SURVEILLANCE OF APPROVAL, CERTIFICATE AND LICENCE HOLDERS

1.0 PURPOSE

1.1. This order provides direction and guidance to the Inspectors on the responsibilities, goals, and methods for surveillance of approval, certificate and licence holders as required by the Civil Aviation Regulations. This Order may also be used to audit an applicant for the relevant approval/certificate/licence for the subject operations. For purposes of this Order, the term Operator means approval, certificate and licence holders.

1.2. Under no circumstances will an applicant be certified until the Civil Aviation Authority (CAA) is satisfied that the prospective applicant or operator has proved that he is capable of fulfilling the required certification/licensing/approval requirements, and shall comply with the Regulations in an appropriate and continuous manner. The CAA must therefore perform a pre-inspection/surveillance of the applicant/certificated operator in order to insure that he meets/continues to meet certification requirements. The State should incorporate provisions in its national legislation which permit government agencies which are responsible for aviation safety (or institutions of higher learning in case of Approved Training Organisations) to conduct inspections of operators.

2.0 REFERENCES

2.1 The Civil Aviation Act;
2.2 Civil Aviation (Air Operator Certification and Administration) Regulations 11 and 66;
2.3 Civil Aviation (Flight Operations) Regulations;
2.4 Annex 1 Appendix 2 (Approved Training Organisations)
2.5 Annex 6, Part 1, Para 9.3 (Flight Crew Member Training Programmes)
2.6 Annex 6, Part 1, Chapter 6.3 (Flight Recorders)
2.7 Annex 6, Part 1, Chapter 11.6 (Manual, Logs and Records - FDR)
2.8 Annex 6, Attachment D-2 (Inspection of FDR and CVR systems)
2.9 Annex 8, Part II (Procedures for Certification and Continuing Airworthiness)
2.10 Model EAC Inspection and Surveillance Audit Manual
2.11 ICAO Doc 9841 (Manual on the Approval of Flight Crew Training Organisations)

3.0 SURVEILLANCE OF OPERATORS
3.1 General:

The surveillance process described herein and in the CAA Advisory Circular CAA-AC-GEN006, "Surveillance of Approval, Certificate and Licence Holders" is both for ensuring that the operator complies with the Regulations in an appropriate and continuous manner, and also for an applicant seeking issuance/renewal of an Operator Certificate under the Civil Aviation Regulations, 2007. The Authority should provide a copy of CAA-AC-GEN006 to applicants for issuance/renewal of an operator Certificate and audit preparations.

It is important to make a clear distinction between surveillance and certification activities, where certification means both the issuance and renewal of Certificates/Approvals and Licences. Both are important aspects of an inspector's duties, and one should not take precedence over the other. Certification activities are required to license, certificate, or otherwise qualify airmen, facilities or an airline to operate in a prescribed manner. Surveillance, on the other hand, is aimed at ensuring that the airmen, facilities or an airline continue to adhere to the standards by which they were certificated or approved, through regular inspections of various aspects of their operations.

3.2 Objectives of Surveillance

The primary objective of surveillance of operators is to provide the Authority, by means of a variety of inspections, with an accurate, real-time, and comprehensive evaluation of the quality and safety status of the operator’s organisation.

3.3 Planning and Executing Surveillance Programmes

For surveillance programmes to be effective, they must be carefully planned and executed. Inspections are specific work activities within a surveillance programme which should exhibit the following characteristics:

- A specific work activity title
- A definite beginning and a definite end
- Defined procedures
- Specific objectives
- A requirement for a report of findings (either positive, negative, or both)

For details of planning and executing surveillance programmes, refer to the Inspection and Surveillance Audit Manual, Chapter 3.

4.0 GENERAL SURVEILLANCE GUIDELINES

4.1 Scope of Surveillance

The inspectors’ scope of surveillance shall not be limited only to areas inspected for purposes of continued airworthiness and re-certiﬁcation, but shall also include being alert to any irregular procedures, evidence of inadequate facilities or equipment or indications that management control of the operation may be ineffective. The inspector should also carefully examine any conditions that may indicate a significant deterioration in the operator’s financial condition. The inspector should contact the operator in advance (where necessary) to
make appropriate arrangements for inspecting or carrying out surveillance on elements of the main base operation. Unlike many types of operations, inspections which are most effective when conducted on short notice (such as Ramp Inspections and En-route Inspections) on the elements of the operator are not subject to rapid adjustments on the part of the operator in anticipation of the inspection, thus, some inspections are most productive following adequate notice and coordination.

