



Leonardo Da Vinci - Fiumicino Airport

AERODROME MANUAL - PART B - AERODROME MANAGEMENT SYSTEM AND PERSONNEL QUALIFICATION AND TRAINING REQUIREMENTS

(Regulation 139/2014 – Subpart E – Aerodrome Manual and documentation)

SECTION 2- The Aerodrome Management System

SECTION 3- Staff training and qualification

COURTESY TRANSLATION – IN CASE OF CONFLICT ITALIAN VERSION PREVAIL

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PART B -SECTION 2 – THE AERODROME MANAGEMENT SYSTEM

(Ref. AMC3 ADR.OR.E.005 – 2)

2 RESPONSIBILITIES AND ORGANISATION

(Ref. AMC3 ADR.OR.E.005 – 2)

The Fiumicino Airport Operator is responsible for the infrastructure, equipment and operations of the aerodrome, in accordance with:

- 1) Regulation (EU) No 2018/1139 and its implementing rules; EN 14.2.2014 Official Journal of the European Union L 44/23;
- 2) the specifications of their certificate;
- 3) the contents of the Aerodrome Manual.

The provision of air navigation services appropriate to the level of traffic and the operating conditions of the airport and the design and maintenance of flight procedures, in accordance with the applicable requirements, are guaranteed by ENAV, who liaises with ADR in compliance with a specific signed agreement.

The provision of the specific services referred to in Chapter B of Appendix IV, Part ADR.OPS.B.010 Rescue and fire-fighting services referred to in Regulation (EU) No. 139/2014, are ensured by the Provincial Fire Brigade Command, who liaises with ADR, in accordance with a specific agreement signed.

The Airport Operator must liaise with the appropriate authority to ensure that information relevant to aircraft safety is contained in the Aerodrome Manual and is published as appropriate. Such information includes:

- 1) exemptions or derogations granted from the applicable requirements;
- 2) provisions for which an equivalent level of safety is accepted by the competent authority as part of the certification basis; and
- 3) special conditions and limitations relating to the use of the aerodrome.

If unsafe conditions at the aerodrome become apparent, the Airport Operator must, without further delay, take the necessary measures to ensure that those parts of the aerodrome which are found to be unsafe are not used by aircraft.

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2.1 ORGANISATIONAL CHART

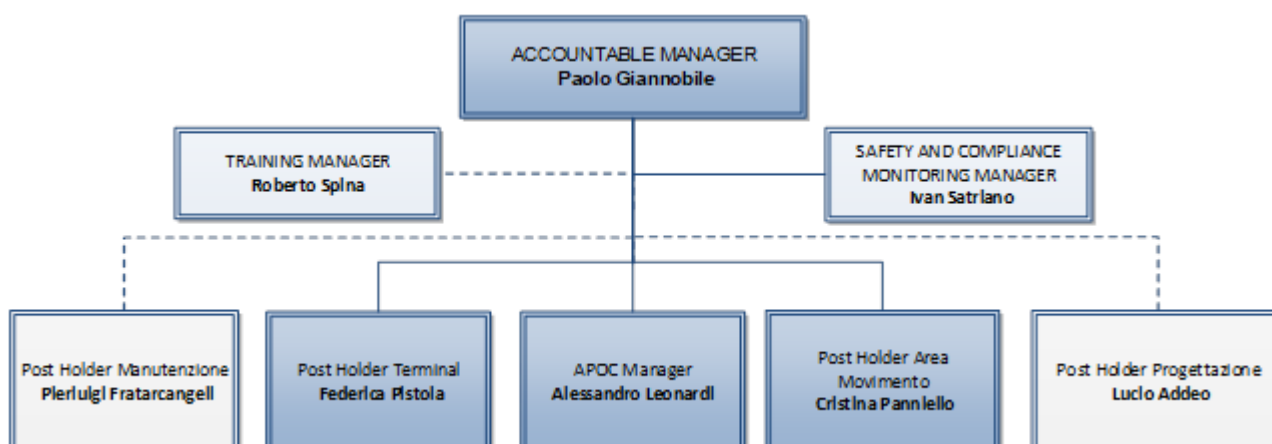
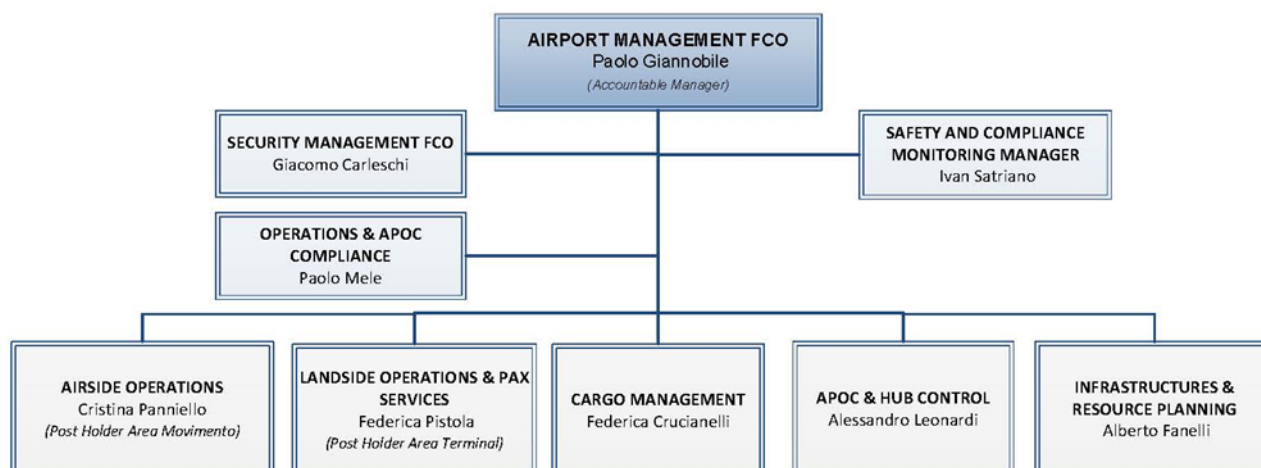
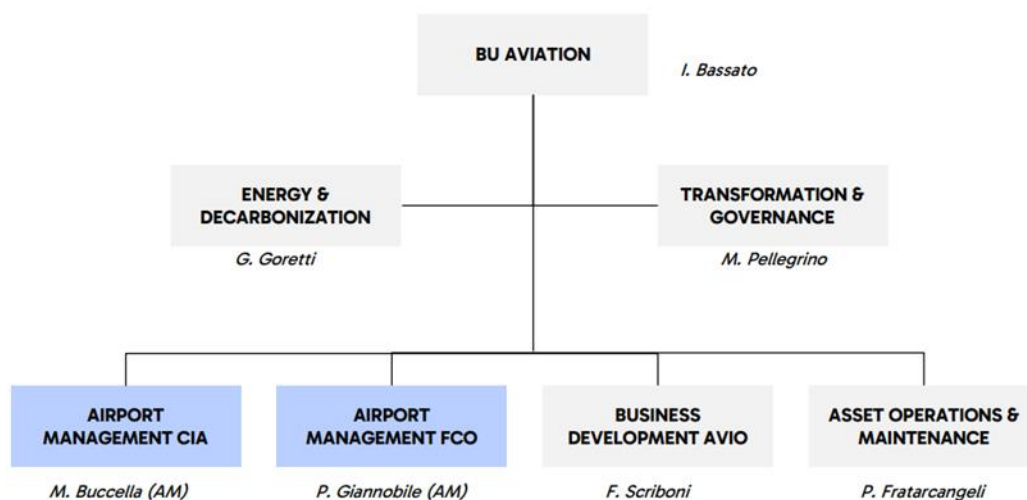
Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	1)
IR	ADR.OR.D.005-	c)	
IR	ADR.OR.D.005-	d)	
AMC1-	ADR.OR.D.005 (b)(1)		
AMC1-	ADR.OR.D.005 (c)	c)	
AMC1-	ADR.OR.D.005 (c)	d)	
IR	ADR.OR.D.015-	a)	
AMC1-	ADR.OR.D.015 (a)	a)	
AMC1-	ADR.OR.D.015 (a)	a)	1)
AMC1-	ADR.OR.D.015 (a)	a)	2)
AMC1-	ADR.OR.D.015 (a)	b)	
AMC1-	ADR.OR.D.015 (a)	b)	1)
AMC1-	ADR.OR.D.015 (a)	b)	2)
AMC1-	ADR.OR.D.015 (a)	b)	3)
AMC1-	ADR.OR.D.015 (b)	a)	1)
AMC1-	ADR.OR.D.015 (b)	b)	1)
AMC1-	ADR.OR.D.015 (b)	b)	2)
AMC1-	ADR.OR.D.015 (b)	b)	3)
AMC1-	ADR.OR.D.015 (b)	b)	4)
IR	IS.D.OR.200		

The organisation of the Management Company, in accordance with the requirements of Reg. (EU) no. 2018/1139 and the corresponding Implementing Rules contained in Reg. EU 139/14, and the requirements of Regulation (EU) No. 2022/1645, is structured to ensure that all areas are covered to guarantee that the certification requirements are maintained.

Below is the organisation chart of the Aviation BU, the Airport Management FCO structure and then the detail of the certification organisation chart showing the departments the Accountable Manager uses to ensure compliance with the applicable requirements:

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The Accountable Manager coincides with the person in charge of Airport Management (who reports hierarchically to the Chief Aviation Officer for the activities necessary for the correct management of the business processes falling within his competence) and receives directly from the Administrator the appropriate delegations, in compliance with the resolution of the Board of Directors, to ensure in full management autonomy and without spending limits, the safe performance of the airport activities described in the Aerodrome Manual, as provided for by Part ADR.OR.D.015 Personnel Requirements and relative AMC1 of Regulation (EU) no. 139/14.

The Infrastructure and Systems Maintenance Post Holder, the Design Post Holder and the Training Manager report directly to the Accountable Manager for matters relating to the rules of EU Regulation 139/14.

The ISMS Manager reports directly to the Accountable Manager for matters relating to the provisions of EU Regulation 139/14 and EU Regulation 1645/22.

In order to ensure adequate resources in terms of personnel, document B-02_Manpower Plan EASA, an appendix to this manual, has been drawn up, where it defines:

- the process by which the Airport Operator guarantees to have sufficient and qualified staff to ensure the activities necessary to maintain the certification requirements are performed;
- the minimum resource requirements to ensure the proper execution of processes falling within the scope of certification under Reg. EU no. 139/2014.
- the minimum resources required to ensure the proper execution of the processes falling within the scope of certification in accordance with EU Regulation N. 1645/202214.

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2.1.1 Roles and responsibilities of certifying figures

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	1)
IR	ADR.OR.D.015-	d)	
IR	ADR.OR.D.015-	e)	
AMC1-	ADR.OR.D.015 (b)	a)	
AMC1-	ADR.OR.D.015 (b)	a)	1)
AMC1-	ADR.OR.D.015 (b)	a)	3)
AMC1-	ADR.OR.D.015 (b)	a)	4)
AMC1-	ADR.OR.D.015 (b)	a)	5)
AMC1-	ADR.OR.D.015 (d)	a)	
IR	IS.D.OR.200	a)-i)	

Compliance with the requirements of Reg. (EU) no. 2018/1139 and the corresponding Implementing Rules contained in Reg. EU 139/14, Part-ADR.OR and Part-ADR.OPS, and the requirements of Regulation (EU) No 2022/1645, is managed through the appointment of certifying figures (nominated persons within the meaning of the regulation) who, having passed an acceptance interview by the Civil Aviation Authority (where applicable), hold the position, described below, to guarantee the required conformity.

Details of the responsibilities for each requirement of the European Regulation are also provided in the Organisation and Operations Requirement basis and Certification Basis compliance checklists and the Information Security Organisation Requirements checklist.

Each procedure referred to in Part E of the Aerodrome Manual also contains a description of the process by which the Airport Operator will ensure compliance with these requirements.

The following table shows the references of the key corporate figures for the certification of Fiumicino Aerodrome in accordance with European regulations.

Function *	FIRST NAME	E-mail address *	Telephone number
Accountable Manager	Paolo Giannobile	paolo.giannobile@adr.it	06.6595/1
Safety & Compliance Monitoring Manager	Ivan Satriano	ivan.satriano@adr.it	
ISMS Manager	Mario Mangano	mario.mangano@adr.it	
Movement Area Post Holder	Cristina Panniello	cristina.panniello@adr.it	

Terminal Post Holder	Federica Pistola	federica.pistola@adr.it	
Infrastructure and Systems Design Post Holder	Lucio Addeo	lucio.addeo@adr.it	
Infrastructure and Systems Maintenance Post Holder	Pierluigi Fratarcangeli	pierluigi.fratarcangeli@adr.it	
Training Manager	Roberto Spina	roberto.spina@adr.it	

The certified email address of the Aeroporti di Roma Company is aeroportidiromaspa@pec.adr.it.

The figures responsible for certification at both Fiumicino and Ciampino airports have been accepted by ENAC.

In the Aeroporti di Roma organisation, the Training Manager and ISMS Manager perform their roles at both airports with an organisation structure that ensures the supervision and monitoring of activities at both airports including through the appointment of respective Deputies.

2.1.1.1 Accountable Manager

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.015-	a)	
AMC1-	ADR.OR.D.015 (a)	a); b)	
IR	IS.D.OR.240		

The Accountable Manager has the spending and decision-making powers necessary to ensure:

- the availability of the resources necessary to ensure that Fiumicino aerodrome complies with the requirements of Regulation (EU) no. 2018/1139 and the corresponding Implementing Rules contained in Reg. EU 139/14, Part-ADR.OR and EU Regulation 2022/1645;
- the application of reductions in the level of capacity of the aerodrome and/or other mitigation actions deemed necessary, should such circumstances or reductions in staff coverage arise that would reduce the level of Safety of the aerodrome;
- the definition, implementation and promotion of information Safety and Security policies at the aerodrome;
- regulatory compliance with the requirements of Regulation (EU) No. 2018/1139 and the corresponding Implementing Rules contained in Reg. EU 139/14, Part-ADR.OR and Part-ADR.OPS and EU Regulation 2022/1645;
- ;

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- that the post holders and the Safety and Compliance Monitoring Manager are aware of their responsibilities regarding the control, maintenance and implementation of the safety requirements at Fiumicino Aerodrome.

In the absence of the Accountable Manager, continuity is guaranteed by the Post Holders for the individual technical and economic responsibilities that each has within the organisation chart. The final responsibility remains with the Accountable Manager.

In this context, for spending powers beyond those authorised to the relevant Post Holders, the latter must refer to the hierarchical line and therefore to the Chief Executive Officer.

2.1.1.2 Safety & Compliance Monitoring Manager

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(1)	a)	1); 2)
AMC1-	ADR.OR.D.005 (b)(11)	b)	1)
AMC2-	ADR.OR.D.005 (b)(11)	a)	1)
IR	ADR.OR.D.015-	c)	
AMC1-	ADR.OR.D.015 (c)	a); b); c); d)	

At Fiumicino aerodrome, Aeroporti di Roma has adopted an organisational solution that provides for a Compliance Monitoring function under the responsibility of the Safety Manager. This organisational solution was approved by ENAC with the issue of AltMoC.LIRF.001.

Within the scope of the functions provided for the Airport Operator by Regulation (EU) No 2018/1139 and corresponding Implementing Rules contained in Reg. EU 139/14, Part-ADR.OR and Part-ADR.OPS, the Safety & Compliance Monitoring Manager is the key figure who ensures the development, management and maintenance of an effective Aerodrome Safety Management System. In particular, they ensure:

- the promotion of Hazard Identification equipment, and encourage their management;
- the management of an effective Risk Assessment and Risk Management process and related preventive and corrective actions;
- the management of an effective Change Management process;
- the management of the Reporting System;
- the management of Safety Management System performance indicators and related periodic reports;
- the management and control of the Safety Management System documentation, including the Aerodrome Manual;

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- the management of the verification of regulatory compliance in accordance with Regulation 139/2014 and the related audit system;
- managing regulatory compliance checks in accordance with Regulation (EU) No. 1645/2022;
- the management of the Incident Investigation Process in accordance with Regulation 376/2014 and the resulting preventive and corrective actions;
- the coordination of activities necessary to update the emergency plan and the exercises to test its effectiveness;
- the coordination with the Post Holders and with the other parties and/or aerodrome bodies on Safety aspects;
- the analysis of the emergency procedures in coordination with the relevant authorities with regard to the assessment of the overall consistency of the emergency plan with the Safety criteria;
- the management of the Safety Committees referred to in paragraph 2.1.3;
- the coordination of Safety Action Groups;
- in coordination with the Training Manager, the identification of the training contents related to the maintenance of the certification standards concerning the Safety Management System and the human factor principles;
- the first-level controls on the processes for which they are responsible.

The Safety and Compliance Monitoring Manager uses the organisational structure described in chapter 2.2.3 of this manual.

Any change in the name of the Safety and Compliance Monitoring Manager must be submitted to ENAC for evaluation and acceptance. The Authority will test the skills of the proposed appointee by examining the curriculum vitae and conducting an interview.

Any change in the responsibilities of the Safety and Compliance Monitoring Manager and the powers attributed to them must also be submitted to ENAC for evaluation and acceptance.

2.1.1.3 Training Manager

Within the scope of the functions foreseen for personnel dedicated to airport operations, maintenance and safety management, the Training Manager ensures:

- the definition of training programmes in coordination with the relevant Post Holder and the Safety & Compliance Monitoring Manager;
- the drafting, also on the indications of the Post Holder and the Safety & Compliance Monitoring Manager, of the Training Plan to be submitted to the Accountable Manager for approval of significant changes at least once a year;
- the scheduling of recurrent training and proficiency checks;
- the management of qualification activities of internal and external trainers;
- the recording of documentation to demonstrate that the requirements of Regulation 139/14 and related plans regarding staff qualification and training have been met;

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- the drafting, after consultation with the Post Holders and the Safety & Compliance Monitoring Manager, of the training budget, which will be submitted to the Accountable Manager for approval;
- participation in the identification of hazards for the area in question by the Safety and Compliance Monitoring Manager;
- the sharing, where relevant, of the risk analysis of the consequences of hazards drawn up by the Safety Management System and its acceptance, as well as the identification of any mitigation actions for the parts under its responsibility;
- the first-level controls on the processes for which they are responsible.

The Training Manager, also on the basis of best practices applied in other airports, can identify improvements in the training of operational staff. The Training Manager is responsible for searching the market for specialised training courses if such resources and skills are not available at AdR.

The Safety & Compliance Monitoring Manager can identify corrective actions for the training of operational staff based on the findings of the Safety Management System, objective evidence recorded in risk assessments, audits and/or investigation reports. Additional identified training needs and/or contingent remedial training needs will be requested from the Training Manager who will take action to identify appropriate corrective solutions.

The Safety & Compliance Monitoring Manager is responsible for defining the plans for the contents directly related to the Safety Management System (Policy, Safety Management System function, reporting methodology).

Training programmes are subject to the approval of the Accountable Manager.

2.1.1.4 Movement Area Post Holder

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.015-	b)	1)

Within the scope of the functions foreseen by the certification, they are the Airport Operator's contact person with regard to everything necessary to guarantee the management and supervision of the airport's operational services. The Movement Area Post Holder ensures:

- the Apron Management Services in coordination with the Flight Assistance Agency for the parts of mutual responsibility and competence referred to in the agreement signed in compliance with recital 8 of Regulation 139/2014;
- the management of flight-related services referred to in the agreement signed in compliance with recital 8 of Regulation 139/2014;

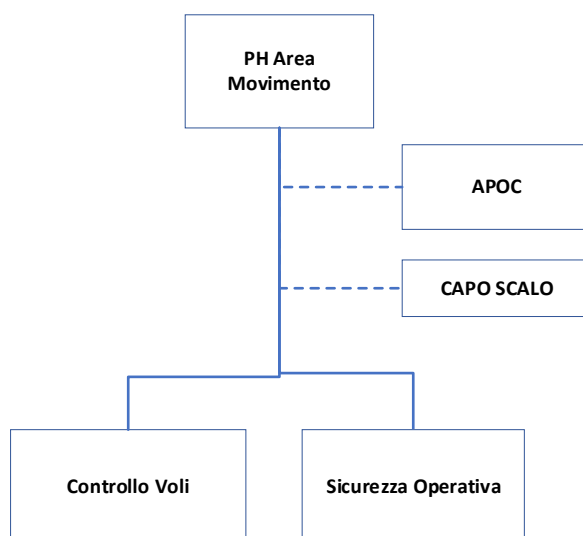
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- the monitoring of areas subject to works with regard to safeguarding the safe movement of aircraft on the ground;
- the monitoring of runway surfaces, taxiways and junctions, road markings, horizontal, vertical and luminous signs during operations, taking care to involve the Maintenance Area Post Holder regarding the results obtained in order to ensure that the movement of aircraft on the ground is safe;
- the evaluation, in coordination with the Safety and Compliance Monitoring Manager and the Post Holder, of any actions that may be useful in order to have the aerodrome being used for operations with a higher code than that for which the aerodrome is certified;
- the clearance of wildlife and the implementation of the wildlife risk prevention and control plan;
- the correct aeronautical reporting for the parts under their responsibility referred to in the agreement signed in compliance with recital 8 of Regulation 139/2014;
- the reporting of incident, serious incident and accident data to the Safety and Compliance Monitoring Manager and, where applicable, to ANSV;
- the coordination of operations to remove crashed aircraft in the movement area and in its vicinity within the airport grounds;
- the drafting and implementation of emergency plans for the parts under their responsibility;
- the checking of the coefficient of friction of the tracks for maintenance purposes, and skidding procedures;
- the conduction of cleaning activities on the movement area paved surfaces and the maintenance of the green areas in the Airside area, referred to as grass mowing;
- the definition of the low visibility procedures in coordination with ENAV for the parts under their responsibility in accordance with the agreement drawn up in compliance with recital 8 of Regulation 139/2014;
- the definition of the 'snow plan', the management of the personnel and means necessary for snow removal;
- the maintenance of the integrity of the aeronautical data received from the Design Post Holder;
- the checking of the correct set-up of vehicles and equipment circulating on the movement area;
- the state of maintenance of the operational assets under their management;
- the implementation, with regard to the area of competence, of Safety policies through the performance of the initiatives identified by the Safety Management System;
- participation in the identification of hazards for the area in question by the Safety and Compliance Monitoring Manager;
- the sharing of the risk analysis of the consequences of hazards drawn up by the Safety Management System and its acceptance, as well as the identification of any mitigation actions for the parts under its responsibility;

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- the qualification and training of their own staff involved in the processes underlying certification, in coordination with the Training Manager;
- the management of documentation demonstrating compliance for activities under their responsibility;
- the regulatory adaptation of the activities and procedures for which they are responsible;
- relations with airport authorities on operational safety and emergency management, participating in Safety Committees in coordination with the Safety and Compliance Monitoring Manager;
- the provision of aviation services related to operational functioning in line with the company's objectives of efficiency and quality of service;
- the technical fulfilments relating to mass evaluations for the issuing of permits for the air side movement of airport operators' vehicles;
- the definition of the budget and multi-year plans for operations under their responsibility;
- the checking of traffic data;
- the coordination of personnel and means required for aircraft de/anti-icing operations;
- the presence of procedures for the authorisation, assessment and training of personnel to drive in the movement area;
- the correct day and night lighting of moving obstacles within the airport grounds with the exception of aircraft;
- the management, directly or indirectly, of subcontracted activities falling within their area of responsibility, including contractual documents and communications related to Safety and Compliance Monitoring;
- the conformity, in coordination with the other Post Holders, in terms of the operational readiness of the infrastructures at the time of commissioning;
- the first-level controls on the processes for which they are responsible.

The Movement Area Post Holder is supported by the following organisational structure:



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Any change in the name of the Movement Area Post Holder must be submitted to ENAC for evaluation and acceptance. The Authority will test the skills of the proposed appointee by examining the curriculum vitae and conducting an interview.

Any change in the responsibilities of the Movement Area Post Holder and the powers attributed to them must also be submitted to ENAC for evaluation and acceptance. This change is part of the Change Management procedure in the Safety Management System Manual and must be accompanied by an Organisational Risk Assessment carried out by the Safety and Compliance Monitoring Manager.

NOTE: The APOC Manager supports the Post Holder in the following areas:

- in the functional coordination of the Control Rooms and garrisons present in APOC, also through the Airport Managers, in order to guarantee the business continuity of operations;
- in the medium/long-term planning and the daily pre-planning of the use of aerodrome infrastructures in line with the company's efficiency and quality of service objectives;

The control rooms and attendants in APOC remain under the direct responsibility of the nominated persons.

Function *	FIRST NAME	E-mail address *	Telephone number
APOC Manager	Alessandro Leonardi	alessandro.leonardi@adr.it	066595.1

In accordance with EU Regulation 139/2014, the figures are not subject to ENAC acceptance.

2.1.1.5 Maintenance Area Post Holder

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.015-	b)	2)

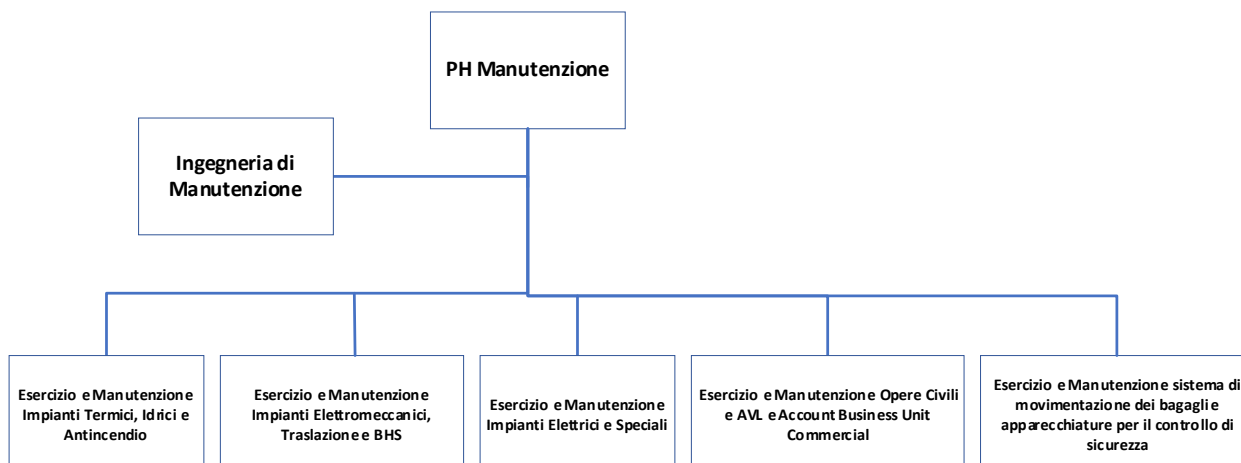
Within the scope of the foreseen functions, the Maintenance Area Post Holder ensures:

- the preparation and implementation of maintenance programmes for all electromechanical and electrical equipment, including LVA signs, for the safe movement of aircraft on the ground, with the exception of those managed by the Ente Nazionale di Assistenza al Volo (National Flight Assistance Body) specified in a specific agreement drawn up in compliance with recital 8 of Regulation 139/2014;
- the preparation and implementation of maintenance programmes for aircraft apron lighting systems;
- periodic checks of LVA systems and, more generally, of aircraft apron and road lighting systems;

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- the preparation and implementation of maintenance programmes for the paved surfaces and infrastructures located at Airside (Pavement Management System);
- the state of maintenance of the operational assets under their management;
- the verification of the efficiency of the day and night signs of the internal and external illuminated aerodrome obstacles according to ENAC provisions in compliance with Article 712 of the CdN and the communication to the Movement Area Post Holder;
- the supply of electrical energy for the proper functioning of the equipment used for the safe ground handling of aircraft and the lighting of the aprons;
- the maintenance of the waste water drainage system in the movement area;
- the implementation, with regard to the area of competence, of Safety policies through the performance of the initiatives identified by the Safety Management System;
- participation in the identification of hazards for the area in question carried out by the Safety and Compliance Monitoring Manager;
- the sharing of the risk analysis of the consequences of hazards drawn up by the Safety Management System and its acceptance, as well as the identification of any mitigation actions for the parts under its responsibility;
- the qualification and training of their own staff involved in the processes underlying certification, in coordination with the Training Manager;
- the management of documentation demonstrating compliance for activities under their responsibility;
- the regulatory adaptation of the activities and procedures for which they are responsible;
- the compliance with European Regulations and current legislation regarding the design of the extraordinary maintenance of all the infrastructures belonging to the Airside;
- the management, directly or indirectly, of subcontracted activities falling within their area of responsibility, including contractual documents and communications related to Safety and Compliance Monitoring;
- and in any case whatever is necessary to guarantee the management and monitoring of Airport maintenance, to the extent of the Airport Operator's responsibility;
- the compliance of the infrastructure with the applicable CS requirements at the time of commissioning, in coordination with the other Post Holders;
- the first-level controls on the processes for which they are responsible.

The Maintenance Area Post Holder is supported by the following organisational structure:



Any change in the name of the Maintenance Area Post Holder must be submitted to ENAC for evaluation and acceptance. The Authority will test the skills of the proposed appointee by examining the curriculum vitae and conducting an interview.

