



INSTRUCTIONS AND GUIDELINES

Detained Goods Management Stocktake Requirements

February 2012

**This Instruction & Guideline refers to Practice Statement:
PS2011/34 – Detained Goods Management**

Published date:	02 February 2012
Availability:	Internal and external
Subject:	Detained Goods Management – National Stocktake Policy
Purpose:	Provide a framework for conducting regular stocktakes to account for all goods detained/seized and stored at Customs and Border Protection Facilities
Owner:	National Director Cargo
Category:	Operational procedures
Contact:	Manager Detained Goods Management Policy

The electronic version published on the intranet is the current Instruction and Guideline.

Summary of main points

This document outlines the requirements and procedures for conducting stocktakes to account for all detained goods and provides detail on:

- Requirement for Customs and Border Protection to conduct stocktakes.
- When stocktakes are to be conducted.
- Who should conduct the stocktake.
- The facilities at which a stocktake is to be conducted.
- The category of goods to be included in the stocktake.
- Reporting requirements.
- Management responsibility to account for the stocktake.
- Regional Operations and Central Policy responsibilities.
- This Instruction and Guideline also details general procedures relating to Work Health & Safety (WHS) considerations, COMCARE reporting, the Customs Incident Reporting Centre (CIRC), COMPASS reporting and Employee Assistance Providers (EAP).

This I&G applies to staff in:

- Detained Goods Management
- All areas where detained goods are held on a temporary basis

Introduction

These instructions have been developed to provide a framework to ensure the secure storage of goods and promote accountability and consistency in the operations of the Detained Goods Management (DGM) function. It is important that all policies and procedures promote and reinforce integrity and transparency.

These instructions apply to the controls exercised on the management of Non-firearms with limited references to Firearms. Specific instruction on the management of Firearms, are contained in the Custodial Firearms Policy Instructions and Guidelines – March 2011.

<http://intranet.customs.gov.au/resources/legislation-and-policy/policy-and-procedure/documents/PSxxxxxx-ig-CustomsandBorderProtectionCustodialFirearmsPolicy.pdf>

WHS Considerations

Workplace safety is the responsibility of every Australian Customs and Border Protection Service (C&BPS) employee.

Prior to commencing any task, C&BPS officers must assess the working environment and circumstances of each individual tasking and ensure they are familiar with the work area risk assessments to identify factors which may impact on the officer's personal safety.

C&BPS officers working in the Detained Goods Management (DGM), are to wear personal protection equipment (e.g.: steel cap boots, high visibility vests, gloves, face masks, eye protection etc) when required. If you are in any doubt about what personal protection equipment should be worn, you should discuss this with your Supervisor, Health and Safety Representatives or Manager, prior to undertaking the task.

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Chemical or liquid goods that may pose a health or safety risk must be transported from other areas to DGM, with the relevant 'Material Safety Data Sheet' (MSDS). DGM Officers handling these goods must familiarise themselves with the MSDS prior to handling or storing the goods. The MSDS provides detailed instructions to the safe handling, storage, transport and destruction of dangerous goods.

C&BPS officers are to handle all goods according to safe lifting guidelines (*OH&S Hazard Instruction & Guideline – Manual Handling*)

http://intranet.customs.gov.au/resources/legislation-and-policy/policy-and-procedure/documents/OHS_Hazard_IG_manual_handling.pdf

Staff should utilise team lifting techniques or mechanical devices, such as: trolleys, pallet jacks, heavy lift winch trolleys etc. to prevent injury. If you are in any doubt about what equipment should be used or how to use the equipment, you should discuss this with your Supervisor, Health and Safety Representatives or Manager, prior to undertaking the task.

C&BPS Supervisors and Managers are to ensure that sufficient First Aid trained officers are available in the workplace.

Reporting to Comcare and in Compass

There are legal reporting timeframes when reporting to Comcare about instances of death, serious illness or injury, or a dangerous incident.

Notifiable workplace incidents are to be reported to Comcare immediately by the fastest possible means, which should be by telephone (1300 366 979). Follow-up information can be provided in writing, which can include an email (ohs.help@comcare.gov.au) or facsimile (1300 305 916).

All injuries or incidents are to be reported in the *Customs Managing People and Self Service (COMPASS)* system, to a Supervisor and to Comcare, where required, via the *Notification and Report of an Incident* form. The regional WHS Coordinator and local Health and Safety Representative should also be informed.

