

Contents

Introduction..... 2

The Recruitment provisions of Part 110..... 3

The Training Process required for certification 4

Screener Competency Testing 5

Grandfathering 6

Requirements for certification 7

Conclusion 8

Introduction

Part 110 provides for the certification of persons conducting any screening function at any airport, airline or regulated agent.

This Part was introduced to, in the words of Poppy Khoza:

According to SACAA's Poppy Khoza, General Manager: Aviation Security, there was previously a regulatory gap in the aviation security training sector. "While training of aviation security personnel has been taking place, a wide variety of standards were being implemented. In addition, training organisations have not until now been approved by the SACAA which is different to all other spheres of aviation training, e.g. flights schools. This gap has now been closed" explains Khoza.

http://www.airnews.co.za/article_CAA_boosts%20aviation_security.html

This being the case, it is very difficult to understand the reasons behind the issue of AIC 18-49.

The emphasis of Part 110 is undoubtedly on the issue of standards and competency testing and assurance.

The AIC states that the requirements of Part 110 will not apply to cargo screeners providing that the training and screening requirements of Part 108 are maintained and until such time as "the training related to screeners" are incorporated into Part 109.

The problem with this is that Part 110 never states that training should be done in terms of Part 109; it merely states that a defined number of hours of training must be done and it provides clear guidelines of the competencies that must be achieved.

In my opinion the Particular Part under which this competency is achieved is irrelevant.

Part 110 functions in a similar way to a normal Unit Standard, it describes outcomes not the details of how the outcomes are achieved.

In any event, the screening and training requirements under Part 108 can never achieve what Part 110 sets out.

Part 110 covers every aspect relating to a screener from recruitment, methods and requirements for background checks, training and very comprehensive competency testing and certification.

This is very clear from the very beginning of the Part 110 Technical Standard:

The objective of the National Screener Certification technical standards is to outline the process for conducting formal evaluations and confirmation, by or on behalf of the Aviation Security Department of the Civil Aviation Authority (CAA), to ensure that a person possesses the necessary competencies to perform assigned functions to an acceptable level as defined by the CAA.



In association with:



These technical standards provide the parameters to be applied during:

- a) *selection*
- b) *hiring*
- c) *training,*
- d) *and competency testing/evaluation of any person or persons assigned responsibility for the screening (by technical process or by other means) of:*
 - i. *Passenger*
 - ii. *Staff*
 - iii. *Cabin baggage*
 - iv. *Hold baggage*
 - v. *Cargo, mail and catering*
 - vi. *Pedestrian and vehicle access*
 - vii. *Aircraft access control screening and aircraft search/inspection*
 - viii. *As well as any person responsible for supervising or managing any person performing screening functions.*

(e) Certification of any person or persons to be assigned the responsibility for screening by technical or by other means of:

- i. *Passenger*
- ii. *Staff*
- iii. *Cabin baggage*
- iv. *Hold baggage*
- v. *Cargo, mail and catering*
- vi. *Pedestrian and vehicle access*
- vii. *Aircraft access control screening and aircraft search/inspection*
- viii. *As well as any person responsible for supervising or managing any person performing screening functions.*

These technical standards shall clearly establish acceptable performance standards for aviation security screeners. Furthermore, these technical standards outline the process for performing job performance evaluations for any person assigned the responsibility for screening, supervision or management of screeners, as well as career development guidance.

The “training and screening” prescriptions of Part 108 obviously do not address any of these issues.

The Recruitment provisions of Part 110

Part 110 spells out detailed requirements for recruitment, selection, interviews, background checks and record keeping that Part 108 does not address at all:

RECRUITMENT:

The following procedures should be followed before deciding whether an employee or potential recruit is of a suitable character and has sufficient integrity to be entrusted to carry out aviation security screening duties. These procedures shall be carried out regardless of the potential recruit’s previous employment, even if this was related to aviation security in another capacity within the aviation industry, police authorities or military.

In total the Technical Standard devotes 4 pages to the selection and recruitment process.



