NAMIBIA CIVIL AVIATION AUTHORITY

Advisory Pamphlet

1/1/2/4/3-12

GUIDANCE ON DEVELOPING DANGEROUS GOODS COMPETENCY-BASED TRAINING PROGRAMS.

01/2023

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NCAA
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DANGEROUS GOODS COMPETENCY-BASED TRAINING PROGRAMS

PURPOSE

This Advisory Pamphlet (AP) provides guidance to AOC holders, shippers and their agents, ground handling service providers, aviation security screening service providers and dangerous goods training service providers in developing and implementing competency-based dangerous goods training programs for personnel involved in the transport of cargo, mail, passengers, and baggage by air.

APPLICABILITY

This AP is applicable to:

- An AOC holder operating a large aircraft in accordance with NAMCARs Part 121
- An AOC holder operating a small aircraft in accordance with NAMCARs Part 135
- An AOC holder operating a Helicopter in accordance with NAMCARs Part 127
- Shippers of dangerous goods and their agents and ground handling agencies of AOC holders that are required to establish and maintain initial and recurrent dangerous goods training programs in accordance with NAMCARs Part 92
- Aviation Security Screening service providers
- Dangerous Goods Training Providers

RELATED REGULATIONS

This AP relates specifically to

- NAMCARs Part 92 read with Part 121, Part 127, and Part 135

RELATED ADVISORY CIRCULARS

There are no related advisory Pamphlets.

CANCELLATION

This Advisory Pamphlet supersedes Advisory Pamphlet FSS-AOC-AP 111/13.

EFFECTIVE DATE

This AP is effective from 15 January 2023.

OTHER REFERENCES

- ICAO Annex 6, Operation of Aircraft, Part I - International Commercial Air Transport – Aeroplanes
- ICAO Annex 6, Operation of Aircraft, Part II - International General Aviation – Aeroplanes

- ICAO Annex 6, Operation of Aircraft, Part III – International Operations – Helicopters
- ICAO Annex 18, The Safe Transport of Dangerous Goods by Air
- ICAO Doc 10147, Guidance on a Competency-based Approach to Dangerous Goods Training and Assessment
- ICAO Doc 9284, Technical Instructions for the Safe Transport of Dangerous Goods by Air (TI) and its Supplements
- IATA Dangerous Goods Regulations Manual

1. INTRODUCTION

1.1 NAMCARs 92.00.6 requires Organisations involved in the transport of dangerous goods by air to establish and maintain initial and recurrent dangerous goods training programs for its personnel having responsibilities in the processing and handling of cargo, mail, passengers, and baggage. Parts 121, 127 and 135 further require AOC holders to establish and maintain dangerous goods training programs that are approved by the Authority.

1.2 The safe transport of dangerous goods by air is dependent on a competent workforce. With effect from 1 January 2023, all dangerous goods training programs used to train and assess the competency of personnel involved in the transport of dangerous goods by air must be competency-based as specified in the ICAO TI.

1.3 The goal of competency-based training and assessment is to produce a competent workforce by providing focused training on the job function of personnel. It does so by identifying key competencies that need to be achieved, determining the most effective way of achieving them and establishing valid and reliable assessment tools to evaluate their achievement. Such training programs should contain elements such as design methodology, assessment, initial and recurrent training, instructor qualifications and their competencies, training records and evaluation of the effectiveness of training.

1.4 This AP provides guidance to those Organisations that are required to establish and maintain dangerous goods training programs in developing and implementing competency-based dangerous goods training programs for its personnel involved in the transport of cargo, mail, passengers, and baggage by air.

2. ROLES AND RESPONSIBILITIES IN A COMPETENCY-BASED APPROACH TO DANGEROUS GOODS TRAINING

Organisations

2.1. Organisations (e.g., shippers, freight forwarders, ground handling service providers and AOC holders) are responsible for identifying dangerous goods job functions performed by its personnel, determining the purpose and objective of the training program, and ensuring that the design and development of the training program components will result in personnel acquiring the competencies necessary to perform their job functions.

2.2. To fulfil its responsibilities, Organisations should study its target population (trainees) to identify the knowledge, skills, and attitudes they already possess, gather information on preferred learning styles, their social and linguistic environments, and other demographics (e.g., age, level of education, experience etc.). Since these factors may affect learning and the acquisition of new competencies, they should be considered when designing various components of the training program.

2.3. Due to various considerations, such as the size of the Organisation, the nature and complexity of its job functions, cost effectiveness and the availability of resources to provide in-house training, Organisations may engage the services of third-party training service providers to provide training to its personnel. Organisations may outsource the full implementation of the training program to a training service provider or limit it to only the core dangerous goods training course. Regardless of arrangements, the employer remains responsible for determining the training needs of its personnel.

2.4. When doing so, Organisations should be mindful that fulfilment of training needs should be the primary factor in deciding the suitability of a training service provider, and not cost alone. Organisations remain responsible for ensuring their personnel are competent to perform their job functions prior to performing them even if certain aspects of the training program have been delegated to third parties.

