



Number: OPS SN- 2012/12

Issue: 4

03 December 2018

Flight Operations Safety Oversight Programme

This Safety Notice contains recommendations regarding operational safety.

Recipients are asked to ensure that this Safety Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability: All Aeroplane and Helicopter AOC Holders

1. Introduction

1.1 The purpose of this Safety Notice is to present to the industry the programme and format of the Flight Operations safety oversight system.

2. Annual Safety Oversight Programme

2.1 Following the initial certification of an Operator, where it is ascertained that the Operator is competent to secure the safe operation aircraft, the aim of the Annual Safety Oversight Programme is to confirm that an Operator continues to maintain this level of compliance in all aspects of the operation.

2.2 Continuing safety oversight of an operator is an obligation under the ICAO Convention by the State of the Operator and is inherent in the system of certification. It is an essential part of the responsibility of a State to ensure that the required standard of operation is maintained in order to provide a safe and reliable commercial air transport service to the public.

2.3 Safety oversight is defined as a function by means of which States ensure effective implementation of the safety-related Standards and Recommended Practices (SARPs) and associated procedures contained in the Annexes to the Convention on International Civil Aviation and related ICAO documents through its own regulatory provisions. Safety oversight also ensures that the national aviation industry provides a safety level equal to, or better than, that defined by the SARPs. As such, an individual State's responsibility for safety oversight is the foundation upon which safe global aircraft operations are built. Lack of appropriate safety oversight in one Contracting State therefore in many ways threatens the health of international civil aircraft operation.

2.4 The Safety Oversight Programme is tailored to each individual Operator and commensurate with the complexity, scale and scope of the operation. The programme of audits and inspections is carried out over a 12-month period based on the expiry of the AOC.

- 2.5 The Programme is planned, recorded and finally transmitted to the Operator on an Annual Safety Oversight Programme form ([Appendix 1](#)). It is flexible so that any changes to the Operator's operation that may affect safety can be accommodated.

3.0 Components of the Safety Oversight Programme

- 3.0.1 The Annual Safety Oversight Programme is made up of a number of individual audit events and inspections (Checks) as follows:

Events: Annual Audit (AA), Mid-term Audit (MA), Manual File Review (MR) and Specific Purpose Audit (SPA)

Checks: Check C (Cabin check), Check D (Documents check), Check Ex (Examiner check), Check F (Flight check), Check G (Ground check), Check L (Liaison visit), Check M (Manuals Check), Check O (Organisational Competency check), Check Q (Quality Management Systems check), Check R (Ramp check), Check S (Safety Management systems check) and Check T (Training Check)

4.0 Events

4.1 Annual Audit (AA)

- 4.1.1 The Annual audit (AA) is an audit including inspections (Checks) carried out in depth once a year around three months prior to the expiry of the AOC on an Operator to assess operational safety. The Annual Audit is made up from a selection of the Checks listed in the following paragraphs below. The number of Checks and the depth to which they are carried out is determined by the Flight Operations Inspector's knowledge of the Operator. For instance, an Operator with a poor safety and compliance record or one that causes safety concerns for other reasons, such as financial difficulties, would not be subject to an audit of the same scope as an Operator with a good safety and compliance record. The audit and associated checks is focused on the adequacy of the Operator's organisational structure, management competence and control, quality control and operator responsibilities in the implementation of systems and processes.

- 4.1.2 Generally, the Annual Audit is made up of a Check O, a management and organisational competency check, and other Checks such as Check D, Check T and Check G that provide a snapshot of the Operator's processes and procedures.

4.2 Mid-Term Audit (MA)

- 4.2.1 The Mid-term Audit (MA) is an audit to establish that an Operator has an effective Quality Management Systems (QMS) and Safety Management System (SMS). It is made up of a Check Q and S and is done at the mid-point of the Annual Oversight Programme.
- 4.2.2 The Mid-term audit may also include Special Objective Checks (SOCs) where applicable to review specific issues such as Flight Data Monitoring, Special Operations, Ground Handling etc...

4.3 Manual File Review (MR)

4.3.1 The Manual File Review process ensures the continued monitoring of the Operations Manual and falls into two categories – those parts that are essential to review annually (safety critical), and the remainder that may be reviewed over a three-year period.

4.3.2 Check M - Annual, includes a series of reviews of applicable parts of the Operations Manual that address the areas that are considered to pose the greatest potential risk to flight safety, and those parts of the Operations Manual relating to the Operations Approval where these are different.

4.3.3 Check M - Three-yearly, includes a review of the remainder of the Operations over a period of three years.

4.4 Specific Purpose Audit (SPA)

4.4.1 The Specific Purpose (SPA) audit is an audit conducted to respond to any safety concerns or circumstances such as new approvals, areas of operations or other significant variations to an Operator's AOC where it is deemed by the Authority a conformance check is required to verify compliance.

