



European Union Aviation Safety Agency

CONCEPT PAPER

GROUNDHANDLING¹ ROADMAP

Training

¹ For a list of activities included in the groundhandling (GH) concept, see the Annex to the Council Directive 96/67/EC and the definition of 'groundhandling service' in [Regulation \(EU\) 2018/1139 of the European Parliament and of the Council of 4 July 2018](#).

A definition of groundhandling is provided in the draft ICAO Manual on Ground Handling (version 2 rev. 12): 'Services necessary for an aircraft's arrival at, and departure from, an airport, other than air traffic services'.



EXECUTIVE SUMMARY

The initial phase of EASA's project to develop a roadmap for a European regulatory framework for the provision of groundhandling (GH) services at EU aerodromes confirmed that a common approach could offer a safer and more efficient service. This concept paper should be read in combination with a suite of related concept papers that will be discussed at EASA's first GH conference in March 2019. Related concept papers refer to oversight of GH activities, management system, ground support equipment (GSE), operational standards for GH services, and staff turnover. This concept paper is intended to trigger discussions on the establishment of a regulatory framework for standard training of personnel employed by GH service providers (GHSP).

Appropriate training of GH personnel is a crucial element that can improve safety of operations. GHSPs that fall within the scope of the new Basic Regulation 2018/1139 shall 'use only adequately trained and qualified personnel and shall ensure the implementation and maintenance of training and checking programmes to ensure the continuing competence of all relevant personnel'.

This concept paper describes the importance of training of GH personnel, taking into account that different GHSPs must be able to adapt the training to their context. The concept paper proposes a European training framework for GH personnel by establishing common training elements, i.e. training types, training content and methodology. Such common training elements should be based on recognised industry standards and best practices, available ICAO guidance on GH and human factors and focus on the competencies that are necessary to carry out specific GH tasks.

The concept paper also highlights the need to propose a standard for training management standards that includes record keeping (for the staff member and the organisation) and the assessment of future training needs. The approach should encourage each GHSP to customise its training to the specificity of the operation (e.g. services provided), job functions, and level of responsibility.

In the declaration system² applicable to GHSPs, the competent authority should oversee training of GH personnel with a view of verifying that safety information from the management system is fed into the training. The management should also monitor that training is efficient and appropriate.

In addition, operational procedures have an impact on training and training also has an impact on staff turnover, and ultimately on safety of operations.

This concept paper is not a rulemaking exercise. Therefore, it does not propose options. Instead, it lists a number of actions that could be developed to address the identified gaps. This list should generate further discussions on critical areas to support decision making on the best ways forward.

² See also concept papers on oversight and management system



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1 Background

Present stage of the process

Groundhandling (GH) is a significant and critical part of aviation industry and is characterised by a significant level of staff turnover. Staff turnover is an important challenge for any organisation relying on trained and qualified staff. In addition, expected growth of air traffic, the proliferation of third party GH organisations, and increasing commercial pressure are additional factors to be taken into account for training of GH personnel.

Appropriate training of GH personnel is a crucial element that can improve or – when missing, jeopardise the safety of operations.

Training should focus on the acquisition and maintenance of a set of competencies that are needed to perform certain tasks to meet a commonly accepted standard.

Training should be based on an assessment by the GHSP of risks and hazards of GH in general but also in the specific context of the operation. The combination of Standard Operating Procedures (SOPs) (the way to carry out a specific task safely) and training that builds and maintains the required competencies to skilfully follow the SOPs will drive safe behaviour in an organisation with a healthy safety culture.

Today, GHSP personnel training is mainly driven by air operators' and partly by aerodromes' training requirements. When looking at training and qualifications, several standards are applied. They vary from one GHSP to another, sometimes even at the same aerodrome. Moreover, the training assessment method, as well as the oversight of training in a GH organisation do not follow a common standard across Europe. This situation not only questions whether the levels of quality and safety are consistent, but also hampers staff mobility within the European Union.

Therefore, the identification of common, task-related training elements provides considerable potential for efficiency and safety gains.

