

EASA Ground Handling Regulations - Personnel Training and Competence (Subpart TRG)

Establishing a Training Needs Analysis (TNA) and Competency-Based Training and Assessment (CBTA).

Initial, recurrent, and refresher training for safety-relevant personnel (ORGH.TRG.100).

Dangerous goods training protocols (ORGH.TRG.110).

Introduction – While traditional training focuses on hours spent in a classroom, modern aviation standards emphasize Competency-Based Training and Assessment (CBTA) driven by a robust Training Needs Analysis (TNA). The regulatory framework mandates a comprehensive "Training and assessment programme" (ORGH.TRG.100).

Issues & Challenges:

- **Complex Operational Interfaces:** Ground handling involves diverse tasks (e.g., baggage handling, de-icing, pushback). Conducting a granular TNA that accurately maps the specific knowledge, skills, and attitudes required for each distinct role is administratively heavy.
- **Subjectivity in Assessment:** Shifting to a CBTA model requires assessors who can objectively evaluate practical competence rather than just grading a multiple-choice test.

Best Practices:

- **Role-Specific Gap Analysis:** Conduct a thorough gap analysis for each role to define the exact competencies required for the safe execution of tasks, ensuring training is tailored and relevant.
- **Standardized Evaluation Metrics:** Develop clear, observable behavioral indicators for assessors to use during practical evaluations, ensuring consistency in how competence is measured across the organization.

Initial, Recurrent, and Refresher Training (ORGH.TRG.100)

Under **ORGH.TRG.100 (Training and assessment programme)**, organizations must structure their training into distinct phases to ensure continuous readiness.

- **All operational personnel must receive safety training relevant to their specific safety responsibilities, and organizations are required to keep adequate records of all training provided.**

Initial training establishes the foundational knowledge and practical skills required before an employee is permitted to perform unsupervised tasks.

- The primary challenge during this phase is balancing the urgency to deploy new hires to the ramp with the necessity of thorough, uncompromised safety training.
- To address this, organizations should utilize blended learning, such as eLearning for theoretical concepts and practical simulators for equipment operation, which maximizes engagement and knowledge retention.

Recurrent training ensures the ongoing maintenance of competence and keeps personnel updated on procedural or regulatory changes.

- A common challenge is scheduling these recurrent sessions without causing severe disruptions to daily ground handling operations.
- A recommended best practice is to integrate micro-learning modules and regular safety briefings directly into daily shifts, allowing organizations to continuously reinforce recurrent topics without pulling staff away from the ramp for extended periods.

Refresher training is designed to re-establish competence after a prolonged absence or following an identified performance deficiency.

- The main difficulty lies in identifying exactly when this training is triggered, such as after an incident or a long leave, and customizing the content to address the individual's specific gaps.
- To optimize this, organizations should link their occurrence reporting system directly to their training management software, enabling the system to trigger automatic, targeted refresher modules when specific errors are detected.

Establishing a Training Needs Analysis (TNA) (Competence (Subpart TRG))

A Training Needs Analysis (TNA) identifies the critical gap between current workforce capabilities and the competencies required for safe, compliant ground operations.

- Under the EASA ground handling regulatory framework, establishing a robust TNA is the foundational step for developing a comprehensive training and assessment programme under Subpart TRG.
- This analysis ensures that technical courseware directly satisfies the new regulatory mandates by confirming that all personnel involved in ground handling activities are fully competent to perform their safety-related duties and are explicitly familiarized with the rules and procedures relevant to their tasks.

Defining the Operational and Regulatory Baseline

The first phase of a TNA requires mapping the organization's strategic safety objectives against specific regulatory mandates.

- This ensures that the resulting curriculum is not just educational, but legally compliant and operationally relevant.

Task and Role Deconstruction: Break down daily operational roles into specific tasks to identify the exact knowledge, skills, and attitudes (KSAs) required for safe execution.

Deconstructing the KSA Framework To ensure operational readiness, each distinct ground handling task must be broken down into its three core components:

Knowledge (The Cognitive Foundation): Identifying the specific theoretical understanding required for a task. For an equipment operator, this includes knowing the technical

specifications of ground support equipment (GSE), the equipment restraint area limits, and the applicable aircraft-specific procedures.

Skills (The Practical Execution): Defining the physical abilities and technical proficiencies necessary to perform the task safely. This involves assessing the precise psychomotor actions required during aircraft servicing, such as executing a safe pushback, connecting potable water systems, or correctly loading unit load devices (ULDs).