5.0 Checks

5.1 Check C (Cabin Check)

5.1.1 The Check C is an inspection of the passenger cabin and cabin crew procedures. It is intended to confirm that a flight is being operated in accordance with published procedures and the Requirements, the aircraft is equipped correctly for the purpose of the intended flight, the required cabin crew complement are carried, and cabin safety procedures are conducted in accordance with the Operations Manual and the Requirements. The Check C is intended to cover all aspects of the flight from pre-flight briefing to the completion of post-flight documentation.

5.2 Check D (Document Check)

5.2.1 The Check D is an inspection of aircraft and/or crew records to confirm that they are completed in accordance with the Operator's Operations Manual and that the contents comply with the Requirements. The inspection will normally include a cross-section of documents covering flight time limitations, training records and returned flight documentation.

5.2.2 There may be occasions where individual elements only are inspected. These can be indicated by using an identifying suffix such as **Df** for flight time limitations; **Dt** for training; and **Dr** for returned flight documentation.

5.3 Check Ex (Examiner Check)

5.3.1 The Check Ex is an audit of crew training and testing performance by Examiners authorised by the Authority to confirm adherence to training and testing standards adopted by the Authority.

5.3.2 A Check Ex may be undertaken in any training or testing environment where Examiners are performing such tasks under authorization or acceptance. These may include Line training/testing, Operator Proficiency checks (OPCs), Licence Proficiency checks (LPCs) or Safety and Emergency Procedures (SEP) testing.

5.4 Check F (Flight Check)

5.4.1 The Check F is an inspection of the flight deck operation and crew procedures. It is intended to confirm that a flight is being operated in accordance with published procedures and the Requirements. The Check F is intended to cover all aspects of the flight from pre-flight planning to the completion of post-flight documentation.

5.5 Check G (Ground Check)

5.5.1 The Check G is an audit normally as part of the Check O, intended to sample the Operator's procedures to confirm that the facilities, ground operational support functions and crew pre-flight briefings are in accordance with the Operator's Operations Manual and the Requirements.

5.6 Check L (Liaison Visit)

5.6.1 The Check L is a liaison visit is an opportunity for the Authority and the Operator to formally or informally discuss safety and regulatory issues. Ideally it should be an opportunity to involve both the management and the workforce. A Check L is not scheduled as part of the Operator's safety Oversight Programme but rather at the discretion of the Flight Operations Inspector and/or the post holders on an opportunity basis. There may be certain cases where the operator may call on the Authority to pay visits or discuss matters such as significant changes in the company structure, core business, new business strategies, new infrastructure or facilities.

5.6.2 A liaison visit also permits the Authority to monitor the Operator's activities without the formality of a planned audit.

5.7 Check M (Operations Manual Check)

5.7.1 The Check M is an audit conducted to confirm that the Operator's Operations Manual complies with the Requirements. A Check M may be undertaken at initial review, subsequent review of amendments or as part of the continued oversight (MR process).

5.8 Check O (Organisational Competency Check)

5.8.1 The Check O is an audit to assess the suitability of the management structure compared to the scale and scope of the operation and the individual competence of significant management post holders or nominees, as well as the competence of the Operator to operate aircraft safely through adequate management supervision and control.

5.9 Check Q (Quality Management System check)

5.9.1 The Check Q is an audit aimed at determining the level of compliance and effectiveness the Quality Management System with the Requirements in structure, process and documentation.

5.9.2 A Check Q specifically addresses:

- Quality Management System management evaluations;
- audit schedule and reports;
- corrective action/follow-up system;
- Quality Management System training; and
- Quality Management System records.

5.10 Check R (Ramp Check)

5.10.1 The Check R is an inspection conducted at the place of an aircraft's arrival or departure intending to determine an aircraft is operating in accordance with the Requirements.

5.10.2 The Check R includes aspects such as if the equipped and configured correctly for the purpose of the completed or intended flight; that crew qualifications are appropriate; that the required cabin crew complement is carried (if applicable); that pre-flight procedures are in adherence with Operator and the Requirements; that the supporting documentation is appropriate and correct and that the aircraft is (as far as can reasonably be established) in an airworthy condition.

5.11 Check S (Safety Management System Check)

5.11.1 The Check S is an audit designed to assess the compliance of the Operator with the requirement for a Safety Management System (SMS) and the nature of the Operator's approach to the systematic management of safety.

5.11.2 The Check S in regards to the SMS specifically checks that the programme:

- identifies safety hazards;
- ensures that remedial action necessary to maintain an acceptable level of safety is implemented;
- provides for continuous monitoring and regular assessment of the safety level achieved;
- aims to make continuous improvement to the overall level of safety; and
- complies with the Requirements.

5.11.3 The Check S also includes the accident prevention and flight safety programmes and the Flight Data Monitoring (FDM) programme (where applicable).