Instructors

2.5. Instructors refer to persons qualified to facilitate or conduct training events (e.g. the core dangerous goods course, simulation, on-the-job training etc.) within a competency based dangerous goods training program. Instructors play an important role and are responsible for communicating the knowledge, imparting skills, cultivating the desired attitudes in performing the job function and monitoring the progress of trainees towards achieving the required competencies. Instructors may also provide feedback to help improve the effectiveness of the training.

Assessors

2.6. Assessors are expected to conduct dangerous goods competency assessments in accordance with the assessment plan and to utilize the assessment tools as specified in the plan to document evidence and outcomes of assessments. To fulfill their role, assessors must be familiar with the competency of each task in the job function of the training program, observe the performance of trainees and subsequently determine whether trainees have achieved the required competencies base on their performance during the assessments. Assessors may also provide feedback to help improve the effectiveness of the training.

Trainees

2.7. Trainees refer to personnel of Organisation performing one or more dangerous goods job function and requiring training to achieve the competencies needed to perform their job at the workplace. In a competency-based training program, trainees are responsible for participating actively in the learning process to complement the efforts of instructors. This is as opposed to trainees being passive recipients of knowledge. The competency-based training program provides trainees with a clear idea of their learning path towards competency through the training program and beyond. The training should directly contribute towards improving their performance on the job. Trainees' feedback is also essential to ensure that the competency-based training is effective.

3. COMPONENTS OF A COMPETENCY-BASED TRAINING AND ASSESSMENT PROGRAMME

3.1. Figure 3.1 is a graphical illustration of the essential components of an effective competency-based dangerous goods training program:

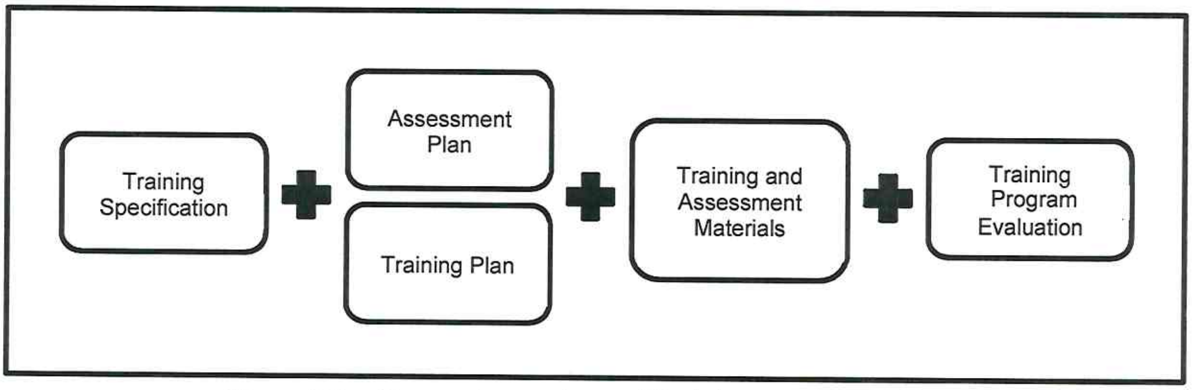


Figure 3.1 - Competency-based training components

The essential components of a competency-based training and assessment program are as follows:

(a) a training specification that describes the purpose of training, the tasks list and the requirements that must be fulfilled when designing the training.

(b) an assessment plan providing the process and tools for gathering valid and reliable evidence at different stages during training.

(c) a training plan describing the training required to achieve the competencies

(d) training and assessment materials and human, material and Organisational resources needed to implement training and assessment plans; and

(e) a process to evaluate the effectiveness of the training program.

4. BUILDING A COMPETENCY-BASED DANGEROUS GOODS TRAINING AND ASSESSMENT PROGRAMME USING THE ADDIE MODEL

4.1. Establishing a competency-based dangerous goods training program takes on a phase approach following the ADDIE (analyses, design, develop, implement, and evaluate) instructional design model as illustrated in Figure 4.1.

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
ANALYSE training needs	DESIGN competency-based training and assessment	DEVELOP the training and assessment materials	IMPLEMENT the training and assessment	EVALUATE the training program

Figure 4.1 - Competency-based training and assessment workflows

Phase 1 – Analyse Training Needs

4.2. In this phase, Organisations should determine the training needs of personnel performing one or more dangerous goods related job functions at the workplace through a training needs analysis. The training needs should be specific to the organisation's working environment and its internal procedures for the processing and handling of dangerous goods intended for transport by air and including preventing undeclared/mis-declared dangerous goods from inevitably being offered for transport by air. The analysis should also consider the demographical characteristics of its personnel which may affect the design of the training program and the choice of training delivery methods. Appendix A illustrates a typical dangerous goods process flowchart for the processing and handling of cargo, mail, passengers, and baggage. This flowchart also identifies the dangerous goods job functions performed by shippers, air operators and their agents, which Organisations may use to identify the job function(s) performed by its personnel.

