



# Guide to ground safety reporting

Supplement to CAP 382

# Introduction

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This booklet provides specific guidance for the UK Civil Aviation Authority's (CAA) Mandatory Occurrence Reporting (MOR) Scheme for ground safety events.

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General information regarding the MOR Scheme is available in CAP 382, which can be downloaded from the CAA website at [caa.co.uk/cap382](https://www.caa.co.uk/cap382)

# Why do I need to report?

## What is the UK Mandatory Occurrence Reporting (MOR) Scheme?

- The MOR Scheme is a way of capturing and sharing safety information and data across the UK aviation industry.

### The purpose of the scheme is to:

- Ensure that the CAA is advised of hazardous, or potentially hazardous, incidents and defects to aircraft and that appropriate action is taken to ensure that the detail of these safety events is circulated to industry. This is so that other people and organisations can learn from them and contribute towards the prevention of accidents and incidents.

### Did you know?

It became a legal requirement for ground service providers to report to the MOR scheme in 2007.

## It is a legal requirement to report safety occurrences to the CAA through the MOR Scheme.

- This is under the Air Navigation Order 2009 - CAP393.
- This is very similar to the RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) requirement for reporting over seven-day injuries to the Health and Safety Executive (HSE). See pages 12-13 for more information.



## Why does the CAA need my report?

- Reports are de-personalised then analysed to identify any trends in the types of events that are occurring across the industry. This analysis is shared with industry.
- Significant events are also followed up by the CAA to ensure that the organisation(s) involved has taken appropriate action to correct any errors in order to prevent reoccurrence. All relevant organisations should then get maximum benefit from the learning opportunity.

### Did you know?

It is helpful when **all parties involved in an occurrence** submit a report as this helps to provide a more comprehensive picture ... **so your report matters!**

### Did you know?

As your **organisation contributes to the MOR Scheme**, an appointed individual within your organisation can review occurrences **related to your type of operation** by logging into the CAA system.

To find out if you are eligible to access the monthly listings or who your appointed individual is, please contact the Safety Data Department:



**01293 573220**

**(Monday – Friday, 0900 – 1700)**



**sdd@caa.co.uk**

## Just Culture

**The sole objective of reporting safety events is to prevent accidents and incidents through improved collection and sharing of safety information; it is not to attribute blame or liability.**

- Article 226 of the Air Navigation Order 2009 states that legal proceedings will not be brought as a result of reporting a safety event **except in cases of gross negligence.**
- Employers should follow the principles of a Just Culture and act responsibly by promoting open reporting of safety events and avoiding action that may inhibit or prevent reporting. They should also be aware that the Public Interest Disclosure Act can protect employees from punitive action by their employer following the disclosure of information such as that submitted to the MOR Scheme.

**What does 'Just Culture' mean?**

“A culture that is fair and encourages open reporting of accidents and incidents. However, deliberate harm and wilful damaging behaviour is not tolerated. Everyone is supported in the reporting of accidents and incidents.”



# What do I need to report?

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## **This section describes the different types of safety events associated with ground handling which need to be reported.**

- A reportable safety event in relation to an aircraft means:

“An incident which endangers or which, if not corrected, would endanger an aircraft, its occupants or any other person.”

CAP382, The Mandatory Occurrence Scheme section 2.1, March 2011  
Article 226, Air Navigation Order (ANO)

- A ground-handling safety event in the UK should be reported to the CAA (MOR Scheme) regardless of whether the aircraft involved is UK or foreign.
- Ground-handling occurrences that affect UK aircraft overseas should also be reported.
- A report should also be made where an event did not endanger the safety of the aircraft but where if it was repeated in different – but likely – circumstances it would create a hazard (near miss).
- A list of examples of events applicable to the ground-handling environment that need to be reported through the MOR Scheme are provided on the following page.

## Did you know?

**Sometimes it can be easy to overlook an error.** For example, if you were to discover unrestrained load during the offload of an inbound flight, **ensure you report it.**



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## **Near miss events must also be reported, some examples of these are detailed below:**

- While manoeuvring onto the stand to park, the aircraft overshot the stop mark and almost made contact with the air bridge.
- During pushback, the tug driver was instructed to come to an emergency stop as a vehicle passed behind the moving aircraft.
- An aircraft started to move under its own power as chocks were being removed by the ground handler.
- High winds blew an empty unit load device (ULD) onto a nearby empty stand.