Further information on what is classed as a serious injury or illness or a dangerous injury can be found on the Comcare website:

[http://www.comcare.gov.au/_data/assets/pdf_file/0009/102879/guide_to Work Health and Safety incident notification.pdf](http://www.comcare.gov.au/_data/assets/pdf_file/0009/102879/guide_to_Work_Health_and_Safety_incident_notification.pdf)

Please note – Failure to comply with the above stated reporting timeframes is a breach of *Part 3 of the Health and Safety Act 2011(CTH)*.

Preserving the incident site

The person with management or control of the workplace has a duty to ensure (so far as is reasonably practicable), that the site where the incident occurred is not disturbed until an inspector arrives at the site (or as directed by an inspector). However, this does not prevent any action:

- to assist an injured person, remove a deceased person, do what is essential to make the site safe, minimise the risk of a further notifiable incident; or
- that is associated with a police investigation; or
- for which an inspector or the regulator has given permission.

Further reporting requirements can be found on the Comcare website

http://comcare.gov.au/safety_and_prevention/reporting_an_injury_or_illness/incident_notification.

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Please note – Failure to comply with the above stated reporting timeframes is a breach of *Part 3 of the Health and Safety Act 2011(CTH)*.

All hazards are to be reported according to the Hazard Reporting process. Specifically, hazards are to be reported to an immediate Supervisor and the Regional HSR Co-ordinator on the *Hazard Report Form*, when the hazard cannot be immediately eliminated or when further action is required.

Customs Incident Reporting Centre (CIRC)

Any incidents that arise during an examination that have the capacity to interrupt or affect C&BPS business, including security incidents, must be reported to the Customs Incident Reporting centre on 1300 303 387 and followed up with on-line reporting.

COMPASS Reporting

Customs and Border Protection utilises COMPASS as its human resources system. As a function of COMPASS, employees/supervisors can lodge WHS incident notifications where there has been an injury, exposure to hazardous substances or a dangerous occurrence/near-miss (an incident where no injury was sustained).

Employee Assistance Provider (EAP)

If required, the C&BPS Employee Assistance Provider, PPC Worldwide, is available to work with staff involved in a critical incident. Trained counsellors can be deployed to a workplace within 2 hours. Telephone 1300 361 008.

Instructions and Guidelines

Stocktake

The community expects that Customs and Border Protection will store items in its custody in a secure and accountable manner. It is essential that all officers having responsibility for the detention, seizure and storage of goods undertake their responsibilities in a transparent manner that is able to withstand internal and external scrutiny.

The purpose of a stocktake is two fold. Firstly, it provides a mechanism by which Customs and Border Protection is easily able to demonstrate transparency of process and adherence to legislative, safety and other requirements. Secondly, it ensures the timely identification of goods stored by Customs and Border Protection that may have been lost, stolen or damaged.

Results of the stocktake will be reported and accounted through regional DGM management to the Detained Goods Management Policy (DGM Policy) section. The DGM Policy section will consolidate the regional reports and prepare a final report for the National Manager Air Cargo & Detained Goods.

Any discrepancies detected will be investigated, outcomes reported to DGM Policy and follow up reports provided on issues identified and corrective actions implemented to minimise the risk of future errors arising.

This instruction provides guidance as follows:

- Operational Areas are responsible for physical security of detained goods under their control and conducting scheduled stocktakes of these goods.
- Detained Goods Management Policy Group is responsible for policy advice and to provide support to regional groups as required.
- As a minimum - All goods stored in Customs and Border Protection Stores are accounted for twice yearly by general stocktake.
- All Sensitive, High Value and Firearms goods are accounted for by

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stocktake four times a year. The May and November Firearms stocktakes are to exclude replica, air and BB firearms.

- In addition to the quarterly Sensitive, High Value and Firearms stocktake, a monthly count of Firearms is to be conducted for every other month.
- All goods detained by Customs and Border Protection are grouped into ten categories. (See stocktake categories below.)
- Templates of stocktake reports and discrepancy reports to ensure standardised recording of results and any follow up actions required.
- The officers who should be involved in the stocktake.
- Areas undertaking the stocktake must place all working papers including the stocktake report on a RIMS file.
- Description of the regional stocktake coordinator role.
- Customs and Border Protection owned firearms, that are used for training or display purposes and other goods transferred into the custody of Detained Goods facilities are to be included in the stocktake. Operational firearms used by Investigations, Enforcement Operations or the National Marine Unit are subject to their own stocktaking procedures and therefore not subject to this requirement.