4.3. Through a detailed analysis of the job function involved, the tasks list applicable to the job function should also be developed. Appendix B contains a generic list of tasks and sub-tasks typically performed by personnel of shippers, air operators or their agents having responsibilities in the transport of dangerous goods by air. Since personnel performing dangerous goods functions are likely to perform at least one or a combination of such tasks and their sub-tasks, Organisations should adapt the task list based on the job function of its personnel. Upon establishing the list of tasks and sub-tasks, the competency factors (i.e. knowledge (K)[1], skills

[1] **Knowledge** is the specific information required to enable a learner to develop and apply the skills and attitudes to recall facts, identify concepts, apply rules or principles, solve problems, and think creatively in the context of work.

(S) [1] and attitude (A)[2]) required to perform each task and sub-task should also be determined. When determining competency factors, Organisations should consider the level of proficiency appropriate to the tasks to be performed, and which may range from introductory to advanced.

4.4. The IATA Dangerous Goods Regulations Manual contain examples of adapted task lists and the level of proficiency for certain well-defined functions applicable to shippers, air operators and their agents. However, Organisations should note that the tasks shown in those lists are recommendations and may not align with the actual job functions of its personnel. Depending on the scope of its personnel's responsibilities in the handling of dangerous goods intended for transport by air, Organisations may need to adjust the magnitude of training and assessments accordingly. Ultimately, the Organisation remains responsible for ensuring that its personnel are competent in performing the job functions for which they are responsible, and its training program is designed to accomplish this.

4.5. In addition to the task lists, Organisations should also analyse documents related to dangerous goods transport regulations and its standard operating procedures in the processing and handling of dangerous goods intended for transport by air at its workplace. Such information should be incorporated into the training program to ensure the competency of its personnel in complying with the regulations and in adhering to its procedures when performing their job function at the workplace.

4.6. The output of this phase is a training specification that describes the following:

- purpose of the training.
- job function involved.
- training needs of personnel involved.
- tasks list and their required competency factors for the job function involved.

4.7 Operational, technical, regulatory, and Organisational requirements that needs to be fulfilled when designing the training and frequency of the training.

[1] **Skills** are the abilities to perform an activity or action. It is often divided into three types: motor, cognitive and metacognitive skills.

[2] **Attitude** is a persistent internal mental state that influences an individual's choice of personal action toward some object, person or event and that can be cultivated.