## **Fuel operations and other essential fluids**

- Significant spillage during fuelling operations.  
(Significant spillage can be defined as a spillage unable to be contained/controlled by the ground service providers' spilling kit.)
- Loading of incorrect fuel quantities likely to have a significant effect on aircraft endurance, performance, balance or structural strength.
- Loading of contaminated or incorrect type of fuel or other essential fluids (including oxygen and potable water).

## **Aircraft damage and unintended contact**

- Unintended contact between an aircraft and any other aircraft, vehicle, ground equipment or ground object.
- Close unintended proximity between aircraft and ground vehicles but contact is not made (near miss).
- Equipment/vehicles obstructing the ramp while the aircraft is parking or pushing back.
- Unreported damage to aircraft (for example from the previous sector).

## **Ground service equipment**

- The removal of aircraft steps where it endangered aircraft occupants/ground service providers.
- The positioning or removing of equipment without following the correct procedures.
- Failures or malfunctions of ground equipment that could endanger the aircraft e.g. tow bar failures (including sheer pin failures), ground power unit (GPU) fires.

Events listed within this document meet the requirement for CAP382 (The Mandatory Occurrence Reporting Scheme) but your own organisation may require further events to be reported to their own internal system.



### **Stand conditions/ operating environment**

- Failure or significant deterioration of aerodrome aircraft operating surfaces.
- Ramp conditions that may cause a hazardous situation for the aircraft.
- Jet or prop/rotor wash incidents resulting in significant damage or serious injury.
- Unsatisfactory ground de-icing/anti-icing (airside environment).

### **Personal safety injury**

- People endangered by aircraft either by actions or omissions relating to an aircraft (e.g. anti-collision beacons switched off prematurely, passengers allowed to walk across ramp unsupervised).

### **Aircraft de-icing and anti-icing**

- Unsatisfactory aircraft de-icing/anti-icing on the ground.
- Contamination or degradation of de-icing/anti-icing fluid.

Events listed within this document meet the requirement for CAP382 (The Mandatory Occurrence Reporting Scheme) but your own organisation may require further events to be reported to their own internal system.

## Aircraft loading and mass & balance (including dangerous goods)

- Significant contamination of aircraft structure, systems or equipment arising from the carriage of baggage or cargo.
- Incorrect loading of traffic load, likely to have a significant effect on aircraft mass and/or balance.
- Discrepancy between the documented masses and actual distributions, e.g. *aircraft not loaded in accordance with the issued loading instructions or the documents produced did not reflect actual load.*
- Carriage of unmanifested unaccompanied baggage.
- Incorrect stowage of traffic load likely to endanger the aircraft, its equipment or occupants or to impede emergency evacuation in any way e.g. *exceedance of structural limitations or non-compliance carriage of load to regulatory, manufacturers or operators requirements.*
- Incorrect or inadequate securing of loads, including incorrectly secured dangerous goods, whether or not there is any evidence of migration. Defective restraint equipment should also be reported such as nets, straps, locks and ULDs which are used to carry the traffic load.
- Electric wheelchairs (or other electronic mobility devices) that have not been stowed and/or secured correctly.
- Transport or attempted transport of dangerous goods which resulted or could have resulted in the safety of the operation being endangered or lead to an unsafe condition.

## Aircraft loading and mass & balance (including dangerous goods) continued

- Damage to packages of dangerous goods, however caused.
- Data discrepancies within the mass and balance documentation produced e.g. dry operating masses/indices, passenger/baggage masses and maximum/limiting masses etc.
- Ground stability of the aircraft compromised due to incorrectly sequenced hold loading or unloading.

### Did you know?

Traffic load includes **passengers, baggage, cargo, catering, spares** and **ballast**.



# How do I report to the CAA?

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**When a safety event occurs which meets the MOR criteria, a report should be submitted through your employer's safety system using their own reporting method - a copy of your report must also be sent to the CAA Safety Data Department.**

 [sdd@caa.co.uk](mailto:sdd@caa.co.uk)

 **Safety Data Department  
Civil Aviation Authority  
Aviation House  
Gatwick Airport South  
West Sussex  
RH6 0YR**

## MOR criteria

"An incident which endangers or which, if not corrected, would endanger an aircraft, its occupants or any other person."  
See pages 4-5 for further details.