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The Training Process required for certification

The training requirements under Part 108 provide for a SINGLE module of screener training and a SINGLE module of x-ray training. It should be noted that the entire Standard Air Cargo Security Level 1 program can be completed by a reasonable competent student if 3 days.

1. The training requirements to qualify as a National Certified Screener are as follows:
 - a. The completion of 40 hours of “classroom” training covering all subjects detailed in the curriculum;
 - b. 40 hours “simulation” training including x-ray simulation, practical exposure to equipment used in the candidate’s job situation and practical exercises.

The following extract from the Part 110 Technical Standard applies to the classroom training component:

“Classroom training shall include a minimum of 40 hours (hands-on training, computer-based training or combination of both) to address each screening function or operation of each piece/type of equipment screeners will be expected to perform/operate.”

“Classroom training shall be supplemented by computer-based training comprising simulation. Simulation is designed to develop practical skills, for example, how to operate X-ray machines and interpret X-ray images by providing trainees with a replication of task that they will eventually carry out in a real operation situation.”

The classroom training component of our program fully complies with these requirements.

- c. The completion of 40 hours monitored and certified “on the job” training.

The following extract from the Part 110 Technical Standard applies to “on the job” training:

“Upon completion of classroom/hands-on training, new screeners shall be required to complete at least 40 hours practical OJT training, under direct supervision. OJT or periods of supervised performance must be completed per type of screening function (Passenger/Cabin baggage/items, Hold Baggage, and/or Cargo) performed before being allowed to perform independent screening.

Records of OJT must be kept and maintained by an aviation security training organisation or an employer where OJT is done as dictated by the training organisation/employer agreement.

However, certification is not established until the completion of a minimum of 40 hours supervised on-the-job training with a demonstration of an acceptable level of competency.”

In terms of paragraph two above (highlighted in red) the training organisation will need to put the procedures in place to comply with this requirement to the satisfaction of the SACAA.



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Please note that Part 110 NEVER dictates that training should be provided in terms of Part 109, it merely addresses the outcomes required.

In addition to the initial training requirements as detailed above the Technical Standard dictates that “refresher” training be conducted throughout the year with re-testing being required every 12 months:

“Refresher training should be undertaken throughout the year with retesting to occur no less than every 12 months after completion of the initial course and each year thereafter for all screeners, regardless of the type of screening performed by them”.

Part 108, in stark contrast, only requires refresher training every 24 months.

Screener Competency Testing

After successful completion of ALL the training requirements detailed above, the candidate must undergo SACAA controlled competency testing in order to qualify as a National Certified Screener.

Part 108, apart from the testing and evaluation contained in the MOP, does not address the question of competency testing and evaluation.

Part 110, in contrast, has very comprehensive testing and evaluation

An extract from the Technical Standard is as follows:

“The Civil Aviation Authority shall be responsible for the certification/recertification of screeners, supervisors and managers to include establishing standards of performance.

The evaluation of screener competencies is a key factor to the certification and recertification process. All applicants intending to be certificated or recertificated by the Civil Aviation Authority will sit for a CAA set assessment or testing which could be manual and/or computer-based. Certification or recertification will be done upon satisfactory completion of the CAA test. At minimum, individuals performing screening duties shall be tested upon completion of initial training.

Competency testing/evaluation/evaluations conducted as part of the recertification process shall be conducted no less than every 12 months. Competency testing/evaluation shall comprise written or computer-based testing.”

The certification process consists of multiple steps that must all be successfully completed prior to the screener becoming certified.

The first step is theoretical examination that covers every aspect of the training that has been provided, the equipment that the candidate operates and the Standard Operation Procedures and processes that must be followed by the candidate.

The theoretical examination can be written or computer based and will include several practical examinations of screening and procedures.

This is then completed by an oral examination that may take place during the completion of the candidates “on the job” training.