4.7. Figure 4.2 illustrates an overview of the workflow in Phase 1.

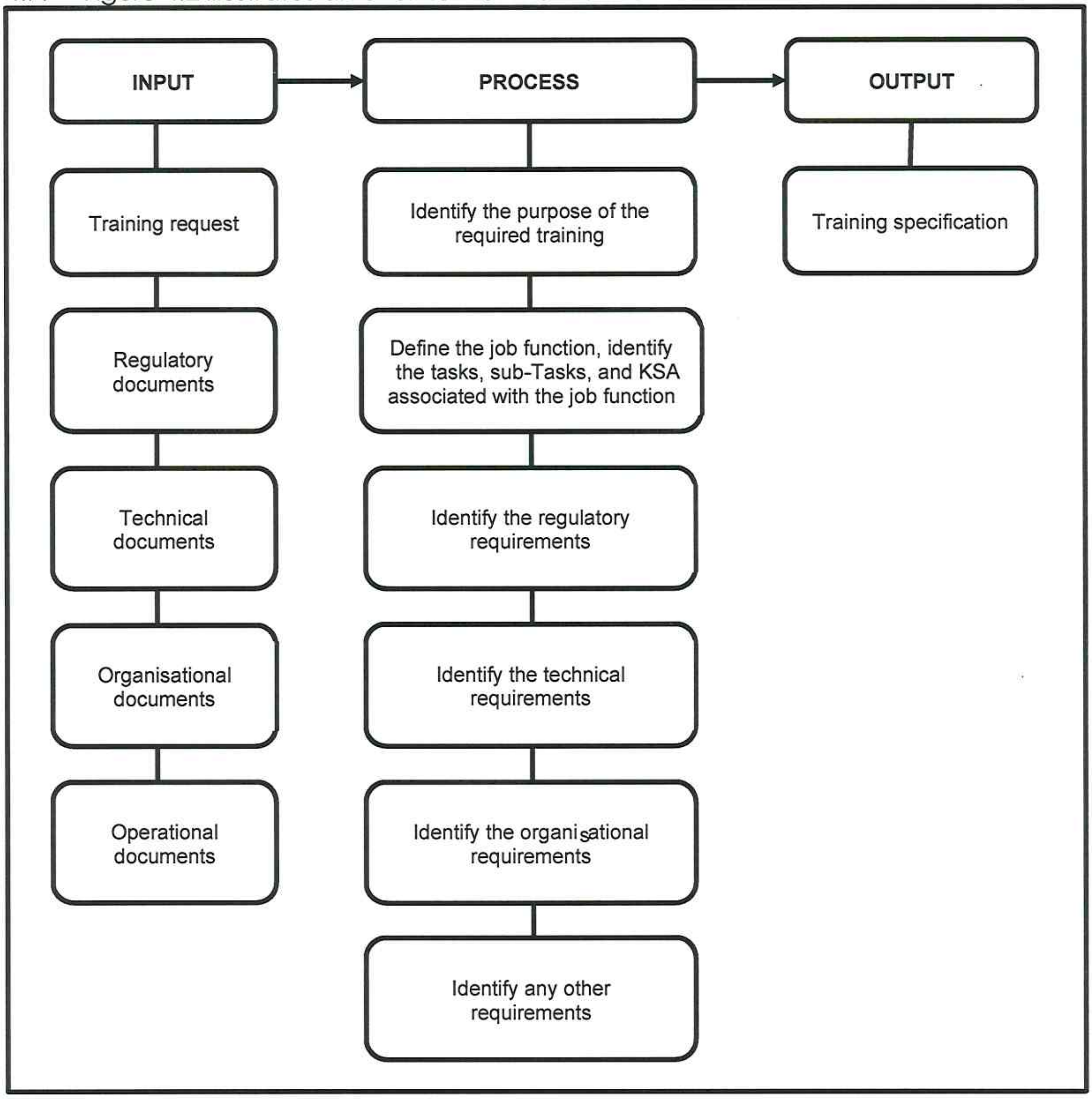


Figure 4.2. Analyse training needs

Phase 2 – Design Competency-Based Training and Assessment

4.8. This phase consists of 2 major components:

- Design an assessment plan that will be used to assess the competency of trainees; and
- Design a training plan that will enable the development and delivery of the training.

Designing an Assessment Plan

4.10. An assessment plan serves to document details of assessments necessary to determine whether trainees have achieved the desired competencies.

4.11. The following principles should be considered when developing assessments within a competency-based training program:

- *Clear performance criteria, that are objective and measurable, should be used to assess competence.*

- *An integrated performance of the competencies is observed.* The trainee undergoing assessment should demonstrate all competencies and their seamless interaction with each other.

- *Multiple observations are undertaken.* Multiple observations should be carried out to determine whether a trainee has achieved the interim and/or final competency standard.

- *Assessments are valid.* All job function related tasks identified in the training programme should be assessed. There should be sufficient evidence to ensure that the trainee meets the competency specified by the interim and/or final competency standard. The trainee should not be asked to provide evidence for, or be assessed against, activities that are outside the scope of the job function identified in the training specification.

- *Assessments are reliable.* All assessors should reach the same conclusion when performing an assessment. All assessors should be trained and monitored to achieve and maintain an acceptable level of inter-rater reliability.

4.12 An assessment plan should consist of the following elements:

- the final competency standard associated with the job function.
- the interim competency standard associated with each milestone if the training has been divided into milestones.
- the list of assessments (formative and summative assessments, examinations, oral assessments, etc.) required for each of the task(s) that have been defined.
- when assessments should take place.
- the tools to be used to collect evidence during practical assessments.
- the pass marks for projects, examinations, or oral assessments.
- if required, the minimum number of formative assessments to be undertaken prior to starting summative assessments; and
- the number of observations required to assess performance for the interim and final competency standards.

4.13 To ensure consistency in implementation, an assessment plan may contain the following administrative procedures:

- Identification of personnel authorized to perform a specific task or perform assessment.
- Roles and responsibilities of personnel during the conduct of assessments.
- Assessment procedures (preparation, conduct and post assessment);
- Conditions for undertaking assessments.
- Keeping of records; and
- Actions to be taken when a trainee fails a competency assessment.

4.14. When assessing competencies, there are several assessment methods that may be considered. They include, but are not limited to, written test, oral test, online test, observation of practical exercises performed by the trainee, online practical exercises, and observation of on-the-job performance by the personnel after completion of their training. These methods may be used alone or in combination to confirm that trainees have acquired the necessary competencies for the intended job function. However, when assessing an integrated performance of competencies, practical assessments should be the primary method of choice. Such assessments may take place in either a simulated or operational environment and may consist of both formative and summative types of assessments.

4.15. Due to duration of the training program or complexity of the combination of tasks within a job function, the training program may be divided into milestones. Milestones that are logically sequenced and spaced can be used to monitor trainees' progress towards competency at an acceptable pace. Interim competency standards should be defined for each milestone which should consist of training and assessment(s). Trainees would be expected to successfully complete a milestone before allowing to advance to the next milestone in the sequence of the training program.

4.16. Organisations engaging the services of external training service providers to train and assess its personnel should develop assessment plans to ensure that its personnel, having job functions in the handling and carriage of dangerous goods by air, have achieved the required competencies to fulfill their responsibilities at the workplace. Organisations should determine whether the assessments provided by training service providers are adequate in assessing that its personnel have attained the required competences or otherwise developed competency assessments to assess trainees at the workplace and incorporate them into its assessment plan. Such an assessment plan may also consist of a combination of both assessments from the training service provider and assessments at the workplace developed by the Organisation.

Designing a Training Plan

4.17. The purpose of a training plan is to detail the training required to fulfil the training specification and to prepare trainees to undertake the competency assessments detailed in the assessment plan.