## Please note

Some occurrences by their nature must be reported under **additional** schemes such as RIDDOR. Dangerous goods are reportable under a **different** scheme. Details of these reports can be found on pages 12-13.

## Did you know?

You can submit your organisation's safety form directly to the CAA if the form has been approved by the CAA Safety Data Department. To gain approval email your form to **sdd@caa.co.uk**

# How do I report confidentially to the CAA?

## Confidential reports

All safety event reports submitted through the MOR Scheme are treated confidentially; however, if you are concerned about the nature of your report and the confidentiality of its content, it may be more appropriate to submit a whistle blowing report.



## Whistle blowing

Where an individual wishes to disclose sensitive information to the CAA, but an MOR seems inappropriate, the preferred method of reporting is by emailing details of the event to **[whistleblowers@caa.co.uk](mailto:whistleblowers@caa.co.uk)**. If this is not possible, reports may be given by contacting the CAA whistle blowing focal point on **01293 573190**. (Monday – Friday, 0900 – 1700).

All whistle blowing reports are treated and acted upon individually with the focus of these reports being on the confidentiality of the reporter.

Further information about making a whistle blowing report to the CAA is available on the CAA website **[caa.co.uk/whistleblowing](https://www.caa.co.uk/whistleblowing)**

# Dangerous goods and RIDDOR

## Dangerous goods reporting

- All occurrences involving dangerous goods must be reported to the CAA's Dangerous Goods Department.
- The appropriate forms for reporting a dangerous goods occurrence can be found on the CAA's website at [caa.co.uk/dangerousgoods](https://www.caa.co.uk/dangerousgoods)
- As dangerous goods safety events are reportable **under a different scheme**, the CAA do **not** require a separate MOR to be submitted. The CAA will review the content of the dangerous goods report and make a decision whether the report meets the MOR criteria.

## Reports should be submitted by:



**01293 573800**  
**(Monday – Friday, 0900-1700)**



**dgo@caa.co.uk**



**Dangerous Goods Office**  
**Civil Aviation Authority**  
**Aviation House**  
**Gatwick Airport South**  
**West Sussex**  
**RH6 0YR**

## RIDDOR

- In addition to reporting occurrences that compromise aircraft safety to the CAA, occurrences that compromise the safety of personnel and members of the public should be reported to the Health and Safety Executive (HSE), under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995.
- To report a RIDDOR occurrence to the HSE, or to find out more detail around what to report, visit **[hse.gov.uk/riddor](https://www.hse.gov.uk/riddor)**



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# Reporting to the AAIB

## Accidents and serious incidents

- All events that affect the safety of an aircraft are reportable through the MOR Scheme. This includes those events which are classed as accidents, serious incidents and incidents in European Regulation 996/2010.
- Accidents and serious incidents are investigated by the UK Air Accidents Investigation Branch (AAIB), which is independent of the CAA. The AAIB should be notified **in addition** to the CAA in order for the AAIB to dispatch an investigation team if they feel it is appropriate for the event.
- It is important to realise the difference between an accident and a serious incident is only the outcome.
- To report an accident or serious incident to the Air Accidents Investigation Branch, phone **01252 512299** (24-hour accident line).

## The definition of an accident:

“An occurrence associated with the operation of an aircraft which, in the case of a manned aircraft, takes place between the time any person boards the aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the aircraft is ready to move with the purpose of flight until such time it comes to rest at the end of the flight and the primary propulsion system is shut down, in which:

- a person is fatally or seriously injured as a result of:
  - being in the aircraft, or
  - direct contact with any part of the aircraft, including parts which have become detached from the aircraft, or
  - direct exposure to jet blast,



- except when the injuries are from natural causes, self inflicted or inflicted by other people, or when the injuries are to stowaways hiding outside the areas normally available to the passengers and crew; or
- the aircraft sustains damage or structural failure, which:
  - adversely affects the structural strength, performance or flight characteristics of the aircraft, and
  - would normally require major repair or replacement of the affected component,
    - except for engine failure or damage, when the damage is limited to the engine; or for damage limited to propellers, wing tips, antennas, probes, vanes, tires, brakes, wheels, fairings, panels, landing gear doors, windscreen, small dents or puncture holes in the aircraft skin; or
- the aircraft is missing or is completely inaccessible.”

