INSPECTION TECHNIQUES

1.0 PURPOSE

This Order is issued to provide information and guidance to safety inspectors on planning and currying out an inspection. It provides basic information and guidance on inspector’s desired qualities, inspection process, and search for evidence, conducting interviews and asking questions, recording the results and evaluating the findings.

2.0 REFERENCE

2.1 ICAO Critical Element No. 6: Licensing, Certification, Authorization and Approval Obligations

2.1 ICAO Critical Element No. 7: Surveillance Obligation.

2.2 ICAO Critical Element No. 8: Resolution of Safety Concerns

2.3 Civil Aviation Regulations: Inspectors access for inspection

3.0 GENERAL INFORMATION

Inspection is an essential element of the overall regulatory oversight programme. It is the systematic and independent examination conducted to verify and to obtain objective evidence that the organisation will comply or complies with the applicable regulations and the processes application will be or is in accordance with the established and approved procedures. It provides information relating to safety implementation and performance upon which the Authority makes informed decisions to allow the organisation to provide or to continue to provide its services.

The Civil Aviation Authority (CAA) is under obligation to ensure that all approved operators; organisations; and personnel have professional competence and capacity to deliver the intended services before approval is granted. And after issuing the license, certificate and or approval the
Authority is still responsible for ensuring that the associated privileges are exercised only when the holder remains in compliance with the regulatory terms of approval.

The CAA (Authority) regulatory framework provides for the safety inspectors to accesses, inspect and audit any person, operator and organisation approved or licensed by the Authority. It is recommended that the Authority adopts a balanced approach which promotes and enhances a sense of shared responsibility between the regulator and the regulated in the management of safety and regulation compliance. The Authority recommended compliance and implementation procedures should not be too prescriptive because it will stifle industry innovations, yet innovative alternative means will be considered only if they satisfy the minimum safety regulation requirements. The balanced safety management approach promotes partnership working relationship between the Authority and the industry.

4.0 INSPECTION: INFORMATION AND GUIDANCE

4.1 Qualities of the Inspector

The inspector should be confident, if the client being inspected is to have confidence in the results. Confidence is results from possession of knowledge and skills on the subject. The attributes of a good inspector include amongst others the ability to be: ethical, open minded, diplomatic and respectful, observant, perceptive, versatile, tenacious, constructive, decisive, self-reliant, objective, resilient, analytical, inquisitive and professional.

Before being assigned (and indeed before accepting to be assigned inspection) duties, it is required to be sure the inspector has the necessary competencies, acquired through training, practice and experience. These competencies include:

a) Knowledge and understanding of the relevant regulations against which the inspection is undertaken.

b) Current best inspection practices and findings assessment techniques.

c) Inspection process management and leadership skills: In particular audit planning, communication, organising and directing, reaching conclusions, preventing and resolving conflict, and audit reporting.

4.2 The Inspection Process

4.2.1 General Information: The Authority grants approvals, certificates and licenses on behalf of the State. The inspector’s roll and responsibility in this process is to provide information, objective evidence and to make recommendations that facilitate decision making to award of approval, continued approval; approval suspension, revocation or imposition of conditions to satisfy before restoration of the full approval status. Unless specifically authorized or delegated, inspectors must recognize that it is the Authority that holds the final ultimate responsibility and accountability for decisions taken in reference to the inspection process findings. However, the inspector’s should be permitted to perform the inspection and make the inspection findings recommendation the evidenced observation during the inspection. The inspectors report should be impartial and objective. The recommendations should reference the relevant applicable regulations.

When assigned to perform an inspection, review the assigned subject available documents to update your knowledge on the job-task, on the organisation approved procedures and to verify
procedures adequacy, relevancy and compliance. This pre-audit review enables the inspector to prepare the inspection plan.

Note: When performing an inspection, inspectors personal wishes, ideas and preferences which are not supported by regulations are not acceptable. Inspections must be carried out in a common, consistent and standard way by all inspectors demonstrating common application of inspection techniques, using and applying the established regulatory requirements; standardized procedures and checklists relevant for the inspection task.