4.18. A training plan should consist of the following elements:
- Composition and structure of the training program
- Syllabus
- Milestones (if required)
- Modules, training events and their delivery sequence; • Method of delivering the training; and
- Course schedule.

4.19. It should be noted that the training plan should not be limited to the core dangerous goods training course but should also include components applicable to on-the-job training and assessments at the workplace. When completed, the training plan may be used to develop training and assessment materials.

4.20 When deciding on the method of delivering the training, factors such as demographics of trainees, frequency of training and complexity of the job function should be considered. Common methods of training delivery include:

- physical classroom instructor led.
- virtual classroom instructor led.
- e-learning.
- distance learning (self-study)
- virtual simulation.
- group discussions; and
- on-the-job training.

These methods may be used in combination to deliver the training objectives.

Figure 4.3 illustrates an overview of the workflow in Phase 2.

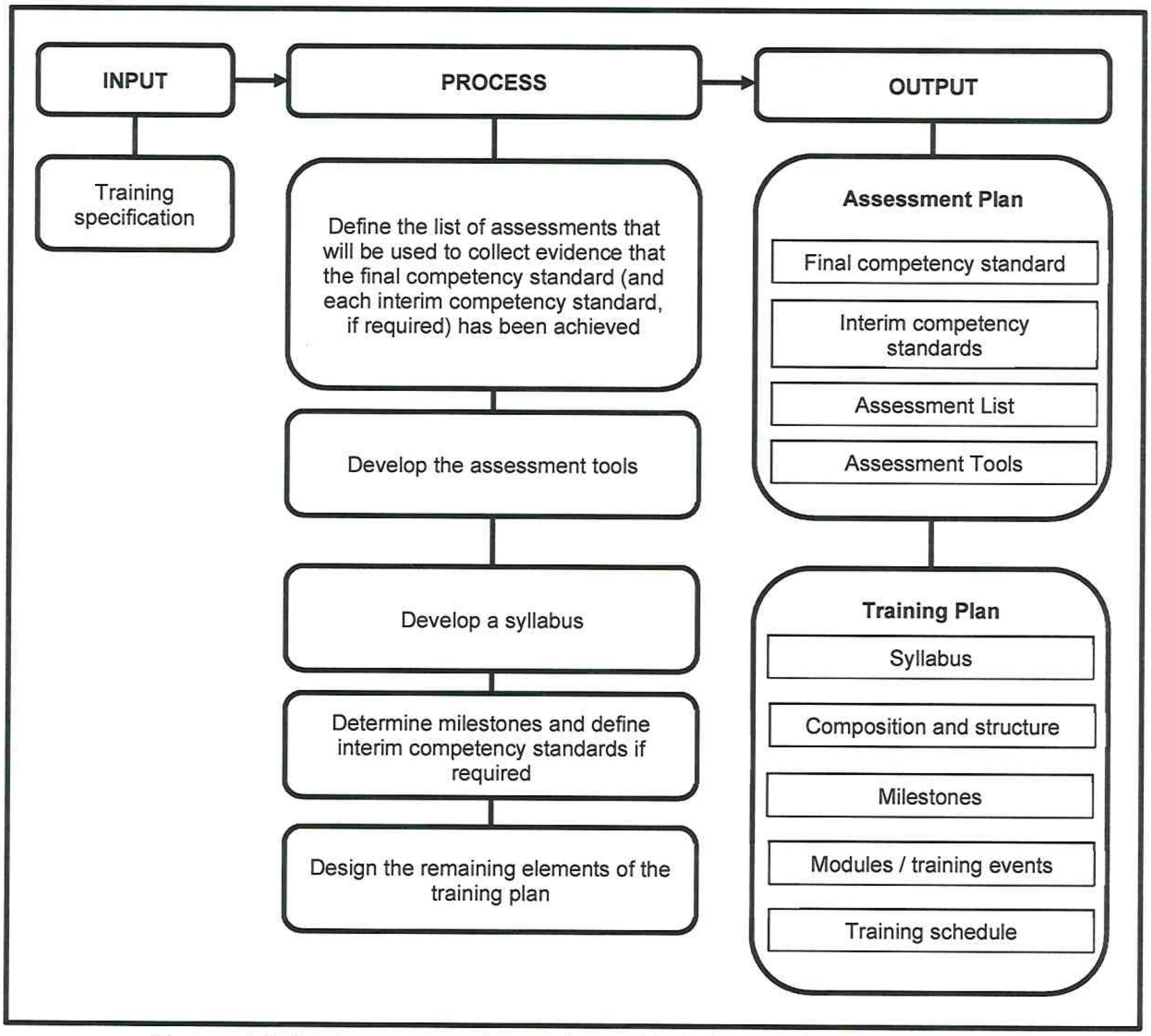


Figure 4.3. Design competency-based training and assessment

Phase 3 – Develop the Training and Assessment Materials

4.21. This phase focuses on the development of training and assessment materials based on the assessment plan and the training plan developed in Phase 2. Such materials would include, but are not limited to:

- training notes.
- trainees' handbook.
- practical exercises.
- case studies.
- presentations.
- video clips.
- self-test quizzes.
- examinations.
- on-the-job observations; • practical assessments; and
- assessment tools.

