

Part 109 Regulated Air Cargo Agent

Associations with relevant service providers

1. The highest risk assessment score for any service provider is < 5%
2. The highest risk assessment score for any service provider is between 5% and 10%
3. The highest risk assessment score for any service provider is between 10% and 20%
4. The highest risk assessment score for any service provider is between 20% and 40%
5. The highest risk assessment score for any service provider is > 40%

Attitude towards risk taking

1. All risks are eliminated, mitigated, or insured against by well understood mechanisms apparent at all levels of the organisation.
2. Most risks are eliminated, mitigated, or insured against. Risk management is well understood and unacceptable outcomes usually prevented by well understood controls and procedures.
3. The concept of risk management is understood but not well implemented.
4. Risk management is not well understood and controls are ineffective or rarely implemented.
5. Risk management is not considered at all. Risk taking is allowed without controls and/or no effort is made to monitor or assess risk.

Organisation's attitude to the regulator

1. Encourages regulatory participation in projects and access at any time. Volunteers information freely and without prompting. Cooperative and helpful. Accepting of comments and recommendations.
2. Accepts regulatory access without question. Open and transparent. Cooperative.
3. Accepts regulatory access but periodically questions timing or site. Audits conducted as expected but does not willingly volunteer all information. Open but engages in "gamesmanship".
4. Senior persons not available. Attempts to postpone audits for no practical reason. Information is provided only when specifically requested. Reluctant to "open up" and only co-operates if it suits.
5. Will not accept free regulatory access to facilities, personnel. Audits deliberately avoided. Information is deliberately withheld and not made available. Argumentative, deceitful, obstructive, aggressive.

Challenges to rules

1. Exceeds rules requirements. Readily accepts interpretations. Actively participates and co-operates in formal processes to improve rules.
2. Exceeds rules requirements. Holistic view in viewing rules as for the general good for everyone so complies even if disagrees.
3. Meets minimum rule requirements. Questions rules from a self interest or industry perspective.
4. Actively seeks avenues to circumvent rules. Self interest in rules in order to further economic advantage. Only complies 'problem' rules if it suits.
5. Deliberately breaches rules. Commonly espouses an attitude of perceived licence to bend the rules. 'Problem' rules are deliberately flouted and actively campaigned against for economic advantage.

Financial situation affects security

1. No bad debtor records in last 24 months
2. One bad debtor record in last 24 months
3. One bad debtor record in last 12 months
4. Two or more bad debtor records in last 12 months
5. Two or more bad debtor records in last 6 months

Company experience eg New start-up company vs experienced participant

1. Most recent certificate first issued > 36 months ago
2. Most recent certificate first issued between 24 and 36 months ago
3. Most recent certificate first issued between 12 and 24 months ago
4. Most recent certificate first issued between 6 and 12 months ago
5. Most recent certificate first issued < 6 months ago

Staff turnover esp supervising staff

1. All senior persons have held positions for > 24 months.
2. All senior persons have held positions for > 12 months.
3. One senior person has held position < 12 months.
4. More than half the senior persons have held their positions < 12 months
5. All senior persons have held their positions < 12 months

Training programme

1. The organisation can show that all the training is effective.
2. The organisation is able to show that ineffective training is the exception. Where training is ineffective it is recognised as such and managed.

3. The organisation is able to show that most of its training is effective. Where training is ineffective it is usually recognised as such and managed.
4. The organisation is able to show that some of its training is effective. Where training is ineffective it is rarely recognised as such or managed.
5. The organisation is not able to show that any training is effective. Ineffective training is not recognised.

Capability of senior persons

1. All senior persons are highly effective at their jobs.
2. All senior persons are effective at their jobs.
3. Most senior persons are effective at their jobs but a small number would benefit from additional experience or training.
4. Most senior persons are adequate for their jobs but would benefit from additional experience or training. Some are inadequate.
5. Senior persons do not seem to be capable of performing their jobs properly.

Part time senior persons

1. All senior persons are full time employees of this organisation only.
2. All senior persons are employed solely by this organisation, and a maximum of 1 holds a part time position in a low-volume job.
3. Most senior persons are full time employees of this organisation, and no more than 1 is employed elsewhere.
4. Most senior persons work for this organisation on a part time basis, or two or more senior persons also work for other organisations.
5. All senior persons work for this organisation on a part time basis

Staff morale

1. Morale is very good. Staff are positive and "up-beat" about this organisation.
2. Morale is good. Most staff are positive in their attitude to the organisation - there is no overt hostility.
3. Morale is average. Most staff have good or "neutral" attitudes, only a very few have a negative attitude.
4. Morale is low. A significant number of staff have a negative attitude towards the organisation.
5. Morale is very low. Few staff have a good word to say about the organisation.

Industrial relations

1. Superb industrial relations characterised by complete trust of company by employee representatives and vice-versa. Industrial action is unknown.

2. Employee and company representatives have a good professional relationship. Industrial problems are solved by negotiation when they arise. Industrial action is rare.
3. Employee and company representatives have a working relationship. Industrial problems occasionally result in limited actions.
4. Employee and company representatives usually meet to discuss issues, but rarely solve them without some industrial action or other.
5. Employee and company representatives rarely meet before an industrial action is taken. Solutions are often externally imposed.

