions." The source said that a BAA airport would be involved in the trial because the company had already installed advanced threat identification X-ray machines. These machines, costing more than £100,000 each, have the capacity, after a software upgrade, to distinguish between harmless liquids and potentially explosive ones. It needs to be said that the responsible *Transec* officials at DfT have seen this paragraph and question its accuracy.

One-Stop Security

46. In May 2009 France joined the majority of the EU countries – but not the UK and Ireland - which allow *One-Stop Security* for passengers arriving from another EU airport. Thus passengers which have already been screened at another European airport will not need to be screened a second time when making flight connections - the hassle of connecting is thus reduced.
47. The International Civil Aviation Organization (ICAO) is working to develop the concept of One-Stop Security and to promote it on a global scale. The key, they say, is common recognition of standards with more governments exchanging information and concluding security agreements which recognise their security measures as equivalent. Aviation is a global industry and international cooperation is essential especially in airport security.
48. Twenty five per cent of passengers at the top 120 airports worldwide are connecting passengers. This represents over 325 million passengers each year. Smooth connections, says ICAO, are at the heart of the hub and spoke system put in place by network carriers.

Stuart Innes
May 2009

Department for Transport – Consultation on overseas criminal record checks for transport staff - extracts from the consultation documents

The Issues

The purpose of this consultation is to seek stakeholder comments on proposals to add a check of overseas criminal history information to the National Security Vetting (NSV) process ie to the Counter-Terrorist Check and Security Clearance process.

The Department for Transport (DfT) is particularly interested in views on the number of people to whom this type of check will apply and the impact of implementing this new check.

Personnel security measures aim to reduce the risk of a person exploiting his or her legitimate access to an organisation's assets (physical or intellectual) for an unauthorised purpose.

A key element of personnel security is the pre-employment screening of new applicants, which generally consists of verifying a person's identity and making a judgment on integrity by checking recent history, such as employment and criminal history. It is relatively straightforward to obtain UK criminal record information, but the UK transport sector now has a high proportion of workers who have limited UK residency. A check of UK records may well only give part of the picture for such workers.

A recent independent review of personnel security in the transport sector (summary at Annex A) included a recommendation that checks of overseas criminal records should be introduced where required for UK records and that it might be sensible to introduce such checks:

- for new staff only;
- starting with certain posts on a risk-assessed basis; and
- starting with a voluntary approach.

In response to this recommendation the then Secretary of State made a statement to Parliament that DfT would issue guidance to industry to enable employers to adopt a voluntary regime, but would also discuss with industry the introduction of a mandatory check of overseas criminal history in respect of the highest risk posts. A copy of the ministerial statement is at Annex B.

The Options

Option 1 would involve DfT issuing guidance to industry about how to obtain and assess overseas criminal history information in respect of new staff, but nothing further.

The DfT has created and issued guidance for employers on how to operate a regime of checking the overseas criminal history of prospective employees, should an organisation or employer choose to do so. The DfT believes that active use of this guidance will reduce the risk of hostile insider action on the UK's transport infrastructure compared to the Base Case. However, DfT believes that the reduction in risk would be less than that achieved for Options 2, 3 and 4 and that a purely voluntary approach offers very limited assurance that the vulnerability will be adequately addressed.

Option 2 would involve DfT requiring industry to consider overseas criminal history record in respect of all new staff where a UK CRC is currently required.

This option would involve a major extension of the current regulations and would mean that all companies who employ staff in areas where a UK criminal record check is mandatory, i.e. in the Restricted Zones (RZ) of UK airports, would also have to check overseas criminal history as provided by prospective employees. It is envisaged that this would apply where the applicant had been resident overseas for 6 continuous months or more in the last 5 years, rather than where the person had any overseas residency. The DfT considers that this would particularly impact on aerodrome managers.

Regulations currently oblige aerodrome managers not to issue a full RZ pass until the applicant has passed the UK criminal record check. It is envisaged that this option would include the same requirement in respect of overseas criminal records, where appropriate, but it is recognised that this could, in certain cases, add significantly to recruitment timescales with the potential to disrupt airport operations. In order to minimise disruption a time-limited full RZ pass (for example valid for 10 weeks) could be issued provided that the applicant can satisfy the check of identity, 5-year employment history, right to work and UK criminal records and had not been resident overseas for more than, say, 12 continuous months in the last 5 years.

