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ASDRVE\_OSI\_087

Version 2.0

## Operational Safety Instruction

# Management of Airside Safety Offences

It is the responsibility of all employers to ensure that relevant OSIs are brought to the attention of their staff. However, individuals remain responsible for their own actions and those who are in any doubt should consult their Supervisor or Manager.

### 1. Introduction

- 1.1. The purpose of this Operational Safety Instruction (OSI) is to advise the airside community on how the penalty points scheme and airside safety offences are managed at Heathrow Airport.
- 1.2. This OSI aims to promote safe driving and deter individuals from engaging in dangerous or prohibited activities airside so that repeated unsafe acts are controlled and managed.
- 1.3. Heathrow Airport Limited (HAL) utilise the penalty points scheme to provide a means to hold individuals and/or company accountable for any contravention of airside rules and procedures. A graduated and proportionate approach will ensure the severity of any offence is sanctioned to encourage positive behavioural changes.
- 1.4. An Airside Occurrence Ticket (AOT) is issued to the involved individual and/or a company to facilitate further investigation, if necessary. It is neither an inference that an offence has been committed nor an apportionment of blame for any incident or accident for which it is issued.
- 1.5. Red bars have been added to the side of this document to draw the reader's attention to where changes have been made.
- 1.6. This OSI should be read in conjunction with the reference documents as stipulated therein.
- 1.7. Any changes made in this OSI will only be executed from the published effective date.
- 1.8. This OSI has been retitled. ASDRVE\_OSI\_087 Management of Airside Infractions v1.0 and Management of Airside Infractions Summary of Changes are hereby cancelled.



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## 2. Parties Involved

All personnel/vehicles/companies operating or accessing the airside and baggage operations areas at Heathrow Airport.

## 3. Definitions

Abbreviation	Description
ADP	Airside Driving Permit
AfDM	Airfield Duty Manager
ANPR	Automatic Number Plate Recognition
AOT	Airside Occurrence Ticket
AOL	Airside Operations Licence
Airfield Ops	Airfield Operations Team
ATC	Air Traffic Control
DVLA	Driver and Vehicle Licensing Agency
GDPR	General Data Protection Regulation
GOL	Ground Operations Licence
HAL	Heathrow Airport Limited
ID	Identification
OSI	Operational Safety Instruction
VAP	Vehicle Apron Pass

- 3.1.** For this OSI, “Vehicle” means any self-propelled conveyance or manually operated apparatus on wheels, including trailers or items of plant.

## 4. Introduction to AOT

- 4.1.** An AOT may be issued by an Airport Representative as defined in 4.3 of this OSI, either immediately or retrospectively. Depending on the nature of the occurrence, a full investigation may be launched and completed by HAL’s Airside Standards and Assurance team as detailed in Section 5 of this OSI.

- 4.2.** An AOT will be issued in the following circumstances (non-exhaustive):

- 4.2.1.** To a person being the driver, operator or owner of a vehicle or piece of equipment or any other airside ID pass holder who is involved in any airside accident/incident or suspected to breach any HAL’s rules and procedures as stipulated in this OSI.

- 4.2.2.** To an accountable company where individual responsibility cannot be identified at the time of occurrence.



4.3. The Airport Representatives authorised to issue AOTs are:

4.3.1. HAL Airfield Ops, Security, Airside and Baggage Operations teams, including Security Operations Manager (Campus Security - Alpha 1), AfDM, Senior Airfield Officers, Airfield Operation Officers, Airside Operations Compliance Officers, Airfield Transport Officers and Baggage Compliance Officers in respect of all airside and baggage operations areas at Heathrow Airport.

4.3.2. Metropolitan Police – Aviation policing, in respect of all airside areas.

## 5. Operation and Investigation of the AOT

5.1. All AOTs are issued electronically by the Airport Representatives, with a copy sent to the company or individual involved at their request, either to a work or personal email address provided at the time and recorded via an electronic system.

5.2. A copy of the AOT will also be sent automatically to the HAL Airside Operations Compliance Officers. Where appropriate, the case may be directed to the HAL Airside Accident Investigation team **within 72 hours** who will triage the case and appoint an investigating officer, as appropriate. The investigation may require interviews, personal statements, supporting evidence or records to be provided by the involved individual or company.

5.3. Whilst the investigation outcome is pending and following the initial triage of the AOT, the investigating officer may request the company concerned to temporarily remove, if not already the case, the ADP of the colleague involved in a driving-related occurrence. However, this should be seen as best practice in relation to incident/accident investigation.

5.4. As part of the investigation, a written statement will be requested from the person or company involved as a primary source of information. However, subsequent additional statements or interviews may also be required.

5.5. Upon request from HAL, the company concerned shall share its investigation report to assist the investigation.

5.6. After investigation, “the Baines Simmons Fair Tool - (Flowchart Analysis of Investigation Results) System” will be utilised for determining the nature of errors in line with HAL’s Just Culture model to determine the most appropriate outcome. Individual or company history may also be considered when incidents have occurred more than once.