Facilities Requiring Stocktake

There is a requirement that all Customs and Border Protection Detained Goods Stores (DGS) and Temporary Storage Facilities (TSF) have a stocktake completed by the end of the allocated month. If a stocktake is scheduled and the facility in question does not have any goods stored at that time, a 'Nil Return' is to be completed.

Where the custody of goods has been transferred to the Detained Goods Store and the goods are stored offsite, for example due to the size of the consignment they remain at a 77G depot or another storage facility, then these goods are to be accounted for according to the schedule and as part of the stocktake process.

DGM in each region is required to identify all facilities where detained or seized goods are stored. This includes district offices, airports, gateway facilities, CEFs and any other line areas that store goods prior to transfer to the DGS or prior to release to the owner.

The stocktake must also include those goods that are either listed for transfer or in transit. All Detained Goods Stores and Temporary Storage Facilities conducting stocktakes should ensure that any transfer or in transit goods are accounted for according to the stocktake schedule and process.

Stocktake Categories

Transparent and accountable custody of all goods stored by Customs and Border Protection is the overriding principle. Regions are required to identify the types of goods that they store at each type of facility.

The types of goods stored by Customs and Border Protection have been categorised as follows.

- Alcohol All alcoholic goods
- Drugs All drugs and items listed at Schedules 4 & 8 of the Customs (Prohibited Imports) Regulations 1956.

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- Firearms Firearms, Ammunition, Parts, Accessories, Replicas, Components of Ammunition, BB Guns
- High Value Diamonds and jewellery, Electronic goods, other high value goods
- IPR All Copyright and Trade Mark Goods
- Other Chemicals, Body Armour and all other goods not fitting into any other category
- Sensitive Objectionable Material and Warfare items
- Tobacco Cigarettes and all other tobacco products
- Weapons All knives/daggers, All martial arts equipment, Dog collars, Antipersonnel sprays/devices, Blow guns/pipes, Laser Pointers, All darts and dart projectors, Pistol crossbows, Gloves, Concealed blades, Slingshots, Maces, Flails, All batons, Electric shock devices, Knuckle dusters and similar devices
- Wildlife All protected and controlled animal and plant products

Stocktake Procedures

All officers involved must be made aware of any security protocols and WHS procedures that apply before undertaking a stocktake. All officers who will be handling firearms must hold a current certification in Custodial Firearms Safety and Handling.

Note: DGM Stores have a range of equipment that is intended to make the workplace safer. It is the responsibility of the officers undertaking the stocktake to use this equipment and to highlight potential areas of concern to their Supervisor or Manager. Staff should utilise team lifting techniques or mechanical devices, such as: trolleys, pallet jacks, heavy lift winch trolleys etc. to prevent injury. If you are in any doubt about what equipment should be used or how to use the equipment, you should discuss this with your Supervisor, Health and Safety Representatives or Manager, prior to undertaking the task. Reference to, and awareness of, the appropriate Occupational Health & Safety Instructions and Guidelines is a requirement for all DGM staff and independent witnesses.

Obtain a printed Stocktake Report from the DGMS database for the category of goods being verified as 'in store'. Undertake a physical count of the goods 'in store' and check the details for consistency against the stocktake report. Record and line details to be checked include:

- Location of the goods
- Quantity
- Condition of the goods
- DGMS Record number
- Owner's name
- Seal number (where applicable)
- Serial number (for firearms)

Where goods, except firearms, have been accepted into the store sealed with a Customs and Border Protection seal, or a number of seals, and none of the seals as recorded in DGMS has been broken or tampered with, only the package is required to be counted.

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Where there is evidence of tampering or the packages are unsealed, individual items must be counted. The goods are then to be resealed and the information noted and updated in DGMS. If packages are required to be resealed, then the new seal number is to be recorded in DGMS, and reasons why recorded in the comments section of the DGMS record.