History of document action, including consideration of action (conditions, suspensions)

1. No document action has been considered within the previous 10 years and no document action has ever been carried out.
2. Has had document action considered in the last 10 years but none has been carried out.
3. Has had document action less than suspension of certificate or licence carried out within the last 5 years but not current.
4. Has had suspension of certificate or licence carried out 1- 5 years ago.
5. Has had suspension of certificate or licence carried out 1- 5 years ago.

Non-compliance/non-conformance

1. NCI score in last 12 months = 0.
2. NCI score in last 12 months is >0 and in lowest 40% of scores.
3. NCI score in last 12 months is in 40-70% range
4. NCI score in last 12 months is in 70-90% range
5. NCI in last 12 months is in the highest 10% (90-100% range)

Change in company organisation, scope or size

1. No changes in company organisation, scope, size or range of activities conducted for at least 24 months
2. No changes in company organisation, scope, size or range of activities conducted for 12 months to 24 months
3. No changes in company organisation, scope, size or range of activities conducted in preceding 12 months
4. Minor to moderate changes in company organisation, scope, size or range of activities conducted in preceding 12 months
5. Significant changes in company organisation, scope, size or range of activities conducted in preceding 12 months

Attitude to safety and compliance by management

1. An excellent attitude to all aspects of security within the organisation. Security culture is well embedded and obvious. Just culture is actively promoted.
2. Management is proactive in security matters and there are only minor/occasional lapses. Security culture is accepted and understood through the organisation. A just culture ethos is in place.
3. Management takes the initiative in security and has security procedures in place. Security culture is generally understood but there are minor individual lapses Operational 'risk assessment' does take place.
4. Management is reactive. Does on occasion take some initiatives towards implementing policy and procedures to enhance security, but generally ongoing monitoring is spasmodic. Security culture is confined to individual initiatives. No operational 'risk assessment' apparent.
5. Management is either inactive or actively fosters the development of poor security culture within the wider organisation. No evidence of a positive security culture in either management or in individuals within the organisation. Individual responsibilities are not recognised and there does not appear to be any grasp of the 'big picture'. There is no operational 'risk assessment' mechanism.

Safety, risk and quality management systems

1. A comprehensive documented Quality Management system is in place. The Operator/Management has clear visibility of issues confronting them and the quality system in place is designed to sensibly anticipate and/or cope with them. No deficiencies in the QMS were observed during the most recent CAA evaluation. Best practice SeMS is evident. Risks are effectively evaluated and mitigated or eliminated. Continual review and improvement. Training in risk management is provided to all relevant staff. Vertical, horizontal and matrix (project orientated) free communications exist between all levels and units.
2. A well-designed Management System is in place within the organisation. It may contain a documented, comprehensive QA system. No significant deficiencies in the Management, Planning, or QA systems were noted. Process and problem ownership is well defined. SeMS in place. Risks are evaluated and routinely dealt with, although not always proactively. Training in risk management is provided to some, but not all affected staff. Clear, well-defined lines of communication exist.
3. A basic Management System is in place and it may contain a QA system. There are aspects/facets of the organisation's operations that have not been considered. Process and problem ownership is defined but some deficiency noted. A proactive planning system is in place. Some deficiencies in the planning or management system noted. Risks are evaluated but not always dealt with in a systemic formal manner. A general awareness of risk management is evident through informal processes. Lines of communication are defined.

4. Management has taken some initiatives towards introducing and implementing a quality approach and systems throughout the organisation's operations. However, the system is not comprehensive and/or not clear. Problem or process ownership is not defined. There is a piecemeal/ reactive approach to planning. Security management is treated as actions to take after a major problem is identified. Risks are ignored when convenient. No risk management training is provided. Lines of communication are not clear.
5. There is little or no evidence of a sensible Quality Management System being in place. No evidence of any form of quality system or proactive management/planning system evident. Security management is ignored in favour of commercial priorities. No evidence of SeMS. Risks are deliberately ignored. No training in risk management is provided and discussion about the subject is discouraged. Communication regarding security, risk and quality matters does not take place unless forced to by external reasons.

Condition of facilities and equipment

1. Standards applied and maintained are considered to be well above minimum industry requirements.
2. Facility is adequate to maintain the security of cargo or mail processed by the operation. It is well arranged, maintained, and presented in all respects. There are no security issues identifiable with the facility.
3. Facility is adequate for the operation. It is basically well maintained and arranged. However, there are minor/occasional discrepancies/vulnerabilities noted.
4. Facility is barely adequate for the operation. It is not well arranged and some deficiencies exist which result in the existence of vulnerabilities to the security of cargo or mail processed by the operation.
5. Facility is inadequate for the operation. It results in significant vulnerabilities to the security of cargo or mail processed by the operation.

Tools/Equipment/Materials/Aircraft

1. Assets, e.g. screening equipment (if relevant) applied and maintained and tested are considered to be well above the minimum industry standards.
2. Tools/equipment are adequate and correct for the job, are well maintained, tested, documented and controlled. No deficiencies observed.
3. Tools/equipment are adequate, correct for the job, and well maintained and tested. An adequate control system is in place but some discrepancies are noted and being corrected.
4. Tooling/equipment/materials are adequate and appropriate for the job and are maintained. Documentation and control is deficient, eg, adequate equipment is provided but no control is exercised.
5. Essential tools/equipment are not provided or their condition is such that their use does not support required security outcomes. Control systems are significantly deficient. Maintenance and testing is questionable.