Where advance notice is made, the operator should be briefed in detail regarding the specific intent of the inspection, the areas to be covered, and the approximate duration of the inspection. Arrangements should be made to ensure that key company personnel will be present during the course of the inspections to provide information and answer questions. The required operator personnel presence will vary according to the type of inspection. For example, when evaluating Operational Control procedures and operations, the inspector will require almost constant contact with personnel who are responsible for each functional area. In contrast, the inspection of Flight and Duty Time records requires very little company personnel involvement except to make records available and answer any initial questions the inspector may have about the record keeping system.

Note: for continuous surveillance inspections e.g. ramp spot checks, the operator need not be notified.

4.2 Presentation of Credentials

4.2.1 Upon arriving at the site where the inspection is to be conducted, the CAA inspectors shall introduce themselves and present their identification to the operator.

4.2.2 The inspector(s) shall review with the operator the scope of the inspection to be conducted, and assemble key organisation personnel who are to be available to answer questions during the course of the inspection.

4.2.3 After the inspection, the inspector(s) shall inform the operator of the findings as appropriate.

5.0 SPECIFIC INSPECTION PROCEDURES AND PRACTICES.

For surveillance as well as certification purposes, operator inspections should be performed at the principal base of operations, sub-bases, and separate maintenance facilities of the operator’s equipment. The purpose of the inspection is to assess the suitability of the operator’s organisation, management, facilities, equipment, manuals, personnel, and training records and continued adherence to the Regulations.

5.1 Document Evaluation

The operations portion of operator inspections will be accomplished in six increments as follows:

- Maintenance Procedures and Control Manuals (MPM, MCM)
- Operational Control
- Operations and Flight (Trip) Records
- Flight and Duty Time Records
• Training Programme
• Training and Qualification Records

5.2 Acquaintance with Operator Manuals and Policy

Before commencing each type of inspection listed in 5.1 above, inspectors should familiarize themselves to the maximum extent possible with the operator's manuals, policies, and instructions regarding the area to be inspected. In developing an annual work programme, it is therefore sound practice to schedule Manual inspections in advance of the other types of inspections contained in this Order. This will provide the inspector with an overview of the operator's instructions and policies prior to evaluating their effectiveness in day to day practice. Before performing the individual inspections contained in paragraphs which follow, inspectors should review for a second time and in greater depth those portions of the Manual which pertain to the specific area to be evaluated. In that sense, all inspections which are conducted by operations inspectors become an extension of the formal evaluation of the operator because unsatisfactory performance in operational areas can often be traced to inadequate planning, guidance, and training.

5.3 Inspection of Manuals

The Inspector should ascertain that the Manuals in place meet the following criteria:

5.3.1 Organisation and Readability

The manual should be organised such that information specific to various employee positions and types of operations is easy to locate, clear, concise, and unambiguous. Tables of contents should be detailed enough so that specific subject areas may be easily and expeditiously located. Type quality, illustrations, and graphics should be clear and readable. Poorly mismatched pages from the Table of Contents should not be acceptable.

5.3.2 Validity and Accuracy

Technical information contained in manuals such as weight and balance charts, performance charts, limitations, etc. should accurately reflect data provided from the manufacturer or that which has been developed through the use of accepted and approved methods.

5.3.3 Continuity

Information presented in the various sections or volumes of a manual should be consistent with that presented in other sections.

5.3.4 Currency and Conformity

Information contained in manuals should reflect the current company organisation setup, equipment in place, procedures, and policies; ICAO standards and recommended practices, Staff numbers, and technical data. The manual(s) should be easy to update and contain a list of effective pages.

5.3.5 Distribution and Availability
The operator should have an effective system for distributing and updating manuals. There should be no question as to who has responsibility for entering changes in specific manuals. The Inspector must be provided with copies of all manuals.

5.3.6 Approvals

Certain portions of the manuals are normally reviewed in detail and require specific signature approval by the Inspector. These include, but are not limited to:

- Aircraft operating limitations
- Normal, abnormal, and emergency checklists
- Minimum equipment lists
- Training syllabi and procedures

The Inspector tacitly accepts other portions of the operator's manual after its review.

5.3.7 Content

An Inspection Checklist/Report Form which appears at the end of this Order will be used for all Manual inspections. The focus of the manual inspection will be to evaluate the OPERATOR manuals in the areas listed above. The "content" area of the Form contains a checklist of the minimum subject areas which should be adequately addressed in the operator's manuals.