The officers undertaking the stocktake are not to have the records in the DGMS database amended until the discrepancies are investigated and resolved. Any goods arriving after the date the stocktake is conducted will be included in the next stocktake.

All working papers used to conduct the stocktake should be retained on RIMS file.

In Transit or Transfer Goods

All in transit or transfer goods must be included in the stocktake. The officers completing the stocktake should print the DGMS 'Action Queue' for both firearms and non-firearms. Items on the 'Action Queue' lists are to be included in the stocktake process with the receiving store initiating actions to account for goods that have been listed for transfer.

Stocktake Schedule

Stocktakes are to be completed by the end of the month indicated in the table below

- February All Goods
- May High Value, Sensitive and Firearms*
- August All Goods
- November High Value, Sensitive and Firearms*
- Each other month Firearms count

*The May and November Firearms stocktakes are to exclude replica, air and BB firearms. These firearms are included in the All Goods 6 monthly stocktakes.

Any requests for variations to this schedule are to be submitted to the National Manager Air Cargo & Detained Goods, through the Detained Goods Management Policy area for approval.

Discrepancies

Discrepancies fall into two broad categories:

- Shortage - Goods listed on the stocktake report but not sighted.
- Surplus – Goods present but not listed on the stocktake report

Generally a discrepancy will have been the result of:

- Goods that have been placed in the wrong storage location. Resulting in a surplus and corresponding shortage.
- Goods that have not been acquitted on DGMS after disposal.
- Goods that are not "picked" or are missed during the "picking" of items for disposal.
- Goods or part of the goods that have been returned to an owner etc, but DGMS hasn't been updated to reflect the action.
- Goods that can't be located.

Where there are a number of the same type of minor discrepancies, such as items placed in the wrong storage location, and where the matters have been resolved, these can be grouped and included on one line in the discrepancy report.

If goods cannot be located, the officers undertaking the stocktake should advise the manager of the storage area.

The manager of the storage area should have their staff re-check the storage location and undertake additional research, which should result in the majority of discrepancies being resolved.

If the goods are located, or the matter is a clerical or procedural error, the Stocktake Discrepancy Report Form should be updated and sent to the Detained Goods Management Policy (DGM Policy) section along with the information listed below under Reporting.

If after research by the storage area, the goods still can't be located, they are then classified as missing goods.

Once goods are classified as missing goods the following should occur:

1. Advise Manager/Director of the storage area.
2. The Director of the storage area will then appoint an independent reviewer to look into the circumstances behind the missing goods.

Note: If the goods are firearm related, the Director must advise the following officers: National Manager Air Cargo & Detained Goods, Firearms & Weapons in Trade Policy & Regulations Branch (weaponspolicy@customs.gov.au) and Detained Goods Management Policy section (DGMPolicy@customs.gov.au) of Cargo Business Improvement Branch.

3. Once appointed, the reviewer will undertake an investigation into the missing goods and report the results to the director of the storage location. The report should include the following:
 - History/Timeline.
 - Likely scenarios
 - Corrective action
 - Recommended changes to policies/procedures

If during the investigation, internal theft is suspected, the officer conducting the investigation must advise the Director of the storage area and the Director will be responsible for:

- reporting the matter to the National Manager Air Cargo & Detained Goods
- referring the matter to Integrity & Professional Standards.

If during the investigation, a security breach, excluding internal theft is suspected, the officer conducting the review must advise the Director of the storage area and the Director will be responsible for reporting the security breach to C.I.R.C.

Once the report is finalised, the Stocktake Discrepancy Report Form should be updated and sent to the Detained Goods Management Policy (DGM Policy) section along with the information listed below under Reporting as well as a copy of the investigation and including and corrective action undertaken.

Reporting

Results of the stocktake will be reported and accounted through regional management to the Detained Goods Management Policy (DGM Policy) section. The DGM Policy section will consolidate the regional reports and prepare a final report for the National Manager Air Cargo & Detained Goods.

A report on the findings of a Region's stocktake must be submitted through Regional DGM Management to the Detained Goods Management Policy (DGM Policy) section. The DGM Policy section will consolidate the regional reports and prepare a final report for the National Manager Air Cargo & Detained Goods.