Defined as per EU Regulation No 996/2010 of the European Parliament and of the Council.

### **A serious incident is defined as:**

“An incident involving circumstances indicating that there was a high probability of an accident and is associated with the operation of an aircraft.”

# Who should report?

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## The following are required to report to the MOR Scheme:

- Ground service providers including (but not exhaustive as **includes all staff involved in the aircraft turnaround** process):
  - Caterers
  - Cleaners
  - De-icing organisations
  - Fuellers
  - Ground handlers
  - PRM providers
- Aerodrome employees
- Engineers
- Pilots
- Air traffic control staff

## Did you know?

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Although the regulation states who has to report, **anyone can report** if they want to. Such as:

- Local authorities/regulators including (but not exhaustive):
  - Customs
  - Department for Transport (DfT)
  - Police
  - Fire service

In the airside environment, safety events are often reportable to more than one safety event reporting system; for example, those of the airline, aerodrome, ground handler or air traffic service provider.

Although ground-handling safety events are often reported to the MOR Scheme through the aircraft operator or the aerodrome, **any party involved is still responsible for reporting the incident through the MOR Scheme**, such as a ground handler or any other company operating airside.



# When should I report an event?

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Reports should be submitted through the MOR Scheme within 72 hours of the event.



**If you think a safety event is particularly hazardous, the CAA expects to be advised of the essential details as soon as possible.**

This should be followed up within 72 hours by a written report in the usual way.

However, if for any reason you cannot meet the 72-hour deadline, you must report at the earliest opportunity.

## Supplementary information

**After you make a report within 72 hours, you can submit supplementary information at any time. This will include either further detail of the event after the required 72 hours or further information from a subsequent investigation.**

This is particularly relevant where the details of the safety event change following the results of an internal investigation.

For example:

The initial report submitted indicated there had been a loading error. However, during the subsequent investigation supplementary information showed that the flight crew had incorrectly set the stabiliser trim for departure.



# Useful links and contacts

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## Civil Aviation Authority (CAA)

### CAA Safety Data Department



01293 573220  
(Monday – Friday, 0900 – 1700)



sdd@caa.co.uk



Safety Data Department  
Civil Aviation Authority  
Aviation House  
Gatwick Airport South  
West Sussex  
RH6 0YR

### CAA Whistle Blowing Focal Point



01293 573190  
(Monday – Friday, 0900 – 1700)



whistleblowing@caa.co.uk



caa.co.uk/whistleblowing

### CAP 382 Mandatory Occurrence Reporting Scheme

General information regarding the MOR scheme is available in CAP 382 on the CAA's website at [caa.co.uk/cap382](https://www.caa.co.uk/cap382)

## CAA Dangerous Goods Department



01293 573800

(Monday – Friday 0900 – 1700)



dgo@caa.co.uk



Dangerous Goods Office

Civil Aviation Authority

Aviation House

Gatwick Airport South

West Sussex

RH6 0YR



[caa.co.uk/dangerousgoods](http://caa.co.uk/dangerousgoods)

## HSE and RIDDOR

To report a RIDDOR occurrence to the HSE,  
or for more details about what to report:



[hse.gov.uk/riddor](http://hse.gov.uk/riddor)

## Ground-Handling Operations Safety Team (GHOST)



GHOST was created in 2007 to form a multi-disciplined CAA/industry group to address some of the issues experienced on the ground.

For more information on GHOST and its activities, visit **[caa.co.uk/ghost](http://caa.co.uk/ghost)**

If you have any comments or queries regarding GHOST or this guidance booklet, please email:



[ghost@caa.co.uk](mailto:ghost@caa.co.uk)

## AAIB

To report an accident or serious incident to the AAIB:



01252 512299 (24-hour accident line)



[aaib.gov.uk/reporting\\_an\\_accident](http://aaib.gov.uk/reporting_an_accident)



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[caa.co.uk/ghost](http://caa.co.uk/ghost)



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