Any change in the responsibilities of the Maintenance Area Post Holder and the powers attributed to them must also be submitted to ENAC for evaluation and acceptance. This change is part of the Change Management procedure and must be accompanied by an Organisational Risk Assessment carried out by the Safety and Compliance Monitoring Manager.

See NOTE 2.1.1.4 for support provided by the APOC Manager.

2.1.1.6 Design Post Holder

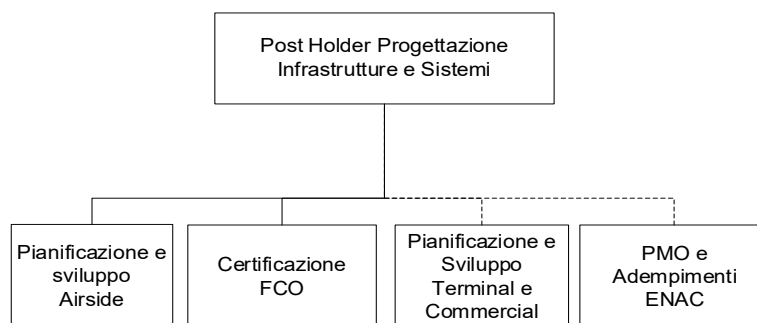
Within the scope of the foreseen functions, the Design Post Holder ensures (Certifications Specifications Book 1 & 2):

- the compliance with European Regulations and current legislation of the design of interventions concerning all the infrastructures belonging to the Airside;
- the updating of compliance lists for certified infrastructures;
- the collection and communication to the recipient bodies of the data on the physical characteristics of the aerodrome contained in the Aerodrome Manual;
- the updating of the obstacle cards on the basis of the type B obstacle card received from ENAV, attached to the Aerodrome Manual and the distribution of the cards to the Movement and Maintenance Area Post Holders for the activities for which they are responsible;
- the state of maintenance of means and equipment for carrying out the activities for which they are responsible;
- the implementation, with regard to the area of competence, of Safety policies through the performance of the initiatives identified by the Safety Management System;
- participation in the identification of hazards for the area in question carried out by the Safety and Compliance Monitoring Manager;

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- the sharing of the risk analysis of the consequences of hazards drawn up by the Safety Management System and its acceptance, as well as the identification of any mitigation actions for the parts under its responsibility;
- the qualification and training of their own staff involved in the processes underlying certification, in coordination with the Training Manager;
- the management of documentation demonstrating compliance for activities under their responsibility;
- the regulatory adaptation of the activities and procedures for which they are responsible;
- the management, directly or indirectly, of subcontracted activities falling within their area of responsibility, including contractual documents and communications related to Safety and Compliance Monitoring;
- and in any case whatever is necessary to guarantee the management of the design of interventions that may have an impact on the safety of operations, to the extent of the Airport Operator's responsibility;
- the compliance of the infrastructure with the applicable CS requirements at the time of commissioning, in coordination with the other Post Holders;
- the first-level controls on the processes for which they are responsible.

The Design Area Post Holder is supported by the following organisational structure:



Any change in the name of the Design Area Post Holder must be submitted to ENAC for evaluation and acceptance. The Authority will test the skills of the proposed appointee by examining the curriculum vitae and conducting an interview.

Any change in the responsibilities of the Design Area Post Holder and the powers attributed to them must also be submitted to ENAC for evaluation and acceptance. This change is part of the Change Management procedure and must be accompanied by an Organisational Risk Assessment carried out by the Safety and Compliance Monitoring Manager.

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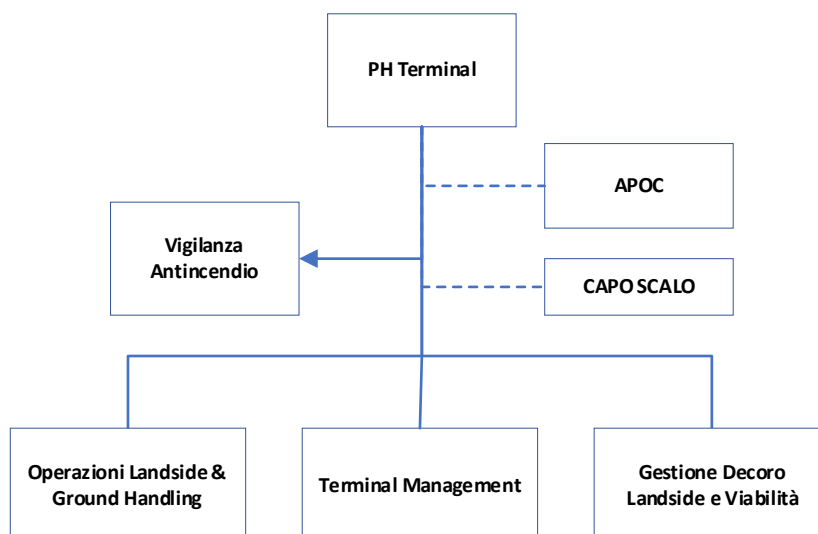
2.1.1.7 Terminal Post Holder

Within the scope of the foreseen functions, the Terminal Post Holder ensures:

- the management of ordinary safety and passenger assistance procedures which, for the purposes of "Safety", concern the connection between the Terminal and the aircraft and, more generally, the air side;
- the drafting and implementation of emergency plans for the parts under their responsibility, more specifically, post rescue procedures in this case;
- the inspection of the handlers' activities for the purpose of verifying the quality of the service and the Safety requirements as per the R.D.S. and the Aerodrome Manual, in liaison with the Compliance Monitoring Management and the Movement Area Post Holder;
- the state of maintenance of the operational assets under their management;
- the implementation, with regard to the area of competence, of Safety policies through the performance of the initiatives identified by the Safety Management System;
- participation in the definition of hazards for the area in question by the Safety and Compliance Monitoring Manager;
- the sharing, where relevant, of the risk analysis of the consequences of hazards drawn up by the Safety Management System and its acceptance, as well as the identification of any mitigation actions for the parts under its responsibility;
- the qualification and training of their own staff involved in the processes underlying certification, in coordination with the Training Manager;
- the management of documentation demonstrating compliance for activities under their responsibility;
- the management, directly or indirectly, of subcontracted activities falling within their area of responsibility, including contractual documents and communications related to Safety and Compliance Monitoring;
- the regulatory adaptation of the activities and procedures for which they are responsible;
- the first-level controls on the processes for which they are responsible.

The Terminal Post Holder is supported by the following organisational structure:

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Any change in the name of the Terminal Area Post Holder must be submitted to ENAC for evaluation and acceptance. The Authority will test the skills of the proposed appointee by examining the curriculum vitae and conducting an interview.

Any change in the responsibilities of the Terminal Area Post Holder and the powers attributed to them must also be submitted to ENAC for evaluation and acceptance. This change is part of the Change Management procedure and must be accompanied by an Organisational Risk Assessment carried out by the Safety and Compliance Monitoring Manager.

See NOTE 2.1.1.4 for support provided by the APOC Manager.

2.1.1.8 Information Security Management System Manager

The role of ISMS Manager, required by EU Regulation 2022/1645, has been assigned to Aeroporti di Roma's ICT Security Manager, who is already responsible for the Information Security Management System (ISMS) certified by ISO/IEC 27001:2022.

As part of their duties, the ISMS Manager:

- establishes an information security policy that defines the organisation's general principles regarding the potential impact of information security risks on aviation security; associates SPI and Objectives with this policy;
- identifies and reviews information security risks, and defines and implements security risk treatment measures in accordance with EU Regulation 2022/1645;
- implements an internal information security reporting scheme; defines and implements the necessary measures to detect and respond to information security events. Identifies

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those events considered incidents with a potential impact on aviation security. In coordination with the SMS, it takes action to report externally to enable the competent authority to take appropriate action.

- monitors the definition and implementation, with the support of Compliance Monitoring, of measures that have been notified by the competent authority relating to the ISMS as an immediate response to a cyber security incident or vulnerability with an impact on aviation security;
- identifies and monitors the implementation of appropriate actions within the ISMS to address the findings notified by the competent authority;
- complies with the requirements for outsourcing to third parties (Supply Chain);
- ensures compliance with staff training requirements;
- ensures compliance with recording and archiving requirements;
- ensures the organisation's compliance with the requirements of Regulation (EU) 2022/1645 and provides feedback on the results to the Accountable Manager in order to ensure the effective implementation of corrective actions within the ISMS;
- protects, without prejudice to applicable incident reporting requirements, the confidentiality of any information that the organisation may have received from other organisations, based on its level of sensitivity.

For more details regarding the Information Security Management System, please refer to the Information Security Management Manual described in Appendix 4 of Part B of the Aerodrome Manual.

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2.1.2 Procedures for continuous supervision in the absence of the responsible officers (Deputy)

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	1)
AMC1-	ADR.OR.D.015 (b)	a)	2)

In order to ensure effective supervision of the Post Holder and Safety and Compliance Monitoring Manager activities, deputies are identified and formalised (through organisational communication) with responsibility for:

- ensuring supervision of the processes for which they are responsible, maintaining the appropriate links with the internal/external bodies involved, even in the event of the absence of the Post Holder (or Safety and Compliance Monitoring Manager) for ordinary reasons (holidays, assignments);
- reporting critical and significant events to the relevant Post Holder (or Safety and Compliance Monitoring Manager), alerting them if action is required;
- participating in Safety Action Groups in support of the Safety Review Board.

Where no deputy is identified, in the event of the absence of the Post Holder, supervision of the activity is ensured by the first reports of the organisational structure, each for their own area of competence, it being understood that the responsibilities remain with the Post Holder and/or Safety and Compliance Monitoring Manager. If decisions need to be made and/or acts and/or documents need to be formalised, the first reports shall submit the required action to the Accountable Manager.

NOTE: Where necessary, with reference to the Company's corporate organisation, the persons to be appointed to the various roles described in this procedure shall be granted the necessary powers of corporate representation and expenditure. The change of the deputy's name is not subject to acceptance by ENAC. The following table shows the references of the deputies appointed at Fiumicino aerodrome.

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Function *	FIRST NAME	E-mail address *	Telephone number
Deputy Safety Compliance Monitoring Manager	Daniele Mauriello	daniele.mauriello@adr.it	
Deputy ISIM Manager	Anna Arnese	Anna.arnese@adr.it	
Deputy Post Holder - Movement Area	Marco Panetta	marco.panetta@adr.it	
Deputy Post Holder - Terminal	TDB	TDB	
Deputy Post Holder FCO airport site planning	Francesco Beltrame	francesco.beltrame@adr.it	
Deputy Infrastructure and Systems Maintenance Post Holder	Claudio Pede	claudio.pede@adr.it	
Deputy Training Manager	Roberto Paladino	roberto.paladino@adr.it	

2.1.3 Aerodrome committees

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.B.040-	f)	2)
AMC1-	ADR.OR.D.005 (b)(9)	a)	
AMC1-	ADR.OR.D.005 (b)(9)	b)	
AMC1-	ADR.OR.D.005 (b)(9)	c)	
AMC1-	ADR.OR.D.005 (b)(9)	c)	1)
AMC1-	ADR.OR.D.005 (b)(9)	c)	2)
AMC1-	ADR.OR.D.005 (b)(9)	c)	3)
AMC1-	ADR.OR.D.005 (b)(9)	c)	4)
IR	ADR.OR.D.027-		
IR	ADR.OR.D.027-	a)	
IR	ADR.OR.D.027-	b)	
AMC1-	ADR.OR.D.027-	a)	
AMC1-	ADR.OR.D.027-	a)	1)
AMC1-	ADR.OR.D.027-	a)	2)

In order to guarantee a widespread commitment to the maintenance of safety requirements at Fiumicino aerodrome and the dissemination of regulatory requirements to all those involved, committees and working groups have been set up with specific functions.

Listed below are the aerodrome safety committees, managed by the Airport Operator and coordinated by the Safety and Compliance Monitoring Manager, who is in charge of:

- taking minutes of meetings, where applicable;
- planning meetings, taking care to involve, depending on the subject matter, the members strictly necessary in accordance with the general criteria of company production efficiency;
- coordinating all activities to bring the objective to fruition, including the management of action plans shared within each committee.

2.1.3.1 Safety Review Board

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(1)	b)	1)
AMC1-	ADR.OR.D.005 (b)(1)	b)	2)
AMC1-	ADR.OR.D.005 (b)(1)	b)	3)
AMC1-	ADR.OR.D.005 (b)(1)	b)	4)
AMC1-	ADR.OR.D.005 (b)(1)	b)	5)
AMC1-	ADR.OR.D.005 (b)(1)	b)	6)

SAFETY REVIEW BOARD

Description: It is an internal committee of the management company that meets regularly with the objective of supporting the Accountable Manager in implementing Safety policies and verifying the compliance of the management system with regulatory requirements.

Chairperson: Accountable Manager

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Post Holder; Maintenance Post Holder; Design Post Holder; Terminal Post Holder, Training Manager, ISMS Manager and their deputies

Objectives:

- Define Safety objectives and Safety Performance Targets (SPT)
- To monitor the progress of safety performance against established policies and targets;
- Review the register of identified risks, verifying their acceptability
- To monitor that the mitigation actions associated with the identification of risks are implemented on time;
- To monitor the effectiveness of Safety Management System processes;
- To ensure that sufficient resources are dedicated to achieve safety objectives.

Standard Agenda:

- Key safety events;
- Progress of SPI indicators (every 3 months) against defined SPT targets;
- Progress of CPI indicators against defined targets;
- Progress of Safety targets (every 6 months);
- Follow up of previous Board actions;
- Follow up on Safety and Compliance actions.
- Change initiatives activated (change management)

Frequency of meetings: At least 6 times per year. The ISMS Manager shall participate at least once a year and when necessary.

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2.1.3.2 Safety Action Group (SAG)

SAFETY ACTION GROUP (SAG)

Description: The Safety Action Group is a permanent or ad hoc group set up to support and act on behalf of the Safety Review Board. More than one Safety Action Group may be set up in relation to the purpose of the group involving figures with specific required competences.

Chairperson: Post Holder owner of the process related to the safety objective

Coordinator: Safety and Compliance Monitoring Manager

Members: The Post Holders and/or their deputies; Safety & Compliance Monitoring Manager and/or their deputy; the managers and specialists of the company departments which, in view of the Safety objective to be achieved, are involved in the implementation processes; Process Stakeholders external to ADR, if deemed necessary for the topics being analysed.

Objectives:

The Safety Review Board establishes safety objectives to be achieved at a time and in a manner deemed appropriate. The Safety and Compliance Monitoring Manager convenes the Safety Action Group, clarifying the objective coordinated with the Safety Review Board, and the time frame.

In particular, the first convening of the Safety Action Group should clarify:

- the objective to be implemented
- the time frames to be respected

The Safety Action Group, being a technical body made up of specialised technical professionals, will act autonomously until the established safety objective is achieved. The Safety and Compliance Monitoring Manager will be responsible for informing the Safety Review Board and, if requested, convening it to review the plan to be implemented or to resolve ongoing issues.

The Safety Action Group also analyses change initiatives, as described in the chapter on the Change Management process.

Each Post Holder is responsible for considering whether to integrate the Safety Action Group with other specialist functions in their own department. The outputs of the Safety Action Groups are minuted and brought to the attention of the Post-holders/Safety & Compliance Monitoring Managers, whether or not they are present at the coordination meetings.

Standard Agenda:

- agenda according to the objectives to be achieved and the change initiatives.

Frequency of meetings: depending on objectives and change initiatives.

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2.1.3.3 Safety Committee

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(7)	a)	
AMC1-	ADR.OR.D.005 (b)(7)	b)	
AMC1-	ADR.OR.D.005 (b)(7)	c)	
AMC1-	ADR.OR.D.027-	b)	

SAFETY COMMITTEE

Description: It is an advisory-type committee whose members, having decision-making autonomy and the ability to assume responsibility towards the outside world, are to be identified within the top management of both public and private organisations present at the airport.

Chairperson: Movement Area Post Holder

Coordinator: Safety and Compliance Monitoring Manager or their representative

Members: Airport Operator (Safety Review Board); Ground Handling Service Providers (Operational Safety Contact Persons); National Flight Assistance Board (Operational Safety Office Manager); Fire Fighting (Airport Detachment Manager or their delegate); Aircraft Operators (AOC Representative); State Police (Manager or their delegate); Carabinieri (Manager or their delegate); Guardia di Finanza (Manager or their delegate)

Objectives:

- Identify objectives for maintaining/improving the safety requirements of apron operations;
- Receive information on significant events and updates on the trend of Safety Performance Indicators against the defined targets in order to identify improvement solutions;
- Developing Safety campaigns for the safe use of the apron area, especially during periods of peak traffic or critical situations such as construction sites, providing pilots with information and supporting documentation prepared for this purpose;
- Promote FOD prevention programmes;
- Monitor the number, type and severity of apron incidents by disseminating recommendations from incident investigation reports and/or ADR Safety Management System risk assessments;
- Promote best practices in order to improve operational safety standards within the apron;
- Evaluate actions useful to mitigate apron risks with regard to infrastructure, organisation of the various parties and procedures useful for the safe operation of the aerodrome;
- Sharing the tools needed to develop and promote a culture of safety within the apron;
- Propose procedural, organisational and infrastructure improvement solutions to improve the aerodrome's Safety requirements.

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Standard Agenda:

- Key safety events;
- Progress of SPI indicators against defined SPT targets;
- Focus on specific aviation safety topics

Frequency of meetings: At least 2 meetings per year

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2.1.3.4 Local Runway Safety Team

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(7)	a) b) c)	
AMC1-	ADR.OR.D.027-	b)	
AMC2-	ADR.OR.D.027-		

LOCAL RUNWAY SAFETY TEAM

Description: It is part of the Safety Committee and is a specialised local group dedicated to manoeuvring area safety. It has the specific task of analysing and assessing the operational safety of the runway in order to be able to concretely contribute to the adoption of suitable corrective and/or preventive measures, aimed at containing and/or reducing the number of events related to incursions/excursions on/from the runway.

Chairperson: Movement Area Post Holder

Coordinator: Safety and Compliance Monitoring Manager or their representative

Members: Airport Operator (Post Holder Movement or their delegate; Maintenance Post Holder or their delegate; Design Post Holder or their delegate); National Flight Assistance Board (Operational Safety Office Manager; Air Traffic Controller Professional Associations Representative); Fire Brigade (Airport Detachment Manager or their delegate); Aircraft Operators (AOC Representative; Airline Principal Pilots Representative; Low Cost Airlines Principal Pilots Representative)

Objectives:

- Identification of objectives to maintain/improve the safety requirements of manoeuvre area operations, including actions to establish hot spot maps and clarity of information reported in PAI;
- Developing Safety campaigns for the safe use of the manoeuvring area, especially during periods of peak traffic or critical situations such as construction sites, providing pilots with information and supporting documentation prepared for this purpose;
- Monitor the number, type and severity of runway incursions against the defined targets, disseminating recommendations from event investigation reports and/or risk assessments from ADR's or ENAV's Safety Management System;
- Implementing best practices also through timely international benchmarking;
- Check that the standard telephony for communication between air traffic controllers and flight crews, vehicles are adequate in accordance with the relevant international regulations;
- Check whether the incidents are not due to incorrect design of LVAs and/or road and vertical markings or their ambiguity, also thanks to the presence of experienced pilots in the Know How team;

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- Verify through investigation reports that all those accessing the manoeuvring area have understood and disseminated within their organisation the procedures of the Aerodrome Manual necessary to mitigate the risks of runway incursion;
- Improve training programmes to ensure that manoeuvring area driving qualifications mitigate the risk of runway incursion;
- Provide suggestions regarding airport change initiatives, practices and procedures in order to identify potential risks of runway incursions and excursions;
- Check the effectiveness of any preventive and corrective actions put in place to mitigate the risk of runway incursion and runway excursion.

Standard Agenda:

- Analysis of runway incursion events;
- Progress of SPI indicators (every 3 months) against defined SPT targets;
- Follow up of previous LRST actions;
- Focus on specific aviation safety topics

Frequency of meetings: At least 4 meetings per year

2.1.3.5 Emergency Response Committee

EMERGENCY RESPONSE COMMITTEE

Description: The Emergency Response Committee is a strategic decision-making committee dedicated to the proper management of emergencies, with the specific task of analysing, testing and re-evaluating aerodrome emergency plans.

It is coordinated by the Airport Operator and is composed of accredited representatives of public and private parties involved in aerodrome emergency management. Accredited members of the Committee are convened from time to time depending on the type of emergency under analysis.

The complete and up-to-date list of bodies and companies involved can be found in the Aerodrome Emergency Plan.

Coordinator: Safety and Compliance Monitoring Manager or their representative

Members:

National Civil Aviation Authority (Aerodrome Director)
Aerodrome Operator (Safety Board)
Ground Handling Service Providers (Operational Safety Contact Person)
National Flight Assistance Board (Operational Safety Office Manager)
Fire Service (Aerodrome Detachment Manager or their delegate)
Aircraft Operators (AOC Representative)
State Police (Manager or their delegate)
Carabinieri (Manager or their delegate)
Guardia di Finanza (Manager or their delegate)
Air Health (Manager or their delegate)
Local Health Service (Manager or their delegate)

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Port Authority (Manager or their delegate)

Municipal Police (Chief Officer or their representative)

Objectives:

- Identification and periodic review of aerodrome critical event scenarios;
- Identification of objectives for maintaining/improving crisis management requirements;
- Ensure the coordination of the Aerodrome Emergency Plan with the local emergency plans and those of other organisations, involving in the ERC bodies and companies operating outside the aerodrome;
- Assistance in the planning of total or partial exercises of the various types of events;
- Implementation of the de-briefing of exercises or significant events pertaining to the AEP defining, where necessary, appropriate improvement actions that each subject, for the parts under their competence, must adopt in order to guarantee an effective management of the events;
- Sharing and approval of all parts of the AEP and its updates;
- Sharing information on best practices adopted at other international airports in order to continually improve the critical incident management process;
- Periodic assessment of the list of alarm systems, facilities and equipment that the manager makes available for emergency management purposes;

Standard Agenda:

- Depending on emergency planning needs

Frequency of meetings: At least 3 meetings per year

2.1.3.6 Other committees

By virtue of the coordinating role assigned to the manager, pursuant to EU Regulation 139/2014, further Committees/Working Groups have been convened/established to improve communication and decision-making processes between public and private parties operating at Fiumicino Airport.

ADR-Fire Brigade (VVF) MANAGEMENT TEAM

Description: technical working table set up as part of the Framework Agreement between the Manager and the Provincial Fire Brigade (VVF) of Rome.

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder (ADR), Safety and Compliance Monitoring Manager (ADR), Aerodrome Sector Manager of the Provincial Fire Brigade (VVF).

Objectives:

- To share and analyse issues concerning the maintenance of safety levels at Fiumicino aerodrome for airside operations in relation to the fire-fighting service for air transport, in compliance with the roles and responsibilities that national legislation entrusts to the Fire Brigade;

The working group can be enlarged, depending on the topics covered, to include other figures from both sides.

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Standard Agenda:

- Depending on the specific topics to be covered

Frequency of meetings: At least 3 meetings per year

GDL LOCAL GOVERNMENT

Description: technical working table involving local authorities and the Manager.

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder (ADR), Safety and Compliance Monitoring Manager (ADR); Aerodrome Sector Manager of the Provincial Fire Brigade (VVF), Mayor of the Municipality of Fiumicino (or their delegate), Commander of the Local Police Corps of the Municipality of Fiumicino (or their delegate), Local Civil Protection.

Objectives:

- Coordination of actions necessary for the mitigation of risks that the territory may generate and that may affect aircraft operations and/or the management of a possible accidental event in accordance with the provisions of EU Regulation 139/14 and related regulations and national legislation on liability in the aerodrome environment

Standard Agenda:

- Depending on the specific topics to be covered

Frequency of meetings: At least 2 meetings per year

GDL STATE BODIES

Description: Coordination group between the Manager and the State bodies operating at the aerodrome.

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder (ADR); Safety and Compliance Monitoring Manager (ADR), Security Manager (ADR), State Police (Chief Officer or their representative), Carabinieri (Chief Officer or their representative), Guardia di Finanza (Chief Officer or their representative)

Objectives:

- Coordination of the actions necessary to mitigate risks in the area of movement, where the support of the Police is useful, with particular reference to the actions arising within the framework of the Aerodrome Emergency Plan

Standard Agenda:

- Depending on the specific topics to be covered

Frequency of meetings: At least 2 meetings per year

FUELLING MANAGEMENT TEAM

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Description: technical working group set up to coordinate communication on fuel quality issues and refuelling procedures between the Manager and the subjects operating at the Aerodrome.

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder or their representative (ADR); Safety and Compliance Monitoring Manager or their representative (ADR); Depot Manager Concessionaire; Aircraft refuelling company (Into-plane).

Objectives:

- Coordination and Communication between the bodies/companies involved in the Fuel Quality Management process, in order to maintain high standards of Safety in Aerodrome Operations and in the refuelling process.

Standard Agenda:

- State of actions;
- Supply progress;
- Airside activities with potential impact on fuel quality and refuelling procedures;
- Problems identified (quality, refuelling procedures and spills);
- Performance indicator progress
- Regulatory updates;
- Proposals for improvement;
- State of actions updates.

Frequency of meetings: At least 4 meetings per year

GROUND HANDLING SAFETY TEAM

Description: coordination group between the Operator and the main Handling Companies operating at the Airport

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder or their delegate (ADR); Safety and Compliance Monitoring Manager or their delegate (ADR), Training Manager or their delegate (ADR), safety contact persons; Full handling company and ramp supervision.

Objectives:

- Committee set up in order to harmonise communications between the subjects operating at the airport directly involved in the management of ground handling activities, in order to guarantee compliance with the safety requirements of EU Regulation 139/14 and similar regulations.

Standard Agenda:

- State of actions;
- Progress of incidents: events/critical issues encountered in handling activities;
- Planned Airside activities that could affect handling activities;
- Technical Regulatory Updates on handling/standardisation procedures;

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- Proposals for improvement;
- Action Definition;

Frequency of meetings: At least 4 meetings per year

GDL AERONAUTICAL MAINTENANCE COMPANY

Description: Coordination group between the Manager and the companies involved in aircraft maintenance.

Coordinator: Safety and Compliance Monitoring Manager

Members: Movement Area Post Holder or their delegate (ADR); Safety and Compliance Monitoring Manager or their delegate (ADR), Aircraft Maintenance Companies operating at the Airport

Objectives:

- Committee set up in order to guarantee effective and efficient coordination between the Airport Operator and the companies/entities involved in aeronautical maintenance activities, in order to ensure compliance with the safety requirements of EU Regulation 139/14 and related regulations.

Standard Agenda:

- Action Status;
- Progress of incidents: events/critical issues encountered at the airport;
- Technical Regulatory Updates on aeronautical maintenance activities impacting on safety/standardisation procedures;
- Proposals for improvement;
- Action Definition.

Frequency of meetings: At least 1 meeting per year

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2.2 SAFETY MANAGEMENT SYSTEM

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (c)	h)	
AMC2-	ADR.OR.D.005 (c)	a)	
AMC2-	ADR.OR.D.005 (c)	b)	12)

2.2.1 Purpose of the Safety Management System

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(1)	a)	2)
AMC2-	ADR.OR.D.005 (c)	b)	1)

The Italian word “security” (safety) comes from the Latin “sine cura”, meaning the absence of worry. Aviation Safety (hereinafter referred to as safety) is intended, for the purposes of this document, as "the ideal condition achieved through the set of activities aimed at preventing accidents involving aircraft and their occupants and therefore protecting public safety and the preservation of aeronautical resources". Safety in this sense is not a permanent condition, but a goal to be reached through a process of continuous improvement.

The ICAO (International Civil Aviation Organization) defines Safety as "the state in which the possibility of

harm to persons or property damage is reduced to, and maintained at or below, an acceptable level through a continuing process of hazard identification and risk management".

Safety Management is a discipline, based on the application of special systematic management techniques, aimed at identifying and controlling unwanted incidents or conditions throughout the life cycle of a project, programme or activity. The main objective is accident prevention. Accident prevention can be achieved through the identification, assessment, elimination or control of so-called safety-related hazards up to levels considered acceptable and controllable. The implementation of an SMS requires the involvement of the highest management levels in order to pursue a programme that ensures:

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- the definition of a management philosophy that always recognises the existence of potential safety concerns, defines organisational standards and confirms that safety is everyone's responsibility;
- the determining of a strategy for achieving safety by identifying clear responsibilities, roles and corporate priorities;
- continuous checks on the company's situation by means of appropriate and effective procedures that emphasise the importance of a positive safety culture, providing for corrective action where any critical issues are identified.

In 2006, Aeroporti di Roma S.p.A. adopted a Safety Management System for Fiumicino Aerodrome, in compliance with national and international regulations.