Aviation is a complex system with many organisations and individuals interacting. In GH, safety outcomes often rely on the humans in the system. Therefore, the primary focus of the key safety management processes for GHSPs should be on the organisational processes and procedures. The way a GHSP operates can have a significant impact on human performance. Therefore, the GHSP's safety management must address how humans contribute both positively and negatively to the organisation's safety outcomes with a view of recognising that human behaviour is influenced by the organisational environment. Training is a crucial element to drive positive safety behaviour and can play a major role in the outcome of this system.

Aim of this concept paper

The aim of this concept paper is to:

- propose actions for a GH Roadmap, including:

- establishing a list of common training elements (e.g. training types, training content and methodology) that will enable training and qualification recognition and crediting of training;
- proposing a competency-based training framework, i.e. to map tasks against competencies, to define competencies for the trainer, how competencies should be evaluated and maintained;
- training management and documentation standards;
- performing a gap analysis between today's training standards and where we aim to be, in order to identify areas requiring improvement;



- identifying possible actions to address the gaps, i.e. rulemaking activities, safety promotion, other actions that do not create regulatory requirements, or a combination thereof.

2 Description of the issue

2.1 Identification of the issue

GH activities cause incidents and accidents which result in damage to aircraft and equipment, injuries or even death of GH staff. Until recently, GHSPs have been the only major safety-critical stakeholder group not directly subject to European aviation safety regulation.

GH is a complex activity involving multiple actors. Often GHSPs offer a wide range of services in various areas of an aerodrome or even outside the aerodrome premises; moreover, different GHSPs may conduct different services on the same aircraft turnaround. GH is an industry branch facing high competition and commercial pressure.

GHSPs that fall within the scope of the new Basic Regulation 2018/1139 shall ‘use only adequately trained and qualified personnel and shall ensure the implementation and maintenance of training and checking programmes to ensure the continuing competence of all relevant personnel’³.

ICAO Annex 6 requires that air operators engaged in commercial air transport (CAT) demonstrate ‘ground handling (...) arrangements consistent with the nature and extent of the operations specified’ (Part I, 4.2.1.3), and that ‘ground handling arrangements and procedures’ are included in the operations manual. The ICAO standard is transposed in the European regulation on air operations and mandatory for all CAT, NCC and SPO operators⁴. This means that each aircraft operator must develop its own groundhandling instructions/procedures. For GHSPs and their personnel, this may lead to different operating requirements for the same tasks. As a consequence, there are training elements that are adjusted to the different operating requirements of aircraft operators⁵. This concept paper acknowledges that the GHSP must comply with the procedures contained in the aerodrome manual or the air operator manual. At the same time, this paper recognises the challenge for GHSPs when different operator procedures result in repetitive training on the same task. This is not only time-consuming, inefficient and stressful but also hazardous, as it creates additional possibilities to make mistakes by applying the wrong procedure. .

A common training standard for each operational task can therefore help to reduce the number of incidents and accidents caused by GH activities. Such common training standard must focus on the competencies that are necessary to carry out a specific task. Airline- and aerodrome operator specific training elements should then only be an add-on with a focus on operator specific differences. These should be kept to a minimum and be duly justified by demonstrable safety benefits.

The future training framework should be competency-based and risk-based. Redundant training should be avoided unless necessary and resulting from the need to comply with the aerodrome and air operator specific elements.

In summary, the GH roadmap should propose common standard on basic training, recognised by all parties involved in GH activities and by all competent authorities in the EASA system. Improving the quality and effectiveness of training will help to drive positive safety behaviours and contribute to a positive safety culture. Establishing a crediting system for training will reduce the need the repeat training elements when

³ See point (e) of point 4.1 of Annex VII of the new Basic Regulation (EU) 218/1139.

⁴ Reg. (EU) No 965/2012, ORO.GEN.205.

⁵ Feedback from stakeholders provided the example of a GHSP serving 15 different aircraft operators on the same aerodrome. This GHSP would have to adjust its training to ensure that staff are familiar with 15 slightly different operator procedures for the same or similar service (e.g. placing of the safety cones).



a staff member changes from one GHSP to another or is assigned to service another aircraft operator. This will reduce training time and enable staff mobility. This will positively influence the social status of employees working in the GH domain and reduce training costs for the GHSP.