DfT feels that Option 2 would present the second highest benefits, more than Options 1 and 4 but less than Option 3, in terms of the likelihood of the risk of hostile insider action on the UK's transport infrastructure being reduced. However, the DfT considers that the greatly increased burden on industry would likely be out of proportion to the reduction in risk.

Option 3 would involve DfT undertaking a check of overseas criminal history for new staff where a UK check is currently required.

This option would involve DfT making regulations to require employers to ensure that new staff in posts where a UK check is already required (i.e. RZ pass holders) submit, for DfT consideration, overseas criminal history information.

This would have the same conditions as Option 2. The only difference from Option 2 is that DfT would undertake the checking of overseas criminality information presented by the applicant and not employers and aerodrome managers.

The DfT considers that Option 3 represents the highest likelihood of the vulnerability to hostile insider action being reduced, although there would be significant costs involved and focusing all such applications through one point (i.e. DfT) rather than being spread across each industry facility (e.g. airports) would present a higher likelihood of delays in the process albeit that increased consistency in decision making would be more likely. However, Option 3 would not fit well with the review's broader recommendation that the industry should take greater ownership of its personnel security risks.

Option 4 would involve DfT assessing overseas criminal history checks in respect of all new staff in posts currently subject to NSV.

This option would create an additional layer of checking within the NSV process and will supplement the extensive check of UK criminal records and Security Service records. It is proposed that this would apply to persons who have spent 6 continuous months or more in the last 5 years living outside of the UK. For other posts not subject to NSV, DfT would expect industry employers to make use of the guidance it has issued to enable them to effectively check overseas criminal history for new employees on a risk-assessment basis.

It is proposed that applicants would obtain the relevant overseas criminal history information and include it with their NSV application (or that the information would follow shortly afterwards) and that NSV clearance will not be granted until and unless overseas criminal record information (or the acceptable alternative) has been received and assessed by DfT.

It is recognised that there is the potential for the NSV process (with or without the addition of an overseas CRC) to restrict the availability of sufficient numbers of staff to undertake security functions. It is therefore proposed that applicants be allowed to undertake security functions where the existing conditions in each modal area are satisfied e.g. that the person has passed all the tests necessary to obtain a RZ pass and has been resident in the UK for the last 5 years.

The DfT considers that this option would offer a very high likelihood of the vulnerability to hostile insider action being reduced to an acceptable level, compared to the Base Case. This would mitigate the risk less than Options 2 and 3, but more than Option 1.

Consultation Questions

The Department is asking six questions:

1. Do you agree that checks of overseas criminal records are a valuable addition to current pre-employment and personnel security processes and, if so, why?
2. Do you agree with the DfT's view that Option 4 (overseas CRCs for new staff in NSV posts) is the most appropriate option and, if not, which other option would you prefer, and why?
3. What time-frame do you think is proportionate for targeting overseas criminal checks? e.g. 6 continuous months or more continuous residency outside the UK within the last 5 years
4. What will be the likely impacts of the introduction of the preferred option (Option 4) on your organisation/location?
5. What proportion of new applicants to your organisation do you think will fall into the category of requiring an overseas CRC (i.e. new staff in posts subject to NSV).

6. Have you made use of the guidance issued by DfT regarding overseas criminal record checks and, if so, do you have any suggestions on how it could be improved?

ANNEXE A2

Consultation on overseas criminal record checks for transport staff – note by the Department for Transport

We propose that a check of overseas criminal records should apply to new staff in posts which are subject to Counter-Terrorist Checks (CTC). It will apply to all such staff, regardless of their nationality, who have spent 6 months or more in the last 5 years outside of the UK. The overseas criminal record information will inform DfT's judgement on the CTC application.

The only way that criminal record information can be obtained is directly from the official source in each country (the UK gov't does not have direct access and *vice versa*). In the vast majority of cases privacy laws exist which mean that sensitive personal data (such as criminal records) may only be provided to the person to whom it relates, unless he gives his express written permission for it to go to a third party. Therefore, we propose that individuals obtain the information themselves, have it translated and then present it to DfT, meeting all costs themselves. It will be key for applicants to obtain the information as early as possible in the recruitment process in order to minimise delays.

It will not be necessary for employers to do anything other than ensure that all relevant staff have obtained and submitted the information.

We are seeking to ensure that any person who has spent significant time outside of the UK is treated no more or less favourably than a person who has not.

The DfT believes that the costs of transport security should be met by users and not taxpayers. In the case of overseas criminal record checks the costs will fall to the applicant, unless an employer wishes to reimburse those costs.