Aeroporti di Roma S.p.A, implements and guarantees this system over time in order to ensure compliance with these essential requirements of Regulation (EU) No 2018/1139 and corresponding Implementing Rules contained in EU Reg. 139/14 with a view to the continuous proactive improvement of aerodrome safety. Furthermore, in compliance with the requirements of EU Regulation 2022/1645, Aeroporti di Roma has implemented an Information Security Management System (ISMS) that provides for coordination and integration with the Safety Management System for the overall management of cyber security risks that could have an impact on aviation safety.

For more details on the Information Security Management System, please refer to the Information Security Management Manual described in Appendix 4 of Part B of the Aerodrome Manual.

The management system comprises the organisational structures, responsibilities, competencies, policies and procedures set out in the following chapters.

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2.2.2 Safety policy and Safety Objectives

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	2)
AMC1-	ADR.OR.D.005 (b)(2)	a)	
AMC1-	ADR.OR.D.005 (b)(2)	a)	1)
AMC1-	ADR.OR.D.005 (b)(2)	a)	2)
AMC1-	ADR.OR.D.005 (b)(2)	a)	3)
AMC1-	ADR.OR.D.005 (b)(2)	a)	4)
AMC1-	ADR.OR.D.005 (b)(2)	a)	5)
AMC1-	ADR.OR.D.005 (b)(2)	a)	6)
AMC1-	ADR.OR.D.005 (b)(2)	b)	
AMC1-	ADR.OR.D.005 (b)(2)	b)	1)
AMC1-	ADR.OR.D.005 (b)(2)	b)	2)
AMC1-	ADR.OR.D.005 (b)(2)	b)	3)
AMC1-	ADR.OR.D.005 (b)(2)	b)	4)
AMC1-	ADR.OR.D.005 (b)(2)	c)	
AMC1-	ADR.OR.D.005 (b)(2)	c)	1)
AMC1-	ADR.OR.D.005 (b)(2)	c)	2)
AMC1-	ADR.OR.D.005 (b)(2)	c)	3)

2.2.2.1 Safety Policy

Below is the Safety Policy currently in force, signed by the Accountable Manager on 21/07/2020 and shared at the Safety Review Board.

The Safety Policy is reassessed annually at the Safety Review Board to ensure that it remains appropriate for the organisation.

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Safety Policy

La Safety è il valore imprescindibile alla base del core business di Aeroporti di Roma.

L'Accountable Manager e tutto il Management di Aeroporti di Roma si impegnano a stabilire, sviluppare, mantenere e migliorare costantemente strategie e processi per garantire che tutte le operazioni aeronautiche siano eseguite in un contesto di risorse adeguate, al fine di raggiungere i più elevati livelli di safety possibili.

A partire dall'Accountable Manager, tutti i dipendenti sono responsabili del raggiungimento di tali livelli di safety.

Il nostro impegno consiste nel:

- **Assicurare che la safety sia il valore imprescindibile**
per tutti i manager e dipendenti;
- **Garantire la gestione della safety**
mediante il ricorso ad adeguate risorse, facendo sì che ciò produca nell'organizzazione una cultura che stimoli l'adozione di prassi sicure;
- **Definire chiaramente le responsabilità per tutto il personale,**
manager e dipendenti, ed il loro coinvolgimento nella gestione e nel raggiungimento delle performance di safety dell'organizzazione;
- **Assicurare che siano impiegate sufficienti risorse umane**
con adeguate competenze e formazione;
- **Garantire la formazione sulla safety**
a tutte le unità del personale in base al loro ruolo;
- **Stabilire e attuare processi di individuazione dei pericoli e di gestione dei rischi,**
per eliminare o mitigare ad un livello di accettabilità i rischi legati alle operazioni degli aeromobili;
- **Incoraggiare la segnalazione di eventi aeronautici**
utili all'individuazione delle root causes e azioni di mitigazione promuovendo la just culture;
- **Garantire che nessuna misura punitiva o sanzionatoria venga adottata**
nei confronti dei dipendenti che riportino problematiche di safety, fatto salvo che tale segnalazione non indichi che è stato commesso un atto illecito, negligenza grave, o inadempimento deliberato o volontario di regolamenti o procedure;
- **Definire e misurare i livelli di safety performance**
attraverso adeguati safety indicator e definire realistici target anche secondo logiche di *benchmarking* internazionale;
- **Promuovere il miglioramento continuo**
attraverso un continuo processo di monitoraggio, raggiungimento ed innalzamento delle performance di safety;
- **Assicurare la fornitura dei servizi di apron management**
attraverso l'attuazione di quanto previsto dal Manuale di Aeroporto per le parti di competenza;
- **Rispettare i requisiti e le norme legislative e regolamentari**
e perseguire, laddove attuabile, le *best practice* internazionali;
- **Verificare che le terze parti**
che effettuano operazioni in airside, operino nel rispetto dei criteri di safety stabiliti a livello locale, nazionale ed internazionale.

Fiumicino, 01/11/2024

L'Accountable Manager
Paolo Giannobile

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Safety Policy

Safety is the value behind the core business of Aeroporti di Roma.

The Accountable Manager and all the Management of Aeroporti di Roma are committed to establishing, developing, maintaining and continuously improving strategies and processes to ensure that all aeronautical operations are performed in an environment of adequate resources, in order to achieve the highest levels of safety.

Starting with the Accountable Manager, all the employees are responsible for achieving these safety levels.

Our commitment is to:

- **Ensure that safety is the underlying value** for all managers and employees;
- **Ensure the management of safety** through the use of appropriate resources, ensuring that this produces a culture in the organisation that stimulates the adoption of safe practices;
- **Clearly define responsibilities for all personnel**, managers and employees, and their involvement in the management and achievement of the organisation's safety performance;
- **Ensure that sufficient human resources are deployed** with adequate skills and training;
- **Provide safety training** to all staff according with their role;
- **Establish and implement hazard identification and risk management processes** to eliminate or mitigate to an acceptable level the risks associated with aircraft operations;
- **Encourage the reporting of aviation events** useful for the identification of root causes and mitigation actions by promoting just culture;
- **Ensure that no punitive or sanctioning measures are taken** against employees who report safety issues, unless such a report indicates that an unlawful act, gross negligence, or deliberate or wilful failure to comply with regulations or procedures has been committed;
- **Define and measure levels of safety performance** through appropriate safety indicators and define realistic targets also according to international *benchmarking*;
- **Promote continuous improvement** through a continuous process of monitoring, achieving and raising safety performance;
- **Ensure the provision of apron management services** through the implementation of the provisions of the Airport Manual for the relevant parts;;
- **Comply with rules and procedures** and pursue, where practicable, international best practices;
- **Ensure that third parties** that carry out airside operations are compliant with local, national and international safety standards;

Fiumicino, 01/11/2024

The Accountable Manager

Paolo Giannobile

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2.2.2.2 Safety Objectives

In accordance with the principles expressed in the Safety Policy, Aeroporti di Roma identifies Safety objectives on an annual basis during the Safety Review Board, which provide the basis for the Safety Performance Monitoring process described in paragraph 2.2.7.

Safety Objectives may be (ref. DOC ICAO 9859):

- Process-oriented: objectives expressed in terms of the behaviour expected of staff or the effectiveness of the actions implemented by the organisation to manage the safety risks.
- Result-oriented: objectives expressed in terms of actions related to the containment of accidents or operational losses.

The Safety Objectives are listed in the appendix to Part B-2-A2 - Safety Objective and are monitored annually in the Safety Review Board.

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2.2.3 Safety responsibilities of key personnel

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(1)		
AMC1-	ADR.OR.D.005 (b)(1)	a)	2)
AMC2-	ADR.OR.D.005 (c)	b)	3)

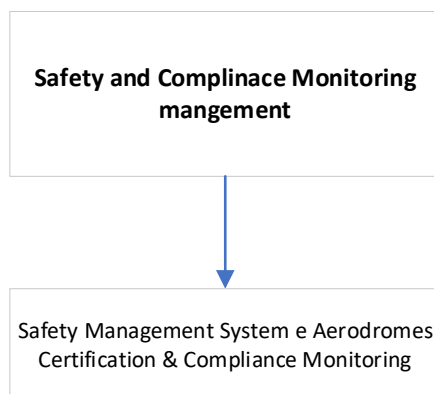
As reported in chapter 2.1 of this Manual, Aeroporti di Roma S.p.A has an internal organisation in which figures are identified who have a key role in maintaining the aerodrome's Safety requirements.

These figures are the Accountable Manager, the Post Holders, the Safety & Compliance Monitoring Manager and the Training Manager and the ISMS Manager.

Post Holders are responsible for implementing the aerodrome's safety policies as well as carrying out the processes under their control in fulfilment of the essential requirements of Regulation (EU) No 2018/1139 and corresponding Implementing Rules contained in Reg. EU no. 139/14.

All key Safety personnel are also involved, starting with the Post Holders, in the effective operation of the SMS through participation in the aerodrome committees referred to in paragraph 2.1.3 of this Manual, as well as in the reporting of Safety events in accordance with the provisions of paragraph 2.2.8 of this Manual and compliance with the Safety Provisions in the applicable Volumes 1-6 E-15 DDS.

The Safety and Compliance Monitoring Manager is responsible for the Safety Management System and all processes described in this chapter. Below is the organisational chart of the Safety and Compliance structure:



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The Safety and Compliance Monitoring Manager is obliged to share the findings of investigation reports, audits and risk assessments with the relevant Post Holders.

The Safety & Compliance Monitoring Manager is classified within the certification figures, guaranteeing direct reporting to the Accountable Manager and appropriate independence from the post holders.

The names responsible for the organisational units depicted in the organisational chart above are given in the relevant organisational communication.

The Safety Management System takes care of business activities through:

- the management of the Risk Management process and the related Hazard Identification and Risk Assessment tools, including the implementation of the risk register;
- monitoring the implementation and effectiveness of the mitigation actions identified in the Risk Management process;
- the management of infrastructural, organisational and procedural changes with an impact on the management system or on the safety of operations, including the management of prescriptions/mitigation actions identified through the work of the Safety Action Group;
- the management of the Reporting System with the reporting of mandated events to ENAC and the analysis and investigation of aeronautical accidents and incidents;
- the coordination of the aerodrome emergency plan;
- the coordination of the Safety Action Groups for the processes identified by the Safety and Compliance Monitoring Manager;
- the promotion of safety, including activities to raise staff awareness of safety management and the dissemination of recommendations resulting from reports, dedicated statistics, the analysis of key performance indicators, the investigation of accidents, incidents, etc.;
- supporting the Safety and Compliance Monitoring Manager in the management of the Local Runway Safety Team, the Safety Committee, the Safety Review Board and the other Committees listed in paragraph 2.1.3.6;
- identifying and proposing to the Safety and Compliance Monitoring Manager the training of personnel on safety management for the process under their responsibility.

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2.2.4 Document management and review

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.B.050-	a)	
IR	ADR.OR.B.050-	b)	
AMC2-	ADR.OR.D.005 (c)	b)	4)

The Safety & Compliance Monitoring Manager ensures the monitoring of the implementation, the evaluation of the effectiveness and the updating of the chapters on the Safety Management System and Compliance Monitoring Management as a result of changes in the applicable regulations, as well as any other contingent changes that require adaptation.

The Safety & Compliance Monitoring Manager is also responsible for informing and training those concerned about the contents of the chapter.

Updating of the Safety Management System and Compliance Monitoring Management chapters are carried out in accordance with Section 0-Part A of the Aerodrome Manual.

The Safety & Compliance Monitoring Manager is in charge of the updating, dissemination and archiving of the Aerodrome Manual through the record keeper reporting directly to them.

Document Control Procedures: all the outputs of the Safety Management System listed in paragraph 2.2.12 of this Manual are prepared by SMS personnel who can be supported, where necessary, by third parties (certifying bodies, consulting companies, test and analysis laboratories). All documents produced are subject to review and approval as reported in paragraph 2.2.12.

2.2.4.1 Distribution list

This document follows the distribution list in Part A of the Aerodrome Manual.

2.2.4.2 Record Keeping

A paper copy of the document is kept on file with the record keeper of the Safety & Compliance Monitoring Manager.

A verified computer copy, in PDF format, of the document is stored on the company server.

The following matrix shows the place of filing, the type of filing and the years of filing of all Safety & Compliance Monitoring Management documents that are subject to strict compliance with the document control procedure:

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DOCUMENT	FORMAT	PAPER ARCHIVING	ELECTRONIC ARCHIVING	DURATION OF ARCHIVING
Hazard list	Electronic	/	Corporate server	10 years
Risk assessment Report	Electronic	/	Corporate server	10 years
Risk Register	Electronic	/	Corporate server	10 years
Reporting System	Electronic	/	SMS computer system	10 years
Audit Reports	Electronic Paper (Audit Part II only)	At the S&CMM Record Keeping office	SMS computer system	10 years
Investigation Reports	Electronic	/	Corporate server	Unrestricted
Safety Notices	Electronic	/	Corporate server	Unrestricted
Safety Committee minutes	Electronic	/	Corporate server	10 years
Safety Promotion	Electronic	/	Corporate server	10 years
Aerodrome Manual, appendices and attachments.	Electronic Paper	At the S&CMM Record Keeping office	Corporate server	5 years
Monitoring Indicators of Safety Performance	Electronic	/	Corporate server	5 years
Annual Safety review	Electronic Paper	At the S&CMM Record Keeping office	Corporate server	5 years
Change management report/ Safety Assessment	Electronic	/	Corporate server	5 years
Internal audit reports	Electronic Paper	Presso ufficio Record Keeping S&CMM	SMS computer system	10 years

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2.2.5 Risk identification and hazard assessment

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	3)
IR	ADR.OR.D.005-	b)	4)
AMC1-	ADR.OR.D.005 (b)(4)	a)	
AMC1-	ADR.OR.D.005 (b)(4)	b)	
AMC2-	ADR.OR.D.005 (c)	b)	5)
IR	IS.D.OR.205		
IR	IS.D.OR.210		
IR	IS.D.OR.220		

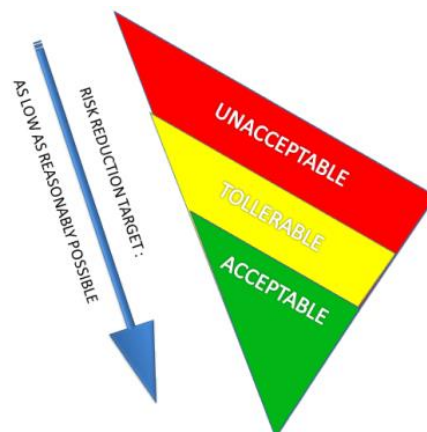
The Safety Risk Management process is a continuous and dynamic process carried out as part of the activities and processes concerning the safety of Airside operations. Risk management is therefore an iterative process, subject to updates, and does not end with the initial identification of the risk. The outline of this process is made up of several interlinked and consequential steps. The objective here is to eliminate or mitigate to an acceptable level the risks associated with aircraft operations.

In order to clarify the process described in this chapter, the definitions of hazard and risk are given below:

- **HAZARD:** A condition, incident or circumstance that may lead to or contribute to an unwanted or unforeseen event.
- **RISK:** the possibility that a hazardous condition may manifest itself in unwanted events, expressed as a function of frequency of occurrence and severity of consequences.

Proper risk assessment is therefore based on the objective collection of data on the frequency and severity related to a specific hazard. In essence, what characterises such evaluations is the method one chooses to use, its homogeneity, objectivity and reliability.

The objectivity and reliability of the result depends directly on the accuracy of each step.



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2.2.5.1 Hazard identification

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(3)	a)	

ADR's hazard identification process is based on the application of the brain storming technique within the (formally established) Safety Action Group.

Supported by the experience of its members, as well as by the main international references (ICAO, CAA, EICAST), the SAG identified the areas subject to risk in Airside operations, against which specific hazards were identified. The list of identified hazards is therefore divided by category with reference to the areas mentioned above. These hazard categories are:

- Environmental
- Infrastructural
- Facilities
- Operational
- Handling
- External hazard
- Organisation

Hazard monitoring is an ongoing process carried out as part of the manager's activities, so the hazard list is an open document and subject to updates. Nevertheless, an annual re-evaluation of the hazard list is formalised to check its adequacy. Additions to the hazard list may result from :

- Reporting System findings;
- Audit findings;
- Operations monitoring activity findings;
- SPI progress analysis;
- Training activity findings;
- Changes to national or international regulations;
- Investigation reports/recommendations of national and international investigative authorities;
- Change Management Process findings.

The hazards in the list are uniquely identified by a code and a description, and this information is stored in the SMS database. For each of them, a description and definition of the undesirable operational state (UOS) has been given according to the definitions below:

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HAZARD	A hazard is a condition or an object with the potential to cause death, injuries to personnel, damage to equipment or structures, loss of material, or reduction of the ability to perform a prescribed function. (ICAO)
UNDESIRABLE OPERATIONAL STATE	The stage in an accident scenario where the scenario has escalated so far that (excluding providence) the accident can be avoided only through successful recovery measure(s). (ARMS)

2.2.5.2 Hazard analysis

The hazard analysis allows the assessment of the risk level of the associated consequences and the subsequent identification of appropriate mitigation/improvement measures. The purpose of this analysis is to provide a description of the causes and consequences of the hazard and of preventive and/or mitigating processes and procedures put in place for said hazard.

All hazards identified by the manager are managed through continuous monitoring. The priority for updating risk assessments using the bow tie method, described below, is based on critical issues identified by the whole organisation through the reporting and auditing system or by needs related to significant changes. In any case, the risk assessments of the hazard list are reissued at a maximum frequency of 5 years.

The analysis process is based on the Bow tie methodology and can be outlined in 5 steps:

Step 1 - identification of the Undesirable Operational State (UOS)

The first stage is to identify the undesirable event in relation to the hazard, i.e. the stage in an accident scenario where the scenario has reached the point where (excluding providence) the accident can only be avoided by effective mitigation barriers.

Step 2 - Threat identification

Threat identification consists of assessing all potential contributory elements, such as conditions, activities, procedures, that may lead to the occurrence of the UOS.

Step 3 - Consequence identification

The identification of consequences consists of the assessment of potential injury to personnel or passengers, damage to aircraft, vehicles, equipment or infrastructure, and inability to perform a specific function as a result of the UOS.

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As part of the SMS activity, the identification of consequences consists, where possible, of searching for the types of occurrences related to the hazard. These occurrences are, in fact, usually the consequences of the UOS identified for each hazard.

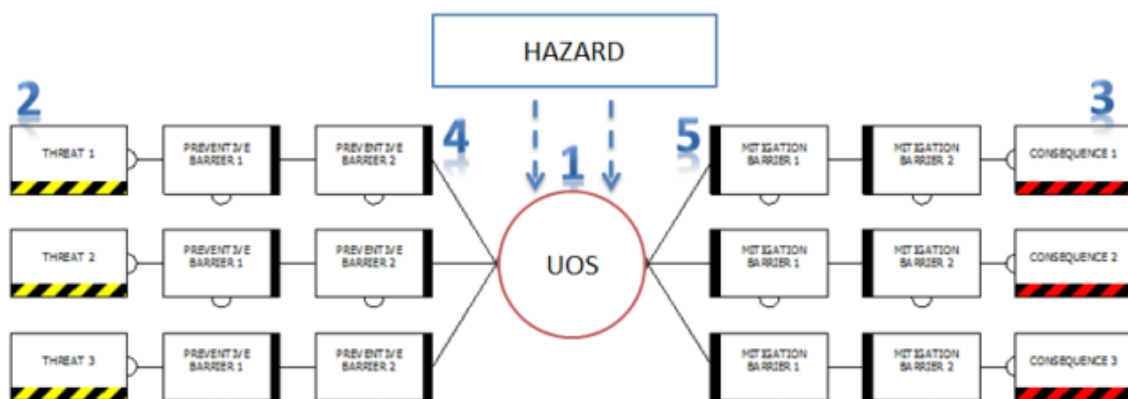
By processing the data in the SMS reporting system, it will be possible to report in this section the number of events, their types and the severity recorded . The data can be supplemented with evaluations of the surveys carried out and the distribution of the types of causes found for these events. In the analysis of occurrences, account will be taken not only of individual events but also of their time-span and thus their trend. The subsequent risk assessment will refer to this data.

Steps 4 and 5 - Identification of barriers

Barriers can be of a preventive or mitigation nature. The former constitute an element of control in order to reduce the possibility of the UOS manifesting itself in the face of a given threat. The latter constitute a dimitigation element of the possible consequences arising from the UOS.

In general, barriers can usually be equated to processes or procedures. In order to assess its effectiveness, this section may therefore report on the audits carried out, the bodies/processes audited and any findings that are still open, indicating their closure times and/or any deadlines not met.

The graphical representation of what emerged from this analysis phase makes it possible to visualise all the elements relevant to the hazard identified and constitutes the working basis for the risk assessment.



The analysis phase is carried out by SAGs, coordinated by SMS staff with the involvement of experienced personnel from within or outside ADR. As part of this analysis, a hazard log is compiled and described in the relevant section.

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2.2.5.3 Risk assessment

The risk assessment is the analysis of the safety risks of the consequences of the hazards that have been determined. The risk analysis breaks down risk into two components: the probability of the occurrence of a harmful incident or condition, and the severity of the incident or condition, should it occur.

Once the hazard analysis phase has been completed and threats, consequences and barriers have been defined, a risk assessment is carried out for all consequences identified in the analysis phase. The assignment of the risk level is then made on the basis of the prepared risk matrix.

Risk assessment matrix

Following comparisons of national and international experiences, as well as experiences gained at local level, it was decided to adopt a risk assessment matrix inspired by the model adopted by the ICAO, whose characteristics are described below:

- PROBABILITY

In order to assess the probability of the occurrence of a consequence, indicative benchmarks have been defined which may refer to recorded or assumed frequencies.

Probability - definition				
Extremely improbable 1	Improbable 2	Remote 3	Occasional 4	Frequent 5
Event with a numerical probability of occurrence of less than 1×10^{-9} , in relation to the total number of operations/movements (frequency of occurrence over 100 years).	Event with a numerical probability of occurrence of less than 1×10^{-7} , but greater than or equal to 1×10^{-9} , in relation to the total number of operations/movements (frequency of occurrence once every 10-100 years).	Event with a numerical probability of occurrence of less than 1×10^{-5} , but greater than or equal to 1×10^{-7} , in relation to the total number of operations/movements (frequency of occurrence once a year).	Event with a numerical probability of occurrence of less than 1×10^{-3} , but greater than or equal to 1×10^{-5} , in relation to the total number of operations/movements (frequency of occurrence once a month).	Event with a numerical probability of occurrence greater than or equal to 1×10^{-3} , in relation to the total number of operations/movements (frequency of occurrence once a week).

- SEVERITY

In order to assess the severity of a consequence, benchmarks associated with 2 categories have been defined: Injuries to persons and damage to property.

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Five levels of severity are defined in relation to these categories (ref. ICAO DOC 9859 and ICAO DOC 9981 - Table I-3-Act B-1):

SEVERITY	Meaning	Examples
Catastrophic A	- Aircraft/goods destroyed - Multiple fatal injuries	- Collision between aircraft and/or other objects during take-off or landing
Hazardous B	- Large reduction in Safety margins; physical stress or workload such that the operator cannot be relied upon to carry out their tasks accurately or in full - Significant injuries - Significant damage to the aircraft/goods	- Runway Incursion with potential risk of collision; extreme avoidance actions to avoid collision - Attempt to take off or land on a closed or occupied runway - Take-off and landing related incidents such as overruns or undershoots
Major C	- Significant reduction in safety margins; reduction in the operator's ability to cope with adverse operating conditions due to increased workload or conditions affecting efficiency. - Damage to aircraft/goods - Minor injuries	- Runway Incursion with ample margin - in time and space - for recovery (no risk of collision) - Collision of aircraft with obstacles on the apron or during parking manoeuvres - Person falling from a great height - Missed landing with wing tip touching the ground - Significant fuel spillage in the vicinity of aircraft with passengers on board
Minor D	- Discomfort; minor injuries not requiring medical examination - Operational limitations - Use of emergency procedures - Slight or negligible damage to the aircraft/asset	- Sudden braking during landing or taxiing - Damage to property due to jet blasts - Material scattered at the stand - Collision between vehicles on vehicular roads - Tow bar breakage during push-back manoeuvre (damage to aircraft) - Slight exceeding of maximum take-off load without Safety consequences - Aircraft contact with passenger air bridge without damage requiring immediate repair - Forklift imbalance - Complex taxi instructions/procedures
Negligible E	- Non-significant consequences (no or negligible injuries; no or negligible damage)	- Slight increase in braking distance - Temporary breaking of fences due to strong winds - Loss of baggage from rolling stock

Safety Action Group and assessment methods

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The risk assessment (inherent and residual) is carried out by a SAG coordinated by Safety Management System personnel with the support of qualified experts in the area of interest.

Since the evaluation of the inherent risk does not take into account the barriers implemented to mitigate the risk, its evaluation is carried out in a purely qualitative manner considering the "worst credible case" in terms of severity and frequent probability of occurrence.

The residual risk assessment of the consequences of a UOS identified in the analysis phase can be supported, if available, by occurrences recorded within the reporting system whose frequency of occurrence is influenced by the barriers in place.

In any case, the principle underlying the assignment of severity and probability is to refer to the "worst credible case".

The matrix used allows for the clear identification of inherent and residual risk levels.

<i>Risk Probability</i>						
EXTREMELY IMPROBABLE 1	IMPROBABLE 2	REMOTE 3	OCCASIONAL 4	FREQUENT 5		
1A	2A	3A	4A	5A	CATASTROPHIC A	<i>Risk Severity</i>
1B	2B	3B	4B	5B	HAZARDOUS B	
1C-	2C-	3C-	4C-	5C-	MAJOR C	
1D-	2D-	3D-	4D-	5D-	MINOR D	
1E-	2E-	3E-	4E-	5E-	NEGLIGIBLE E	

Once the level of residual risk associated with the consequences has been established, an assessment is made as to whether this risk is deemed acceptable or not. The matrix used (shown above) allows the clear identification of residual risk levels and their acceptability or otherwise.

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The residual risk is defined as unacceptable, tolerable or acceptable and a description of the actions to be taken in identified cases is given below:

➤ **UNACCEPTABLE (red):**

Immediate mitigating actions must be implemented in order to reduce this level to at least a tolerable value before operations resume.

➤ **TOLERABLE (yellow):**

Mitigating actions need to be assessed.

➤ **ACCEPTABLE (green):**

No action is necessary. Eventual improvement actions can be undertaken to optimise operations.

It is important to emphasise that the tolerable risk may be generated by the probability of occurrence of the worst credible case, and although it may be mitigated in terms of probability, the severity may be such that the risk falls into this area.

The residual risk, i.e. the risk that results from the effectiveness and efficiency of the identified barriers, is accepted even though it is placed in the yellow risk matrix.

In fact, the area of the matrix identifies the probability and magnitude that the worst credible case may occur, and therefore that several barriers identified at the same time may not be effective due to circumstances that are not easily foreseeable, also in consideration of the principles of human factors, and that, as a consequence, an accident may occur.

All risks with effective identified barriers are therefore considered acceptable. The inherent and/or residual risk assessment carried out is then updated if one of the following situations occurs :

- significant or abnormal increase in reports of incidents related to the identified hazard;
- significant ineffectiveness of hazard-related preventive or mitigation barriers;
- major organisational, infrastructural and procedural changes related to the identified hazard;

Risk acceptance

Once the associated residual risk level has been established, the Safety & Compliance Monitoring Manager and the Post Holders involved in the hazard analysis, who have the authority to make decisions about the tolerability of the risk, assess whether or not the risk is acceptable by signing the assessment document.

If there is a disagreement between the relevant Post Holder and the Safety & Compliance Monitoring Manager, the final decision is referred to the Accountable Manager.

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2.2.5.4 Risk Assessment Report and hazard log

The Risk Assessment Report and the hazard log (risk register) are the documents summarising the process of analysing, assessing and possibly mitigating the risk associated with a given hazard.

The compilation and updating of this documentation is the responsibility of the Safety Management System personnel, also in order to guarantee the traceability of the activities carried out in relation to each hazard.

Risk Assessment Report

The Risk Assessment Report (RAR) is a descriptive document, summarising all the hazard analysis carried out and the related risk assessment. It sets out the mitigation actions identified by the SAG.

The person responsible for compiling the RAR shall forward copies of the RAR to the members of the SAG, PHs and any company representatives concerned for the implementation of mitigation actions.

Hazard log (Risk register)

The hazard log/risk register is a summary diagram of the hazard constituents identified in the hazard analysis and the associated risk assessment. This document is updated in accordance with the relevant Risk Assessment Report and is reassessed annually at the Safety Review Board.

2.2.5.5 Cyber Security Risk Management

The Cyber Security Risk Management process consists of identifying, analysing, assessing and treating risks relating to Information Security.

In order to achieve an integrated approach to managing cyber risks with a potential impact on aviation safety, the ISMS Manager, taking into account the results of the annual Risk Analysis Report, will notify the Safety & Compliance Monitoring Manager of any new threats identified in the field of IT security so that a reassessment of the Cyber Security Risk Assessment can be considered.

This process ensures that emerging threats are promptly assessed and dealt with in a synergistic manner.

For more details on the Information Security Management System, please refer to the Information Security Management Manual described in Appendix 4 of Part B of the Airport Manual.