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All of these steps are completed by the accredited training organisation following which that organisation issue what the Technical Standard refers to as a “certificate of certification”:

“Upon successful completion of all training and competency testing/evaluation, the accredited training organisation shall issue a certificate of Certification, signed by the Civil Aviation Authority to screeners. A copy of the certificate is to be retained in each screener’s training record. Recertification does not require any completion of OJT.”

Grandfathering

Part 110 contains the “grandfathering” clause that would remove any potential problems with the training regime and it would allow companies and individuals 12 months to comply and, in turn, would allow the SACAA 12 months to make any changes that they believe may be required.

This clause reads as follows:

GRANDFATHERING

- 1) *This term applies to screeners who are currently on the job (performing screening duties as outlined in these technical standards) for a specified amount of time after the actual effective date of these Technical Standards.*
- 2) *Screeners who have worked for more than 6 months are exempt from part of the initial training. “Grandfathered” employees will undergo recurrent training only in the following areas:*
 - i. *Passenger screening*
 - ii. *Cabin baggage screening/ items*
- 3) *All screeners who have been effectively performing screening duties for a minimum of 12 consecutive months prior to the effective date of National Screeners Certification Technical Standards will be exempt from the Initial training requirement.*
- 4) *However, said screeners meeting the above criteria must complete all recurrent training and testing requirements, as well as any other recertification requirements within 12 months of the effective date of the National Screener Certification Technical Standards.*

The use of the terms of the “grandfathering” provisions of the Technical Standard will allow us to meet the requirements of ACSA in the short terms and will provide us with the time that will be required to train and certify the staff as required to continue to enjoy the status of National Certified Screeners.

Please refer to paragraph 4 above; all persons who enjoy the benefit of “grandfathering” will have to meet the training and testing requirements for recertification within 12 months.



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Requirements for certification

Part 108 makes NO provision for SACAA certification of screener staff.

In addition to the training requirements detailed above, Part 110 makes provision for the following additional requirements for certification:

Requirements for screener certification

110.02.1 *An applicant for the issuing of a screener certification shall –*

- (a) be not less than 18 years of age;*
- (b) hold a valid Class 2 medical certificate issued as prescribed in Document SA-CATS-AVSS;*
- (c) have successfully completed the training referred to in Regulation 110.02.2;*
- (d) have passed the theoretical knowledge examination referred to in Regulation 110.02.3;*
- (e) have undergone the skill test referred to in Regulation 110.02.4;*
- (f) have undergone the background checks;*
- (g) have a minimum qualification as prescribed in Document SA-CATS-AVSS.*

Please note that the recently issued AIC 18-49 relieves the candidate from the requirements of a Class 2 medical and allows a normal medical certificate that complies with the requirements of the Technical Standard to be used.

We have dealt with the training and theoretical examination, the medical and skills test requirements are as follows:

Medical Examination

Candidates shall be medically tested to determine whether they are in good physical and mental state of health to the extent necessary to perform their security screening duties to an adequate standard. Examinations shall be conducted by a medical practitioner registered with the Health Professionals Council of South Africa (HPCSA). The doctor shall upon satisfactory assessment of the medical status, issue a certificate of good health. The medical examination shall be based on the following:

- a) Eyesight*
- b) Colour perception*
- c) Hearing*
- d) Sense of smell*
- e) Chemical/drug dependency (excluding prescribed chronic medication)*
- f) Perception awareness.*



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110.02.4 Skills test

It is recognized, however, that when designing a selection procedure, it is important that it be based on a detailed description of the characteristics of the job in terms of task requirements (procedures involved), functions performed, personal competencies (knowledge, skills and abilities), and the organisational environment within which duties are performed. This can be used as a basis for ensuring the validity of the selection process, particularly in the case of legal requirements and audits. Potential staff should be assessed against these competencies and only those meeting the requirements, should be hired.

Conclusion

Part 108 can never be any substitute for Part 110 as Part 108 only contain rudimentary training requirements and does not address the issues of selection, background checks, quality control and competency certification.

The central theme of Part 110 is one of quality control and the certification of screener competence and none of these issues are addressed by Part 108.



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