- 5.7. A summary or detailed investigation report may be produced as a record of the occurrence and may be used for circulation to other airside users for airside safety promotion or recommendation for airside safety improvements. The use of such material is subject to UK GDPR.
- 5.8. If at any point a company or an individual seeks an update on the status of an investigation, they should contact the HAL Airside Standards and Assurance team by email to [airside\\_safety@heathrow.com](mailto:airside_safety@heathrow.com).

## 6. Outcome of AOT Investigations

- 6.1. The following list demonstrates typical examples of AOT investigation outcomes in consideration of their severity:
- 6.1.1. No Further Action (NFA);
  - 6.1.2. Written advisory;
  - 6.1.3. Monetary fine, in line with those published in the latest Heathrow Airport Fees and Charges document. This monetary fine will be directed to the company involved but not an individual;
  - 6.1.4. Penalty points awarded against an individual's ADP;
  - 6.1.5. Suspension of an ADP and/or confiscation of airside ID pass temporarily or in the most severe cases, permanently withdrawn.
- 6.2. An investigation outcome will be provided to the company **no later than 28 days** after an AOT is issued, except for those AOTs that have been issued in conjunction with a HAL-filed safety report, in which case the outcome of the AOT will not be determined until the investigation is completed, in accordance with the 'Just Culture' principle at Heathrow Airport.
- ## 7. Appeals Procedures
- 7.1. Should an individual or a company not agree with the outcome of an occurrence investigation, an appeal must be submitted in writing by the company with the support from the respective line manager to HAL Airside Standards and Assurance team as detailed below within the **21 days response period**.



- 7.2. Appeals must be submitted by email to [airside\\_safety@heathrow.com](mailto:airside_safety@heathrow.com) or by letter to:

HAL Airside Standards and Assurance team.  
Airside Operations Facility  
Building 16887  
Heathrow  
TW6 2GW

- 7.3. Appeals review meeting will be held between the individual involved, their company's representative and members of the HAL Airside Standards and Assurance team. The individual or company must provide any evidence/ground which has not been considered in the original decision at this meeting.

- 7.4. The case will be reviewed, and a decision will be made on whether to uphold or overturn the original decision. The outcome of this review will be notified to the company **within 7 days** which shall be considered final and conclusive.

## 8. **Withdrawal of ADP/ Airside ID Pass**

- 8.1. In the case of serious driving-related or safety occurrences, the operating company shall suspend the ADP and/or the airside ID pass of the staff involved. In such cases, the airside ID pass must be returned to HAL without delay.

- 8.2. HAL reserves the right to suspend any person's ADP either immediately or retrospectively by a member of the Airport Representatives with the knowledge and approval of the HAL AfDM. When doing so, a factual statement of the events and reasons for suspension will be recorded and provided to the staff involved at the time of the incident. The staff's line manager will normally be requested to attend the scene.

- 8.3. In addition to 8.2 above, an individual's airside ID pass may be confiscated when in the opinion of the Airport Representatives that the employee is engaged in serious airside safety occurrence or likely to pose a significant or unacceptable risk to the airport. Confiscation of airside ID passes must be done with the knowledge and approval of the HAL Security Operations Manager. The employee must then be escorted to the landside area immediately and the relevant airside ID pass must be returned to HAL without delay. A confiscation notice will then be issued by HAL Security.

- 8.4. The duration and conditions of ADP suspension or airside ID pass confiscation as described in 8.1, 8.2 and 8.3 above will be agreed upon with the individual concerned in the presence of their management. The line manager will be responsible for ensuring adherence to these conditions.





8.5. Any ADP and airside ID pass reinstatement applications should be directed to HAL Airside Safety and Assurance team ([airside\\_safety@heathrow.com](mailto:airside_safety@heathrow.com)) and ID Centre ([idcentresurgery@heathrow.com](mailto:idcentresurgery@heathrow.com)) respectively by email.

8.6. All ADP suspension and/or airside ID pass confiscation records must be fully documented within the initial safety report.

## 9. Operation of the Penalty Points Scheme

9.1. The penalty point scheme sets out airside driving rules that apply to all ADP holders. Each offence carries a certain amount of penalty points to reflect its severity. Continuous breaching of the airside driving rules will result in the accumulation of penalty points and subsequently lead to ADP suspension or withdrawal. It is the responsibility of all companies to consistently promote, educate and monitor the driving behaviour of their drivers.

9.2. The penalty points will be awarded as a numerical value between 3 and 12 per offence towards an individual's ADP and will stay on the ADP record for a period of 36 months. After 36 months from the date of the offence, the relevant penalty points will be removed.

9.3. If the same offence is committed more than once within 6 months, this will incur additional points awarded to the driver.

9.4. Any driver who accrues 12 or more penalty points in a rolling 36-month period will be subject to a suspension of their ADP for a minimum period of 3 months. Drivers who accrue 20 or more penalty points in a rolling 36-month period will be suspended from driving for a period minimum of 3 years.

9.5. In addition to 9.4 above, HAL reserves the right to suspend or withdraw an ADP under certain conditions as set out in ASDRVE\_OSI\_006 Airside Driver Permit Requirements and Driver Training.

9.6. If an ADP is suspended or withdrawn under the condition as detailed in 9.4 and 9.5 above, prior to reinstatement, the driver's company must provide the HAL Airside Compliance team with evidence of the following:

9.6.1. Documented action plan between the driver and company to mitigate further occurrences.

9.6.2. A copy of the driver training and exam certificate must be completed no earlier than 1 week before the suspension expiry date. For details of airside driver training requirements, please refer to ASDRVE\_OSI\_006 Airside Driver Permit Requirements and Driver Training.