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2.2.6 Risk mitigation measures

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	4)
AMC1-	ADR.OR.D.005 (b)(4)	a)	
AMC2-	ADR.OR.D.005 (c)	b)	6)

Risk mitigation measures resulting from the analyses and assessments carried out by the Safety Management System and shared with the involved Post Holders/deputy must be decided directly by the Post Holder/deputy on the basis of their own know-how. If, on the other hand, they are proposed by the Safety & Compliance Monitoring Manager, they must be shared and accepted by the relevant Post Holder in order to guarantee their feasibility.

If there is a disagreement between the relevant Post Holder and the Safety & Compliance Monitoring Manager, the final decision is referred to the Accountable Manager.

The Post Holder is responsible for implementing the action on time and informing the Safety & Compliance Monitoring Manager if an impediment prevents the proposed action from being implemented. Actions are monitored according to section 2.3.5.6 of this document.

The Safety & Compliance Monitoring Manager, in coordination with the Post holder involved, is responsible for monitoring the implementation and effectiveness of the actions implemented.

The Safety & Compliance Monitoring Manager assesses the effectiveness of the implemented actions through the combined use of Compliance Monitoring activities (Ref. para. 2.3.5.7), the results of Safety Provision Monitoring (Ref. GEN01) and through the monitoring of the Safety Performance Indicators on the basis of the Ground Safety Reports relevant to the Hazard subject to corrective action.

The SAG Risk & Change is the working group that supports Safety & Compliance Monitoring Managers and Post Holders in defining actions to reduce the level of risk identified as a result of the assessment. Such mitigation actions may be defined to reduce the likelihood or severity of the risk and should respect the following principles:

- they can be identified through a specific description;
- if not identified in the defined hazard, the Safety Management System manager must update the hazard with the identified measures;

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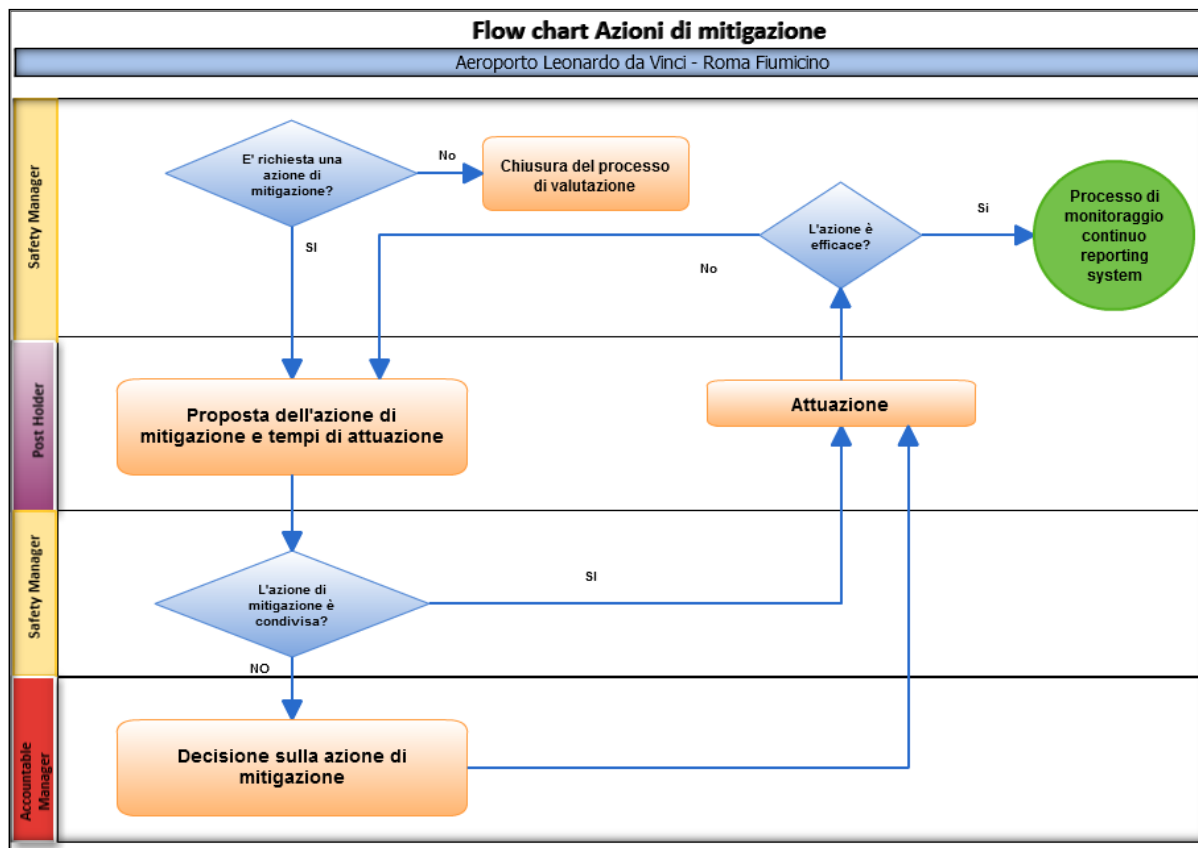
- they identify the parties responsible for their implementation and the time frame.
- they can be identified/prioritised by assigning a level according to the following scheme

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Level	Definition
First level	<i>The mitigation action must be applied immediately, because risks of particular severity have been identified, so as to restore the level of risk deemed acceptable. It is understood that, pending the identification and implementation of immediate mitigation action, the operation/infrastructure causing the risk may be suspended/restricted.</i>
Second level	<i>The corrective action is defined to reduce the level of risk by means of a recovery plan agreed upon when defining it.</i>
Observation	<i>Preventive action is identified with a view to improving the process and is not an immediate necessity. Such action will have an agreed payback plan.</i>

As part of the Compliance Monitoring activities, the implementation of the defined actions is monitored.

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Flow Chart 1 - Mitigation Actions Flow Chart

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2.2.7 Monitoring of Safety indicators

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	5)
IR	ADR.OR.D.005-	b)	7)
AMC1-	ADR.OR.D.005 (b)(5)	a)	
AMC1-	ADR.OR.D.005 (b)(5)	b)	
AMC1-	ADR.OR.D.005 (b)(7)		
AMC2-	ADR.OR.D.005 (c)	b)	7)

Safety Performance Monitoring is the process by which the safety levels of Airside operations are verified in relation to established Safety Objectives, identified risks and related mitigation measures.

This process, in order to also ensure the continuous improvement of the SMS, includes:

- carrying out safety surveys examining particular procedures of specific activities that are carried out in the apron (e.g. turnaround inspection);
- the assessment of the organisational safety culture through specific surveys or SPIs;
- the dissemination of lessons learned from the analysis of events received from the reporting system or from investigation reports/recommendations from national and international investigative authorities;
- the identification and implementation of best practices at national and international level;
- indicators linked to the monitoring of management system compliance (ref. 2.3.8);
- the identification of particular SPIs (Safety Performance Indicators) adopted annually by the Safety Review Board with the definition of specific targets on an annual basis and the subsequent monitoring of these SPIs.
- trend verification of occurrences related to the reporting system activities that are not annual;
- The sharing of Safety results within Safety Committees.

The purpose of this chapter is to describe:

- the formal process adopted to develop and maintain the set of SPIs adopted annually by the Safety Review Board;
- how to define the annual target levels of the SPIs;

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- the process adopted for monitoring performance.

2.2.7.1 Safety Performance indicator (SPI)

Identification of SPIs

SPIs are identified in line with Safety Objectives on the basis of parameters used at international level (e.g. by ACI or EASA), as well as experience gained within the SMS. These indicators are approved annually at the Safety Review Board and are useful for monitoring the expected trend of the aerodrome's Safety level, also allowing the timely identification of any critical issues, which then become the subject of subsequent specific in-depth studies.

SPI adopted

The indicators identified, which mainly concern the safety levels of airside operations, are divided into two clusters (ref. ICAO DOC 9859):

- Outcome-based SPI: indicators measuring safety incidents recorded at the aerodrome
- Process SPI: indicators that measure the effectiveness of the processes implemented by the organisation to maintain or improve the level of safety.

Statistical processing of the PES is done by using data from the SMS database.

The following table shows the selected indicators with their description and formulation shared annually in the Safety Review Board.

SAFETY PERFORMANCE INDICATOR			
No.	Outcome-based SPI	DESCRIPTION	FORMULA
1	Aircraft ground damage rate	Damage to moving or parked aircraft (excluding damage due to technical causes or birdstrike).	Ratio between the number of reports of damage to aircraft and the number of aircraft movements, per 1000 aircraft movements
2	Near collision with aircraft by vehicle rate	Lack of aircraft precedence	Ratio between the number of missed aircraft precedence reports and the number of aircraft movements, per 1000 aircraft movements
3	Runway Incursion rate	Incorrect presence of aircraft, vehicles and people in the runway protection area	Ratio between the number of runway incursion incidents and the number of aircraft movements, per 1000 aircraft movements
4	BRI2-	Birdstrike risk index	Please refer to Annex 6 of ENAC Traffic APT-01B.

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5	FOD on runway	Reports of FOD on the runway	Ratio between the number of reports of FOD on the runway and the number of aircraft movements, per 1000 aircraft movements
6	Injuries rate	Injured or dead airside passengers or operators	Ratio between the number of reports of injured/dead people and the number of aircraft movements, per 1000 aircraft movements
No.	Process SPI	DESCRIPTION	FORMULA
1	External voluntary reporting rate	Culture of voluntary reporting by all airport bodies except ADR staff	Ratio between the number of alerts received from external bodies not followed by MOR alerts to the authority and the number of aircraft movements, per 1000 aircraft movements

- SPI Maintenance

The selection and formulation of SPIs is reassessed (at least annually, at the beginning of the year) at the Safety Review Board, where the results are also presented quarterly.

The SMS also monitors Safety performance with further indicators which, depending on the critical issues detected, may be subject to variations (E.g. the index of accidents between vehicles, although not strictly related to aviation safety, can give a measure of the culture of compliance with the rules).

The indicators identified are in line with those of the main European airports with which Safety management maintains contact through a European working group for comparison and standardisation.

2.2.7.2 Definition of SPI targets

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(7)	a)	
AMC1-	ADR.OR.D.005 (b)(7)	b)	
AMC1-	ADR.OR.D.005 (b)(7)	c)	

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In line with its Safety Policy, Aeroporti di Roma aims in general to contribute to a constant improvement in terms of Safety of the highlighted indicators. The Safety Review Board therefore sets annual SPI target figures.

2.2.7.3 Monitoring of SPIs

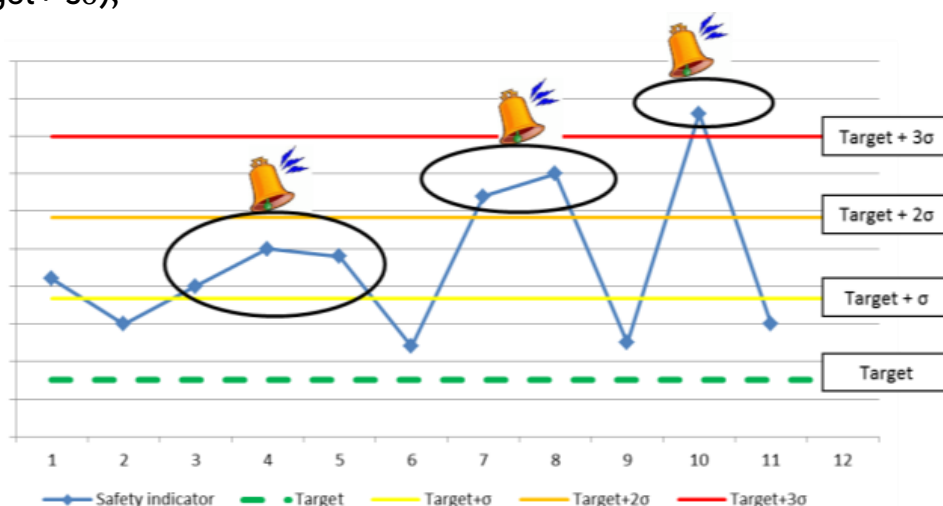
Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(7)	a)	
AMC1-	ADR.OR.D.005 (b)(7)	b)	
AMC1-	ADR.OR.D.005 (b)(7)	c)	

With reference to ICAO DOC 9859 (Chapter 4), in order to periodically monitor the trend of the Safety indicators listed above, three corresponding alert levels have been defined for each indicator. The values are based on the performance achieved in a given previous reference period (annual or multiannual) and depend on the standard deviation from the mean that characterises the data considered.

Alert levels define the value and/or trend for a specific monitoring period after which corrective action needs to be considered. In particular, an alert level is deemed to be exceeded if one of the following situations occurs during the (quarterly) monitoring period:

- Three consecutive points should be above (or below depending on the objectives) level 1 (Target+ σ);
- Two consecutive points should be above (or below depending on the objectives) level 2 (Target+ 2σ);
- One singular point should be above (or below depending on the objectives) level 3 (Target+ 3σ);



When an alert is triggered, appropriate mitigation actions are assessed by the Safety Action Group and, if necessary, are implemented following a specific analysis of the causes of the abnormal trend.

SPI performance is reported to the Safety Review Board on a quarterly basis.

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2.2.8 Reporting system and Investigations

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.C.030-	a)-e)	
IR	ADR.OR.C.030-	b)	
IR	ADR.OR.C.030-	c)	
IR	ADR.OR.C.030-	d)	
IR	ADR.OR.C.030-	e)	
AMC1-	ADR.OR.C.030-		
AMC1-	ADR.OR.C.030-	a)	
AMC1-	ADR.OR.C.030-	b)	
AMC1-	ADR.OR.C.030-	c)	
AMC1-	ADR.OR.C.030-	d)	
AMC2-	ADR.OR.D.005 (c)	b)	8)
IR	ADR.OR.D.030-	a)	
IR	ADR.OR.D.030-	b)	
IR	ADR.OR.D.030-	b)	1)
IR	ADR.OR.D.030-	b)	2)
IR	ADR.OR.D.030-	c)	
IR	ADR.OR.D.030-	d)	
IR	ADR.OR.D.030-	d)	1)
IR	ADR.OR.D.030-	d)	2)
IR	ADR.OR.D.030-	d)	3)
IR	ADR.OR.D.030-	d)	4)
IR	ADR.OR.D.030-	d)	5)
AMC1-	ADR.OR.D.030-	a)	
AMC1-	ADR.OR.D.030-	a)	1)
AMC1-	ADR.OR.D.030-	a)	2)
AMC1-	ADR.OR.D.030-	a)	3)
AMC1-	ADR.OR.D.030-	a)	4)
AMC1-	ADR.OR.D.030-	a)	5)
AMC1-	ADR.OR.D.030-	a)	6)
AMC1-	ADR.OR.D.030-	a)	7)
AMC1-	ADR.OR.D.030-	a)	8)
AMC1-	ADR.OR.D.030-	a)	9)
AMC1-	ADR.OR.D.030-	a)	10)
AMC1-	ADR.OR.D.030-	b)	
AMC1-	ADR.OR.D.030-	b)	1)
AMC1-	ADR.OR.D.030-	b)	2)
IR	IS.D.OR.215		
IR	IS.D.OR.230		

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One of the key elements of the Safety Management System is the Reporting System. Every aeronautical event, i.e. any operational interruption, defect, fault or other irregular situation that has or may have affected the safety of aircraft operations at the aerodrome, contains within itself the elements that, if properly known and investigated, can form the basis for implementing corrective actions so that the event does not recur in the future. Aeroporti di Roma has set itself the objective of encouraging the participation of all airport operators in its reporting system. They are required to report events that pose a risk to the safety of operations by completing a Ground Safety Report. Voluntary and mandatory reporting is the most important communication tool to ensure that no event is overlooked. Each anomaly can be of great value in highlighting potential causes of more serious events.

This chapter will describe the voluntary and mandatory reporting of aeronautical incidents, their analysis and follow-up process in line with the provisions of Regulation (EU) 376/2014 and 2015/1018. With reference to the same regulation mentioned above, the method of reporting incidents to the Competent Authority and the possible analysis and follow-up will be described.

2.2.8.1 Methods of reporting aeronautical events

Without prejudice to the obligations set out in Regulation (EU) 376/2014, staff and any aerodrome organisation must report to the Safety Management System any aeronautical incident occurring at the aerodrome Airside which could pose a risk to the safety of operations.

The information received is collected, recorded, analysed and used solely to maintain or improve the safety of operations and not to apportion blame or liability.

Reports to the Safety Management System can be made, by personnel/organisations, by directly accessing the dedicated section of www.adr.it or by using the Ground Safety Report form (see Annex B-2-F01 Occurrence Management Forms). The information transmitted is used only for statistical and analytical purposes in order to provide information for prevention.

The methods for transmitting the Ground Safety Report, made available within the Safety Management System, are:

- Link to the online compilation of the Ground Safety Report (ITA/ENG).
- E-mail inbox sms@adr.it

Mandatory reporting

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Any event resulting in damage (injury to persons, damage to aircraft, equipment, infrastructure) or affecting the safety of Airside operations must be reported to the Safety Management System within 72 hours of the event, without prejudice to the need to promptly communicate the event to ADR/CEA for operational management.

For further details and a complete list of mandatory reports, please refer to Implementing Regulation (EU) No 2015/1018 ANNEX IV (para. 4.1).

1.1. Incidents involving aircraft and obstacles

1	A collision or non-collision on the ground or in flight, with another aircraft, with the ground or with an obstacle (An obstacle may also be a vehicle)
2	Impact with wildlife including birds
3	Excursion from the taxiway or runway
4	Actual or potential encroachment on taxiway or runway
5	Encroachment or exit from final approach and take-off area (FATO)
6	Failure of an aircraft or vehicle to comply with authorisation, instructions or restrictions while operating on the movement area of an aerodrome (for example: failure on the runway, taxiway or restricted part of an airport)
7	A foreign object on the aerodrome movement area that has or could have endangered the aircraft and its occupants or any other person
8	Presence of obstacles at or near the aerodrome that do not appear in the PAI (Publication of Aeronautical Information) or NOTAM (Pilot Notices) and/or are not properly marked or illuminated
9	Interference in push-back, power-back or taxiing by vehicles, equipment or persons
10	Passengers or unauthorised persons left unsupervised on the apron
11	Jet blast, rotor or propeller flow effects
12	Declaration of emergency situation ("MAYDAY" or "PAN" calls)

1.2. Degradation or total interruption of services or functions

1	Interruption or malfunction of communications between:
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	a) aerodrome, vehicle or other ground personnel and air traffic services unit or apron management service unit b) apron management service unit and aircraft, vehicle or air traffic service unit
2	Significant failure, malfunction or defect in aerodrome equipment or systems which has or could have endangered the aircraft or its occupants
3	Significant deficiencies in aerodrome lighting, marking or signage
4	Failure of the aerodrome's emergency alarm system
5	Life-saving and fire-fighting services not available as per current requirements

1.3. Other incidents

1	Fire, smoke, explosion in the aerodrome installations, surroundings and facilities which has or could have endangered the aircraft and its occupants or any other person
2	Aerodrome security related events (e.g. illegal entry, acts of sabotage, bomb scares)
3	Failure to report a significant change in aerodrome operating conditions that has or could have endangered the aircraft and its occupants or any other person
4	Missing, incorrect or inadequate ice formation removal/prevention treatment (De-icing/Anti-icing)
5	Significant fuel spillage during refuelling operations
6	Loading of contaminated or unsuitable fuel or other contaminated or unsuitable essential fluids (including oxygen, nitrogen, lubricants and drinking water)
7	Failure to address poor track surface conditions.
8	<u>Any event in which human performance has directly contributed or may have contributed to an accident or serious incident.</u>

Information Security Reporting

In compliance with the requirements of EU Regulation 2022/1645, Aeroporti di Roma has established an internal reporting system as part of its information security management system to collect and assess cyber security events.

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In the event of incidents (incidents/vulnerabilities) affecting software that have a potential impact on the safety of the certification processes of EU Regulation 139/2014, the ICT department (ISMS staff) and, in general, all staff affected by the incidents shall report the incidents by entering them into the ADR “Ground Safety” internal reporting system in accordance with paragraph 2.2.8. Where applicable, following analysis of the event, reports will be handled with MOR to ensure reporting to the competent authority.

Voluntary reporting

Safety is improved not only through the reporting of compulsory incidents that mainly trigger a reactive analysis, but mainly through a proactive analysis that is triggered by spontaneous reports of incidents that are deemed to be potential or real dangers.

It is open to anyone to report incidents deemed dangerous that do not fall into the categories of mandatory incidents.

The following are examples of events that are recommended to be reported to the SMS:

1. Failure of aircraft to follow procedures during the parking phase.
2. Oil spills from aircraft and vehicles.
3. Fuel spillage during refuelling operations.
4. Any other event that could have an impact on Safety
5. Failure to comply with vehicle traffic rules

Collecting and recording aeronautical incidents

Reports received by the Safety Management System are acquired, verified and recorded in the SMS database (if they have had or could have an impact on aerodrome safety).

Data protection

Sensitive data entered in the fields of the form are handled in accordance with current regulations on the protection of privacy and Regulation (EU) 376/2014.

Data is collected and managed in accordance with the principles of just culture, i.e. without any punitive or sanctioning intention towards the personnel involved, except in cases of proven malice, gross negligence or wilful non-compliance with regulations and procedures.

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2.2.8.2 Analysis of aeronautical events

Regulatory references:

TYPE	CODE	Letters	Numbers
AMC1-	ADR.OR.D.005 (b)(3)	a)	
AMC1-	ADR.OR.D.005 (b)(3)	b)	
AMC1-	ADR.OR.D.005 (b)(7)	a)	
AMC1-	ADR.OR.D.005 (b)(7)	b)	
AMC1-	ADR.OR.D.005 (b)(7)	c)	
AMC1-	ADR.OR.D.027-	a)	2)

Classification of records

An occurrence is defined as any incident that has, or could have, affected the safety of operations. One of the most important aspects of the occurrence recording process relates to the classification phase: an accurate and standardised classification of occurrences allows a better statistical analysis of the data, which is useful not only for monitoring Safety Performance Indicators but also for hazard identification and risk assessment.

Within the SMS database:

- the incidents are classified according to the ADREP taxonomy as defined by ICAO;
- each incident is assigned a severity rating based on the severity of the consequences that the incident caused, according to the following table:

SEVERITY	DEFINITION
Accident	All events covered by the definition of an Accident according to ICAO Annex 13, as well as events not included in the ICAO definition but which result in very serious damage to property or infrastructure and/or loss of property or fatal injury.
Serious Incident	All events covered by the definition of a Serious Incident according to ICAO Annex 13, as well as events not covered by the ICAO definition but which result in extremely serious damage to property or infrastructure or significant injury and/or permanent disability.
Incident	All events included in the definition of an Incident according to ICAO Appendix 13, as well as events not included in the ICAO definition but involving minor/contained damage to property or infrastructure or minor injuries requiring medical examination.

Occurrence Without Safety Effect

Events that have had no consequences in terms of safety; negligible or slight damage to property or infrastructure; minor injuries not requiring medical examination.

- a risk grade (green, yellow or red level) is assigned to the manager's incidents based on assessments of the effectiveness of the remaining barriers and the worst possible outcome if no barrier had worked (according to the matrix¹ below).²

Question 2 What was the effectiveness of the remaining barriers between this event and the most credible accident scenario?				Question 1 If this event had escalated into an accident outcome, what would have been the most credible outcome?	
Effective	Limited	Minimal	Not effective		
50	102	502	2500	Catastrophic Accident	Loss of aircraft or multiple fatalities (3 or more)
10	21	101	500	Major Accident	1 or 2 fatalities, multiple serious injuries, major damage to the aircraft
2	4	20	100	Minor Injuries or damage	Minor injuries, minor damage to aircraft
1				No accident outcome	No potential damage or injury could occur

Management of occurrences according to risk grade

On the basis of the assigned risk grade, the subsequent analysis process is defined:

- GREEN** the occurrence is characterised by a low level of risk: it does not require punctual investigation, but its possible recurrence is monitored with a view to continuous improvement; these types of events are usually analysed as part of the SPIs or subject to risk assessment.
- YELLOW** the occurrence is characterised by a medium level of risk: it requires further investigation, which can be carried out through a spot investigation or as part of risk assessment updates;

¹ Ref. ARMS Methodology

² Only for incidents Ref. Annex 4 (Para. 4.1) Reg. 2015/1018, excluding those where the Manager is not directly involved in the dynamics of the event or is not able to assess the safety risk through the identification of the effectiveness of the barriers and, therefore, does not have the elements to make an analysis of it

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3. **RED** the occurrence is characterised by a high level of risk: it requires priority dedicated investigation and the implementation of immediate mitigation actions.

All investigations, in line with Regulation (EU) 376/2014, are closed within 90 days.

Incident reporting to the Competent Authority via MOR

The reports required by Implementing Regulation (EU) No 2015/1018 ANNEX IV (Para. 4.1), are sent by the SMS ADR to the Competent Authority, via MOR, within 72 hours of receipt.

The reports are recorded in the Safety Management System database, which is able to transmit files compatible with Eccairs software to the competent authority.

Alternatively, Safety Management System personnel have access credentials to use the system provided by the Authority for reporting aeronautical incidents.

Where actual or potential dangers to the safety of operations are identified, reports sent via MOR to the Authority must be subject to analysis, in accordance with the following timelines set out in Regulation (EU) 376/2014:

- Within 30 days of sending the first report to the Competent Authority, update the report with the preliminary results of the analysis of the incident, if present, and any actions identified to be taken.
- Within 90 days of sending the first report to the Competent Authority, update the report with the final results of the analysis of the incident.

Based on the results of the safety analysis, the airport management shall notify the competent authority and any third parties concerned (such as manufacturers or equipment suppliers) of any event, condition or anomaly that has caused or may cause a safety risk. In this regard, the airport management shall, where necessary, issue any recommendations, corrective actions or relevant information following the conclusion of the investigation.

In the event of incidents relating to information security, reports submitted via the Ground Safety system by ISMS personnel are analysed and classified by the SCMM, with technical support from the ISMS, and, where necessary, managed with MOR to ensure reporting to the competent authority.

In particular, all incidents classified as Medium, High or Very High criticality according to the IT Security and Privacy Incident Management procedure must be reported.

Method of Investigation Implementation

The assigned investigator provides for, as needed:

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- finding information about the physical circumstances of the incident (locations, interaction between people, facilities, equipment, etc.). This information may be collected by means of photographs, drawings, measurements, etc.
- if necessary, finding out through interviews the information gathered from those directly involved, from those who compiled the Safety Report or in general from witnesses to the incident. Information provided by those indirectly involved in the incident may also be included. ~~For requests made to pilots to contribute to the analysis of incidents in which they are involved, two forms have been prepared by the SMS (one for incidents in the manoeuvring area and one for incidents in the apron) which are sent out with a request to fill them in in order to identify causes that may be attributable to communications, signalling, situational awareness, etc.~~
- finding all documentary information on operating procedures, training received by the personnel involved, maintenance of vehicles/equipment, etc.

Without prejudice to the reporting obligation under para. 2.2.8.1, the companies involved have an obligation to cooperate with the investigator by avoiding obstructive behaviour.

Those responsible for the areas under investigation are also obliged to provide access to any documentation requested by the investigator.

The aim of the investigation is to highlight the circumstances, dynamics, causes and consequences of the incident.

During the investigation, individuals responsible for the activities/processes under analysis will be involved and will be responsible for identifying critical areas.

Any corrective actions resulting from the analyses and evaluations carried out by the Safety Management System and shared with the Post Holders/deputy involved (possibly in a dedicated SAG) must be decided directly by the Post Holder/deputy on the basis of its own know-how; if proposed by the Safety & Compliance Monitoring Manager or their deputy, these must in any case be shared and accepted by the relevant Post Holder in order to guarantee their feasibility.

If there is a disagreement between the relevant Post Holder and the Safety & Compliance Monitoring Manager, the final decision is referred to the Accountable Manager.

The Post Holder is responsible for implementing the action on time and informing the Safety & Compliance Monitoring Manager if an impediment prevents the proposed action from being implemented.

The Safety & Compliance Monitoring Manager, in coordination with the Post holder involved, is responsible for monitoring the implementation and effectiveness of the actions implemented.

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The Safety & Compliance Monitoring Manager is able to assess the effectiveness of the proposed action through the regular receipt of Ground Safety Reports, showing the events subject to any mitigation action taken.

Corrective actions should respect the following principles:

Level	Definition
First level	<i>The mitigation action must be applied immediately because particularly serious risks have been identified, unless the operation of the aerodrome is restricted/suspended until conditions deemed acceptable are re-established.</i>
Second level	<i>Corrective action is defined to reduce the likelihood of recurrence and is characterised by a remedial plan agreed upon when defining the incident.</i>
Observation	<i>Preventive action is identified with a view to improving the process and is not an immediate necessity. Such action will have an agreed payback plan.</i>

The investigator records the results of the investigation within a special form in the SMS database, drawing up an additional Investigation Report where deemed necessary in order to detail the analysis phase according to the complexity of the investigation.