Attitudes (The Behavioral Standard): Establishing the required mindset and safety-first approach.

- This encompasses the employee's commitment to reporting safety-related occurrences, understanding their individual role in the aviation safety chain, and adhering to the organization's just culture principles.

Training Delivery Once roles are deconstructed into specific KSAs, this granular data directly informs the curriculum design.

- The training delivery must align with the operational reality that many ground handling organizations rely on traditional, manual infrastructures rather than enterprise Learning Management Systems (LMS).
- Once roles are deconstructed into specific Knowledge, Skills, and Attitudes (KSAs), this granular data directly informs the curriculum design through accessible, scalable methods that ensure regulatory compliance without requiring heavy IT investment.

Modular Standardized Curriculum: Identified KSAs are structured into standardized instructor guides, physical workbooks, and classroom presentation decks.

This allows organizations to deliver targeted, role-specific training blocks using internal subject matter experts.

Structured On-the-Job Training (OJT) Checklists: Practical skills and behavioral attitudes are evaluated directly on the ramp.

- Organizations utilize rigorous OJT checklists and physical assessment rubrics where qualified evaluators sign off on an employee's demonstrated competence for exact operational functions before they are permitted to exercise their duties unsupervised.

Shift Briefings for Recurrent Delivery: Regular meetings with personnel and pre-shift briefings are utilized to deliver micro-learning, discuss procedures, and communicate safety matters, ensuring personnel remain continually aware of their safety responsibilities without needing to log into a portal.

Auditable Record-Keeping: To satisfy the regulatory requirement to keep adequate records of all safety training provided, organizations manage compliance through centralized spreadsheet matrices cross-referenced with secure physical or scanned employee files containing signed attendance rosters and practical assessment sheets.

How do you currently standardize the sign-off criteria for your on-the-job training checklists to ensure evaluators remain objective without the automated guardrails of an LMS?

- By structuring the identified KSAs into modular, SCORM-compliant digital courseware, organizations can host and track targeted training blocks within an enterprise Learning Management System.
- This ensures that every employee receives specific, tailored instruction addressing their exact operational functions before they are permitted to exercise their duties unsupervised.

Regulatory Compliance and Assessment Mapping deconstructed tasks to EASA Subpart TRG ensures that the resulting training and assessment programme validates the exact competencies required for the safe execution of daily duties.

This prevents training gaps and ensures objective, observable metrics are available for assessors during practical evaluations on the ramp.

When deconstructing highly technical ramp roles, how are you currently capturing and translating the subjective "attitude" elements into trackable, SCORM-compliant assessment criteria within your custom LMS?

- **Performance Gap Identification:** Assess the current competency levels of the workforce through safety audits, compliance reports, and direct performance evaluations to pinpoint exact capability deficiencies.

Managing performance gap identification requires a structured feedback loop that continuously extracts actionable competency data from daily operations.

Under the EASA ground handling framework, organizations must actively monitor compliance and safety performance to ensure personnel possess and maintain the competence required to execute their specific duties safely.

Delivery and Management Mechanisms

Targeted Compliance Monitoring: Organizations must utilize their internal compliance monitoring function to conduct scheduled and unscheduled audits.

- These audits verify whether documented operational procedures align with actual ramp practices, directly exposing behavioral or procedural knowledge gaps.

Continuous Proficiency Checks: Rather than relying on isolated annual appraisals, performance evaluations should be embedded into routine supervisory oversight.

- This continuous assessment ensures that personnel maintain their competence after their initial qualification to exercise duties unsupervised.

Safety Reporting Integration: The internal safety reporting scheme serves as a primary diagnostic tool.

- By analyzing errors, near misses, and hazards reported by front-line staff, the organization can pinpoint specific capability deficiencies driving those events.

Issues and Challenges

Fragmented Data Silos: In organizations operating without unified digital systems, safety occurrence reports, audit findings, and training records often reside in disconnected spreadsheets or physical files.

- This fragmentation makes it incredibly difficult to correlate a specific operational incident with a systemic competency gap.

Evaluation Subjectivity: Direct performance evaluations risk being highly subjective. Without rigidly standardized observation rubrics, the identification of a capability gap relies heavily on the individual supervisor's personal judgment, leading to inconsistent assessments across different shifts or stations.

Just Culture Barriers: Identifying genuine performance gaps relies heavily on accurate safety reporting. If an organization fails to foster a genuine just culture, personnel will actively hide near misses and operational errors out of fear of punitive action.