**9.6.3.** The Airside Compliance team will require the driver concerned to attend an interview to review how to avoid further occurrences.

**9.7.** To prevent drivers from reaching ADP suspension and to ensure airside safety, driver re-training is mandatory before certain thresholds are reached. This re-training must include a focus element on the nature of the offence committed. The driver is required to undertake some form of practical assessments and pass an ADP theory test paper **no later than 2 weeks** from the last offence committed under the following conditions:

**9.7.1.** Accumulated 6 points or more in a rolling 12-month period

**9.7.2.** Accumulated 9 points or more in a rolling 24-month period

**9.8.** Where a driver has reached 9 penalty points in a rolling 24-month period, in addition to the fulfilment of the re-training requirements as detailed in 9.7 above, the HAL Airside Compliance team will require an action plan from the company to explain what will be done to prevent the driver from reaching 12 points in a rolling 36-month period.

**9.9.** The penalty point values of each offence are provided in Appendix A with the full offence definitions provided in Appendix B of this OSI.

**9.10.** The HAL Airside and Baggage Operations teams reserve the right to vary the amount of points allocated for certain offences, subject to the combination of offences identified in an occurrence and any additional contributory factors which must be taken into consideration. In such a case, HAL will issue an outcome letter which sets out the reasons for any variations from the published penalty points. Should the company not agree with the outcome for any reason, the appeal procedures as detailed in Section 7 of this OSI should be followed.

## **10. Airside Safety Offence**

**10.1.** All airside safety offences are applicable for all airside and baggage operations areas staff involved in non-driving unsafe behaviours. These offences will usually take the route of a written advisory as a result.

**10.2.** HAL reserves the right to increase the consequence up to confiscation of airside ID pass temporarily, or in the most severe cases for a serious event or continual breaches of airside safety rules, permanently withdrawn, according to Section 6 of this OSI.

**10.3.** Where an individual's responsibility could not be identified, an AOT will be issued to the responsible company. In such case, the consequence as detailed in Section 6 of this OSI shall apply.

**10.4.** The full list of airside safety offences can be found in Appendix C of this OSI.





## 11. Company Performance

All operating companies must observe and comply with the requirements as detailed in the GOL and/or AOL. The number of infringements committed by each company's colleagues will be regularly promulgated at Airport Governance Forums. Such information may be used to assess the company's performance and to assist in the analysis of incident cause and effect. Such learning will be shared with other airside companies where appropriate. Furthermore, the data will be reviewed during the regular Ground Handling Scorecard meetings between HAL and the licensed company.

## 12. Enquiries

Any further questions regarding this OSI should be directed to the HAL's Airside Standards and Assurance team by email to [airside\\_safety@heathrow.com](mailto:airside_safety@heathrow.com).

## 13. References

- 13.1. ASDRVE\_OSI\_005 Vehicles and Equipment Airside – Operation;
- 13.2. ASDRVE\_OSI\_006 Airside Driver Permit Requirements and Driver Training;
- 13.3. ASDRVE\_OSI\_017 Pedestrian Crossings & Walkways Airside;
- 13.4. ASGrOps\_OSI\_042 Use of Personal Protective Equipment Airside;
- 13.5. Heathrow Airport Byelaw 2014;
- 13.6. Aerodrome Manual.



## Appendix A: Penalty Points Scheme Values

(The full offence definitions are provided in Appendix B of this OSI)

\*A higher penalty points will be awarded towards a HAL direct employee.

### Non-Punitive Action

AOT Code	Meaning	No. Of Points
100	No Further Action	0
99	Advisory	0

### Parking Offences

AOT Code	Meaning	No. Of Points
P01	Vehicle/Equipment parking brake not set	3
P02	Parking on a Red route	3
P03	Parking in a position other than where authorised or provided for parking that type of vehicle	3
P04	Parking in a bay other than those provided for that company's vehicles or authorised to do so	3
P05	Vehicle left with the engine running	5
P06	Causing unnecessary obstruction	3
P07	Leaving a vehicle in a dangerous position	6
P08	Obstructing the movement of an aircraft	6
P09	Parking or waiting in such a position as to block the vehicle exit path of a fuel bowser vehicle involved in refuelling	6
P10	Partial obstruction or blocking of: a) Emergency escape exits from buildings and Hex escape shafts b) Emergency escape routes from the building to assembly points c) Assembly Points	Up to 11



## Signs & Signals

AOT Codes	Meaning	No. of Points
S01	Failure to comply with the instructions of an Airport Representative	Up to 6
S02	Failure to comply with road signs or markings (excluding parking)	Up to 6