By way of example and not exhaustively, the following are the types of events for which it is considered necessary to proceed with an investigation and, where indicated by the Safety Manager, with an investigation report:

- events with a RED Risk Grade
- events with a Severity of Serious Incident or Accident
- events of Runway Incursion
- significant events involving aircraft damage
- significant NAV events
- significant events involving worksite areas
- significant events involving aerodrome infrastructure (pavement, LVA, intrusion detection sensors, jetties, sub-board facilities)

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Investigation reports are approved by the Safety & Compliance Monitoring Manager (or their deputy).

Investigations recorded on SMS database forms are validated by the Reporting Manager or the Deputy Safety & Compliance Monitoring Manager.

It will be the responsibility of the investigator to provide feedback on the investigation to the subjects who reported the occurrence.

2.2.8.3 Monitoring corrective action

Following the analyses carried out and the identification of corrective or preventive actions, Compliance Monitoring Management monitors the implementation of these actions through the Follow Up Management process as described in Para.2.3.5.7.

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2.2.9 Emergency Response Planning

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	10)
AMC1-	ADR.OR.D.005(b)(10)		
AMC2-	ADR.OR.D.005 (c)	b)	9)

The Aerodrome Emergency Plan (AEP) constitutes the fundamental act of planning and coordination of the measures to be adopted in relation to emergency and/or accident scenarios - identified within the scope of the "Emergency Response Plan" risk assessment - which may affect Leonardo da Vinci Aerodrome of Fiumicino within the airport grounds.

Aircraft accident emergency planning outside the aerodrome site is the subject of emergency planning for the territory on which the incident takes place.

The Plan was, in any case, drawn up in coordination with other applicable local and regional emergency management plans.

The AEP is prepared by the airport operator, in line with the provisions of EU Regulation 139/2014, which establishes the technical requirements and administrative procedures relating to aerodromes pursuant to EU Regulation 2018/1139 of the European Parliament and of the Council, with reference to which Aeroporti di Roma S.p.A. was certified on 22 December 2016.

The airport operator's Safety Management System coordinates and supports - within the framework of the Emergency Response Committee (para. 2.1.3.5) - the different parties involved in the management of aerodrome emergencies.

The objective is to minimise the negative effects of an emergency or incident, with particular regard to saving lives and maintaining the highest possible level of airport operations. These aims are achieved by ensuring prompt intervention and adequate coordination of the various parties involved in rescue operations, establishing precise functions for each airport authority and operator and envisaging the involvement of the authorities and public bodies involved.

The procedures relating to the management of states of danger - contained in the Aerodrome Emergency Plan - are shared in the Emergency Response Committee and tested with the following frequency of:

- at least 1 full-scale drill every 2 years;
- at least 1 partial drill in the intermediate year between full exercises.
- at least one partial or full-scale exercise on the Family Assistance Plan.

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The Safety & Compliance Monitoring Manager analyses the emergency procedures and monitors the implementation of corrective/preventive actions by the responsible parties, resulting from the exercises or the analysis of significant events that required the activation of the AEP, in order to continuously improve the emergency management system.

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2.2.10 Change management and notification process

Regulatory references:

Normative Ref.	Title Ref.
IR ADR.OR.A.015 a), b)	Means of compliance
AMC1 ADR.OR.A.015	Means of compliance
IR ADR.OR.B.040	Changes
AMC1 ADR.OR.B.040 (a);(b)	Changes
IR ADR.OR.B.050 b)	Continuing compliance with the Agency's Certification Specifications
IR ADR.OR.D.005 b) 6)	Management System
AMC1 ADR.OR.D.005 (b)(6)	Management system
AMC2 ADR.OR.D.005 (c) b) 10)	Management system
IR ADR.OR.E.005 e) 1)	Aerodrome manual
IR ADR.OR.E.005 e) 2)	Aerodrome manual
IR ADR.OR.E.005 f)	Aerodrome manual
AMC1 ADR.OR.E.005 d)	Aerodrome manual
AMC3 ADR.OR.E.005 a) 2	Aerodrome manual
IR ADR.OPS.A.015 b)	Coordination between Aerodrome Operators and provides of Aeronautical Information Services
IS.D.OR.255	Changes to the information security management system

2.2.10.1 Purpose and field of application

2.2.10.1.1 Purpose

The purpose of this procedure is to define :

- The roles and responsibilities, within the change implementation process, of those responsible for ADR;
- the way the request for change is activated;
- the way the change is classified;

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- the internal approval process and how to conduct the impact assessment of each change;
- how to assess the impacts on the 'Aerodrome System', in terms of safety, in relation to the introduction of the change;
- how safety assessments are shared with stakeholders;
- how to notify ENAC of proposed changes.

2.2.10.1.2 Field of application

This procedure applies to proposed changes affecting Fiumicino aerodrome in terms of physical characteristics, organisation and operations and which are detailed in table 1 below (ref. ICAO DOC 9188 para. 2.4.4.3.2).

The scope of application of the Change Management procedure also includes modifications/updates or new implementations of software systems with potential safety impacts; proposed modifications will be assessed on the basis of the criticality of the system involved, as reported in the Information Security Management Manual (Appendix 4 of Part B of the Aerodrome Manual).

Change management processes may be initiated as a result of internal requirements from ADR managers or external stakeholders, as well as to ensure continued compliance with regulatory requirements, including any adjustments to Certifications Specifications.

Modifications are classified into two categories:

- changes requiring prior approval by the Authority (level 1),
- changes not requiring prior approval by the Authority (level 2),

according to the criteria indicated in the table below:

PROPOSALS FOR CHANGE REQUIRING PRIOR APPROVAL BY THE AUTHORITY LEVEL 1	- use of Alternative Means of Compliance - changes to the Aerodrome Certification Basis and Certification Specification - the procedures for managing and notifying changes that do not require approval and its variations - modifications to safety-critical equipment - changes with a significant impact on the constituent elements of ADR's Management System: - o Hierarchical lines - o Safety policy - o Hazard identification procedure - o Risk management procedure - o Safety performance indicator - o Safety Review Board management process - o Training programme - o Safety communication - o Emergency plan - o Compliance monitoring - change in the level of RFFS (Rescue and Firefighting Services) protection - changes to low visibility procedures - operations with aircraft with a letter code greater than the aerodrome reference code or part of it - other approvals required under EU legislation (e.g. deviations from EASA CS, air navigation obstacles)

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	- other approvals required under national law.
CHANGE PROPOSALS THAT DO NOT REQUIRE PRIOR APPROVAL BY LEVEL 2 AUTHORITY	INFRASTRUCTURES AND FACILITIES
	- replacement of LVA (including sign) with equivalent LED technology equipment - replacement of existing light guides (VDGS, A-VDGS) with similar equipment - modest additions to existing apron markings (e.g. aircraft indication) that do not change the overall layout of stands and clearances - changes to the layout of vehicular traffic systems - Temporary changes to the traffic system due to the presence of construction sites for ordinary maintenance work or approved works. - installation of cranes, previously assessed in agreement with ENAV, which do not pierce the obstacle-limiting surfaces and do not interfere with radio assistance
	AERODROME MANUAL/OPERATIONAL PROCEDURES
	- modification of normative references, names and contact details - changes to the contents of the Manual - and its procedures - as a result of infrastructural changes that have already been approved (e.g. changes to plans resulting from the implementation of approved interventions) - amendment of annexes and appendices to procedures (e.g. checklists), unless otherwise stated - changes to the Manual - and its procedures - resulting from the implementation of corrective actions following ENAC findings, accepted in advance - changes to the Manual - and its procedures - arising from the implementation of corrective actions as a result of findings from internal audits or from improvement needs arising from the Operator's internal review, provided it is evidenced that the changes are intended to improve safety levels and do not relate to a reduction in allocated resources (as well as not falling within the cases where prior approval is expressly required) - modification of the type of tools and equipment referred to in the Manual - and its procedures - as long as they are among those accepted by ENAC, if applicable (e.g. 'friction tester') - Amendments and updates to Part A of the Aerodrome Manual - AEP: changes resulting from the implementation of corrective actions following drills or actual emergencies, approved in advance by the ERC, which are consistent with the regulatory framework and do not affect the allocation of tasks and responsibilities of the various parties involved - AEP: modification of supporting infrastructures and means (e.g. reception rooms identified, type of resources/means employed) shared within ERC - AEP: changes to references and contacts - Editorial changes to the documentation - Changes to the contents of the Manual - and its procedures - as a result of the introduction of new aircraft models at the Aerodrome (except Level 1 cases falling under operations with higher aircraft code)
	ORGANISATION
	- change of figures not subject to acceptance by ENAC (e.g. deputy) - change in the organisational structure, without impacting on the structure and responsibilities defined for the purpose of aerodrome certification

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	- outsourcing of Operator activities falling within those defined in Part OPS of Regulation (EU) No. 139/2014, provided that they are outsourced in accordance with the provisions of ADR.OR.D.010 (Contracted Activities)
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Table 1 Scope of the Change Management Process

It should be specified that the concept of "change" - as understood in the meaning of EU Regulation 139/2014, in ADR.OR.B.040 - refers only to interventions which, when fully operational or after the conclusion of the relevant works, determine a change in the layout of the infrastructures and facilities (including the possible introduction or modification of obstacles to air navigation) and/or a change in the operational characteristics of the aerodrome.

Therefore, the change procedure does not apply in the case of ordinary and extraordinary maintenance work that does not involve changes to the infrastructure, facilities and/or equipment being worked on or to the aerodrome's operational characteristics.

However, there are situations in which a maintenance intervention, although not modifying the final configuration of the infrastructures and/or facilities at the end of the works, determines a significant impact on operations (e.g. works involving the temporary variation of the declared distances or the modification of the operational characteristics). In such cases, which can be assimilated to "temporary changes", the Operator - as part of the procedures for managing the works - carries out all the necessary assessments to determine the implications of the temporary change.^{2F.3}

Notifications of changes received by change owners, which the S&CMM does not assess as falling under the list in Table 1, are also excluded from the application of the change procedure. These notifications are assigned a level 3 and are stored in the Ground Safety software.

2.2.10.2 Proposal for Change

2.2.10.2.1 Proposal for change originating from ADR

For the purposes of this procedure, different types of change are defined: infrastructural, organisational, procedural/operational or a combination of the above.

For each type, a Process Owner is defined, i.e. the representative of the Organisational Unit who is responsible for initialising the change management process.

Type of change	Scope of application	Change owner (CO)
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³ The safety implications of work that has a significant impact on operations but does not involve permanent changes to airport infrastructure and facilities are managed through the "Airside Work Management" process described in procedure MOV08.

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Infrastructural	Any activity involving a change to infrastructure/facilities that has an impact on the safety of airside aircraft operations.	<i>Design PH Maintenance PH RPP SCMM**</i>
Organisational	Any organisational change involving the operator's certification structure.	<i>HRO/resp function</i>
Procedural/Operational	Any change to procedures or operations that is reflected in a change to the contents of the Aerodrome Manual or its annexes and that impacts on the safety of airside aircraft operations.*	<i>SCMM/PHs/TM</i>
*: In the case of any operational requirements that lead to infrastructural changes, the activation of change management is the responsibility of the Movement Area PH, which may be supported by the Design PH for the preparation of the necessary documents. **: SCMM on behalf of the external company/organisation.		

With regard to changes that may have a potential safety impact on the operations of ENAV and Fire Brigade (VVF) , the provisions of the specific Agreements entered into between the Operator and the Parties shall apply.

2.2.10.2.2 Proposal for change originating from external companies/organisations

Any change originating from external companies, that may have a potential impact on the safety of operations, must be communicated in advance to ADR by the external companies involved, to allow the Airport Operator to carry out the appropriate evaluations before implementation according to para.2.2.10.3. In such cases, the SCMM will record the activation in the Ground Safety system.

With regard to changes originating from ENAV and Fire Brigade (VVF) , which may have an impact on the safety of operations, the provisions of specific Agreements entered into between the Manager and the Parties shall apply.

2.2.10.3 Process description

The Change Management process is divided into the following steps:

STEP	ACTIVITIES	OWNER	APPLICATIVE – APPLICABLE DOCUMENT
1 ----- ACTIVATION	CO submits the proposed change to the S&CMM using the Ground Safety software (or alternatively Form B-2-F02). <u>Note:</u> The activation of the change is subsequent to the authorisation of the change, obtained in accordance with ADR's internal authorisation procedures and in accordance with the company proxies in place.	CHANG E OWNE R	Ground Safety/ Form B-2-F02

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STEP	ACTIVITIES	OWNER	APPLICATIVE – APPLICABLE DOCUMENT
2 ----- LEVEL EVALUATION	CO attaches all relevant documentation for safety assessments	S&CMM	Ground Safety Forms attached to Framework Agreements
	CO submits analysis of regulatory requirements impacted by the change (OORB and CS/CB checklists) and material supporting compliance.		
	S&CMM or their deputy analyses the proposal for change		
3a ----- SAFETY ASSESSMENT	S&CMM or its deputy assigns the level of the change by choosing from the indications in Table 1 Scope of the change management process	SMS/CO	Ground Safety Form B-2-F04 SAG minutes ACTION PLAN Safety Committees
	In the event that the change has possible impacts on external or outside Stakeholders, the S&CMM or its deputy informs them of this change.		
	Depending on the type of change, if deemed necessary by the S&CMM or its deputy, SMS convenes a SAG with internal and/or external entities to analyse the change.		
	Depending on the complexity of the change, the safety assessment supporting it may be simplified, integrated directly into the CMR, possibly enclosing supporting material (e.g. SAG report), or it may be drawn up in a dedicated document, signed by the CO, with risk levels assigned. Any limitations or conditions applicable during the transitional phases of the change will be noted in the safety assessment and/or CMR. Any further limitations can be dealt with in the MOV08 procedure. (*) Impact assessment can be conducted using different methodologies, from simple brainstorming sessions (e.g. 'WH Questions' (What - Why - Who - When - Where - How)) to more structured systems, bearing in mind in each case the importance of assessing the interactions of the proposed change with the different components of the system, also in terms of the Human Factor (cf. SHELL Model).		
3b- ----- COMPLIANCE ASSESSMENT	SMS/CO, identifies mitigation requirements/actions and shares them with internal and/or external entities.	CM	Ground Safety Form B-2-F04
	CM verifies the correct identification of regulatory requirements impacted by the change (OORB Checklist and CS/CB Checklist) and material supporting compliance. CM verifies the content of the amendments, prepared by the CO, to the certification documents impacted by the change.		
4 -----	The CO and internal and external stakeholders will take action to implement mitigation requirements/actions.	CO, STAKE	Ground Safety Form B-2-F04

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STEP	ACTIVITIES	OWNER	APPLICATIVE – APPLICABLE DOCUMENT
MANAGEMENT AND VERIFICATION OF MITIGATION ACTIONS	The safety requirements for the submission of the change proposal will be monitored by the SMS function. Actions included in the Follow Up will be monitored by the CM function.	HOLDER	
5 ----- ISSUE OF DOCUMENTATION	CM, at the end of the safety assessment and compliance verification activities, produces and signs the Change Management Report with supporting documentation attached. The CMR must also be signed by the Change Owner.	CM/CO	Ground Safety Form B-2-F04 ANNEXES
6 ----- TRANSMISSION TO THE AUTHORITY FOR NOTIFICATION OR APPROVAL	SCMM transmits the CMR + necessary annexes to the Authority. For the management of the Aerodrome Manual and its attachments, please refer to document management procedure A-0-A01. The change proposal is sent by Certified Electronic Mail to ENAC-Directorate of Operations Centre.	SCMM	Form B-2-F04 Safety Assessment ANNEXES

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STEP	ACTIVITIES	OWNER	APPLICATIVE – APPLICABLE DOCUMENT
	NOTE: INFRASTRUCTURAL CHANGES Without prejudice to the provisions of ENAC Traffics APT 21 and APT 13A, and described in procedure E-30-PRO01, which provides for the inclusion of the CMR as an attachment in the transmission of the different project phases, the SCMM transmits the relative communications to ENAC Operations Department for the purposes of this procedure in accordance with the level of change. If, in the transition from one project phase to the next or within the scope of a variant appraisal in progress, changes are introduced that produce variations to the Change Management Report, the latter must be updated and forwarded to the territorially competent Operations Department. Following approval of the executive project and completion of the related works, i.e. before the change becomes effective (in any case before the infrastructure/facility is opened for operation), the SCMM must send the competent Operations Department the documentation relating to the actual implementation of the change (e.g. request for modification of the Certification Basis, modifications to the Aerodrome Manual, evidence of publication of the relevant aeronautical information evidence, implementation of any training activities deriving from the implementation of the change, etc.). - in accordance with the Change Management Form attached to the project.		
7 ----- EFFECTIVENESS OF THE CHANGE	For Level 1 changes, the change may not be implemented until ENAC-Central Operations Directorate approval has been received and implemented. With regard to revisions to the Aerodrome Manual (ref. ADR.OR.E.005 (f)), if the change is necessary to safeguard the safety of operations, it may be adopted immediately, provided that the relative request for approval has been forwarded to ENAC- DO Centre. For the management of the Aerodrome Manual and its attachments, please refer to document management procedure A-0-A01.	PH and SCMM	Training Records Safety Notice Procedures

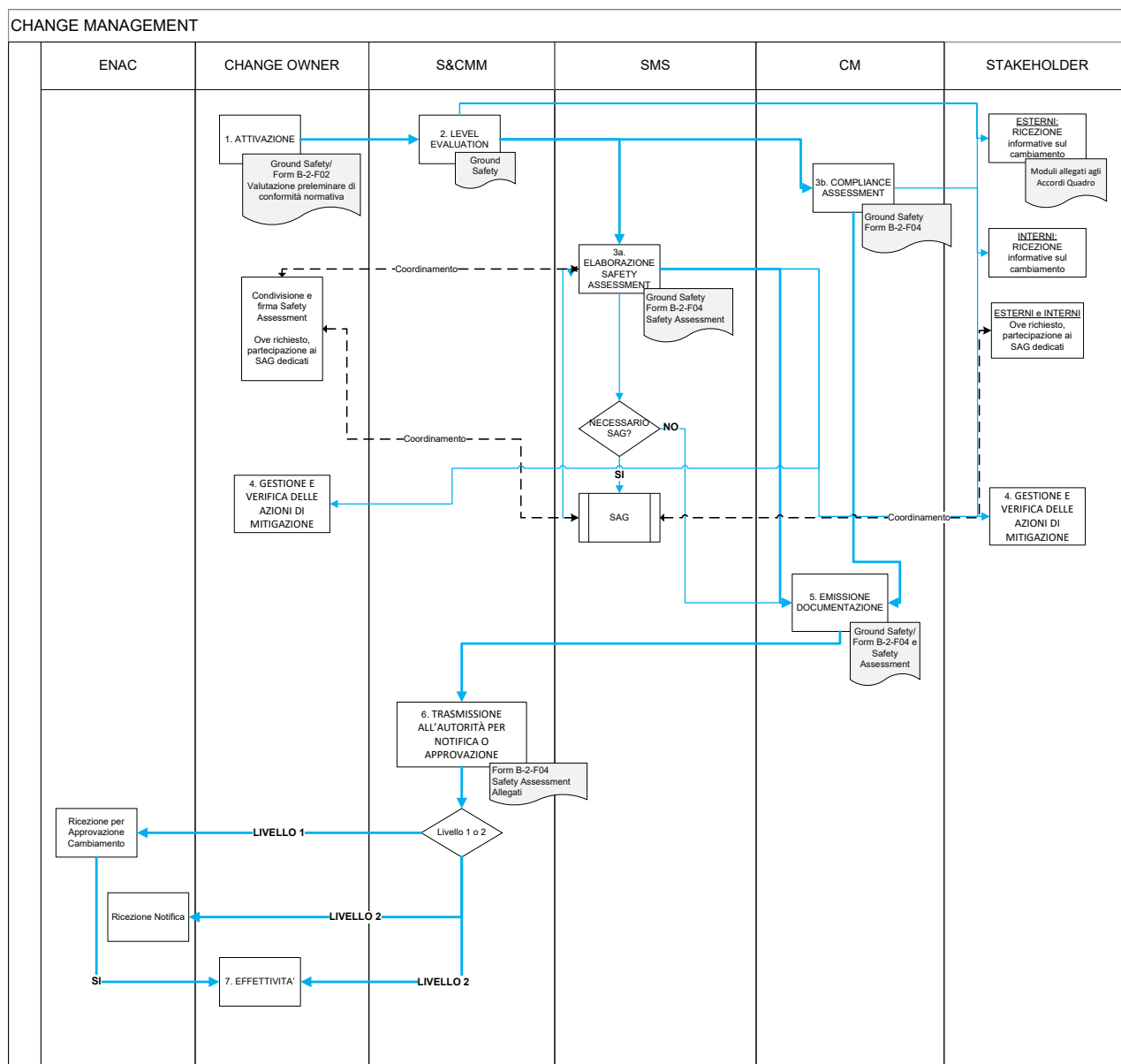
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STEP	ACTIVITIES	OWNER	APPLICATIVE – APPLICABLE DOCUMENT
	For Level 2 changes, the change may be implemented following notification of receipt of the documentation by the Authority and after informing/training all staff affected by the change. For the management of the Aerodrome Manual and its attachments, please refer to document management procedure A-0-A01.		

It is understood that for infrastructural/facility changes not included among the changes requiring prior approval by the Authority, for the purposes of aerodrome certification in accordance with Reg.(EU) n.139/2014 (Level II), the procedure provided for by the sector design regulations must be followed, in any case.

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The process is structured according to the following flow chart:



In the case of infrastructural change accompanied by a project that requires prior approval by the Authority, reference should be made to step 6 of the previous paragraph, where the details for proper management of the change notification and application process are indicated.

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2.2.10.4 Safety assessment

Every infrastructural, procedural and organisational change at level 1 and 2 is supported by a safety assessment, where:

- Interdependence with stakeholders, who are involved in the safety assessment process, is defined;
- The assumptions made and the mitigation measures identified are defined;
- An overall assessment of the change is reported, taking into account possible impacts;
- The arguments, evidence and criteria supporting the safety assessments are listed;
- Mitigation measures that are no longer necessary because of changes that have a positive effect on safety levels are removed or modified.

Depending on the complexity of the change, the safety assessment supporting the change may be of a simplified type, integrated directly into the appropriate field of the Change Management Report. In all other cases, the reference to the risk analysis document used (Safety Assessment) is entered in the field.

The Safety Assessment in support of the change is referenced in ‘GM1 ADR.OR.B.040(f) Changes’, providing within it, where applicable:

- (1) the identification of the purpose of the change;
- (2) the identification of hazards;
- (3) the determination of the safety criteria applicable to the change;
- (4) the risk analysis concerning hazards or improvement of the safety level related to the change;
- (5) the risk assessment and, where necessary, mitigation to support change;
- (6) the verification that the change complies with the purpose of the safety assessment and that it meets the safety criteria, before being introduced;
- (7) the specification of any monitoring activity that may be required to ensure that the aerodrome and its operations continue to meet the safety criteria following the introduction of the change.

The purpose of the safety assessment includes the following elements:

- (1) the aerodrome, its operations, management and human elements subject to change;
- (2) the interfaces and interactions between the elements being modified and the rest of the system;
- (3) the interfaces and interactions between the elements being modified and the operational environment;
- (4) the lifecycle of the change from definition to operation;

The criteria used for safety assessments are defined in accordance with the safety management and change management procedures contained in the Aerodrome Manual - Part B. Where possible (also in relation to data availability), the criteria used refer to quantitatively defined acceptable safety levels, or to recognised standards and/or codes of practice, or to the level of safety performance of the existing system or similar systems.

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2.2.10.5 Ground Safety software and B-2-F02 form

For the management of the entire change process, the dedicated functionality of the "Ground safety" software is used, with the definition of dedicated authorisation profiles. As an alternative to this change activation software, the CO may send the change notification by completing and submitting the B-2-F02 Change Notification Document form to the SCMM.

2.2.10.6 How to send changes to ENAC

In all cases, the Change Management Report is transmitted to ENAC- DO. It contains:

- ✓ A description of the change;
- ✓ Evidence of the assessment of the level of change;
- ✓ The requirements applicable to the amendment;
- ✓ The Third Party Impact Assessment;
- ✓ The impact of the amendment on the Aerodrome Manual and PAI publication;
- ✓ The impact on the Training Manual;
- ✓ The safety assessment

Please refer to Form B-2-F04 for details of the contents of the various sections.

2.2.10.7 Compliance Assessment

The verification of compliance takes place through the issuance of a check list listing the regulatory requirements (CS, ADR.OR/OPS, other standards) applicable to the change, specifying how compliance is to be demonstrated and, if changes are required, including references to already approved flexibility tools and/or any new ELoS and Special Conditions. Impacts on certification documentation are also assessed. The implementation of these checks is recorded in the appropriate fields of the Change Management Report.

In the event that the CS EASA Check-list project draft is issued by the CO, this check list is not directly reported in the appropriate field of the Change Management Report, but following verification of the contents, the reference to the project draft is inserted.

2.2.10.8 Compliance with PAI deadlines

Notifications of changes affecting aerodrome information in PAI are handled in accordance with the deadlines imposed by AISP in an AIC traffic.

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2.2.11 Safety promotion

Regulatory references:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.D.005-	b)	9)
AMC1-	ADR.OR.D.005 (b)(9)	a)	
AMC1-	ADR.OR.D.005 (b)(9)	b)	
AMC1-	ADR.OR.D.005 (b)(9)	c)	
AMC1-	ADR.OR.D.005 (b)(9)	c)	1)
AMC1-	ADR.OR.D.005 (b)(9)	c)	2)
AMC1-	ADR.OR.D.005 (b)(9)	c)	3)
AMC1-	ADR.OR.D.005 (b)(9)	c)	4)
AMC2-	ADR.OR.D.005 (c)	b)	11)
IR	ADR.OR.D.027-		
IR	ADR.OR.D.027-	a)	
IR	ADR.OR.D.027-	b)	
AMC1-	ADR.OR.D.027-	a)	
AMC1-	ADR.OR.D.027-	a)	1)
AMC1-	ADR.OR.D.027-	a)	2)

Safety promotion is an important component of the Safety Management System (SMS) and, together with the safety policy and the organisation's objectives defined therein, is an essential element in the continuous improvement of safety levels. Through the promotion of safety, an organisation proposes a culture that goes beyond the ultimate goal of avoiding accidents or reducing the number of accidents, but suggests a model of virtuous behaviour for operators and organisations to implement the correct actions in response to both normal and emergency situations.

ICAO outlines, in the architecture of the SMS, Safety Promotion as consisting of two main elements :

- Communication;
- Training.

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The following paragraphs will describe the tools used by ADR SMS to promote safety issues through communication and training tools.

Safety promotion activities are re-evaluated annually at the Safety Review Board to ensure that they remain aligned with the organisation's objectives as defined in paragraph 2.2.2.2.

2.2.11.1 Communication

Communication is a significant issue with regard to aspects of human interaction. It plays a key role in air transport and, in particular, in air safety.

Safety communication aims to ensure that staff are aware of the Safety Management System, to pass on critical safety information, and to explain why particular mitigation/improvement measures are taken or why procedures are introduced or changed.

The ultimate aim of the communication is also to disseminate and support a safety culture at aerodromes, i.e. an increasing awareness of safety issues on the part of operators.

To this end, the following paragraphs describe the communication tools used by the SMS.

Commitment to the maintenance of Safety requirements at the aerodrome is periodically implemented through the committees referred to in Section 2 - paragraph 2.1.3 and following.

- The Safety Management System has a section on the website www.adr.it and on the company's intranet specifically dedicated to the dissemination of safety-related documentation to the members of the Safety Committee and a section containing a guide to the correct management of certain key aerodrome risks (<https://www.adr.it/bsn-aviation-safety>).

Safety Notice

The Safety Notice is a document drawn up by the Safety Management System with the aim of contributing to the dissemination of information relating to events or hazardous conditions occurring at Fiumicino aerodromes, in order to avoid their recurrence. Particular emphasis is placed on those events whose triggering factors have occurred with significant frequency or are of particular severity. Safety Notices are mainly used to provide information on critical aspects of operations in the aircraft movement area.

In order to ensure maximum dissemination, Safety Notices are published on the website www.adr.it. The investigator who drafts the document sends it to a list of recipients selected according to the subject of the incident and, at the same time, publishes the document on the site. If, depending on the content of the Safety Notice, the latter is only of interest to a specific company, a Safety Notice may be issued in confidential mode. Confidential Safety Notices are not published on the website. During audits, compliance monitoring

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management auditors can check the dissemination of the document within the organisations on the distribution lists.

The list of issued Safety Notices is stored in the network folder of the Safety Management System.

Safety Learning

It differs from the Safety Notice in that it aims to give a positive message about behaviour, following incidents, contributing to avoiding an accident/incident.

Safety Learning, at the discretion of the investigator, are compiled following the preparation of an investigation report and are disseminated to all parties whose employees may be subject to the same type of incident and may take diligent behavioural measures that have been found to be essential to avoid the damage. Safety learning works pro-actively, while the Safety Notice acts in correction and thus reactively.