4.22. Training and assessment materials should not be limited to only the core dangerous goods course but should also include materials applicable to training events such as on the-job training and assessments at the workplace.

4.23. Figure 4.4 illustrates an overview of the workflow in Phase 3.

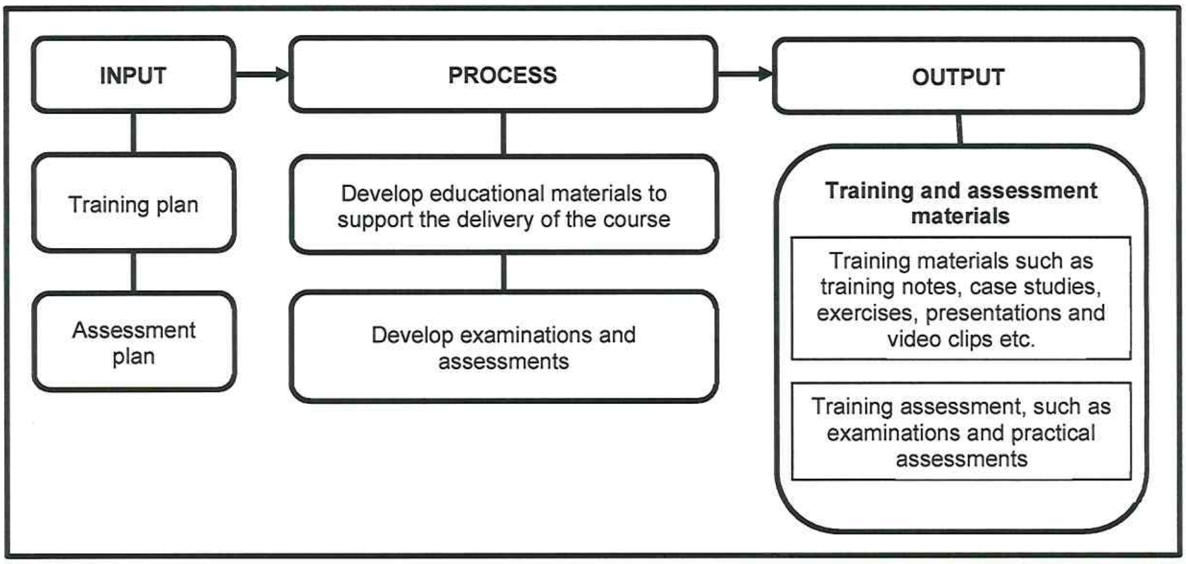


Figure 4.4. Develop the training and assessment materials

Phase 4 – Train and Assess According to the Training and Assessment Plans

4.24. This phase focuses on delivering the training and conducting the competency assessments according to the plans developed in the earlier phases. When delivering the training, trainees' learning progress should be monitored against the interim and final competency standards. Timely and continuous feedback regarding their performance should be given to trainees. Any learning deficiencies identified should also be addressed in a timely manner.

4.25. At the end of the training and upon the successful completion of all assessments, trainees should be competent in performing their assigned job function. If assessment results show that trainees are not yet competent, the affected trainees' learning gaps should be identified. Additional support and opportunities in the form of exercises, on-the-job practices and coaching should be provided to the affected trainees prior undertaking further competency assessments.

Phase 5 - Evaluate the Competency-Based Training Program including the Training and Assessment Plans

4.26. The competency-based training program should be reviewed by the Organisation on a periodic basis to ensure its effectiveness. After training is completed, feedback on job performance of trainees at the workplace should be gathered from trainees, instructors, assessors, and Organisations (in the case of training program developed by training service providers). Such feedback may be in the form of course results, audit reports, inspection reports, documented observations of trainees' job performance at the workplace, written evaluation by trainees, instructors or assessors and occurrence reports involving personnel that were trained and assessed to be competent under the training program. Such reports should be evaluated with a view to amend or revise various components of the training program (e.g., assessment plan, training plan, training, and assessment materials) to better support the learning progression and competency of personnel in performing the intended job function.

5. APPLICATION FOR APPROVAL OF DANGEROUS GOODS TRAINING PROGRAMMES

5.1. Organisations will be required to submit the following documents of its competency-based dangerous goods training program for NCAA's review and approval:

(a) Training specification containing the information as specified in paragraph 4.6.

(b) Assessment plan containing the information as specified in paragraph 4.11 and 4.12.

(c) Training plan containing the information as specified in paragraph 4.17.