## Driving Offences

AOT Code	Meaning	No. Of Points
D01	Reversing on an aircraft stand without a trained banksman or guide person (but excluding vehicles where the driver has a 360-degree vision, or a working reversing camera is fitted)	3
D02	Driving without dipped headlights at all times, either airside or baggage operations areas.	3
D03	Failing to display a working obstruction beacon in line with current OSIs	3
D04	Driving across a stand	3
D05	Driving with vehicle doors open	3
D06	Failure to wear a seat belt as a driver	6
D06A	Failure to enforce passengers wearing a seat belt	1
D07	Driving whilst using any electronic device or handling any items that may cause distraction while driving	6
D08A	Driving between 3 – 8 mph (both inclusive) over the published speed limit on the airside roads	3
D08B	Driving between 9 – 15 mph (both inclusive) over the published speed limit on the airside roads	6
D08C	Driving 15 mph over the published speed limit on the airside roads	12
D08D	Driving 5 mph over the published speed limit in the manoeuvring area	6
D09	Driving with a disabled or defective safety or warning device	9
D10	Driving without due care and attention	3 - 9
D11	Failure to stop and report an accident	6
D12	Driving with an ADP or supporting license that is not valid	6
D13	Insecure Load	4
D14	Dropped Load	6



D15	Equipment on tow which detaches	6
D16	Driving under an airbridge	3
D17	Entering the manoeuvring area or runway without authority	Up to 12
D18	Driving against the flow of traffic	4
D19	Driving a vehicle where there is a danger of injury	9
D20	Dangerous driving	Up to 12
D21	Failure to stop prior to using an uncontrolled crossing or before a rapid-rise door.	3
D22	Failure to give way to an aircraft	Up to 12
D23	Endangering an aircraft	12
D24	Failure to comply with an ATC instruction	Up to 12
D25	Driving under the influence of alcohol or drugs	20
O01	Contravention of rules that are not specifically identified in the infringement offence code but are covered in any other OSI currently in force at the time of the infringement	Up to 12



## Appendix B: Penalty Points Scheme Definitions of Offences and Exemptions

### AOT code 100. No Further Action (NFA)

An AOT will be deemed a NFA if HAL Airside Standards and Assurance team deem that there is no case to answer for the driver.

### AOT code 99. Advisory

An advisory will be issued when the HAL Airside Standards and Assurance team believe that it is suitable to provide educational learning into the individual's actions rather than taking punitive action against the individual.

### AOT code P01. Vehicle/ Equipment parking brake not set

It is an offence for a person to cause or permit any vehicle to be left unattended anywhere airside or in the baggage operations areas without engaging the parking brake or restraining device properly.

### AOT code P02. Parking on a red route

It is an offence for a person, except upon the direction or with the permission of the Airport Representatives in uniform, to cause or permit any vehicle to stop, park and/or wait on any of those airside roads marked with double red lines as a red route, unless the vehicle is engaged in one of the following exemptional conditions: -

- Removal of obstruction or potential obstruction to traffic.
- Maintenance and improvement work of the roadway or adjacent infrastructure.
- Erection, maintenance, removal testing etc. of apparatus in, on, under or over the roadway.
- Airport Representatives, London Ambulance Service, Airport Rescue and Fire Service, HAL's Airside Engineering or London Fire Brigade to execute their duty.
- To avoid an accident.
- Dustbin collections or refuse clearance.
- Prevented from proceeding by circumstances outside the driver's control.
- Unless otherwise exemption is granted in the VAP.



**AOT code P03. Parking other than where authorised**

It is an offence for a person, except upon the direction or with the permission of the Airport Representatives in uniform, to cause or permit any vehicle to park in a position other than where authorised or provided for parking that type of vehicle anywhere airside or in the baggage operations areas. This includes any areas marked with yellow lines, hatched areas or other areas that specify 'No parking', unless under one of the following exemptional conditions: -

- Removal of obstruction or potential obstruction to traffic.
- Maintenance and improvement work of the carriageway.
- Erection, maintenance, removal testing etc. of apparatus in, on, under or over the carriageway.
- Airport Representatives, London Ambulance Service, Airport Fire and Rescue Service, HAL Airside Engineering or London Fire Brigade to execute their duty.
- To avoid an accident.
- Dustbin collections or refuse clearance.
- Prevented from proceeding by circumstances outside his/her control.
- Unless otherwise exemption is granted in the VAP.

**AOT code P04. Parking in a bay other than those specifically provided**

It is an offence for a person, except approved in advance by or upon the direction or with the permission of the Airport Representatives in uniform, to cause or permit any vehicle to park in any bay that is specifically allocated to another company's vehicles, unless under one of the following exemptional conditions: -

- Removal of obstruction or potential obstruction to traffic.
- Maintenance and improvement work of the carriageway.
- Erection, maintenance, removal testing etc. of apparatus in, on, under or over the carriageway.
- Airport Representatives, London Ambulance Service, Airport Fire and Rescue Service, HAL Airside Engineering or London Fire Brigade to execute their duty.
- To avoid an accident.
- Dustbin collections or refuse clearance.
- Prevented from proceeding by circumstances outside his/her control.
- Unless otherwise exemption is granted in the VAP.





**AOT code P05. Vehicle left unattended with the engine running**

It is an offence for a person to leave or cause any vehicle to be left unattended with the engine running or with a removable ignition key unattended when the ignition key is in the vehicle while that vehicle is stationary anywhere airside or in the baggage operations areas.