Similarly to the Safety Notice, the Safety Learning is published on the website, at the following address, to ensure maximum dissemination:

www.adr.it

The investigator who drafts the document sends it to a list of recipients selected according to the subject of the incident and, at the same time, publishes the document on the site. If, depending on the content of the Safety Learning, the latter is only of interest to a specific company, a Safety Learning may be issued in confidential mode. Confidential Safety Learnings are not published on the website.

During audits, compliance monitoring management auditors can check the dissemination of the document within the organisations on the distribution lists.

The list of issued Safety Learnings is stored in the network folder of the Safety Management System.

2.2.11.2 Training

Safety training is provided by ADR Training Management through the definition, coordination and implementation of training programmes as well as their management and traceability.

Safety & Compliance Monitoring Management, which is responsible for defining the training content directly related to the Safety Management System (Policy, Safety Management System function, reporting methodology), can support Training Management in identifying corrective training interventions for operational personnel based on the findings of the Safety Management System, objective evidence recorded in risk assessments, audits and/or investigation reports.

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Please refer to Chapter 3 of this Manual for more details.

Training Notice

Used to disseminate updates and changes in training content to external trainers in a timely manner (e.g. while waiting for training material to be updated) or to communicate particular area of focus to be emphasised during training.

The Training Notice is issued by ADR Training Management, which is responsible for its preparation, dissemination and storage.

2.2.11.3 Safety campaigns

In order to promote safety and increase airport operators' awareness of operational risks and how to prevent them, the SMS promotes awareness campaigns on safety issues.

These campaigns use different methods of communication in order to increase the safety culture among the aerodrome population (or among the staff identified as the target of the campaigns).

Each campaign is developed by defining a main theme and a target group of people to whom the campaign is addressed. On the basis of these elements, a communication strategy is elaborated, which may include the organisation of conferences, training meetings, courses or simply the dissemination of the material developed on the topic.

The Safety Management System carries out safety campaigns on an annual basis.

The promotion of the safety culture may also include the holding of a 'Safety Week', in which the Safety Management System distributes prize gadgets to those who have carried out activities in accordance with the required safety standards.

The Safety Management System's safety campaigns are stored on the company server.

2.2.11.4 Publication process of Safety documents

Appendix 7 to this section contains the Operational Instruction followed by Safety & Compliance Monitoring Management in order to ensure the publication and dissemination of Safety & Compliance Monitoring Management System documents on the specially structured websites.

2.2.11.5 Safety provisions

The Safety provision is a document drafted by the Post Holders to issue a requirement to be applied immediately to safeguard the safety of operations under EU Regulation 139/14.

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For this purpose, the form in Annex 1 of document E-15-Safety Provisions is filled in by the PH and, following verification of the SCMM's regulatory compliance, distributed to all interested stakeholders in the same way as document E-15-Safety Provisions is distributed.

The Safety provision becomes an integral part of document E-15-Safety Provision, and will be officially incorporated into the document at the next revision.

Safety provisions can be made and issued for example:

- to distribute Safety Directives issued by the Authority;
- following the implementation of an audit/inspection to deal with any critical operational issues found;
- following the occurrence of an incident that has lowered the required Safety levels;
- following a risk assessment, as risk mitigation actions.

2.2.11.6 Monitoring of national and international investigation reports

The SMS ADR monitors and analyses, on a monthly basis, the investigation reports issued at national and international level and intercepted on official investigation websites, identifying, where applicable, improvement/mitigation actions (Action plan) and/or issuing Safety notices containing lessons learnt.

2.2.12 Safety Management System output

In the context of the various processes of the Safety Management System, analyses are carried out to determine improvement actions and prescriptions useful for the mitigation of identified risks and in general for maintaining and, where possible, improving safety levels.

These outcomes are the result of the following main document outputs produced by the Safety Management System:

- Hazard list
- Risk Assessment Report
- Risk Register
- Investigation Reports
- Safety Notices
- Safety Committee minutes
- Safety Promotion (leaflet, poster)
- Safety Performance Indicator Report
- Annual Safety review
- Change management report/ Safety Assessment
- Internal and external audit reports (through the Ground Safety management system or on paper for external audits)

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- Safety Training Report

All listed outputs of the Safety Management System are appropriately identified. They include a description and purpose of the document, where applicable, and are produced and stored in a predefined format and medium in accordance with the procedures described in paragraph 2.2.4.2 of this Manual. During issuance, they are verified, approved and accepted in order to ensure their suitability and adequacy in accordance with the following table. As part of the annual audit of the Airport Manual, the documents are reviewed to verify whether they need to be updated.

Document	REVIEW ⁴	Verification	APPROVAL	ACCEPTANCE	ACKNOWLEDGEMENT
Hazard list	Annual	Deputy SCMM	Safety & Compliance Monitoring Manager, Post Holder, Training Manager, Security Manager	/	/
Risk Assessment Report	5 years	Deputy SCMM	Safety & Compliance Monitoring Manager	Post Holder, Training Manager (where involved)	/
Safety assessment (Change)	/	Deputy SCMM	Safety & Compliance Monitoring Manager	Post Holder, Training Manager (where involved)	/
Risk Register	Annual	Deputy SCMM	Safety & Compliance Monitoring Manager	Post Holder, Training Manager, Security Manager	Accountable Manager
Investigation reports	/	Deputy SCMM	Safety & Compliance Monitoring Manager o Deputy	/	/

⁴ The frequency indicated in the table, unless updates are required, is linked to process output.

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Safety Notices	/	Deputy SCMM	Safety & Compliance Monitoring Manager or Deputy	/	/
Aeroportual Committee Minutes	/	Deputy SCMM	Safety & Compliance Monitoring Manager or Deputy	Committee participants	/
Safety Promotion (leaflet,	/	Deputy SCMM	Safety & Compliance Monitoring Manager o Deputy	ADR External Relations	/
Safety Performance Indicators	Quarterly	Deputy SCMM	Safety & Compliance Monitoring Manager o Deputy	Safety Review Board	/
Rapporto di Safety annuale (Annual Safety	Annual	Deputy SCMM	Safety & Compliance Monitoring Manager	/	/
Change Management Report	/	Deputy SCMM	Safety & Compliance Monitoring Manager,	Post Holder coinvolti, Training Manager (where involved)	/
Audit reports	/	Lead Auditor	Deputy Compliance Monitoring Manager	PH/TRN/Responsibile external company owner of the process	/
Safety Training Report	/		Deputy SMS	/	/

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2.3 COMPLIANCE MONITORING MANAGEMENT

This subsection of the Aerodrome Manual meets the following regulatory requirements:

TYPE	CODE	Letters	Numbers
IR	ADR.OR.B.050-	a)	
IR	ADR.OR.B.050-	b)	
IR	ADR.OR.D.005-	b)	11)
AMC1-	ADR.OR.D.005 (b)(11)	c)	1)
IR	ADR.OR.F.045	b)	10)
AMC1	ADR.OR.F.045		
IR	IS.D.OR.200		(12)

2.3.1 General principles

Aeroporti di Roma has implemented a compliance monitoring system to ensure objective compliance with the relevant requirements of EU Regulation 1139/2018 and the related Implementing Rules referred to in EU Regulation 139/14 and the requirements of EU Regulation 2022/1645.

The compliance monitoring process also ensures that compliance is maintained in relation to:

- The terms of the Aerodrome Certificate;
- The Aerodrome Manual procedures;
- Third party manuals applicable to equipment and systems in use and falling within the scope of the Aerodrome Certificate.

The compliance monitoring process can be assimilated to a second level control with regard to the applicable legislation as defined in this chapter.

2.3.1.1 Regulatory references of Compliance Monitoring

Below is a non-exhaustive list of the regulatory framework used by Compliance Monitoring for verification activities:

- Regulation (UE) 2018/1139;
- Implementing Rules Regulation 139/2014;

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- Sources of international and national primary law on safety;
- Sources of international and national secondary legislation on safety;
- Aerodrome Manual Procedures;
- Aerodrome Safety Regulations;
- Organisation & Operations Requirements Basis;
- Certifications Basis;
- EU Regulation 2022/1645.

2.3.1.2 Definitions and Acronyms

<i>Corrective Action</i>	Action to remove (or significantly mitigate) the causes of non-compliance.
<i>Preventative Action</i>	Action to remove the causes of a potential non-compliance.
<i>Containment Action</i>	Action of a temporary nature aimed at reducing the risk related to the non-compliance detected.
<i>Check List</i>	Sequence of checks aimed at analysing a process by: examining documentation, direct observation of operations and interviews with operators.
<i>Follow Up</i>	Verification of the effectiveness of a corrective/mitigation action.
<i>Process Owner</i>	Responsible for the Process being audited. In the case of an internal process belonging to the Airport Operator, the Process Owner is the Post Holder of the area concerned.
<i>Root Cause</i>	Root cause of an event/non-compliance. It is identified through a methodological analysis (Root Cause Analysis) of the processes underlying the incident/non-compliance.

2.3.2 Compliance Monitoring Management Activities

The main tasks of Compliance Monitoring Management are:

- Monitoring the Regulatory Compliance of the Manager's organisation, processes and infrastructure with applicable requirements;
- Monitoring the effectiveness of barriers, processes and actions designed to reduce risk levels;
- Monitoring the requirements applicable to Contracted Activities;

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- Monitoring of the requirements applicable to companies providing services on board and other parties operating at the airport;
- Monitoring of the aeronautical data quality management system;
- Monitoring of regulatory updates in order to continuously maintain compliance;
- Coordinating internal bodies in the management of audits carried out by third parties, including ENAC surveillance activities;
- Verifying compliance as part of the Change Management process, as described in AM B-2-2.10.

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The Compliance Monitoring process uses the following tools:

- Verification activities (Audit and Inspection);
- Non-Compliance Management and Follow Up;
- Compliance Safety Action Group.

The outputs of the Compliance Monitoring activities are communicated periodically to the Accountable Manager at the Safety Review Board.

2.3.3 Compliance Monitoring Management Organization

Responsibility for Compliance Monitoring Management is assigned to the Safety & Compliance Monitoring Manager, who is supported by the Aerodrome Certification and Compliance Monitoring Management (ACE) sub-unit manager to perform the activities described in this subsection of the AM. The manager of the ACE sub-unit is also internally appointed as the Deputy to the Compliance Monitoring Manager.

Compliance Monitoring Management (CMM) employs an adequate number of qualified auditors to meet operational needs.

Compliance Monitoring Management can make use of auditors belonging to the Safety Management System department.

Both CMM and SMS auditors are qualified to perform internal and external verification activities (Part I and Part II audits) independently (Lead Auditor).

2.3.3.1 Requirements for independence

CMM auditors verify processes and related documentation from which they are independent.

The monitoring of processes under the responsibility of the S&CMM is ensured by:

1. A biannual third-party audit carried out by an independent party;
2. A biannual audit/assessment by an internationally accredited body/company, alternating annually with the audit under point 1.

2.3.3.2 Access

CMM auditors have access to:

- all company documentation;

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- documentation of contracted activities useful for verifying continued compliance with the European Safety Regulation;
- documentation of airside companies relevant to CMM audits;
- all evidence/results of third-party audits.

Similarly, they have access to all areas of organisations operating in the Airside at Fiumicino Aerodrome, including airlines, contractors and subcontractors of ADR. The managers of audited areas are obliged to cooperate with the auditor and avoid obstructive behaviour.

The managers of the audited areas are also obliged to provide access to any documentation requested by the auditor.

2.3.4 Compliance Monitoring Management Equipment

In managing the monitoring process, the CMM uses an application that guarantees:

- The performance of the different process steps on the basis of the authorisation profiles assigned to the different personal users;
- Real-time monitoring of the progress of activities against schedule;
- Direct feedback to the SMS function regarding potential impacts on the effectiveness of Safety barriers; as well as the association of barriers with the audited process
- The maintenance of the necessary records to give evidence of the correct implementation of the process.

2.3.5 Compliance Monitoring Process

The Compliance Monitoring Process consists of the following sub-processes:

- Definition and management of the Master Check List (OORB) - Monitoring of Aerodrome Manual compliance;
- Audit programme definition, management and updating;
- Management of part-IS checklist;
- Co-ordinating the management of the CS Checklist; in accordance with ADR.OR.B.050, identifying, with the technical support of the responsible PHs, changes to the applicable CS in the event of regulatory updates and initiating the change process;
- Monitoring DAAD status;
- Monitoring Certification Basis update (Aerodrome Certificate and AM Declaration of Conformity);
- Monitoring QMS of AIS data (Quality Assurance ADQ Manual);
- Implementation of scheduled verification activities;

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- Implementation of unscheduled verification activities;
- Coordination for third-party verification activities;
- Management of findings and follow-up from audits and SMS activities (Change Management, Investigation, Risk Assessment, actions) as well as actions related to the action plans of the various aerodrome committees.

It is the responsibility of the organisational structures of the relevant Post Holders, for the identified processes (referred to in Part B of the Airport Manual), to ensure that the Safety & Compliance Monitoring Manager is provided with the necessary documentation to demonstrate compliance with the requirements under their responsibility, if a change in the terms of compliance in the Checklist is identified in the course of their activities and/or following notification by a Post Holder.

Compliance with EU Regulation 2022/1645 is ensured by a series of checks involving various company organisational units, such as the annual review of the Information Security Management System (ISO/IEC 27001:2022 certification).

For the assessment of aspects related to Aviation Safety, the biennial Audit Schedule drawn up by the Safety & Compliance Monitoring Management function will be supplemented with an Audit dedicated to the ISMS with the ultimate aim of keeping the Information Security Management Manual up to date.

2.3.5.1 Master Check List

The Resp. Auditor defines a correlation matrix (Master Check List) between:

- Reg. UE 139/2014 (IR and AMC) requirements;
- Means of Compliance i.e. references to the Aerodrome Manual, operating procedures or other document demonstrating compliance with the requirement;
- Process(es) impacted by the requirement.

The Master Check List constitutes the OORB.

The CMM manager keeps the Master Check list up to date with respect to changes managed within the Change Management process, including amendments to European legislation.

The Master Check list is reviewed periodically.

2.3.5.2 Audit programme

The audit programme is issued annually following the analysis of the results of the previous audit programmes and taking into consideration the risk analyses issued by the SMS relating to the processes to be audited, guaranteeing the regulatory frequencies envisaged; below is a list of the types of audits scheduled:

- PART I AUDIT - KEY PROCESSES: audits targeting the key processes of the Manager;

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- **AUDIT I PART - CONTRACTED ACTIVITIES:** audits targeting processes that fall under the scope of the Aerodrome Certificate, but which are entrusted to third parties through a subcontract/sub-supply agreement. This category also includes activities/supplies/services entrusted in-house to companies belonging to the ADR Group;
- **AUDIT PART II - HANDLERS:** audits targeted at private bodies operating in various capacities in the movement area: Providers certified under Italian Legislative Decree. no. 18/99.
- **PART II AUDIT - OTHER COMPANIES OPERATING IN AIRSIDE:** audits concerning private entities operating in different capacities in the movement area, whose activity has been assessed as impacting Safety both directly and indirectly (e.g. companies operating in the manoeuvring area; certified maintenance companies part 145, vehicle maintenance companies present in the airside).

The Audit Programme, relating to internal processes and/or in the inspection plan provided for in procedure E-15 GEN01, includes sample checks on coordination procedures with carriers and checks on compliance with the Aerodrome Manual (e.g. refuelling procedure, WIWO procedure).

Excluded from the Audit Programme are subjects with which the Operator has drawn up an agreement in compliance with recital 8 of Regulation (EU) 139/14 and requirement ADR.OR.C.005 point (b).

The Audit Programme shall be drawn up in accordance with the following criteria:

- Each internal key process must be audited every 24 months, with the exception of the following processes, which are audited every 12 months:
 - Demonstration of compliance (focus: Certification Basis, Aerodrome Certificate, Declaration of Compliance, OORB/CS Master Checklist, DAAD Status);
 - Coordination with other organisations (focus: Agreements);
 - Management System;
 - Safety Management system;
 - Compliance monitoring;
 - Definition, management and quality control of the Aeronautical Data and the Data reported in the AM;
 - Fuel Quality
 - Management of Information Reported in the PAI
 - Management of the Aerodrome Manual
- Safety assessments related to internal and external processes, including mitigation actions arising from SMS processes;

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- Historical analysis of the verification activities carried out;
- Assessments and guidelines from ENAC (Surveillance Team);
- Assessments and guidelines from the Accountable Manager and the other certifying figures;
- updating of the list of contracted activities;
- updating of the list of companies operating on the airside.

A frequency is assigned to each audit included in the plan, taking into consideration the results of previous audits and the inherent risk assessments carried out by the operator itself, in addition to the criteria set out above.

The standard frequency is indicated below:

Audit Type	Audit Sub-Type	Frequency
Internal Processes Audit	Internal Processes requiring annual auditing	12
	Standard internal processes	24
Audit of Handlers	Full Handler	24
	ADR Assistance	24
	Into plane Company and Fuel Depot Manager	36
	General Handler*	36
Audit of ADR Contracted Activities	ADR Group contracted activities	24
	Other Contracted Activities*	24/36
Audits of Other Companies Operating in Airside*	Companies Operating in Manoeuvring Area that do not fall under the above cases	24

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* depending on the risk classification, some activities without direct impact on the safety of operations are monitored through inspection campaigns (ref. GEN01) and dedicated spot audits.

The Audit Plan is reviewed annually on the basis of the above criteria and approved by the Safety Review Board. The analysis at the basis of the review is formalised in the "Report --- Definition of Audit Frequencies" document, approved by SCMM, which contains the 36-month schedule, in order to monitor and ensure compliance with the defined frequencies and to review previously performed audits.

The Annual Audit Plan is subsequently transmitted to:

- Managers of the processes concerned by the scheduled audits;
- Contact persons of the companies outside ADR involved in the scheduled audits;
- ENAC Operations Directorate (surveillance team), in order to promote its dissemination within its own organisational units.

The Audit Programme may be subject to changes due to focuses that become necessary as a result of reports and/or incidents, risk assessments, audit findings that may represent a risk of non-compliance with a requirement.

In case of significant changes, the Audit Programme is reviewed and forwarded to the above-mentioned recipients.

2.3.5.3 Planned verification activities - Audits

The purpose of the scheduled verification activities is to:

- verify compliance with the requirements impacted by the process;
- verify the effectiveness of process-related safety barriers;
- verify the effectiveness of corrective actions implemented following audits previously carried out on the same process.

In addition, in all audit activities, checks are carried out against the following cross-cutting processes (where applicable):

- Record Keeping;
- Occurrence reporting;
- Management of contracted activities;
- Personnel requirements;

Within the management application, audits are divided into the following steps:

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<i>Step</i>	<i>Owner</i>	<i>Activities</i>
PLANNED	Resp. Auditor*	The audit is included in the Audit Programme.
TO DO	Resp. Auditor	The audit is assigned to a Lead Auditor, who will be responsible for managing the audit and the findings arising from it.
VALIDATED	Lead Auditor	Defines the check list and can submit it to the Resp. Auditor for approval.
CONFIRMED	Lead Auditor	Agrees on the Audit Agenda with the Process Owner and convenes the initial meeting (Briefing).
ON GOING	Lead Auditor	In the briefing phase, the Lead Auditor agrees with the Process Owner on the time frame and methods for carrying out the audits in order to optimise coordination with operational activities; Carries out documentary and operational checks and interviews; Collects the necessary evidence to support the checks performed; Compiles the check list, recording the compliance status with respect to the verification points, and entering, for each non-conformity detected, the description, level, responsibility and any impacted barriers.
DE BRIEFING	Lead Auditor	Convenes the closing meeting (Debriefing) and, during said meeting, presents the results of the audit and any findings, in the presence of the responsible auditor. Following sharing, the audit is sent for acceptance to the Process Owner
TO BE ACCEPTED	ADR Process Owner	Formalises acceptance of the audit results, including any findings. At the moment of acceptance, the Audit is in the CLOSED state, from that moment onwards it is filed in the system and all findings are translated into actions.
	External Process Owner	Signs the Audit Report, formalising acceptance of the audit results, including any findings.

* the Resp. Auditor coincides with the Deputy Compliance Monitoring Manager

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2.3.5.4 Inspection

The Safety and Compliance Monitoring Manager may request, also with input from the Accountable Manager, an unscheduled audit whenever a particular area of concern is identified.

The management of the inspection follows the same steps as the audit.

2.3.5.5 Verification activities assigned to third parties

Compliance Monitoring can make use of third parties (certification bodies, consulting companies, testing and analysis laboratories) to carry out verification activities, whether scheduled or unscheduled. Once the verification activities have been completed, the findings are shared and managed in the management application, similar to those carried out directly by Compliance Monitoring.

The verification activities, performed on behalf of the Accountable Manager, regarding the Safety and Compliance Monitoring function are also assigned to third parties to further demonstrate the compliance of the processes managed according to AltMoc_APT.LIRF.001.

2.3.5.6 Management of Findings

The following table shows how the findings are classified and managed:

Level Definition	Action required	Action Definition	Action Implementation	Extension
LEVEL 1 Non-compliance with applicable policies, procedures and regulatory requirements, negatively impacting Safety levels.	CONTAINMENT ACTION	Immediate	Immediate	N/A
	CORRECTIVE ACTION	Immediate	21 GG	N/A
LEVEL 2 Non-compliance with applicable policies, procedures and regulatory requirements, potentially impacting Safety levels.	CONTAINMENT ACTION	15 GG	30 GG	30 GG
	CORRECTIVE ACTION	30 GG	90 GG	90 GG

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Level	Action required	Action Definition	Action Implementation	Extension
Definition				
LEVEL 3 All other cases of findings not classifiable as level 1 or 2	PREVENTATIVE ACTION	60 GG	180 GG	180 GG
Opportunities for improvement Potential for improvement is identified.	N/A	N/A	N/A	N/A

The Lead Auditor, for each finding, defines:

- The Action Owner;
- The level of the action;
- Request for Containment Action (if level 1 or 2);
- Request for Root Cause Analysis (only applicable in level 1 or 2 cases);
- Impacted safety barriers;

Within the management application, the actions resulting from audit/inspection activities are divided into the following phases:

Step	Owner	Activities
ACTION DESCRIPTION	Action Owner	Describes the proposed action, including, where required, a full description of the root cause analysis. The root cause analysis consists of identifying, also using the most common methodologies (5why's / Ishikawa), the aspect of the process that actually caused the Non-Compliance. <u>With a view to continuous improvement, this step is crucial in the subsequent definition of effective corrective action.</u>
ACTION TO BE ACCEPTED	Lead Auditor	Checks the proposal, analysing the completeness of the description and compliance with applicable requirements. Accepts if the check is successful, rejects if not.
ACTION ON GOING	Action Owner	Implements the proposed action within the deadlines defined in this manual, attaching the necessary evidence.

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<i>Step</i>	<i>Owner</i>	<i>Activities</i>
ACTION TO VERIFY	Lead Auditor	Checks the attached evidence. Accepts if they are comprehensive, rejects if not.
EXTENSION REQUEST	Action Owner	Requires deadline extension, if applicable, in case of non-compliance with agreed closing dates.
	Lead Auditor	Authorises any request for extension of the deadline made by the Action Owner.
FOLLOW UP TO VERIFY	Lead Auditor	Checks the effectiveness of the implemented corrective actions.

Within the management application, the actions resulting from Risk/Change Management and Investigation activities are divided into the following phases:

<i>Step</i>	<i>Owner</i>	<i>Activities</i>
ACTION ON GOING	Action Owner	Implements the proposed action within the deadlines defined, attaching the necessary evidence.
ACTION TO VERIFY	Lead Auditor	Checks the attached evidence. Accepts if they are comprehensive, rejects if not.
EXTENSION REQUEST	Action Owner	Requires deadline extension, if applicable, in case of non-compliance with agreed closing dates.
	Lead Auditor	Authorises, in coordination with the head of the SMS organisational sub-unit, any request for extension of the deadline made by the Action Owner.
FOLLOW UP TO VERIFY	Lead Auditor with the support of the Deputy Safety Manager	Checks the effectiveness of the implemented corrective actions, emerging from risks and investigations

2.3.5.7 Follow Up Effectiveness (Monitoring Actions) and Notification to the AM

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The follow up of actions is performed per type of action according to the previous paragraph. The effectiveness of corrective actions is verified according to the following table:

Type of actions	Frequency	Recording of Effectiveness
Actions from Audits or Inspections related to Audits with a frequency of 12 months	Annual	As part of the subsequent audit report: The outcome is recorded in the subsequent audit report.
Actions from Audit or Inspection relating to Audits with a frequency of 24/36 months	Annual*	- In January of each year, a report of corrective actions which have passed into 'follow-up to verify' status in the interval between 6 months and 1.5 years prior to the date of extraction is issued. - For these actions, document checks or operational checks are carried out, depending on the type of action, within the following six months to verify their effectiveness. - The outcome of the follow-up is recorded within the Ground Safety system action by action.
Actions by investigation and risk	Annual*	- In January of each year, a report of corrective actions which have passed into 'follow-up to verify' status in the interval between 6 months and 1.5 years prior to the date of extraction is issued. - For these actions, document checks or operational checks are carried out, within the following six months, with the support of deputy safety management to verify their effectiveness.

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		The outcome of the follow-up is recorded within the Ground Safety system action by action. Note: for the DAAD and ELOS actions, the effectiveness of the actions supporting the risk assessments is checked annually, supported by the analysis of any occurrences and related events, and the performance of the SPIs. This activity is recorded on Ground Safety with dedicated follow-ups.
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*Annual refers to data extraction

The Safety and Compliance Monitoring Manager directly notifies the Accountable Manager on:

- the issuance of Level 1 findings;
- the status of any Level 1 and Level 2 actions that exceed the expected turnaround time.

At the Safety Review Board, the Safety and Compliance Monitoring Manager reports to the Accountable Manager the details of the findings from the previous SRB, with a particular focus on levels 1 and 2.

The progress of the closures of the non-conformities that have emerged is monitored by the AM through the Safety Review Boards, which include the analysis of the progress of the SPIs referred to in paragraph 2.3.8.

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2.3.6 ENAC surveillance activities

The audit activities carried out by the ENAC Surveillance Team are divided into the following steps:

<i>Step</i>	<i>Owner</i>	<i>Activities</i>
Planning and implementation	Compliance Monitoring	- Convening, following input from the Team Leader, the initial meeting (Briefing); - Supporting the Audit Team during audits; - Convening the closing meeting (Debriefing);
	Process Owner	- During the Briefing, they agree with the Audit Team on the Agenda, defining the time frame and methods for carrying out the audits in order to optimise coordination with operational activities; - They guarantee, also through their own structure of managers, assistance in carrying out any inspection, testing and verification activities requested by the Audit Team; - They also ensure that the audit team has access to all areas, documents, data and procedures relevant to the audit; - Participating in the closing meeting (Debriefing);
Survey sheet management	Compliance Monitoring	- If a findings sheet is reported, they will inform the Process Owner of the results of the Audit, and coordinate the drafting of the Action Plan, including actions and return dates relating to the closure of findings (Level 1 and 2) and observations; - They notify the team leader of the Action Plan;
	Process Owner	- Defines the corrective actions, complete with root cause analysis and return dates, required to close any Level 1/2 findings; - Defines the preventive actions, complete with return dates, needed to close any observations;

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<i>Step</i>	<i>Owner</i>	<i>Activities</i>
Survey management	Compliance Monitoring	- After notification of the Action Plan to the Team Leader, they enter the audit findings into the management application; - They notify the team leader of the closure of the level 1/2 actions described in the Action Plan by attaching the necessary evidence; - They manage the observations (level 3 actions) internally, in coherence with what has been notified to ENAC, applying possible extensions, according to the internal observations management process. The notification of the closure of observations to ENAC is integrated in the notification of changes related to the introduction of the changes necessary for the closure of observations.
	Process Owner	- Manages re-entry actions in the same way as for findings from internal audits;

2.3.6.1 Compliance Safety Action Group

The Compliance Monitoring Manager may convene the Compliance Action Group from time to time in an advisory capacity related to compliance issues.

The group does not have a fixed composition and may vary according to the topics covered. Representatives of third parties operating at the aerodrome or external experts with proven experience in operations or in the aeronautical sector may also be members.

By way of example, the Compliance Action Group must:

- Carry out a Gap Analysis, when faced with an amendment to the applicable regulations, and define the actions necessary to ensure compliance with the new requirements by initiating the Change Management process (note 1);
- Monitor the status and results of audits;
- Monitor the progress of actions related to the findings;
- Identify/resolve risks related to audit operations;
- Identify transversal non-compliances common to several operators or functions, and identify common ways of resolving them;

Identify any training requirements;

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Note 1: in such cases, a regulatory checklist is drawn up identifying the changed/added regulatory requirements, assigning responsibilities, defining the compliance status, and, if necessary, the adaptation actions. This checklist will allow easy identification of regulatory procedural compliance, through specific references to sections/paragraphs of the certification documentation (AM and attachments).