2.2 Identification of the possible ways forward

The following actions are proposed for the roadmap:

1. Establish a common European training standard for the GH domain in a high-level framework. This would allow flexible elements from existing industry standards to be applied as acceptable means of compliance (AMC). The requirements should address the following aspects:
 - a. Identification of the key functions involved in the GH activities as listed in the Council Directive 96/67/EC of 15 October 1996;
 - b. Training delivery (types, content and methodology):
 - i. Initial training, recurrent training (maintenance of competencies), on-the-job training, and differences training (for personnel who have already completed the basic training with another GHSP); additional training, preferably, task-specific training;
 - ii. Proportionate combination of theoretical and practical elements;
 - iii. Training on SMS and occurrence reporting, security, as well as training on non-operational elements, as appropriately, such as quality management, data protection, etc. in line with applicable requirements. This is an aspect of an integrated management system approach;
 - iv. Training and retention of knowledge and skills for instructors and examiners;
 - v. An evaluation process to ensure that personnel have demonstrated their capabilities and continued competence in the performance of their assigned duties (e.g. proficiency check at relevant intervals).
 - vi. Assessment and selection of adequate training methodology; methodology must remain technology neutral and must be accessible to all GH employees;
 - c. Training management:
 - i. Record keeping (for the staff member and the organisation) – part of the management system;
 - ii. The assessment of training needs should allow customisation per GHSP specificity of operation (services provided), job functions, and level of responsibility.
2. Avoid redundant training delivered by aircraft operators to GHSP employees.
3. Map elements of GH training from the existing Member States (MS) requirements against the new GH regulation. The new framework should contain high-level provisions to ensure a smooth transition from the current system with regulations on air operations and aerodromes, and a variety of requirements from MSs.
4. Include flight operations officers among the key functions of the GH domain (see point 9 on the list of GH services in the Annex to the Council Directive 96/67/EC of 15 October 1996).
5. Identify the best way to ensure recognition and crediting of completed training modules.
6. Propose competency-based and outcome-focused training programmes. Such a competency-based framework needs to define:



- a. competencies of the trainer;
 - b. technology-neutral training methods and best practices for GH staff;
 - c. methods to evaluate competencies (theoretical and practical); and
 - d. methods to maintain competencies (avoiding repetitive training exercises).
7. Propose a framework for the acceptance of the training programme.
8. Include oversight of training in the GH domain in the new authority requirements that will extend the scope of oversight to the GH activities. Include training programme and policy in the GHSP's management system to ensure:
- continuous monitoring of the training content and training delivery (proficiency checks);
 - assessment of the training needs,
 - performance monitoring,
 - regular improvement and updates.

Within the same framework of an integrated management system, the training records should enable to maintain the person's competencies in the GH domain. In close coordination with the staff retention policy, the GHSP should also consider a system of incentives (e.g. in the form of access to additional training and qualifications) based on performance indicators and linked to the retention of high-performing personnel.

A training programme and syllabi based on existing industry standards and best practices for GHSP⁶ should allow a GHSP to demonstrate compliance with requirements. In this context it is important to emphasise that compliance with an existing industry standard should be one but not the only means to demonstrate compliance with the essential requirement to have adequately trained and qualified staff.

The future training requirements should create common expected standards in training, reduce the need to repeat the same training for every air operator, and also reduce the need to perform repetitive audits to the GHSP training of personnel. Ultimately, this should generate trust in the GHSPs training system and bring recognition of training provided to GH personnel by all the parties involved in GH activities.

2.3 Analysis of impacts

2.3.1 Safety impact

At present there is no EU framework for a common training standard for GH operations. There is also no direct requirement for GHSPs to assess or measure the effectiveness of training in order to improve its contribution to the risk mitigation.

Furthermore, different operational requirements for the same activity can have a negative effect on safety, because they may increase the risk of human error.

Task-oriented and competency-based standard training which explains safety relevant procedural differences is expected to have a positive impact on safe behaviour. Staff will easier remember safety relevant differences if safe behaviour is mainly based on acquired competencies and not on memorised procedures only. .

Including the training elements in the broader management system will improve the quality of the training process as a whole. While being subjected to continuous monitoring, it will receive feedback and can be improved on a regular basis. It will also enable a quick detection of the training needs and a fast adjustment of the training programme to address individual performance issues of employees.

⁶ E.g. AHM and ISAGO Standards manual developed by IATA; IS-BAH standards developed by IBAC.