6.0 TRAINING PROGRAMME INSPECTIONS

The primary objective of a training programme inspection is to ensure that the operator's overall training programme continues to provide quality instruction by conducting an evaluation of the training programme curricula, facilities, instructors, courseware, instructional delivery methods, and testing and/or checking procedures, which were previously approved by the CAA.

In order to ensure that all students and flight crew members are adequately trained to perform their assigned duties, the administration of an operator should provide adequate ground and flight training facilities and adequately trained instructors. Inspections of the many components of such a training programme are an important part of an overall operator surveillance programme. These inspections are best planned and executed over a period of time that permits a thorough and ongoing evaluation of an operator's training programme. For details of the Training Programme inspection areas, refer to the ISAM, Chapter 9.

7.0 SPECIFIC TRAINING PROGRAMME INSPECTION PROCEDURES

In certain situations, there may be a requirement for the CAA to initiate a "special emphasis" training programme inspection of one or more specific areas. This type of inspection may be initiated for several reasons such as an incident, an accident, or a series of deficiencies discovered through trend analysis of surveillance data. Special emphasis training programme inspections usually focus on a limited area, such as use of checklists, and are relatively short in duration.
The four areas described in the ISAM must be carefully considered before granting approval to a training curriculum. Because these areas are broad in terms of scope and context, their key elements have been organized into 10 categories in order to provide a flexible inspection strategy. This approach permits the many components of an operator's training programme to be broken down into manageable inspection areas, and provides inspection data which lends itself to meaningful interpretation.

An inspection of any of the 10 categories may be conducted as an independent inspection, or categories may be combined when examining a specific training curriculum in detail.

8.0 SURVEILLANCE OF FOREIGN APPROVED TRAINING/MAINTENANCE ORGANISATIONS

Foreign ATO/AMOs where national operators carry out training of their cadres and maintenance of their equipment shall have to undergo audits by the relevant CAA Inspectors at least once every twelve (12) months. When and if necessary, the CAA shall carry out impromptu audits on the foreign ATO/AMO.

The onus shall be on the operator to verify the currency status of Approval for the foreign ATO/AMO and shall update the Authority accordingly. The Authority on its part shall forward a copy of its findings to the foreign CAA responsible for oversight of the ATO/AMO.

9.0 AUDIT OF RELIABILITY PROGRAMMES

Operators shall develop and submit their Reliability Monitoring Programmes to the CAA for approval and evaluation purposes. The operator shall be required to submit to the CAA cumulated data from the Reliability Monitoring Programme as appropriate but not later than a month, with a clear written analysis for evaluation purposes.

In case the analysis of the data from the Reliability Monitoring Programme be found to be of a degrading nature, the CAA shall impose operation restrictions on the operator until such period when the operator rectifies the anomaly.

10.0 INSPECTIONS OF FDR AND CVR SYSTEMS

Flight recorders comprise two systems — a flight data recorder and a cockpit voice recorder. Flight data recorders are classified as Type I, Type II and Type IIA depending upon the number of parameters to be recorded and the duration required for retention of the recorded information. The operator shall have to satisfy the inspector that there is a system in place to monitor that prior to each flight of the day, the Built-In-Test-Equipment (BITE) on the flight deck for the FDAU (Flight Data Acquisition Unit), FDR and CVR, if installed, is operational.

Annual inspections should be carried out as detailed in the ISAM.

The inspector shall consider the Flight recorder systems unserviceable if there is a significant period of poor quality data, unintelligible signals, or if one or more of the mandatory parameters is not recorded correctly. A report of the annual inspection should be made available on request to the inspector for monitoring purposes.

11.0 INSPECTION FOR CALIBRATION OF THE FDR SYSTEM
The inspector shall ask the operator to prove that the FDR system are re-calibrated at least once every five years to determine any discrepancies in the engineering conversion routines for the mandatory parameters, and to ensure that parameters are being recorded within the calibration tolerances.

The inspector shall ask the operator to prove that when the parameters of altitude and airspeed are provided by sensors that are dedicated to the FDR system, there is a re-calibration performed as recommended by the sensor manufacturer, or at least once every two years.

12.0 INSPECTION REPORTING PROCEDURES

This Order has provided a broad overview of the many areas of an operator’s training programme that must be evaluated during the Inspector’s annual work programme. The Inspection Checklist/Report Forms which are found in the ISAM will be used for all such inspections. They contain the major inspection areas which were discussed in this Order. These Forms are designed to be flexible, and appropriate sections should be completed to indicate the scope or content of an inspection which has been conducted.

Civil Aviation Authority