2.3.7 Monitoring of contracted activities

2.3.7.1 Definition and mapping

Each Post Holder/Process Owner, within the scope of their responsibilities:

- defines the activities that require the use of external companies and specifies them in its operational procedures;
- defines the technical/operational requirements that must be met;
- activates the Change Management in the following cases:
 - o the activity is outsourced/internalised;
 - o the activity is entrusted to a new company;
- manages the contract with the supplier;

The applicable regulatory requirements are defined in the documents attached to each contract. In particular, the Aerodrome Manual, which defines the safety obligations of all airside operators, is mandatory.

The process of accessing the ADR supplier register ensures a preliminary check on the suitability of the supplier in terms of authorisation, staff capacity and competence, and any other requirements outlined by the contract manager in the documents attached to the contract.

Compliance Monitoring updates the mapping of contracted activities on the basis of the Change Management initiated by the Process Owner, recording the new activities/companies within the management application.

2.3.7.2 Checking and monitoring

The Process Owner, in the context of contract management, is responsible for:

- reporting any safety discrepancies through occurrence reporting;
- evaluating the supplier's safety performance through the supplier's vendor rating.

Compliance Monitoring schedules verification activities on the basis of the following factors:

- risk allocation of the contracted activity;
- vendor qualification and performance rating;
- duration of the contract;

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Compliance checks on contracted activities are therefore carried out according to three levels of priority:

- Documentary verification during audits of key processes;
- Direct verification of the supplier (through on-site visits, interviews with staff, operational checks, checks at subcontractors);
- Third party technical verification by certification bodies, consultancies, testing laboratories.

The results of audits carried out directly on suppliers are shared quarterly with the Procurement and Purchasing Department in order to update the supplier's vendor rating.

2.3.8 Continuous Improvement

Key Performance Indicators (KPIs) are defined with a view to improvement, with the following aim:

- To provide a clear indication of the progress of compliance:
 - Both in terms of the performance of the monitoring process itself;
 - As well as in terms of the status of processes under ADR responsibility.
- Identifying areas for improvement, assessing the targets for the various objectives from year to year.

Compliance Monitoring Report

Defines the performance of Compliance Monitoring, providing an indication of alignment with the programme defined in the Audit Programme.

$$CMP = \frac{\text{N° Verifiche Eseguite}}{\text{N° Verifiche Programmate}}$$

Compliance Follow Up Performance

Defines the performance of the entire process in terms of the adequacy of the Process Owner's response time.

$$CFP = \frac{\text{N° Totali Azioni Livello 2} - \text{N° Azioni Livello 2 Scadute}}{\text{N° Totali Azioni Livello 2}}$$

Therefore, in the Safety Review Board, the following takes place:

- Targets for compliance indicators are set;

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- The process, including analysis of indicator trends, is reviewed;
- The final analysis of the objectives is carried out and possible improvement actions are defined at the same time,
- The Compliance KPIs are redefined or integrated, if they are not considered adequate to provide useful indications for monitoring the process.

In the Safety Committee, the trends and tendencies of the Compliance KPIs are also presented for consultative purposes, in order to collect possible input from external bodies involved in the Compliance Monitoring process.

2.3.9 Appendices

Appendix	Code	Title
Appendix 4	B-2-F03-	Compliance Monitoring Report

2.3.10 Maintenance of records

Records relating to the Compliance Monitoring process are maintained within the management application, which guarantees a digital repository of documents for a minimum of 10 years.

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2.4 AERONAUTICAL DATA QUALITY MANAGEMENT

(Ref. AMC3 ADR.OR.E.005 -2.4)

The Aeroporti di Roma Company has implemented an aeronautical data quality management system through:

- The definition of a process of activities and related responsibilities aimed at generating aeronautical data according to the requirements of Regulation 139/2014 and Regulation (EU) 373/2017;
- The use of a control process that ensures the integrity of the data generated until it is published in PAI.

In particular, all data published in the PAI falling under the responsibility of the operator (contained in Annex 1 ADQ Manual - Cross reference), are included in Part D of the Aerodrome Manual.

Through standard or backup procedures, the quality of the data from creation to publication is guaranteed by ADR. In particular, the aeronautical data quality management system covers:

- For technical data (data in the table in Appendix 1 of the ADQ manual): the phases from the creation to the transmission to the AIS of the aeronautical data and aeronautical information present in the centralised aero DB database through the use of the PLX system or possible backup procedure in case the PLX is unavailable; with the exception of obstacle data (limited to the obstacles contained in the area represented by the type "B" obstacle map) for which the operator guarantees the quality of the data in accordance with Annex 7 of the ENAV-ADR agreement, without the use of PLX, in the management of data not managed in the PLX and in accordance with the paragraphs applicable to obstacles in the ADQ manual;
- For non-technical data (data not included in the table in Appendix 1, but provided as text or free text in APPENDIX 1 of Regulation (EU) 373/2017 section 1 aerodromes): origin and validation of non-technical data.

The aeronautical data management procedures in Part D of the Aerodrome Manual are referred to in Section 7 of this Manual.

The aeronautical data quality management process complies with the information security requirements set out in EU Regulation 2022/1645. The MASTERLIST IT tool, used at Ciampino aerodrome, is stored on ADR NAS network folders, protected by high corporate IT security standards certified to ISO/IEC 27001:2022.

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2.5 REPORTING OF AERONAUTICAL EVENTS TO THE COMPETENT AUTHORITIES

(Ref. AMC3 ADR.OR.E.005 -2.5)

a) Definition of accident, serious incident and occurrence and responsibilities of all persons involved

An occurrence is defined as any incident that has, or could have, affected the safety of operations.

Staff and each aerodrome organisation must therefore report any aeronautical event occurring on the airport airside that could pose a risk to the safety of operations to the Safety Management System.

Each occurrence reported to the Safety Management System is assigned a severity rating based on the severity of the consequences that the incident caused, as described in paragraph 2.2.8.

For definitions of accident, serious incident and incident, see ICAO Annex 13.

b) Method of transmission of alerts

The methods for compiling and transmitting the Ground Safety Report made available as part of the Safety Management System are described in paragraph 2.2.8 of this Manual.

Any incident resulting in damage (injury to persons, damage to aircraft, equipment, infrastructure) or affecting the safety of Airside operations must be reported to the Safety Management System within 72 hours of the incident.

Mandatory reports received in this way - for a complete list see Implementing Regulation (EU) No 2015/1018 ANNEX IV (Para. 4.1) - are sent by the ADR SMS to the Competent Authority, via MOR, as soon as possible and no later than 72 hours after receipt, in accordance with Regulation (EU) 376/2014. The reports are recorded in the Safety Management System database, which is able to transmit files compatible with Eccairs software to the competent authority. Alternatively, Safety Management System personnel have access credentials to use the system provided by the Authority for reporting aeronautical incidents.

Where actual or potential dangers to the safety of operations are identified, reports sent via MOR to the Authority are subject to analysis, in accordance with the following timelines set out in Regulation (EU) 376/2014:

- Within 30 days of sending the first report to the Competent Authority, update the report with the preliminary results of the analysis of the incident and any actions identified to be taken.

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- Within 90 days of sending the first report to the Competent Authority, update the report with the final results of the analysis of the incident.

Reporting of serious accidents/incidents to ANSV

The Movement Area Post Holder ensures, in coordination with the Safety & Compliance Monitoring Manager, that the ANSV will be informed as soon as possible in the event of an aeronautical incident classified as a serious accident/incident (as defined in REG (EU) No 996/2010), and in any case within 60 minutes of knowledge of the occurrence of the event. A dedicated 'Report of Serious Incidents/Accidents' form is then transmitted via the Chief of Port of Call, collecting all available preliminary information. The forms are filed by the aerodrome manager and Safety Management.

Reporting of serious accidents/incidents to ENAC

The Movement Area Post Holder ensures, in coordination with the Safety & Compliance Monitoring Manager, the immediate reporting to the ENAC Crisis Room of air accidents, serious incidents occurring to aircraft and serious aerodrome disruptions in order to guarantee full and rapid institutional and operational coordination by the Authority's top management with the external bodies involved in the particularly serious and emergency events relating to the air transport sector

c) Recording and archiving of reports

The reports received by the Reporting System and the evidence gathered, as necessary, by the investigator-in-charge within the framework of the Investigation Reports, are filed and stored as described in paragraph 2.2.4.2 of this Manual.

2.6 PROHIBITION OF THE USE OF ALCOHOL AND DRUGS; PROVISIONS ON THE USE OF MEDICINES.

(Ref. AMC3 ADR.OR.E.005 -2.6)

In fact, the consumption of alcohol, drugs or medicines during the performance of any operational activity in an airport environment can pose serious risks to the health and safety of the individual worker, as well as potentially serious risks to passengers and the entire airport community.

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At Fiumicino Aerodrome, the use of alcohol and drugs is forbidden, both to protect aerodrome safety and to safeguard the health and safety of workers and third parties. No worker in a state of confusion and/or with psycho-motor difficulties who displays symptoms related to the use of alcoholic or narcotic/psychotropic substances may continue to carry out the tasks assigned to them. The responsibility for monitoring this compliance lies with the Employers of all Companies operating in Airside in accordance with the national law in force i.e. Legislative Decree 81/2008 and Law 125/2001.

The prohibition is referred to in the Airside Safety course as a compulsory course for the purpose of issuing the aerodrome badge.

In accordance with current legislation, it is expressly forbidden to administer or take drugs that may affect the psycho-physical capabilities of operators during working hours in such a way as to compromise their safety and that of airport operations. However, it remains the responsibility of each organisation to comply with the relevant national legislation (Legislative Decree 81/2008 and Law 125/2001).

The Manager has prepared a policy to make all companies operating at Airside aware of their legal obligations.

The policy can be found in Part E of the Aerodrome Manual, Section 33.

2.7 SAFETY PROCEDURES

(Ref. AMC3 ADR.OR.E.005 -2.7)

2.7.1 Compliance with safety directives;

The Safety Management System of Fiumicino Aerodrome, within the framework of the airport committees formally established on the subject of Safety (see paragraph 2.1.3) and by means of the communication tools with which it has been equipped (see paragraph 2.2.11), shall provide for:

- the dissemination of any Safety Directives communicated by the authority (ENAC), evaluating in the operational committees the actions necessary to meet any requirements defined by the directives;
- collective evaluation and planning of emerging actions to address safety issues that have not already been managed through typical SMS processes.

2.7.2 Reaction to Safety Issues

The ADR company is structured to manage all Safety issues that may arise during Airside activities and that may affect the regular and safe execution of ordinary activities.

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In particular, there are procedures dedicated to the management of Safety issues related to the processes that, by virtue of their level of risk, may have the possibility of incurring emerging situations.

By way of example, the main active procedures are listed, which contain indications on the management of processes considered to be more risky, up to the emergency management process:

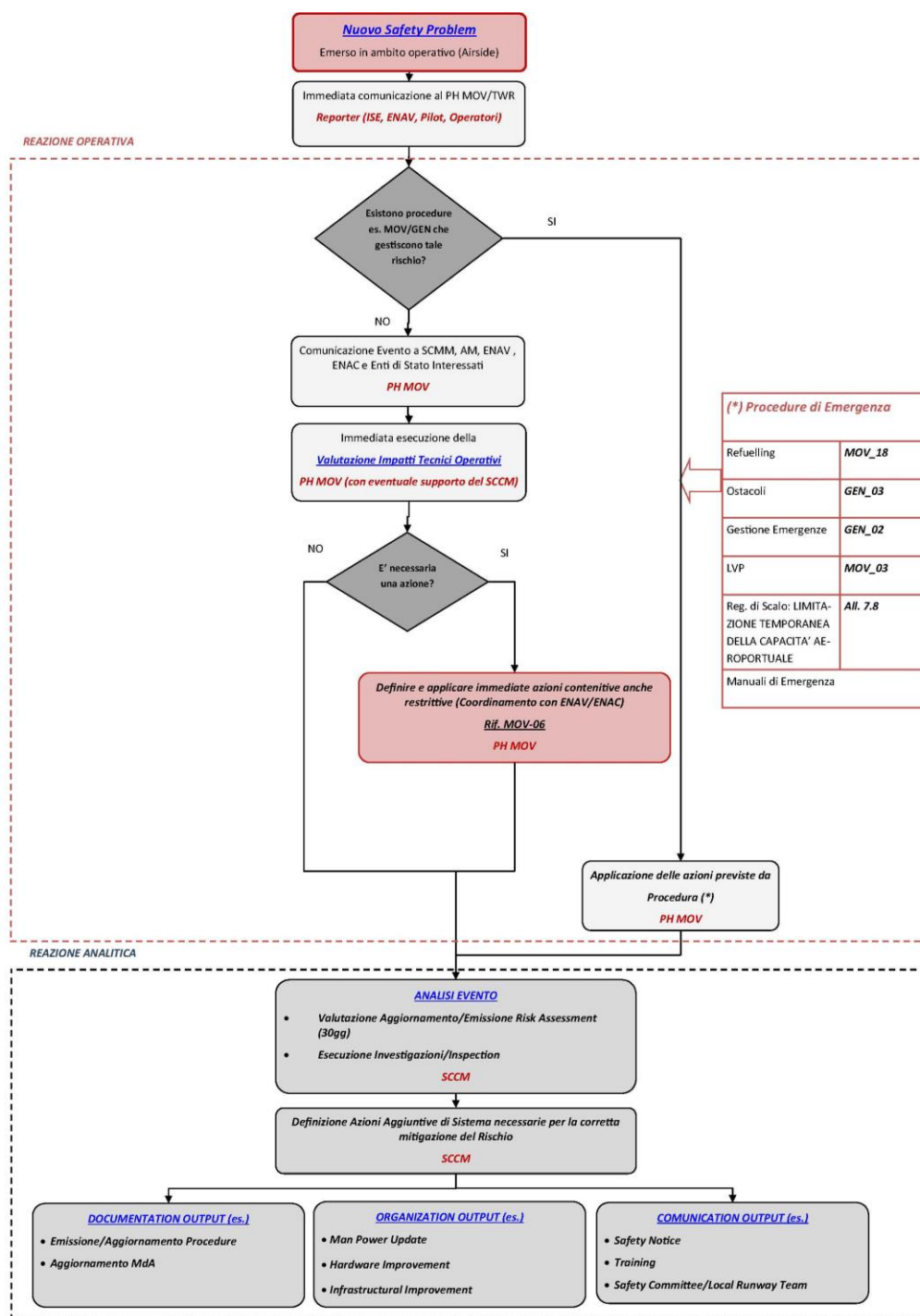
- ✓ Emergency Management - GEN_02
- ✓ Air navigation hazards - GEN_03
- ✓ Refuelling - MOV_18
- ✓ LVP MOV_03
- ✓ Aerodrome Reg.: TEMPORARY LIMITATION OF AERODROME CAPACITY - Annex 7.8
- ✓ AEP

To complete these procedures, ADR envisages a decision-making flow for the management of any Safety issues, which, since they do not fall within the cases for which the aerodrome hazard log is defined, and do not belong to the Manager's normal operating processes, would not otherwise be managed by dedicated procedures. The ADR reaction is divided into two distinct steps:

- ✓ Operational Reaction: with the immediate objective of assessing the technical and operational impact of the incident and mitigating it, if necessary, by taking containment and corrective action in coordination with ENAV/ENAC. This activity is the responsibility of the Movement Area PH in co-ordination, where time permits, with the SCMM.
- ✓ Analytical Reaction: following the mitigation of the risk, the Safety & Compliance Monitoring Manager intervenes by triggering the necessary risk-assessment, investigation/inspection processes in order to identify the additional system actions necessary for the proper management of the newly emerged risk. This second step also includes final communication of the analysis managed through Safety Committee and Safety Notice.

The flowchart describing the ADR Safety Reaction process is as follows:

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2.7.3 Management of Safety Recommendations issued by Investigating Authorities.

The Safety Management System of Fiumicino Aerodrome, within the framework of the airport committees formally established on the subject of Safety (see paragraph 2.1.3) and by means of the communication tools with which it has been equipped (see paragraph 2.2.11), manages any Safety Recommendations communicated by the investigating authorities in order to favour their rapid implementation.

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2.8 RECORDING OF MOVEMENTS

(Ref. AMC3 ADR.OR.E.005- 2.8)

For procedures regarding the recording of aircraft movements, including aircraft type, date and number of passengers, please refer to Part E of the Aerodrome Manual, Annex E-14 MOV 09 *Stand Management and Movement Recording*

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PART B -SECTION 3 – TRAINING AND QUALIFICATION OF PERSONNEL

3 TRAINING AND QUALIFICATION OF PERSONNEL

3.1 Training programme

The Aeroporti di Roma Company ensures the training and qualification:

- of its own staff and those working in contracted activities, for all activities covered by the essential requirements of EU Reg. 1139/18 and Implementing Rules of EU Reg. 139/14⁵;
- of personnel who have access to the Fiumicino Aerodrome Airside for any reason, through courses on the general rules of Aerodrome Safety.
- its employees receive training and certification in cyber security issues in accordance with the Information Security Management Manual described in Appendix 4 of Part B of the Aerodrome Manual.

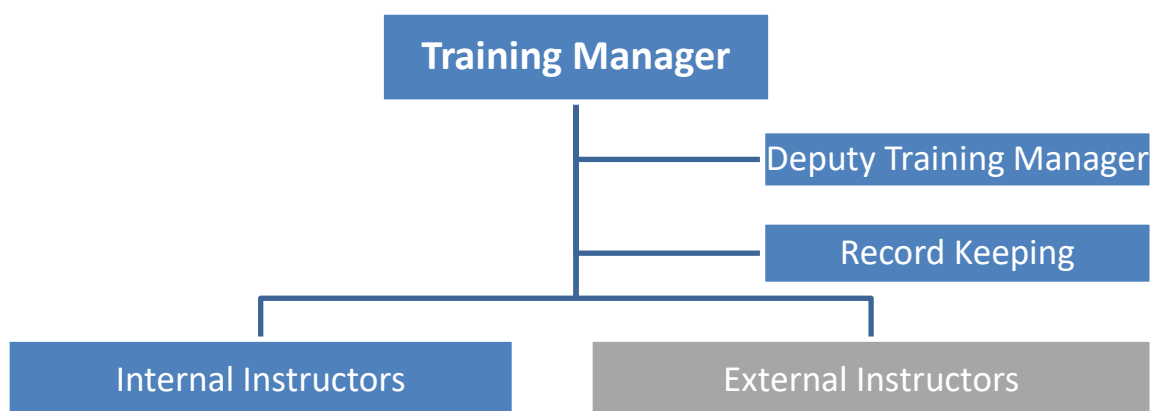
ADR offers Safety training organised on three levels:

1. Training for all those accessing the Airside area through the provision of Airside Safety training;
2. Training of ADR's internal middle management,
3. Training for Nominated Persons and Senior Management, with a dedicated specialist module.

The Training Management department reports organisationally to the Training Manager according to the following organisation chart:

⁵ An exception to this is the training provided for fire and rescue services carried out by the CNVVF, which is provided by the National Corps itself.

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For training activities, the Training Management department has classrooms, PCs and an IT platform suitable for delivering courses both in classrooms and in the form of e-learning.

- 3.1.1 Responsibilities, frequencies, modules, duration of each type of training, methodologies for the delivery of training and competency assessments, minimum results to be achieved by the personnel in training and identification of the training required for all personnel involved in operations, rescue and firefighting, maintenance and management of the airport, and all persons working autonomously in the movement area and other operational areas of the aerodrome.**

3.1.1.1 ADR PERSONNEL

Responsibilities

The Accountable Manager (see 2.1.1.1) ensures that all necessary resources are available for the proper management of the aerodrome in accordance with EU Reg. 139/2014, as well as the requirements identified in the Aerodrome Manual. The Accountable Manager, in order to maintain control over the qualification and training requirements of staff, employs the Training Manager, as described in section 2.1.1.3.

The **reference Post Holder** (and comparable qualifications) ensures the definition of the technical skills required for the operational personnel employed by them (qualification), the identification of training needs, and the

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contents of initial and recurrent specialist courses. The reference Post Holder also appoints the relevant in-house instructors and approves the methods and contents of the qualification and training programmes drawn up in collaboration with the Training Manager, with the aim of guaranteeing, by signing the technical file, that the personnel employed are qualified to perform the services for which they are responsible. They also ensure, in consultation with the Training Manager, that, for personnel performing operational roles within their contracted activities, the technical skills and training required for qualification are defined, as outlined in 3.1.2.1.1

The Training Manager (see 2.1.1.3) ensures the definition, coordination and implementation of training programmes as well as the management and traceability, (directly for ADR employees and through the respective systems and processes for companies using external instructors), of records relating to courses, and written/oral/on-the-job examination sessions. Together with the Post Holders, they ensure the definition of the first qualification assessment and proficiency check procedures. The Training Manager is responsible for planning the qualification activities of internal and external instructors and managing their periodic updates.

The **Training Manager** is responsible for searching the market for specialised training courses if such resources and skills are not available at AdR.

The Safety & Compliance Monitoring Manager can identify corrective actions for the training of operational staff based on the findings of the Safety Management System, objective evidence recorded in risk assessments, audits and/or investigation reports. Additional identified training needs and/or contingent re-training needs will be requested from the Training Manager who will take action to identify appropriate solutions.

The **Safety & Compliance Monitoring Manager** is responsible for defining the training contents directly related to the Safety Management System (Policy, Safety Management System function, reporting methodology).

Frequencies, modules, duration of each type of training, methods of delivering training and assessment, minimum outcomes to be achieved by trainees, and identification of required training are contained in Training Manual Part 3.

The training of fire and rescue personnel is the responsibility of the fire brigade in accordance with the ADR-Fire Brigade (VVF) Agreement.

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3.1.1.2 OTHER PERSONNEL

The responsibility for training/educating the workers of third party entities/companies, who carry out their activities at the Aerodrome, as per Legislative Decree 81/2008, remains with the individual Employers and is beyond the responsibility of the Airport Operator and the contents of the Aerodrome Manual.

The qualification, training and instruction of Ground Handling Service Providers' personnel, with regard to aircraft handling activities as per Legislative Decree 18/1999, do not fall within the ADR Company's training programme and are subject to certification by the Civil Aviation Authority.

Similarly, the activities of ADR do not include the qualification, training and instruction of the personnel of other airport operators aimed at carrying out specific tasks for which they are responsible (e.g. use of vehicles/equipment, aircraft assistance operations).

For compulsory courses for all personnel operating at Airside and provided by ADR or ADR-qualified personnel, responsibilities, frequencies, duration of each type of training, methodologies for providing training and assessment of competence, minimum results to be achieved by personnel in training, and identification of necessary training are contained in paragraph 3.1.2.1.2.

Training in the use of **fuel distribution network facilities** (HRS manholes and refueller loading bays) is provided by the companies.

To ensure proper use of centralised **aerodrome equipment** (boarding bridges, light guides, 400HZ systems and air conditioning systems), ADR:

- provides authorised operators with the relevant operating instructions (attached to the Aerodrome Regulations);
- provides for the qualification of external trainers.

To ensure the proper and safe use of **centralized aerodrome equipment** (boarding bridges, optical guides, 400 hz systems and air conditioning systems), handling companies, for operators assigned to such use must comply with the following:

- deliver initial theoretical and practical training exclusively through theoretical instructors and practical supervisors qualified by ADR and identified in special registers;

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- The syllabi of the theoretical and practical training shall be in accordance with the contents of this section of the Aerodrome Manual, ensuring that the training is always aligned with the 'instructions for use of boarding bridges, optical guides, 400 hz facilities and air-conditioned air facilities at aircraft stands available at www.adr.it;
- the theoretical course must be delivered using the training material provided by ADR;
- following the theoretical training and practical/on-the-job training (of the duration and in the manner defined by the individual company on all types of equipment used) a final qualification assessment must be carried out by the ADR-qualified assessor, using the assessment form provided in Annex 6 E-15 Safety Rules;
- In addition, the following must be provided:

refresher training for inoperability on installations according to the requirements of the Aerodrome Manual:

- from 3 months to 12 months: refresher training + practical assessment;
- over 12 months: initial theoretical/practical training + practical assessment;

a **continuation training** at each instructional update and/or modification of the facilities, at least in read and sign mode;

a **recurrent training** with a frequency of 24 months that ensures:

- the verification of the continuity of work on the installations;
- a theoretical refresh;

a **practical proficiency check** (on a minimum number of a/m movements) performed by an ADR-qualified assessor.

In order to guarantee the safe execution of aircraft thrust operations, the company to which the qualified operators belong must include in their initial training programmes theoretical and practical training (correct identification of standard routes) on the Operation Letter - Orderly Movement and guarantee punctual continuation training with each update of the same operation letter, at least in read and sign mode, should there be any operational impact.

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Training for marshalling operations is the responsibility of Handling companies certified under cat. 5.1 in accordance with ENAC regulations - Ground Handling Service Providers. The training shall be carried out in accordance with the following theoretical/practical syllabus:

	Duration	Method	Test	notes
Marshalling	4h theory + practical: 3 side-by-side operations	Classroom or e-learning On the field	Yes Final assessment	/
(1) the role and responsibilities of the flight attendant; (2) the visual signals included in Appendix 1 'Signals' of the Annex to Commission Regulation (EU) No 923/2012 of 26 September 2012; (3) aircraft characteristics, both physical and operational, relating to the manoeuvring of the aircraft within the boundaries of the apron; (4) safety procedures around the aircraft and in particular around the engines; (5) emergency procedures in the event of an accident or incident on the apron; (6) low visibility procedures; (7) apron driving; (8) emergency stop procedures for visual or advanced visual docking guidance systems, if applicable; and (9) FCO Aerodrome aircraft stand configuration and layout (road markings and special features) (10) Operator's local procedures (ref.E-15 DDS Vol.2)				

Practical FOD training for the specific operations performed is the responsibility of the companies through practical OJT (On-Job-Training) and subsequent assessment. This specific training shall be documented through OJT reports and assessment reports

Specific theoretical/practical training on the AEP for operations performed during emergency management (operational checklists and intervention/support operations) is the responsibility of the companies to which they belong through dedicated theoretical/practical training and subsequent assessment. This specific training must be documented through theoretical certificates, OJT reports and assessment reports. This training must be carried out every 24 months.

Below are the syllabi of the external theoretical and practical courses provided by ADR or by external instructors qualified by ADR; the other syllabi mentioned in para. 3.1.2.1.2 are contained within the Training Manual: Training carried out by ADR-qualified external trainers must comply with the following syllabi:

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	Durati on	Method	Test	notes
<i>Airside Safety</i>	3h-	Asynchronous (e-learning)	Yes	/
1. Operator organisation and responsibilities 2. Safety policy 3. Safety management system 4. Reporting system 5. Hazard identification 6. Operational areas and aircraft characteristics 7. FOD 8. Risk management 9. Safety Promotion 10. Safety Communications 11. Safety Procedures (AM) 12. Outline of the Human Factor 13. Aerodrome Emergency Plan				

	Durati on	Method	Tes t	notes
<i>AEP Remote Alerting (initial and recurrent)</i>	1.5h-	Synchronous (classroom/we binar)	YES *	*group/class learning test
1. System presentation and use 2. Operator workstation components 3. Illustrative video of functionality 4. Back-up procedure				

	Durati on	Method	Test	notes
<i>Qualification to drive on the apron – initial theoretical</i> (general driving training programme - theoretical)	4h-	Synchronous (classroom/we binar) + Volume 1 Qualification to drive airside	NO*	* includes final examination for qualification
- Reference Standards - Glossary - Aerodrome description - aprons-quadrants - Dissemination of information on Airside movement - General requirements for drivers and vehicles - Vehicle breakdown/accident				

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- General rules and speed limits - Driving rules and priorities - Vehicular traffic/Perimeter/underpass road - Signposting - Behaviour in the event of fire				
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	Durati on	Method	Test	notes
Qualification to drive on the apron – initial practical <i>(general driving training programme - practical)</i>	2h-	Practical	NO*	* includes assessment
- vehicular traffic - taxiway crossing - limitations during low visibility procedures - aprons and stands - road markings for vehicles and aircraft - road markings for the boundary between the apron and taxiway - road markings, vertical markings and luminous markings indicating access to the runway - parking areas and associated restrictions - speed limits and driving rules - hazards when assisting aircraft and their movement				

	Durati on	Method	Test	notes
Qualification to drive on the apron – recurrent theoretical <i>(general driving training programme - theoretical)</i>	2h-	Asynchronous (e-learning)	Yes	
- Reference Standards - Aerodrome description - General requirements for drivers and vehicles - General rules and speed limits - Driving rules and priorities - Vehicular traffic/Perimeter road - Signposting - Behaviour in the event of fire - Update of aerodrome procedures - Update of references/contacts - Update of infrastructure				

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	Duration/met hod	Test	notes	
<i>ADC-A Instructor Qualification (initial training)</i>	6 hours of theory with ADR Instructor (ADC-M)	Learning test and final assessment with ADC-A ADR Instructor	/	
- vehicular traffic - taxiway crossing - limitations during low visibility procedures - aprons and stands - road markings for vehicles and aircraft - road markings for the boundary between the apron and taxiway - road markings, vertical markings and luminous markings indicating access to the runway - parking areas and associated restrictions - speed limits and driving rules - hazards when assisting aircraft and their movement - The role of the ADC-A Instructor - Course and assessment management and reporting - End-of-course learning test				
	Durati on	Method	Test	notes
<i>Qualification to drive in the manoeuvring area - initial theoretical</i> <i>(manoeuvring area training programme – Theoretical)</i>	8h-	Classroom with ADC-M ADR instructor	Yes	Test*
• ADC A concept recall • Risks associated with driving in the Manoeuvring Area • Responsibilities in the Manoeuvring Area • Runways, including entry and exit junctions, waiting areas, taxiways and Aprons • Specific signage separating the Apron from the Manoeuvring Area • Road markings, vertical markings, luminous markings • LVA (Luminous Visual Aids) • Critical ILS areas, sensitive areas, other protected areas, green areas, antennas, RVR facilities and meteorological service equipment • Any hazards associated with landing, take-off and taxiing manoeuvres				

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- Possible presence of conventionally designated areas or routes - Radiotelephone communications (EU Regulation 923/2012 as amended. - SERA, section 14) Aircraft characteristics End-of-course learning test				
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*The certificate of successful completion of the theoretical course enables the start of practical training and must be kept by the operator's company to support the competent bodies' inspection activities.