- This suppresses the exact diagnostic data required to identify and correct deficiencies before they escalate into serious accidents.

Operational Resource Drain: Conducting rigorous, objective safety audits and direct performance evaluations requires dedicating qualified compliance personnel and pulling supervisors away from immediate operational tasks. This places a heavy strain on roster planning and operational budgets.

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Given the reliance on manual or spreadsheet-based tracking in many ground handling operations, what specific audit metrics have you found most effective for bridging the gap between a reported safety occurrence and a tangible training intervention?

- **Regulatory Mapping:** Cross-reference every identified training gap directly with the relevant aviation authority standards (e.g., EASA, FAA, UAE GCAA, UK CAA) to ensure all mandatory compliance items are addressed.

Key Insight: An effective TNA operates as a continuous feedback loop. As regulations evolve or new internal safety reports are generated, the TNA must be actively updated to reflect the shifting competency requirements of the organization.

Competency-Based Training and Assessment (CBTA).

Competency-Based Training and Assessment (CBTA) represents a paradigm shift from traditional, time-based instruction to a performance-oriented framework where the primary metric is demonstrable operational capability.

- Under the European regulatory framework for ground handling, CBTA ensures that safety and operational standards are actively met rather than passively observed.

Core Principles of CBTA in Ground Handling

- **Mandatory Demonstration of Competence:** The foundational regulatory mandate dictates that all personnel must successfully demonstrate their competence to perform assigned tasks before they are permitted to exercise their duties unsupervised.
- **The KSA Framework:** A robust CBTA program deconstructs competence into three specific components: Knowledge, Skills, and Attitudes (KSAs). Training programs must be specifically tailored to address these components, ensuring personnel not only understand the procedures (Knowledge) but can physically execute them (Skills) with the correct safety-first mindset (Attitudes).
- **Continuous Proficiency Validation:** Competence is not a one-time achievement. The framework requires recurrent training and assessment at regular intervals to guarantee continued competence. These recurrent assessments function as direct proficiency checks, evaluating a staff member's actual performance against the specific objectives established for their role.
- **Targeted Remediation:** Within a CBTA model, assessment serves as a diagnostic tool. If an individual fails to achieve the expected performance outcome during an assessment, the deficiency must be actively addressed through a targeted training session to restore and maintain their competence at the expected level.

Detailed analysis of the core training components, outlining the regulatory expectations, operational challenges, and industry best practices.

Personnel Training and Competence (Subpart TRG)

- The dedicated framework for personnel training is established in Subpart TRG (Training of Ground Handling Personnel). This subpart shifts the regulatory focus from merely tracking attendance to actively ensuring and verifying operational competence.

Issues & Challenges:

- **High Turnover Rates:** The ground handling sector often experiences significant seasonal and temporary staff turnover, making it difficult to maintain a baseline of experienced, competent personnel.
- **Resource Allocation:** Delivering comprehensive training requires dedicated facilities, qualified instructors, and time off the ramp for operational staff, which strains operational planning and budgets.

Best Practices:

- **Integrated Safety Culture:** Embed safety management system (SMS) principles directly into competence training so that personnel understand the "why" behind the procedures, not just the "how".
- **Continuous Mentorship:** Pair newly trained personnel with highly experienced staff for supervised on-the-job training before allowing them to operate independently.

Dangerous Goods Training Protocols (ORGH.TRG.110)

The handling of dangerous goods presents severe safety risks, necessitating stringent training protocols under **ORGH.TRG.110 (Dangerous goods training)**. Ground handling organizations are fully responsible for ensuring that dangerous goods events—such as discovering undeclared items or accidents—are reported to the appropriate authority of the Member State of occurrence.

Issues & Challenges:

- **Regulatory Complexity:** Dangerous goods regulations (such as the ICAO Technical Instructions) are highly technical and undergo frequent revisions. Ensuring all ramp and passenger-facing staff stay updated is demanding.
- **Varying Exposure Levels:** The training required for a check-in agent identifying undeclared dangerous goods in passenger baggage differs vastly from the training required for cargo handlers building freight pallets.

Best Practices:

- **Targeted CBTA for Dangerous Goods:** Tailor the dangerous goods training to the exact function of the employee (e.g., "no-carry" awareness vs. full acceptance processing) to prevent information overload.
- **Scenario-Based Exercises:** Use real-world examples of dangerous goods incidents discovered in cargo, mail, or passenger baggage to train staff on proper identification and emergency reporting procedures.