Exemptions to stopping engine: -

- A vehicle being used for emergency purposes, or
- A vehicle in such a position and condition as unlikely to endanger any person or property and is currently engaged in an operation which requires its engine to be used to drive machinery forming part of, or mounted on the vehicle and used for purposes other than driving the vehicle.

**AOT code P06. Unnecessary obstruction.**

It is an offence for a person in charge of any vehicle or trailer to cause or permit the vehicle to stand anywhere airside or in the baggage operations areas to cause unnecessary obstruction to other airport users, except in an emergency.

**AOT code P07. Leaving vehicle in a dangerous position.**

It is an offence for a person in charge of any vehicle to cause or permit the vehicle or trailer drawn by it to remain at rest anywhere airside or in the baggage operations areas in such a condition or circumstances as to involve a danger of injury to other airport users.

**AOT code P08. Obstructing the movement of an aircraft.**

It is an offence for a person in charge of a vehicle to cause or permit the vehicle or trailer drawn by it to remain at rest in such a position to obstruct an aircraft from manoeuvring, such as pushing back or taxiing onto a stand.

**AOT code P09. Parking or waiting in such a position as to block the vehicle exit path of a fuel bowser vehicle involved in refuelling**

It is an offence for a person in charge of any vehicle to cause or permit the vehicle or trailer drawn by it to remain at rest in any such position to obstruct the egress of a fuelling vehicle or equipment, such as fuel dispenser, fuel tanker and bowser, during, about or after fuelling or defueling activities are being taken place.



**AOT code P10. Partial obstruction or blocking of:**

- a) Emergency escape exits from buildings and Hex escape shafts
- b) Emergency escape routes from the building to assembly points
- c) Assembly Points

It is an offence for a person in charge of any vehicle to cause or permit the vehicle or trailer drawn by it to remain at rest in any such position to obstruct the locations of (a), (b) and (c) as indicated above.

**AOT code S01. Failure to comply with the signals of Airport Representatives**

It is an offence for a person, whilst driving anywhere airside or in the baggage operations areas, to ignore, neglect, fail or refuse to follow the signals, reasonable instructions, or directions of the Airport Representatives for the purpose of and without limitation to, operational needs, accident/ incident scene handling, road traffic management and airside discipline enforcement.

**AOT code S02. Failure to comply with road signs or markings (excluding parking)**

It is an offence for a person to drive any vehicle without following the road signs or marking either erected as a signpost or painted on the ground airside or in the baggage operations areas, unless under one of the following conditions: -

- With an exemption issued by the HAL AfDM.
- In the case of Airport Representatives, the Airport Fire and Rescue Service, and London Ambulance Service as part of the emergency response.
- With the direction or permission of the Airport Representatives in the event of an emergency or accident/ incident handling.

**AOT code D01. Reversing on an aircraft stand without a trained banksman or guide person (but excluding vehicles where the driver has 360-degree vision, or a working reversing camera is fitted)**

It is an offence for a person to drive or permit any vehicle to reverse in an aircraft stand unless under the guidance of a trained banksman or guide person or the person has 360-degree vision, or a working reversing camera is fitted to that vehicle. **Any use of 360-degree cameras equipped on the Vehicle will not be considered as having a 360-degree vision.**

**AOT code D02. Driving without dipped headlights at all time**

It is an offence for a person to drive any vehicle airside or in the baggage operations areas without dipped headlights turned on at all times.

**AOT code D03. Failing to display a working obstruction beacon in line with current OSIs**

It is an offence for a person to drive any vehicle without displaying a working obstruction beacon in line with current OSIs. The requirements detailed in ASDRVE\_OSI\_005 Vehicles and Equipment Airside – Operation shall prevail.



**AOT code D04. Driving across a stand.**

It is an offence for a person to drive any vehicle across aircraft stands unless under one of the following exemptional conditions:

- That vehicle is involved in servicing an aircraft on that stand.
- With an exemption issued by the HAL AfDM.
- In the case of Airport Representatives, the Airport Fire and Rescue Service, and London Ambulance Service as part of their duty.
- With the direction or permission of the Airport Representatives in the event of an emergency or accident/ incident handling.

**AOT code D05. Driving with vehicle doors open.**

It is an offence for a person to drive any vehicle fitted with doors with any door open other than whilst actively involved in the process of loading or unloading any trailer attached to that vehicle or to assist in a reversing manoeuvre.

**AOT code D06. Failure to wear a seat belt as a driver**

It is an offence for a person to drive any vehicle airside or in the baggage operations areas without wearing a seat belt where one is fitted unless one of the following exemptions applies:

- Whilst manoeuvring a vehicle within the confines of an aircraft stand (where the 5mph speed limit must be obeyed). Operating companies must satisfy themselves (by means of a risk assessment) that risks to their staff operating on the stand are appropriately mitigated if seatbelts are not worn whilst manoeuvring.
- A person holding a valid medical exemption certificate.
- Emergency service response vehicles where wearing a seatbelt may cause obstruction to execute of their duties.

**AOT code D06A. Failure to enforce passengers wearing a seat belt**

It is an offence for a person who fails to enforce any passenger onboard the Vehicle to wear a seatbelt airside or in the baggage operations areas where one is fitted unless one of the following exemptions applies:

- Whilst manoeuvring a vehicle within the confines of an aircraft stand (where the 5mph speed limit must be obeyed). Operating companies must satisfy themselves (by means of a risk assessment) that risks to their staff operating on the stand are appropriately mitigated if seatbelts are not worn whilst manoeuvring.
- A person holding a valid medical exemption certificate.
- Emergency service response vehicles where wearing a seatbelt may cause obstruction to execute of their duties.