	Duration	Method	Test	notes
<i>Qualification to drive in the manoeuvring area - initial - practical</i> (<i>manoeuvring area training programme – practical</i>)	Depending on OJT	*	Final assessment performed by ADE-M, documented on the assessment form provided by ADR (Annex 3 E-15 DDS)	/
- Runways, including entry and exit junctions, waiting areas, taxiways and Aprons - Road markings and luminous markings associated with the runway, holding positions, and CAT operations - Road markings and luminous markings associated with taxiways - Specific signage separating the Apron from the Manoeuvring Area - Critical ILS area, other protected areas, antennas, RVR facilities and meteorological service equipment - Any hazards associated with aircraft landing, take-off and taxiing manoeuvres - Possible presence of conventionally designated areas or routes				

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- Radiotelephone communications and procedures - Radiotelephone communications: Use of fixed and mobile equipment putting the theoretical knowledge acquired in training into practice - Use of existing aerodrome communication procedures				
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*Recording of practical shadowing on a dedicated OJT form (Annex 5 E-15 DDS) containing all the tasks (missions) foreseen in the manoeuvring area as well as specificities according to the activity the company performs, repeated n-times (at least 3 times), under the supervision of the ADE-M. In particular, the candidate must be driving at least in the last repetition of the n-times.

	Durati on	Method	Test	notes
Qualification to drive in the manoeuvring area - recurrent <i>(manoeuvring area training programme – Theoretical)</i>	4h-	Classroom and learning test with ADC-M ADR or external ADR-qualified instructor Continuity and proficiency declaration with ADE-M	Theoretical (recurrent test) and Practical (continuity declaration with proficiency check) assessment	/
- ADC A recall - Risks associated with driving in the Manoeuvring Area - Responsibilities in the Manoeuvring Area - Runways, including entry and exit junctions, waiting areas, taxiways and Aprons - Specific signage separating the Apron from the Manoeuvring Area - Road markings, vertical markings, luminous markings - LVA (Luminous Visual Aids) - Critical ILS areas, sensitive areas, other protected areas, green areas, antennas, RVR facilities and meteorological service equipment - Any hazards associated with landing, take-off and taxiing manoeuvres - Possible presence of conventionally designated areas or routes - Radiotelephone communications (EU Regulation 923/2012 as amended. - SERA, section 14) - End-of-course learning test				

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- Aircraft characteristics - Continuity declaration with final proficiency check				
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	Duration/met hod	Test	notes
ADC-M Instructor Qualification (initial/recurrent)	6 hours of theory with ADR ADC-M Instructor	Learning test and final assessment with ADR ADC-M Instructor	/
- Tips for effective training - ADC A concept recall - Risks associated with driving in the Manoeuvring Area - Responsibilities in the Manoeuvring Area - Runways, including entry and exit junctions, waiting areas, taxiways and Aprons - Specific signage separating the Apron from the Manoeuvring Area - Road markings, vertical markings, luminous markings - LVA (Luminous Visual Aids) - Critical ILS areas, sensitive areas, other protected areas, green areas, antennas, RVR facilities and meteorological service equipment - Any hazards associated with landing, take-off and taxiing manoeuvres - Possible presence of conventionally designated areas or routes - Radiotelephone communications - The role of the ADC-M Instructor - Course and assessment management and reporting - End-of-course learning test			

	Duration/met hod	Test	notes
ADC-M Instructor Qualification – recurrent 12 months <i>(manoeuvring area training programme – Theoretical)</i>	2 hours of theory + 1 hour in the movement area with ADR Instructor (ADC-M)	Learning test and final assessment with ADC-M Instructor	/

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- Regulatory/procedural/infrastructural updates - Reporting and Record Keeping - End-of-course learning test - Operational inspection in Movement Area			
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	Duration/met hod	Test	notes
<i>ADE-M theoretical and e-practical qualification</i> <i>(manoeuvring area training programme – Theoretical and practical)</i>	6 hours of theory with ADR Instructor (ADC-M) + 2 hours of practical training with ADE-M ADR + 16 hours of on-shift shadowing with an ISE Officer/Supervisor with at least 3 years of experience, to be completed within 15 working days	Learning test and final assessment with ADE-M ADR	/

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- The role of the ADE-M - ADC A concept recall - Risks associated with driving in the Manoeuvring Area - Responsibilities in the Manoeuvring Area - Runways, including entry and exit junctions, waiting areas, taxiways and Aprons - Specific signage separating the Apron from the Manoeuvring Area - Road markings, vertical markings, luminous markings - LVA (Luminous Visual Aids) - Critical ILS areas, sensitive areas, other protected areas, green areas, antennas, RVR facilities and meteorological service equipment - Any hazards associated with landing, take-off and taxiing manoeuvres - Possible presence of conventionally designated areas or routes - Radiotelephone communications - End-of-course learning test - Management and reporting of training missions (first release and refresh) for driving in the Manoeuvring Area			
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	Duration/met hod	Test	notes
ADE-M qualification - recurrent 12 months (manoeuvring area training programme – Theoretical)	2 hours of theory with ADR Instructor (ADC-M) + 1 hour in the movement area by ADE-M	Learning test and final assessment with ADE-M ADR	/
- Regulatory/procedural/infrastructural updates - Reporting and Record Keeping - End-of-course learning test - Operational inspection in Movement Area			

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	Duration	Method	Test	Notes
<i>Stand facilities (for theoretical instructor and training supervisor/assessor)</i>	6h	Theoretical- Practical	Yes*	*theoretical and final assessment
Theory (4h) - The Role of the Instructor Assessor stand Facilities - Introduction. - Safety Rules - Boarding bridges in the models and types found on the aerodrome - Use of optical guidance systems - Use of 400HZ power systems - Use of preconditioning systems - Verification, reporting and communication of anomalies or malfunctions Practice (2h) - check of the stand and surrounding area of operation, - checking stand free of FOD and obstacles - turning on and reading operator panel messages - pier handling - aircraft docking - self-levelling mode - aircraft detachment and repositioning in parking area - use of 'auto parking' function - no touch policy except where it is planned to place the jet bridge bumper slightly in contact with the fuselage - use of pca (preconditioning) facilities - use of 400hz systems - use of VDGS systems - chock-on function of VDGS systems				

	Duration	Method	Test	Notes
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<i>Stand facilities</i>	min. 10h	Theoretic al- Practical	Yes *	*theoretical and final assessment on Attachment 6 E-15 DDS
Theory (min. 4h) - Introduction. - Safety rules - Boarding bridges in the models and types found on the aerodrome - Use of optical guidance systems - Use of 400HZ power systems - Use of preconditioning systems Practice (min. 6h) - check of the facility and surrounding area of operation - checking of stand free from FOD and obstacles - checking, reporting and signaling anomalies or malfunctions - turning on and reading operator panel messages - jet bridge handling - aircraft docking - self-levelling mode aircraft detachment and repositioning in parking area - use of 'auto parking' function - no touch policy except where it is planned to place the jet bridge bumper slightly in contact with the fuselage - pitches 502/504/506, mandatory contact with aircraft - use of pca facilities (preconditioning) - use of 400hz facilities - use of VDGS facilities - chock-on function of VDGS facilities				

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3.1.1.3 Italian language proficiency check

The Italian language proficiency-check requirement [ref. AMC1 ADR.OPS.B.029 a) 2)] applies for personnel who require an ADC-M permit for access to the manoeuvring area and frequency communication with the TWR.

Therefore, having the appropriate level of proficiency in the Italian language is considered the prerequisite for the application for the issue of the ADC-M permit. This requirement is considered to be fulfilled by:

- possession of the secondary school certificate issued in Italy or by recognised Italian schools abroad (ICAO Level 6 ref. AMC1 ADR.OPS.B.029(b));
- passing the assessment in Italian foreseen in the practical part of the ADC-M qualification in order to verify (in communication, listening and interaction):
 - (1) effective communication on the radio and in person;
 - (2) accurate and clear communication on common and work-related topics;
 - (3) proper handling of incomplete/understood communications;
 - (4) proper handling of communications in the event of complications or unexpected work-related or non-work related events;
 - (5) use of dialect or accent intelligible to the aviation community.

(Theoretical and practical training for the issuing of the qualification will be carried out in Italian with tests and teaching materials in Italian. The final assessment will include the verification of the tasks of correct comprehension and use of phraseology in Italian with the TWR and the recording of this verification on the assessment form ^{note 1)}).

Note 1: ENAV and Fire Brigade (VVF) qualified ADC-Ms will be responsible for applying these requirements and recording them on ADR assessment forms, which will be verified by ADR on a sample basis.

The certificate of knowledge of the Italian language must be provided by the applicant to ADR at the same time as the application for the type M permit.

If proof of knowledge of the Italian language is not available, ADR has selected an Italian language training institution that will carry out an Italian language assessment in accordance with the CEFR (Common European Framework of Reference for Languages) standard; The minimum level that must be achieved, equivalent to the knowledge of Italian required for a secondary school certificate issued in Italy (ICAO LVL6), is set at level B1. Following this certification, the candidate may proceed with the initial training provided by ADC-M, as described above, aimed at obtaining the ADC-M licence. If the level is lower than B1, the candidate will not be able to apply for the ADC-M licence.

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3.1.1.4 Proficiency English language

In Coordination with ENAV, related to the phased implementation of the change in accordance with the regulatory requirements - ADR.OPS.B.029, SERA.14015 (IR, AMC and GM) - which prescribe/recommend the use of English language on VHF frequencies in communications between ground personnel and ENAV-TWR, in order to improve situational awareness on the runway and in the maneuvering area, it was agreed to use on an experimental basis the afternoon runway inspection by ISE.

The experimentation applies excluding conditions of: adverse weather, winter condition and low visibility.

For personnel who are required to enter on maneuver area with ADC-M license and frequency communication with the TWR, the proficiency requirement in English language applies [ref. AMC1 ADR.OPS.B.029 (a)(2)].

Therefore, the prerequisite for access to the application to conduct inspections in English is the possession of the qualification of SAR Officer or SAR Supervisor and the appropriate level of English language proficiency, which is understood to be met by:

- Posses English proficiency certificate at least at ICAO Level 4 [ICAO Level 4-5-6 ref. AMC1 ADR.OPS.B.029(b)] issued by the Aviation English training institution selected by ADR, as a result of passing of a dedicated assessment (final term test) in order to verify (in communication, listening and interaction):
 - o (1) effective communication on the radio and in person;
 - o (2) accurate and clear communication on common and work-related topics;
 - o (3) correct handling of incomplete/understood communications;
 - o (4) correct handling of communications in case of work-related and non-work-related complications or unexpected events;
 - o (5) use of dialect or accent understandable to the aviation community.

Personnel who meet the above requirements will be given appropriately updated personal technical files for carrying out the experimental inspection in English.

In case the classification level is below than ICAO level 6 [secondary school ref. AMC1 ADR.OPS.B.029(b)]:

if 4 or 5 a recurrent assessment will be required every 4 or 6 years, respectively, performed by assessor from the Aviation English training provider selected by ADR, to confirm competency in frequency communication activities with the TWR.

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3.1.2 Training and qualification procedure

3.1.2.1 *Procedures for the training and competency assessment of staff in training*

In order to maintain the Safety requirements of EU Regulation 139/2014, ADR has defined a training standard for both internal and external staff operating at Airside.

The training requirements are defined starting from the analysis of the technical skills required for each activity profile. The purpose is to guarantee the necessary training so that the personnel employed are qualified for the type of function aimed at maintaining the certification requirements and, more generally, all the national and international sector regulations.

Management training, managed by the ADR Human Resources and Organisation Department (HRO), is not covered by this manual.

3.1.2.1.1 ADR PERSONNEL and Contracted Activities

For each internal qualification of personnel involved in airport operations, maintenance and management, for the purposes of issuing and maintaining the qualification itself, ADR has established:

RELEASE

- Initial requirements for access to the qualification,
- Initial theoretical training,
- Initial practical training,
- Initial qualification assessment.

RENEWAL

- Theoretical Recurrent Training (or theoretical-practical where necessary)
- Continuity of Work Verification or Renewal Assessment,
- Proficiency Check (Assessment of maintenance of qualification-specific competence).

REFRESHER TRAINING

- If qualified personnel are absent from their duties, they must, before they can be authorised to carry out the tasks covered by their qualification independently, do the following:

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- For a period of absence from 3 to 12 consecutive months, carry out theoretical refresh training on aerodrome safety provisions and operational procedures applicable to the qualification, with a particular focus on changes during the period of absence; at the end of this theoretical refresh training, an assessment must be carried out;
- For a period of more than 12 consecutive months, re-perform the initial qualification training on aerodrome safety provisions and operating procedures applicable to the qualification, with a particular focus on changes during the period of absence. On completion of this training, a qualification reactivation assessment must be carried out.

CONTINUATION TRAINING

For a description of the continuation training process for ADR personnel, please refer to the Training Manual para. 1.6.

All details concerning the qualification process of internal staff are contained in the Training Manual as well as the structure of the courses (modules) and the process of evaluating the effectiveness of the training.

For third parties that carry out part of the processes falling under the scope of the Aerodrome Certificate (Contracted activities), ADR ensures, by referring to them in the contracts, the requirements applicable to the Airport Operator as described in ADR.OR.D.017, in particular:

- Define and implement a training programme for personnel involved in contracted activities, with initial training (including qualification assessment) and recurrent training at intervals of no more than 24 months.

Below are the minimum course contents (syllabus) with a duration of no less than 4 initial and 2 recurrent hours:

- Applicable aerodrome/technical regulations
- ADR-Contracted interface procedures
- Specialised technical training on equipment, facilities and vehicles covered by the ADR contract

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- Define and implement a theoretical/practical proficiency check plan no more frequently than every 24 months
Note: in case of failure of the proficiency check, remedial training must be arranged.
- Define procedures for staff not reaching standards;
- Provide refresher training for breaks of more than 3 months with a final assessment;
- Repeat the initial training for breaks of more than 12 months with a final assessment;
- Provide continuation training: in the case of new tasks assigned to operators, it will be the employer's responsibility to provide initial training on the new task/qualification; in the case of changes to the operating environment, the personnel concerned must be trained on the change (e.g. distribution of Training Notice and Safety Notice issued by the Manager).
- Use qualified instructors and assessors to implement the training mentioned in the previous points;
- Ensure that records of training activities are maintained in accordance with the requirements of ADR.OR.D.035 and are available for ADR monitoring activities.

3.1.2.1.2 OTHER PERSONNEL

For personnel entering the movement area unescorted (unescorted persons), in accordance with the requirements of regulation 139/2014:

a) ADR defines a series of compulsory initial and recurrent courses, delivered by ADR or by qualified instructors, which are essential for maintaining the Safety of Airside Operations (table below). The training standards of these courses are defined by the nominated persons in collaboration with the Training Manager;

<i>Compulsory course</i>	<i>Applicability</i>	<i>Recurrent training interval</i>
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<i>Aerodrome Safety Module 2 - Airside Safety</i>	To all parties operating at Airside	24 months
<i>Aerodrome safety Module 1 - Code of conduct and emergency management at the aerodrome</i>	Basic elements of the Emergency Plan are contained within the course for all those working in Airside	NA, recurrent topics are entered in the recurrent Airside Safety
<i>AEP remote alerting</i>	To all operators whose qualifications require them to use the remote alerting system provided by AEP (operations room personnel)	24 months
<i>ADC Theoretical Initial Course Type A</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on apron	delivered on first ADC release
<i>Practical OJT with final ADC Type A assessment</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on apron	delivered on first ADC release
<i>ADC Theoretical Recurrent Course Type A</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on apron	24 months after the initial course
<i>ADC Theoretical Initial Course Type M</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on manoeuvring area	delivered on first ADC release
<i>Practical OJT with final ADC Type M assessment</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on manoeuvring area	delivered on first ADC release
<i>ADC Theoretical Recurrent Course Type M</i>	All parties operating at Airside who have to drive aircraft/vehicles/equipment on manoeuvring area	24 months after the initial course

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Details on how to access the courses are available at www.adr.it (section: for Business/Training) or can be requested from the following e-mail address: formazionesicurezza@adr.it

In order to ensure that the requirements for unescorted access and airside driving are maintained, ADR, by making available an unambiguous and consistent training product, is able to carry out notification and reminder campaigns at the required frequencies. Timely compliance remains the responsibility of individual employers.

b) ADR provides companies operating in the movement area as unescorted service providers, certified in accordance with Legislative Decree 18/99, as well as other companies whose personnel enter the movement area unescorted (unescorted persons), with a training standard for the provision of training regarding the companies' responsibilities towards the operators.

The companies in question must suitably define and describe in their Manuals the process of training and qualification of personnel, providing for each individual qualification, related to courses provided by the aerodrome operator, or for which the aerodrome operator qualifies external instructors, analogous to what is applied in ADR:

RELEASE

- Initial entry requirements
- Initial theoretical training
- Initial practical training (OJT)
- Qualification Assessment

RENEWAL (Frequency 24 Months)

- Recurrent theoretical training
- Recurrent practical training,
- Proficiency Check

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REFRESHER TRAINING

- If qualified personnel are absent from their duties, they must, before they can be authorised to carry out the tasks covered by their qualification independently, do the following:
 - For a period of absence from 3 to 12 consecutive months, carry out theoretical refresh training on aerodrome safety provisions and operational procedures applicable to the qualification, with a particular focus on changes during the period of absence; at the end of this theoretical refresh training, an assessment must be carried out;
 - For a period of more than 12 consecutive months, re-perform the initial qualification training on aerodrome safety provisions and operating procedures applicable to the qualification, with a particular focus on changes during the period of absence. On completion of this training, a qualification reactivation assessment must be carried out.

CONTINUATION TRAINING

The qualification issue and renewal process must guarantee that in the event of a change/extension of qualification or of changed training or operational requirements (environment), the personnel involved undergo the necessary incremental theoretical/practical training and an assessment before being able to carry out the new tasks independently.

In case the change is generated by the operator and related to Aerodrome Safety aspects, it will be ADR's responsibility to foresee the necessary training to be provided (e.g. Additional Courses, Safety/Training Notice issue). It will then be the responsibility of the employer to provide for the delivery or distribution of the necessary documentation.

The definition of the methods (theoretical/practical), the timing of the training (initial and recurrent) and the subsequent qualification of personnel (issue and renewal) are the

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responsibility of the Company operating in Airside on the basis of the analysis and training needs related to the type of activity and are mandatory according to the applicable regulatory framework of reference.

In particular, companies must use appropriately qualified instructors and assessors to implement the training referred to in the previous points.

3.1.2.1.3 Qualification of Internal Instructors

The process of qualifying as an in-house instructor, both release and renewal, is described in the Training Manual. The instructor training and qualification process includes the development of the skills necessary to deliver specific courses and a structured learning test at the end of the course.

3.1.2.1.4 Qualification of External Instructors

For the courses listed below, if the number and frequency of the sessions and/or the volume of activities/participants or other specificities of the Operator require it, ADR allows the possibility of qualifying external instructors, for course delivery limited to the personnel of the company they belong to.

A	Initial theoretical ADC-A driving permit
B	Theoretical ADC-M driving (recurrent)
C	Use of Stand Equipment

Preparatory courses for the issue of aerodrome passes in accordance with the membership procedure:

- Aerodrome Safety Module 1, Behavioural standards and emergency management at the aerodrome
- Aerodrome Safety Module 2, Airside Safety

They are made available by ADR free of charge via e-learning. The qualification of instructors for such courses is limited to particular

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technical/operational needs to be assessed on a case-by-case basis.

Where provided for by the operator, requirements for qualification as an instructor are:

- Having been an instructor for at least 2 years in an Airside operational environment.
- Having participated in the initial "qualified instructor permit" course for the specific course by passing the learning test and subsequent assessment.
- Having passed a theoretical/practical qualification assessment involving course performance simulation.
- In the case of the ADC-A driving permit, having driven for at least two years on the Apron.
- In the case of an ADC-M driving permit, having driven for at least 3 years in the Manoeuvring Area or having certified knowledge of frequency communication techniques.
- In the case of the use of stand installations, to have technical skills and documented experience in the field and to have carried out theoretical training of in-house personnel on these installations for at least two years.

The instructor qualification is issued by the ADR Training Manager.

In order to maintain the qualification, it is necessary:

For ADC-A instructors: to participate at least once a year in a meeting, organised by ADR (dedicated recurrent training course), which includes: an update on the course topics and record keeping methods, the sharing of the progress of safety indicators, a field check and a final evaluation (proficiency check).

For ADC-M instructors: to participate at least once a year in a meeting, organised by ADR (dedicated recurrent training course), which includes: an update on the course topics and record keeping methods, the sharing of the progress of safety indicators, a field check and a final evaluation (proficiency check). This course also contains the recurrent Italian language proficiency check.

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For 'stand equipment' instructors: participate at least once every 2 years in recurrent training, which includes: the sharing of safety/efficiency indicators, a theoretical/practical update on the installations available at the aerodrome, record keeping on the training activities carried out and the passing of a final assessment (proficiency check). The syllabus of the recurrent course is similar to the initial course, but with a duration limited to 2h theory and 2h practice.

ADR is responsible for the distribution of training materials and updates to qualified instructors, as well as the provision of any necessary technical briefings in the event of substantial changes. Part E of the Aerodrome Manual contains the training manuals related to the driving license, while the Aerodrome Regulations contain the technical instructions for the use of the stand installations that serve as a reference for the training/education of the operators.

External instructors are required to use the training materials provided by ADR and the record keeping and delivery methods provided.

ADR manages the list of all qualified instructors and their deadlines.

As a monitoring element, ADR requires organisations and companies that are authorised to provide training themselves to send records of the activity provided in order to verify the maintenance of competences for renewal purposes.

Instructors are required to notify ADR in a timely manner of any changes in the email address to which they send communications, updates of training materials, deadlines, etc.

3.1.2.1.5 Airside Driving Expert ADC Type A (ADE-A) and Airside Driving Expert ADC Type M (ADE-M)

In order to ensure that a structured training and practical assessment is carried out, within the ADC-A and ADC-M first issue process, the Airside Driving Expert for ADC type A and M permits has been established (ref. Provisions of Safety, volume 2 airside driving, para. 5.10).

ADE-A requirements

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In order to qualify as ADE-A, the operator must meet the following requirements:

- At least 2 years of driving experience in the relevant aerodrome
- No points deduction (ADC) in the last 12 months
- Having passed a theoretical/practical qualification assessment for ADE-A

ADE-M requirements

In order to qualify, the operator must meet the following requirements:

- At least 3 years of driving experience in the manoeuvring area of the relevant aerodrome (for ADE-M ADR, experience must be gained in Operational Safety)
- No points deduction (ADC) in the last 12 months
- Having participated in the ADE-M qualification course and having passed the required theoretical/practical qualification assessment;
- Possession of a certificate of schooling carried out in Italy or at recognised Italian schools abroad of secondary school level or equivalent (ICAO Level 6).

ADE-A qualification

- The qualification can be carried out by ADC instructors of ADR or of bodies/companies that are qualified to do so (3.1.2.1.4). In order to qualify as an ADE-A, the ADC instructor must attend a refresher course held by ADR, after which a specific certificate will be issued. The list of qualified ADE-As is managed by ADR. All bodies/companies forming ADE-A through their instructors are obliged to communicate the names to ADR for inclusion in the list and assignment of a unique identifier.
- Maintenance of qualification: In order to maintain the qualification, they must attend a recurrent training course every 24 months with the same characteristics as the first release followed by a proficiency check.

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ADE-M qualification

- Qualification is carried out by ADC-M (test) and ADE-M (assessment) ADR instructors by means of an ADE-M theoretical/practical course with a learning test and final assessment. The list of ADE-Ms is managed by ADR.
- Maintenance of qualification: recurrent course every 12 months with ADC-M ADR Instructors with a learning test and final assessment with ADE-M ADR.

3.1.2.1.6 Training supervisor/Assessor stand plants

The qualification of Training supervisor/Assessor Stand Facilities, qualified to provide practical training and conduct final assessments is awarded those who have demonstrated:

- At least 3 years of experience in the use of stand installations.
- Having passed the theoretical/practical course and the specific qualification assessment.

Verification of the implementation of training programmes

The monitoring of training activities for the above courses is ultimately ensured by the processes of membership, issuing of driving permits and boarding dock permits.

ADR requires Entities and Companies that have instructors qualified to teach training in areas of Aerodrome Operator responsibility to submit records of the activity delivered in an established mode and frequency, both to verify competence maintenance for renewal purposes and as an element of compliance monitoring.

3.1.2.1.7 Training Notice

In order to distribute updates and changes regarding training content to external instructors in a timely manner (e.g. pending the updating of training material) or to communicate particular areas of focus during training, ADR Training Management issues 'Training Notices' and forwards them directly to the instructors via the contact details stored in the relevant lists.

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3.1.2.2 Procedures to be applied when staff in training have not reached the required standard training levels

- For theoretical courses carried out by ADR for both internal and external staff, a learning test is usually given, and if the first test is not passed, a second attempt is given at a defined time interval (1 week, except in special cases). If the second attempt is also unsuccessful, the entire course must be repeated.
- For the practical qualification assessment, carried out by ADR for both internal and external personnel, if the practical test is not passed:
 - for ADR personnel, a training intervention consisting of the repetition of a theoretical/practical training procedure (remedial training) is required, defined by the operator in coordination with the Training Manager;
 - for external personnel, it will be the responsibility of the operator's company to identify suitable remedial training.

3.1.3 Description of the documentation to be retained with an indication of the retention period

For all ADR personnel, the content of the courses and the objective evidence of the training carried out in compliance with the requirements of EU regulation 139/2014 are filed by the Training Manager's department in coordination with the Post Holder's departments (the original paper copies of: initial courses, recurrent training, on-the-job training, proficiency checks and assessments are kept by the departments that provided them).

The archiving of data and copies of documents is done using dedicated systems (company NAS network, SAP, Canopo) that guarantee data retention. Using these systems, it is possible to track the training of each registered resource, verifying that training is carried out according to the established frequencies.

Storage details are also contained in Training Manual 1.5 and Part 4.

For operators of other bodies/organisations, for whom training has been provided by ADR-qualified instructors, the archiving of evidence (Training files for each individual employee: date of hire, area of activity, attendance signatures, dates of courses, name of instructor and/or examiner, examination, etc.) is the responsibility of the individual body/organisation, which must define archiving methods in compliance with EU Reg. 139/2014 ADR.OR.D.035 in order to enable the Training Manager and Compliance Monitoring to carry out checks.

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All training records must be kept for 4 years after the termination of the relationship between company and operator.

3.2 Proficiency check programme (competence check), including responsibilities and frequency of proficiency checks

3.2.1 Verification methodologies and procedures

For all ADR qualifications, the proficiency check is described in the Training Manual.

For compulsory courses that ADR delivers externally, the proficiency check takes place every 24 months and is delivered in the form of a theoretical test (test at the end of the recurrent training). Where applicable, the proficiency check includes a statement of continuity issued by the employer or a theoretical/practical assessment carried out by appropriately qualified personnel.

In any case, the proficiency check includes topics related to the operational procedures of interest.

3.2.2 Procedures to be applied when staff in training have not reached the required standard training levels

- For the theoretical proficiency check performed by ADR for both internal and external staff, usually delivered in the form of a test, if the first test is not passed, there is the possibility of a second attempt at a defined time interval (1 week, except in special cases). If the second attempt is also unsuccessful, a training intervention is scheduled, which in some cases consists of a repetition of the course (applicable for ADR and external personnel). In other cases (only for ADR personnel), it consists of a theoretical/practical training course (remedial training) defined by the operator in coordination with the Training Manager.
- For the theoretical proficiency check, carried out by ADR for both internal and external personnel, if the practical test is not passed:
 - for ADR personnel, a training intervention consisting of the repetition of a theoretical/practical training procedure (remedial training) is required, defined by the operator in coordination with the Training Manager;
 - for external personnel, it will be the responsibility of the operator's company to identify suitable remedial training.

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3.2.3 Validation process to measure the effectiveness of the programme

This process is described in Training Manual 1.6.6 - Training Effectiveness.

3.2.4 Description of the documentation to be retained with an indication of the retention period

See paragraph 3.1.3