Standard training will also strengthen the even application of operational procedures, thus contributing to the overall safety of GH operations and reduction of accidents and incidents generated by inadequate delivery of the training objectives.

Within a performance and risk-based approach, the GHSP should be able to expand themes in training to cover new and emerging trends. This is expected to encourage proactive training in line with safety performance indicators.

The proposed way forward is expected to have a positive impact on safety.

2.3.2 Social impact

The training system is expected to assist the development of a career path, which would consequently put a particular job into perspective, thus ensuring a higher job stability. The social status/prestige of a position in GH is positively impacted.

Within the GHSP sector, high turnover also caused by peak seasons and fluctuation of contracts with aircraft operators causes drastic adjustments to staff numbers in order to accommodate the workload. If future requirements enable training and qualification recognition and crediting of training is formalised, GH employees who have received standard training and qualification would be able to move easily from one GHSP to another and even on different aerodromes in different Member States, with only differences training to be completed.

The proposed actions are expected to have a positive social impact.

2.3.3 Economic impact

A standard training framework is expected to ensure that the quality of training will be less impacted by market fluctuations and staff turnover. At the same time, minimum training requirements could have another positive effect: to boost training efficiency.

Training management for GHSPs operating in more than one MS is costly and difficult to implement if there varying regulatory regimes, standards and oversight practices in each MS. For GHSPs offering their services in more than one MS the costs are expected to be reduced once a standard training frameworks allows defining common and universally applicable training elements in the GH domain. These should be accompanied by common oversight requirements for the competent authorities.

Some of the existing GHSP and air operators providing self-services will be initially negatively impacted by the introduction of new training requirements in the GH domain if they have not developed these by themselves or if their training programme is not meeting the future standard.

No additional costs are expected for organisations that already apply existing industry standards in GH training; on the contrary, training expenses should be significantly reduced due to the following reasons:

- a) A common GH training standard in connection with the establishment of a management system should significantly reduce the burden of repetitive training. Recognition of previous training and qualification of GH personnel is expected to reduce the costs of training and boost a more efficient management process with the GHSP.
- b) Mutual recognition and acceptance of the GHSP management system, including compliance monitoring of training is expected to reduce additional audit-related costs for air operators. For GHSPs, this is also expected to reduce the audit burden.
- c) Crediting of previous training and improvement of training efficiency is expected to have a positive impact on staff turnover. The better the training system is conceived and functional, the higher the



chances that it enables a career path and thus improve retention of skilled personnel and provide a better social perspective.

- d) Furthermore, the increased safety standards implemented through the management system will reduce the direct and indirect costs due to injuries from accidents and incidents and absenteeism.

Additional expenses are expected for those competent authorities which currently do not oversee GH activities on the aerodromes in their territory. Setting up training and delivering training to GH inspectors is also expected to generate additional costs. On the other hand, competent authorities already oversee the way in which the aircraft operators under their oversight jurisdiction manage training of their service providers, GH services among them.

2.3.4 Proportionality issues

Training requirements should be applied according to the standard, regardless of the size, nature or complexity of the operation, or the place or time of delivery of the GH services.

2.3.5 Impact on regulatory coordination and harmonisation

A common training standard shall enable the application of existing industry standards. It shall be in line with existing ICAO guidance material and other European regulations.

The high advantage brought about by new training requirements will be the harmonisation of today's national training requirements into a single European standard. Such standard shall provide enough flexibility to recognise what has been built and implemented so far and allow a fast transition from the multiple national systems to a common European system.

Current national regulations which are affected by the introduction of new requirements for GH operations will need to be amended accordingly.

As part of the interfaces that will have to be created, competent authorities will need to consider how compliance with the training requirements should be audited and assessed. The competent authorities will also need to ensure adequate training for their inspectors performing oversight to the training programme of the GHSP.

There should be a suitable transition period for GHSP to achieve compliance with the new requirements.

3 Conclusion

The establishment of minimum common training requirements across Europe, in combination with that of a management system to ensure the training management mechanisms will reduce the number of safety occurrences in the GH domain. It is also expected to ensure a level-playing field and generate cost reductions to the current training and auditing processes.

The main purpose of the proposed ways forward is to build trust in the quality of training delivered in the GH domain and improve the safety of operations.