Included must be:

- A minute summarising the overall results of the stocktake including detailing action taken and resolution in regard to identified discrepancies.
- Firearms, High Value and Sensitive Goods Stocktake Results Form (Qtly)
- General Goods Stocktake Results Form (Bi-annually)
- Stocktake Discrepancy Form as required

The results form is to be provided for every facility. Nil results forms are required.

Finalisation of the stocktake report and any follow up investigation must be provided to Regional DGM Management and DGM Policy within two weeks of completion of the stocktake month. If the report isn't available within two weeks of the stocktake month an explanation must be provided to DGM Policy detailing the reasons why the report has not been finalised.

All working papers, including the stocktake report must be placed on a RIMS file.

Officers to be involved

A minimum of two officers, one of whom is independent of the daily operations of the store area, must conduct the stocktake.

Dependent on the volume of goods stored, regions may elect to have more officers involved in the physical count. In District Offices where there are less than four officers, the requirement for an independent officer is waived.

Where the stocktake includes firearms, all officers who will be handling firearms must hold a current certification in Custodial Firearms Safety and Handling. Security protocols and OHS considerations must be explained to any officers assisting in the stocktake.

Stocktake Coordinator

To assist in the collation of a region's stocktake reports, and to ensure time lines are met, regions are to allocate responsibility for stocktakes to a regional coordinator. To assist transparency, it is recommended, but not mandatory, that the regional coordinator not be involved in the daily running of the Customs and Border Protection Store.

Monthly Count

An additional accountability mechanism for firearms also exists. Firearms must be accounted for on a monthly basis by a physical count. The purpose of this count is to indicate, in a timely manner, if there are firearms missing, stolen or unaccounted for.

This is a lower level check that only requires confirming that the number of firearms physically in store is the same as the number of firearms recorded as being in store. Replica, air and BB firearms, ammunition, parts and accessories are not required to be counted. Monthly counts of non-air firearms are to be conducted in accordance with the following schedule:

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- i. A count of commercial firearms conducted during March, June, September and December.
- ii. A count of private firearms is conducted during January, April, July and October.

Results of the monthly count are to be reported to Regional Cargo Management with relevant documentation and working papers retained on a regional RIMS file and all necessary follow up action completed.

Any discrepancies involving firearms unable to be accounted for must be reported to the regional work area management, National Manager Air Cargo & Detained Goods, Firearms & Weapons in Trade Policy & Regulations Branch (weaponspolicy@customs.gov.au), Detained Goods Management Policy section (DGMPolicy@customs.gov.au) and the Regional Security Advisor.

Confirmation of receipt of this notification must be received by the line area within 24 hours of discrepancy being discovered. High risk issues should be notified and confirmed immediately.

Customs and Border Protection Owned Firearms and Other Equipment

Where the custody of Customs and Border Protection owned goods has been transferred to a Detained Goods Store or TSF, they are to be categorised in line with the Stocktake Categories outlined earlier in this instruction & guideline and accounted for in line with the stocktake schedule relating to that category.

These are the minimum stocktake requirements for Customs and Border Protection owned firearms, ammunition and equipment retained in a Detained Goods Store, but there may be additional accountability mechanisms put in place by the areas that own the equipment.

Detained Goods Management, Policy Group Responsibilities

Detained Goods Management Policy Section of Cargo Business Improvement Branch will be responsible for the following aspects of a stocktake:

- Send out reminders to regional contacts at the start of the stocktake month;
- Collate all stocktake results from the regions for reporting to executive as required;
- Provide advice of any internal or external audits to be conducted; and
- Development and review of this Instruction and Guideline in consultation with regions every two years.
- Evaluate discrepancy reports

Related Policies and References

Practice Statements:

- PS2008/11 – Detained Goods Management

Other Instructions & Guidelines

- Refer to list on PS2008/11

Key Roles and Responsibilities

Account for the secure storage of goods held by Customs in approved locations.

- Manager Detained Goods Management Policy
- Manager Detained Goods Management

Consultation

Internal

The following internal stakeholders have been consulted in the development of these Instructions and Guidelines.

- Cargo – regional Detained Goods Management work areas
- Trade Policy – Firearms & Weapons
- Cargo – National Manager Air Cargo Operations & Detained Goods
- Regional Directors
- Cargo – Air Cargo Improvement

External

- Nil

Approval

Approved on	01 February 2012	
By	David Leonard A/g National Director Cargo	
Review Period	Biennially	