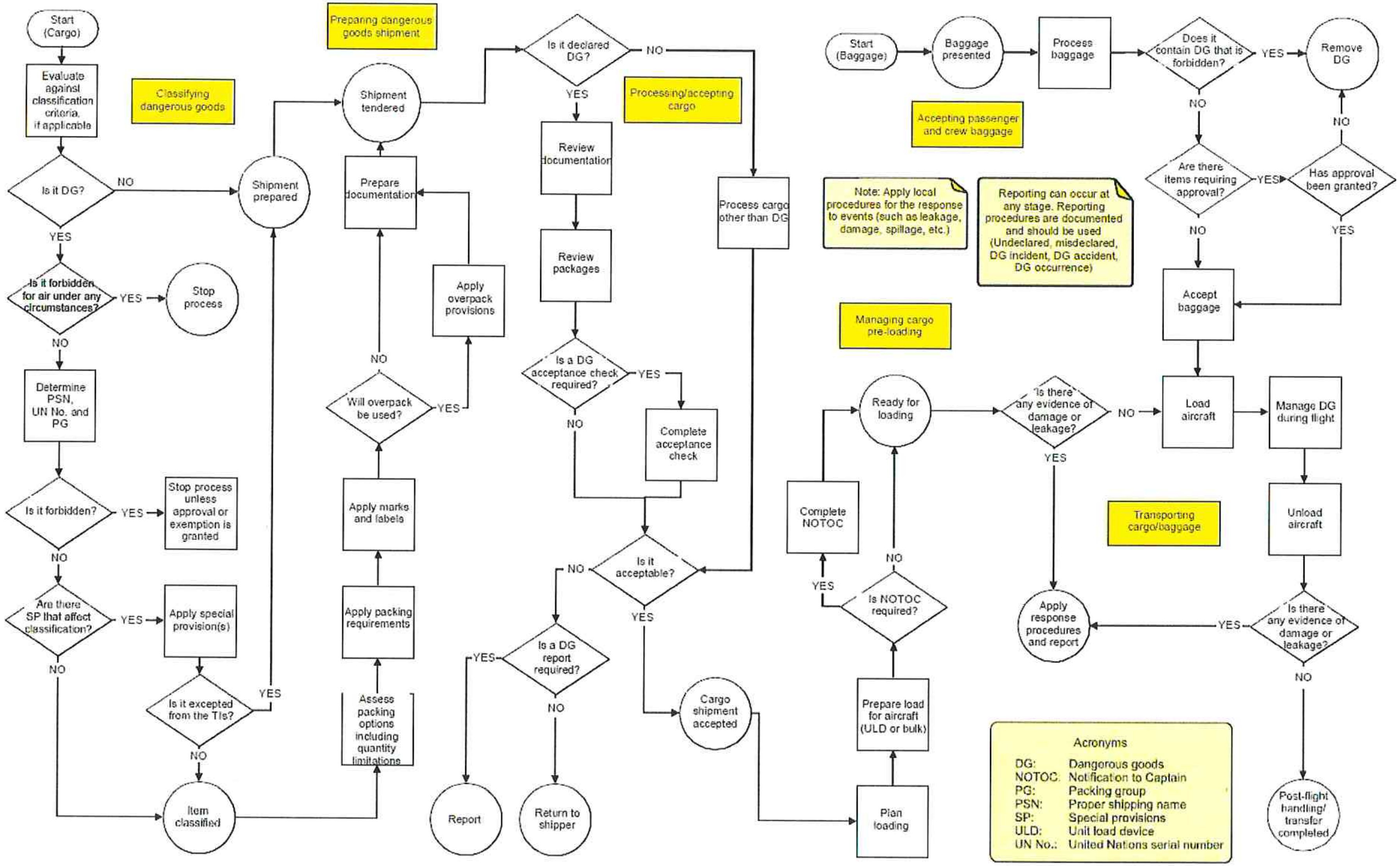
(d) Training and assessment materials including, but not limited to, the materials identified in paragraph 4.21.

(e) Procedures to evaluate the effectiveness of the training program; and

(f) Evidence of an evaluation of the training program completed in accordance with the procedures mentioned in item e) (for applicants seeking a renewal of NCAA approval of its competency-based training program only).

5.2. Training program documents should be accompanied by a letter of application on the applicant's company letterhead specifying the title of the training program and the job function of the personnel involved. Applicants may submit their training program to NCAA by hand or via email at DG@ncaa.na

APPENDIX 1: Dangerous Goods Functions – Process Flowchart



APPENDIX 2 – Generic Dangerous Goods Task List

1. Understanding the basics of dangerous goods

1.1. Recognising the dangerous goods applicability
- 1.1.1 Understanding the definition
- 1.1.2 Recognise the legal framework (global, national)
- 1.1.3 Identify the application and scope
- 1.1.4 Differentiate hazard and risk

1.2. Understanding the general limitations
- 1.2.1. Develop a sense of forbidden dangerous goods
- 1.2.2. Recognise potential hidden dangerous goods
- 1.2.3. Familiarise with passenger provisions

1.3. Identifying roles and responsibilities
- 1.3.1. Clarify the individual and collective role of the supply chain stakeholders
- 1.3.2. Understand the passenger's responsibilities
- 1.3.3. Recognise the impact of State & operator variations

2. Classifying dangerous goods

2.1 Evaluate a substance or article against classification criteria
- 2.1.1 Determine if it is dangerous goods
- 2.1.2 Determine if it is forbidden under any circumstances