### **AOT code D07. Driving whilst using any electronic device or handling any items that may cause distraction while driving**

It is an offence for a person to drive any vehicle anywhere airside or in the baggage operations areas if the driver is holding or using either: -

- a hand-held mobile telephone;
- an in-ear device (e.g. airpods);
- sat nav, tablet, or any device that can send or receive data; or
- any other item that may cause distraction such as drinks or food.

This offence still applies under the following circumstances:

- stopped at traffic lights;
- queuing in traffic;
- supervising a driver; or
- holding and using a device that is in offline or in-flight mode

### **AOT code D08A to D08D. Driving above the published speed limits**

It is an offence for a person to drive any vehicle above the published speed limit anywhere airside or in the baggage operations areas, except for those that are engaged to the parties involved in emergency response.

All speeding events will be captured using either HAL Airfield Ops or a Police vehicle fitted with a calibrated camera or with a hand-held laser speed gun. This also includes the use of the ANPR average speed camera located at either end of the cargo tunnel.

In the event a person has been reported or suspected of speeding, the related vehicle telematics data may be used as evidence.

### **AOT code D09. Driving with a disabled or defective safety or warning device**

It is an offence for any person to drive a vehicle anywhere airside or in the baggage operations areas, whereby any of the safety/ warning devices or indicators are either faulty or have been unlawfully disabled.

### **AOT code D10. Driving without due care and attention.**

It is an offence for a person to drive any vehicle anywhere airside or in the baggage operations areas, without due care and attention or reasonable consideration for others using the road or place.

### **AOT code D11. Failure to stop and report an accident**

It is an offence for a person who fails to stop and report a traffic accident airside or in the baggage operations areas within a reasonable time to Airport Representatives whenever it is spotted, regardless of the severity.



**AOT code D12. Driving with an ADP or supporting license that is not valid.**

It is an offence for a person to drive a vehicle anywhere airside or in the baggage operations areas with an expired or invalid ADP, or one which has been defaced or the supporting DVLA Licence or equivalent is expired or invalid.

**AOT code D13. Insecure Load**

It is an offence for a person to drive or operate a vehicle or trailer anywhere airside or in the baggage operations areas whereby the load carried by that vehicle or trailer is insecure and is in such a position that neither damage, danger nor nuisance is likely to be caused to any person or property because of the load or any part thereof falling or being blown from the vehicle or trailer, or by any other movement of the load or any part thereof in relation to the vehicle. All loads must be secured by physical restraints other than their own weight if deemed necessary and it is solely the driver or operator's responsibility to ensure that all loads are secured at all times.

**AOT code D14. Dropped Load**

It is an offence for a person to drive or operate any vehicle or trailer anywhere airside or in the baggage operations areas whereby the load carried by that vehicle is dropped. It is not a requirement for neither any damage, danger or nuisance to be caused to any person or property as a result. The driver or operator is solely responsible for ensuring that all loads are secured such as physical restraints other than their own weight before moving off.

**AOT code D15. Equipment on tow which detaches**

It is an offence for a person to allow or permit any vehicle or equipment on tow which detaches anywhere airside or in the baggage operations areas, regardless of any personnel injury or property damage that may occur as a result, following an investigation concluding that the accident is solely contributed by the person who has failed to secure the equipment on tow and to conduct a check before moving off.

**AOT code D16. Driving under an airbridge**

It is an offence for a person to drive any vehicle under an airbridge, unless under one of the following conditions: -

- With an exemption issued by the HAL AfDM.
- In the case of Airport Representatives, the Airport Fire and Rescue Service, and London Ambulance Service as part of the emergency response.
- With the direction or permission of the Airport Representatives in the event of an emergency or accident/ incident handling.





**AOT code D17. Entering the manoeuvring area or runway without authority**

It is an offence for a person to drive a vehicle to enter the manoeuvring area or runway without proper authority.

- Entry to a live runway without clearance from ATC is a 'runway incursion'. Such an act can seriously endanger aircraft and the occupants of the vehicle. HAL takes any runway incursion seriously and a Safety Investigation will always follow for any reported occurrence.
- Entry to a closed runway should be requested through Airfield Ops except a live aircraft crossing route has been set up which remains under active control by the ATC.
- Entering a taxiway without an "M" and "R" ADP would be considered as "taxiway incursion" and a Safety Investigation will always follow for any reported occurrence.

**AOT code D18. Driving against the flow of traffic**

It is an offence for a person to drive a vehicle against the flow of traffic as indicated by a signpost and/or ground marking painted on anywhere airside or in the baggage operations areas.

**AOT code D19. Driving a vehicle where there is a danger of injury.**

It is an offence for a person to drive or use a vehicle or trailer anywhere airside or in the baggage operations areas when: -

- the condition of the vehicle or trailer, or its accessories or equipment, or
- the purpose for which it is used, or
- the number of passengers carried by it, or the way they are carried, or
- the weight, position or distribution of its load, or the way it is secured is such that the use of the vehicle or trailer involves a danger of injury to any person.

