

TEMPLATE · ADAPT THE BITS IN [BRACKETS]

Data protection impact assessment: starter

Observing people at work calls for a data protection impact assessment in many countries. This starter sets out how NOMIC Ramp works, so your data protection officer can complete it for your organisation in an hour, not a week.

■ 1. What the programme does

Trained observers from [organisation] watch a sample of normal turnarounds at [stations] during [cycle dates]. They note what happens and what made the work easier or harder, and code their notes afterwards. Results are reported as totals and patterns to improve conditions, equipment, procedures and planning.

■ 2. Purpose and lawful basis

- Purpose: safety management (hazard identification and safety assurance) and improving working conditions.
- Lawful basis: [legitimate interests / legal obligation under the safety management system rules that apply, e.g. Commission Delegated Regulation (EU) 2025/20 for ground handling organisations in the EU].
- Not used for: discipline, performance assessment, contract management or ranking of crews or companies (set out in the signed **agreement**).

■ 3. What is collected

- Turnaround details: date, scheduled time, station, port type, stand, aircraft type, handling company, team size and mix, hours into the shift, shift length, temperature, equipment.
- The observer's own notes of what happened, which may mention roles (such as "loading supervisor") but not names.
- Not collected: names, staff numbers, flight numbers, aircraft registrations, photos, video or voice recordings.
- Observer initials, used only inside the programme team to number observations. Reports and exports use neutral numbers.

■ 4. Who can see it

- Observers see their own observations on their phone until they clear them.
- The programme team (programme lead and checking group, [number] people) sees all observations on connected computers.
- Managers and the workforce see reports: totals across many turnarounds. On-time results are shown only for the whole cycle, never by station, company, crew, shift or observer.
- NOMIC Research Pty Ltd can't read the observations: they are encrypted with [organisation]'s own key before they leave the device. Cloudflare, Inc. hosts the encrypted storage.

■ 5. Risks to workers, and safeguards

RISK	SAFEGUARD
A crew is identified by matching date, time and stand with rosters	Ban on matching in the agreement; spreadsheets give the month, not the date, and no times; notes stay with the programme team
Results used against a person or crew	Signed non-jeopardy agreement; results only as totals; no results by crew, shift or observer
A small station's results point at one crew	On-time hidden under station and company filters and below 20 turnarounds; results read with the workforce representative
Quotes in a Learning Team pack identify someone	No times in quotes; quotes edited before printing; programme lead reads them first
A lost phone or a link reaches the wrong person	Phones can't read anything back from storage; observers clear sent observations; a new storage space shuts out old links
Observers watch their own team	Observers never observe a team they supervise or work in that day
Data kept too long	Notes deleted [6 / 12] months after the cycle's report; backups and spreadsheets on the same timetable

■ 6. Workers' say

- Workforce representatives co-sign the agreement and review it after each cycle.
- Crews are asked before each observation and can say no. A crew member can ask for an observation to be deleted by the end of the following day.
- Results go to the workforce before or at the same time as management.

■ 7. Conclusion

[Residual risk: low / medium.] [Approved by: name, role, date.] [Review: after each cycle.]