2.2 Determine dangerous goods description
- 2.2.1 Determine class or division
- 2.2.2. Determine packing group
- 2.2.3 Determine proper shipping name and UN number
- 2.2.4. Determine if it is forbidden unless approval or exemption is granted

2.3 Review special provisions
- 2.3.1 Assess if special provision(s) is applicable
- 2.3.2 Apply special provision(s)

3. Preparing dangerous goods shipment

3.1. Assess packing options including quantity limitations

3.1.1. Consider limitations (de minimis quantities, excepted quantities, limited quantities, passenger aircraft, cargo aircraft only, special provisions, dangerous goods in the mail)
3.1.2. Consider State and operator variations
3.1.3. Determine if all-packed-in-one can be used
3.1.4. Select how dangerous goods will be shipped based on limitations and variations

3.2 Apply packing requirements
3.2.1 Consider constraints of packing instructions
3.2.2 Comply with the instructions provided by the packaging manufacturer when UN specification packaging is used
3.2.3. Select appropriate packaging materials (absorbent, cushioning, etc.)
3.2.4. Assemble package

3.3 Apply marks and labels
3.3.1 Determine applicable marks
3.3.2 Apply marks
3.3.3 Determine applicable labels
3.3.4 Apply labels

3.4. Assess use of overpack
3.4.1 Determine if overpack can be used
3.4.2 Apply marks if necessary
3.4.3 Apply labels if necessary

3.5 Prepare documentation
3.5.1. Complete the shipper's declaration for dangerous goods
3.5.2 Complete other transport documents (e.g. air waybill)
3.5.3. Include other required documentation (approvals/exemptions, etc.)
3.5.4. Retain copies of documents as required

4. Processing/accepting cargo

4.1. Review documentation
4.1.1 Verify shipper's declaration for dangerous goods
4.1.2 Verify other transport documents (e.g. air waybill)
4.1.3 Verify other documents (exemptions, approvals, etc.)
4.1.4 Verify State/operator variations

4.2 Review package(s)
- 4.2.1 Verify marks
- 4.2.2 Verify labels
- 4.2.3 Verify package type
- 4.2.4 Verify package conditions
- 4.2.5 Verify State/operator variations

4.3. Complete acceptance procedures
- 4.3.1 Complete acceptance checklist
- 4.3.2 Provide shipment information for load planning
- 4.3.3 Retain documents

4.4. Process/accept cargo other than dangerous goods
- 4.4.1. Check documentation for indications of hidden/undeclared dangerous goods
- 4.4.2. Check packages for indications of hidden/undeclared dangerous goods

5. Managing cargo pre-loading

5.1 Plan loading
- 5.1.1 Determine stowage requirements
- 5.1.2 Determine segregation, separation, aircraft/compartment limitations

5.2 Prepare load for aircraft
- 5.2.1 Check packages for indications of hidden/undeclared dangerous goods
- 5.2.2 Check for damage and/or leakage
- 5.2.3 Apply stowage requirements (i.e. segregation, separation, orientation, securing and protecting from damage)
- 5.2.4 Apply ULD tags when applicable
- 5.2.5 Transport cargo to aircraft

5.3 Issue NOTOC
- 5.3.1 Enter required information
- 5.3.2 Verify conformance with load plan
- 5.3.3 Transmit to loading personnel

6. Accepting passenger and crew baggage

6.1 Process baggage
- 6.1.1 Identify forbidden dangerous goods
- 6.1.2 Apply approval requirements

6.2 Accept baggage
- 6.2.1 Apply operator requirements
- 6.2.2 Verify passenger baggage requirements
- 6.2.3 Advise pilot-in-command, when applicable

7. Transporting cargo/baggage

7.1 Load aircraft
- 7.1.1 Transport cargo/baggage to aircraft
- 7.1.2 Check packages for indications of hidden/undeclared dangerous goods
- 7.1.3 Check for damage and/or leakage
- 7.1.4 Apply stowage requirements (i.e. segregation, separation, orientation, securing and protecting from damage)
- 7.1.5 Verify that NOTOC against aircraft load
- 7.1.6 Provide NOTOC information to pilot-in-command and flight operations officer/flight dispatcher

7.2 Manage dangerous goods prior to and during flight
- 7.2.1 Detect and address dangerous goods not permitted in baggage
- 7.2.2 Interpret NOTOC
- 7.2.3 Apply procedures in the event of an emergency
- 7.2.4 Inform flight operations officer/flight dispatcher/air traffic control in the event of an emergency
- 7.2.5 Inform emergency services of the dangerous goods on the NOTOC in the event of an emergency

7.3 Unload aircraft
- 7.3.1 Apply specific unloading considerations
- 7.3.2 Check packages for indications of hidden/undeclared dangerous goods
- 7.3.3 Check for damage and/or leakage
- 7.3.4 Transport cargo/baggage to facility/terminal

8. Collecting safety data

8.1 Report dangerous goods accidents
8.2 Report dangerous goods incidents
8.3 Report undeclared/misdeclared dangerous goods
8.4 Report dangerous goods occurrences