Proper preparation for the inspection enables the inspector to remain in control of the inspection. On the day of inspection, be on time and to get on with the task, i.e. don’t waste time; do not argue; use the checklist; discuss problems when they are found. A successful inspection depends on the skill of the inspector and the degree of openness and co-operation of organisation being inspected. Organizations normally have highly qualified quality assurance and inspection personnel; and experience has proved that the most difficult people to inspect are those who are already experts in the art, because they already know all the tricks by the book. Good preparation will eliminate embarrassing situation occurrences where the organization teaches the inspector.

On site inspection normally includes: an opening meeting; the inspection; evaluation of the findings; and the closing meeting

4.2.2 The Opening Meeting: Before commencing an inspection activity in any organisation, it is a good practice to ensure that the organisation management are fully aware of what the inspection is all about. In the opening meeting introduce the inspection team, inform the organisation about the plan of the inspection, i.e. purpose of the inspection; scope or areas to be inspected; specific organisation documents that will be needed and how the results will be communicated – e.g. in writing during the exit meeting.

4.2.3 The inspection: The items to be inspected always depend on the specific assignment and the inspection scope. Normally the inspection is conducted to verify compliance or to identify non-compliances. It is required to obtain the necessary objective evidence that support satisfactory compliance and/or the identified non-compliance. Inspection items normally include:

a) Documentation: Procedures and instructions; schedules and plans; inspection and test data; failure reports, performance data; minutes of meetings; technical records; contracts and orders;

b) Tools: Availability; condition; storage; operating instruction; and calibration management.

c) Material: Correct specification and identification; handling, records and storage facilities; shelf life management; safety warnings; appropriate instructions; issue and return to stores; disposal procedures.

d) Personnel: Qualifications and training records; sufficient numbers; availability; awareness of responsibilities; familiarity with procedures and instructions.

e) Products: Production / operations / maintenance records; inspection and test results; conformance with approved specifications and requirements.

f) Equipment: Condition; serviceability; compliance with established operating requirements; availability of approved and current service and operational documents and records.
4.2.4 Conducting Interviews & Asking Questions: Persons to be interviewed range from senior managers to those who actually perform the tasks. Prepare an interview schedule and select the right people to be interviewed. Better response is realized when the interview is conducted in a relaxed atmosphere where neither party feels threatened or intimidated. Ask questions on issues within the scope of the inspection. Verify the information obtained through interviews with objective evidence, physical observation; measurements and/or records, i.e. “SHOW ME”.

The good practice is to Ask simple, clear understandable open ended questions that promote two way communication using key words like: what-why-when-where-who & how. Avoid answering own questions; give interviewee time to respond; avoid expressing your opinions.

Take notes, do not depend on memory, listen to what is said and observe at all time, record what is important as you go and reference it to the area audited; persons interviewed; document number / issue status; equipment identification

4.2.5 Search for Evidence: Inspections involve collection of evidence in order to ensure that what is documented in the approved management and procedures manuals is happening in practice. In other words, the practices are in line with the intent. Objective evidence should be collected through interviews; examination of documents; observation of activities and conditions in the area of concern.

4.2.6 Recording Results: Non-conformities or deficiencies observed during the inspection provide the audit output. In the normal cases these will be either instances of:

- Non-conformity to the regulations, or
- Non-conformity to documented approved procedures and practices.

Clearly and concisely record what has been observed and why it is a concern. The organisation need to know what the problem is before it can be satisfactorily corrected. Avoid assumptions, only findings based on factual evidence should be reported. It is a recommended to obtain the signature of the auditee’s representative on the agreed upon audit non-conformity report.

Non-conformity record statements must be precise, clear, understandable and exhaustive. The record statement should reflect the three “W’s”: What; Where; and Why. That is:

- What has been found – The objective evidence
- Where it was found – The specific location
- Why it is considered a non conformity – The reference to a requirement or procedure.