**AOT code D20. Dangerous Driving**

It is an offence for a person to drive a vehicle dangerously anywhere airside or in the baggage operations areas.

Manner of driving: A person is to be regarded as driving dangerously: -

- If the way a driver falls far below what would be expected of a competent and careful driver, and
- It would be obvious to a competent and careful driver that driving in that way would be dangerous

Condition of vehicle: A person is to be regarded as driving dangerously if it would be obvious to a competent and careful driver that driving that vehicle in its current state would be dangerous.

It includes anything attached to or carried in or on the vehicle or the way it is carried.





“Dangerous” refers to danger either of injury to any person or of serious property damage; and when determining what would be obvious to a competent and careful driver regard shall be given not only to the circumstances of which he could expect to be aware but also to any circumstances shown to have been within the knowledge of the accused. Reference is made to Section 2A of the Road Traffic Act 1988.

#### **AOT code D21. Failure to stop prior to using an uncontrolled crossing or rapid-rise door**

Before using an uncontrolled crossing in the airside or rapid-rise door in baggage handling areas, drivers must bring their vehicles to a full stop and perform a careful check of their surroundings to ensure it is safe to proceed. Such as the vicinity is free of aircraft (either on self-taxiing or on-tow) or any other vehicles using the adjacent taxiway and ensure any rapid rise door is fully elevated prior to manoeuvring past the baggage operations areas.

#### **AOT code D22. Failure to give way to an aircraft**

It is an offence for a person to drive a vehicle without giving way to an aircraft on the aircraft movement areas airside, such as on the back-of-stand roads, uncontrolled crossings, taxiway system and runways. Unless sufficient communication is established with special instruction given by the ATC, any aircraft including those under tow always have the right of way over any vehicles.

#### **AOT code D23. Endangering an Aircraft**

It is an offence for a person to drive a vehicle recklessly if such an act is having the possibility that damage or harm would cause to an aircraft. There is no requirement for that act to have eventually endangered the safety of the aircraft, as long as it is reasonably possible to have an implication on the safety of the aircraft.

#### **AOT code D24. Failure to comply with an ATC Instruction**

It is an offence for a person to drive any vehicle neglectfully so that ATC’s instruction is not properly followed. There is no requirement for any consequence to occur by such an act to commit this offence. The subsequent investigation will normally follow by an incident, if such an event has been deemed the fault of the driver, any subsequent point(s) will be awarded towards the driver’s ADP.



**AOT code D25. Driving under the influence of alcohol or drugs**

Driving under the influence of alcohol or drugs is strictly prohibited for all airside drivers. It is an offence if a person:

- Drives or attempt to drive anywhere airside or in the baggage operations areas or any other place airside; or
- is in charge of a vehicle anywhere airside or in the baggage operations areas or any other place airside.

While the proportion of alcohol in a person's bloodstream exceeds the prescribed limit as detailed in ASGrOps\_OSI\_046 Alcohol and Classified Drugs, the person is guilty of this offence. All breath samples taken airside will be conducted by a member of the Police using a calibrated breath tester. Should an Airport Representative suspect someone to be under the influence of alcohol and drugs the Police may conduct a 'field impairment assessment'.

**AOT Code O01. Contravention of rules that are not specifically identified in the infringement offence code but are covered in any other OSI currently in force at the time of the infringement**

It is an offence for a person to drive any vehicle without following any rules, requirements or standards as set out in any applicable OSI published by HAL, such contravention of rules is not specifically identified in any AOT offence code.



## Appendix C: Airside Safety Offences

(The full offence definitions are provided in Appendix D of this OSI)

AOT Code	Meaning
A01	Failure to wear correct PPE/Safety equipment where required
A02	Creating or ignoring a FOD Hazard
A03	Causing an obstruction to the pedestrian walkways or emergency exits
A04	Failure to use a published safe walking route
A05	Failure to follow safe passenger handling procedures
A06	Failure to monitor the emergency stop button
A07	Allowing unescorted person(s) airside
A08	Walking between baggage or cargo dolly trains
A09	Approaching and/or walking behind an aircraft when it's not safe to do so
A10	Unauthorised marshalling of an aircraft
A11	Failure to comply with the instruction from an Airport Representative
A12	Smoking Airside other than designated areas
A13	Incorrect use of stand equipment, infrastructure or baggage manual handling aids
A14	Failure to stop and report an incident/ accident
A15	Sitting on chutes, laterals and conveyors in the baggage operational areas
A16	Causing aircraft damage
A17	Failure to position reflective safety cones properly
A18	Leaving a ULD on the ground without prior approval
A19	Contravention of rules that are not specifically identified in the infringement offence code but are covered in any other OSI currently in force at the time of the infringement



## Appendix D: Airside Safety Offences Definitions and Exemptions

### AOT code A01. Failure to wear correct PPE/Safety equipment where required

It is an offence for a person not wearing proper PPE or any other safety equipment where required airside and in the baggage operations areas. Such as high-visibility clothing, foot protection etc. For detailed requirements and exemptions, please refer to ASGrOps\_OSI\_042 Use of Personal Protective Equipment Airside.