The non-compliance record form (Ref. Inspection Non-Compliance Report Form. Appendix 1) should be completed in duplicate on the day of the inspection and a copy given to the organisation after discussion in the exit meeting. The non – compliance statements should be short and to the point.

4.2.7 Evaluation of the Findings: The inspection process may reveal non-conformities or observation findings, some may be significant than others, some may be closely related or manifestation of the same problem. What is important is to evaluate all the findings to identify and separate those with major and those with minor safety concern. A common format of categorizing findings and/or non conformities is either:
• Significant or;
• Non Significant

4.2.8 Significant findings Classification:
   a. Significant non-compliance with the regulations
   b. Significant non-compliance with established approved procedures.
   c. Significant finding of complete omission of a regulatory requirement.
   d. Significant finding of high aggregate number of minor non-conformities concerning the same approved procedure requirement.

4.2.9 Non Significant findings: The are inspection findings which do not have a direct negative impact on safety, which however degrade the general safety working environment whose result may indirectly jeopardize the overall safety objective.

4.2.10 Findings and Non-Compliance Rating: Significant findings and non-compliance are rated in accordance to magnitude they would affect safety, or to identify the serious and the less serious non-conformities basing on their level of safety significance.

Level 1- Findings are significant non-conformities which lowers the safety standard and seriously hazards safety.

Level 2- Findings are significant non-conformities which could lower the safety standard and possibly hazard safety.

Level 3- Findings have no direct negative impact on safety, which however degrade the general Safety environment.

4.2.11 Inspection Exit: Before leaving the organisation after the inspection it is recommended to hold an exit meeting with the Accountable Manager or the Quality Manager of the facility / equipment that has been inspected. In this meeting communicate, discuss and explain the inspection findings. A copy of the Inspection Non-Compliance Report Form covering the agreed upon findings should be submitted to the organisation before leaving. It is recommended that this report is signed by the authorized organization representative.

4.2.12 The Inspection Report: The inspection report, including the appropriate checklist, findings report and associated evidence collected during the inspection should be compiled and submitted to the Manager Flight Safety Standards (MFSS) for evaluation and assessment of the inspector’s findings; recommendation; and follow-up action before forwarding the report to the Director Safety Security and Economic Regulation (DSSER) for the final review and approval.

The inspection report must include: Purpose and scope of the inspection; Summary of findings and the referenced regulations and/or approved organisation procedure; compliance and non compliance evidence attachments as applicable; recommendations for follow up of corrective action and for subsequent inspection if necessary and a conclusion of the audit team judgment as to the degree of compliance with the regulations and the system’s ability to achieve or failure to achieve the defined objectives.

DSSER’s approval of the report signifies the Authorities acceptance of the responsibility to communicate and implementation of the inspector’s recommendations to the inspected organisation.
Civil Aviation Authority
Appendix 1
FORM: O-GEN006
July 2008

INSPECTION NON COMPLIANCE REPORT FORM

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<thead>
<tr>
<th>Type of Inspection: Certification; Renewal; Surveillance; Ramp Inspection; C of R Issue; C of A Issue/Renewal; Others Specify:—</th>
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<tbody>
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<td>Name of Operator</td>
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<td>Airport of Inspection</td>
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<td>Date of Inspection</td>
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This form should be filled in duplicate, one copy to be handed to the organisation authorized representative.

Levels of Non Compliance

- Level 1: Are significant non conformities which lowers the safety standard and seriously hazards safety.
- Level 2: Are significant non conformities which could lower the safety standard and possibly hazard safety.
- Level 3: Are findings that do not have direct negative impact on safety, which however degrade the general Safety environment.

Non-Conformity Reports- whState:

- What has been found – The objective evidence
- Where it was found – The specific location
- Why it is considered a non conformity – The reference to a requirement or procedure.

Findings

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Name & Signature of Organisation Rep: ..........................................................

Signature of Inspector: ..........................................................