### AOT code A02. Creating or ignoring a FOD Hazard

It is an offence for a person to act neglectfully airside so that a FOD is created or ignored as a result. There is no requirement that certain damage to an aircraft or any other equipment is caused to commit this offence.

### AOT code A03. Causing an obstruction to the green walkways or emergency exits

A person who causes an obstruction to the green walkways or emergency exits is considered to commit this offence regardless of the means of obstruction caused. Exemptions will be granted if the presence of such obstruction is with the knowledge of the Airport Representatives who are engaged in an incident, accident or any other emergency handling.

### AOT code A04. Failure to use a published safe walking route

It is an offence for a person who fails to use a published walking route anywhere airside wherever they are provided, such as the followings:

- A full airside pedestrian crossing is similar in design to a zebra crossing on a public highways;
- An implied airside pedestrian crossing consists of dotted paint markings across the carriageway

For more information, please refer to ASDRVE\_OSI\_017 Pedestrian Crossings & Walkways Airside.

### AOT code A05. Failure to follow safe passenger handling procedures

It is an offence for a person who does not follow HAL's requirements and/or individual company's procedures associated with safe passenger handling anywhere airside, including but not limited to the following circumstances:

- Any passengers crossing the apron (during embarking or disembarkation) or are on the apron for a longer period (such as baggage reconciliation) are supervised.
- Ground staff must always remain vigilant to ensure passengers do not deviate from the intended safe walking route. There must be enough personnel to always monitor passengers whilst on the apron.



**AOT code A06. Failure to man the emergency stop button**

It is an offence for a person who does not man the emergency stop button anywhere airside as required by HAL OSIs and/or individual company's standard procedures. To maintain control of the emergency stop button, the person should position at a reasonable distance from the emergency stop button so that it can be activated immediately following an abnormal or emergency situation occurs.

**AOT code A07. Allowing unescorted person(s) airside**

It is an offence for a person to allow another person who does not hold a valid airside ID pass to present unescorted anywhere airside. The escort person must ensure that all personnel being escorted airside are in sight at all times, and they must be able to effectively control their behaviour to comply with all rules and regulations throughout the escorting period airside.

**AOT code A08. Walking between baggage or cargo dolly trains**

Under no circumstance for any person to walk between baggage and cargo dollies trains anywhere airside or in the baggage operations areas no matter whether they are properly parked or not.

**AOT code A09. Approaching and/ or walking behind an aircraft when it's not safe to do so**

It is an offence for a person to approach and/or walk behind an aircraft until it has fully stopped with aircraft chocks being put in place, brakes applied, the engines have shut down and the aircraft anti-collision beacon has been extinguished, unless for aircraft maintenance purposes where sufficient communication between the person and the flight deck is established to ensure that the aircraft will remain stationary and the engines are not to be started-up.

**AOT code A10. Unauthorised marshalling of an aircraft**

It is an offence for a person who receives or provide any signal to an aircraft on a stand or in any other aircraft movement areas at Heathrow Airport without undergoing any proper training and granting approval from HAL.

**AOT code A11. Failure to comply with the instruction from an Airport Representatives**

It is an offence for a person who does not comply with the instructions given by an Airport Representative in uniform.

**AOT code A12. Smoking other than designated areas airside**

It is an offence for a person to smoke anywhere airside or in the baggage operations areas other than the designated areas where appropriate signages are displayed.

**AOT code A13. Incorrect use of Stand Equipment/Infrastructure**

It is an offence for a person to incorrectly use any stand equipment/ infrastructure airside other than the purpose that it is designed to be used or operated. Any person who fails to follow the appropriate HAL OSIs and/or individual company's standard procedures while using the stand equipment/ infrastructure would be considered to commit this offence.



**AOT code A14. Failure to stop and report an incident/accident**

It is an offence for a person who fails to stop and report an incident/accident occurrence to Airport Representatives airside or in the baggage operations areas, regardless of the severity of such incident/ accident occurrence that might be or the location at where it happened.

**AOT code A15. Sitting on chutes, laterals and conveyors in the baggage operational areas** Under no circumstance for a person to sit on the chutes, laterals or conveyors in the baggage operations areas.

**AOT code A16. Causing Aircraft Damage**

It is an offence for a person who acts neglectfully or dangerously anywhere airside, either intentionally or accidentally, to cause damage to an aircraft as to render its incapable of flight regardless of the severity of such damage may have caused.

**AOT code A17. Failure to position reflective safety cones properly**

It is an offence for a person who fails to position sufficient reflective safety cones properly to demarcate the safety zones while aircraft ground servicing activities are taking place, according to the minimum requirements as detailed in the relevant OSI.

**AOT code A18. Leaving ULDs on the ground without prior approval**

It is an offence for a person to leave ULDs on the ground without the knowledge and approval of HAL Airside or Baggage Operations teams anywhere airside. ULDs should normally be stored on the designated stillage or be secured on a trailer.

**AOT code A19. Contravention of rules that are not specifically identified in the infringement offence code but are covered in any other OSI currently in force at the time of the infringement**

It is an offence for a person to act without following any rules, requirements or standards as set out in any applicable OSI published by HAL, such contravention of rules is not specifically identified in any AOT offence code.





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