5.12 Check T (Training Check)

5.12.1 The Check T is an inspection of a training function conducted by or on behalf of the Operator. This may include any aspect of the operator's administration of the training function, implementation of approved training or testing programmes and training devices. The Check T is divided into three categories indicated by suffixes **Td**, **To**, **Tp** and **Tt**.

- 5.12.2 A Check Td is an inspection of any training device utilised by the operator in lieu of the aircraft. Check Td examines in general device fidelity and will include inspections of simulators as part of the simulator user approval and any other training devices or mock-up utilised by the operator.
- 5.12.3 A Check To is an audit normally conducted as part of the Annual Audit (AA) to determine the suitability and adequacy of the administration, control and oversight of the training function from an organisational perspective.
- 5.13.4 A Check Tp is an audit of the implementation and delivery of approved programmes against the Operations Manual and the Requirements. These include any training programmes approved such as CRM, Ground refresher training, Special Operations, SEP, Command training, Line training etc...
- 5.13.5 A Check Tt is an audit of compliance against the approved programme and the Requirements any testing programme approved such as Licence or Operator Proficiency tests, SEP tests, Line checks etc...

6. Frequency of audits and inspections

- 6.0.1 The audits and inspections are carried out at the following frequencies:

Audit/Inspection	Frequency
Annual Audit (AA)	Annually
Mid-term Audit (MA)	Annually
Manual File Review (MR)	Annually
Specific Purpose Audit (SPA)	At the discretion of the Authority
Check C (Cabin Check)	At the level determined by the Authority
Check D (Documents Check)	Annually
Check Ex (Examiner Check)	At the level determined by the Authority
Check F (Flight Check)	At the level determined by the Authority
Check G (Ground Check)	Annually
Check L (Liaison Visit)	At the discretion of the Authority or Operator
Check M (Manual Check)	As required
Check O (Organisational Competency Check)	Annually
Check Q (Quality Management systems Check)	Annually
Check R (Ramp Check)	At a level determined by the Authority
Check S (Safety Management Systems Check)	Annually
Check T (Training Check)	
Check Td	At a level determined by the Authority
Check To	Annually
Check Tp	Annually
Check Tt	Bi-annually

- 6.0.2 The Check F and Check C frequency is set by the Authority depending on a number of factors relating to the complexity, scale and scope of operations. Factors considered are:
- Route structure
 - Number of flights
 - AOC regions
 - Navigation specifications (RNP or RNAV)
 - Special Operations Approvals (ETOPS, AWO, RVSM etc...)
- 6.0.3 At least one Check F and Check C are conducted to each AOC region annually and the Authority ensures that the entire route structure is covered in a period of 2 years. This policy also ensures adequate oversight on all other technical aspects of navigation specifications and special operations. The audits include both the outward and inward sector to ensure that the audit captures the performance of outstation functions. Long term charters and wet/damp lease out with durations exceeding 3 months are subject to Specific Purpose Audits and will usually include the scope of a Check F and C.
- 6.0.4 The Check Ex is programmed based on the number of Examiners an Operator has. On average the Authority programmes at least one audit between successive Examiner revalidation.
- 6.0.5 The Check Td is programmed based on the number of training devices an operator utilises. The Authority ensures that as part of its oversight, training devices are inspected at least once within a period of two years.

7. Audit/Inspection Findings

7.1 General

- 7.1.1 The terms finding and non-conformity are interchangeable. In order to follow standard auditing practice, findings are ascribed levels. The levels used replicate the definitions contained in European Aviation Safety Agency (EASA) Part-M and Part-145, and are described in the Table below.
- 7.1.2 Level 1 findings will normally require regulatory action to prevent an activity taking place. It will normally require the withdrawal of an approval, permission or exemption or the prevention of an aircraft flight until the root cause of the finding is addressed. The latter sanction is to cater for the case where a finding is specific to an aircraft rather than a function. It will generally result in the requirement for an action plan with specific timescales, agreed between the Operator and the Authority.
- 7.1.3 Level 2 findings are graded by the timescales based on a risk analysis in which the Flight Operations Inspector considers a satisfactory resolution shall be required.

7.2 Finding Levels and Timescales

- 7.2.1 A Finding may be raised against a *Specific Requirement* which include any current Seychelles legislation, regulation and technical standards (JAR OPS, FCL, CAP 371 etc...) and mandatory FODs directly related to Requirements. A Finding may also be raised against an Operations Manual Requirement.

7.2.2 The following Table presents the finding levels and timescales.

FINDING	DEFINITION	TIMESCALES
Level 1	Any significant non-compliance with a Specific Requirement which lowers safety to the point where there is a serious hazard to flight safety. Remedial action is required either before the next flight/event, or prior to the reinstatement of an Approval, or the lifting of a restriction placed upon the operation. A Level 1 finding will normally result in formal regulatory action; e.g. the withdrawal of an approval; prevention of an aircraft from flying, etc.	Remedial action is required either before the next flight/event, or prior to the reinstatement of an approval, permission, exemption or the lifting of a restriction placed upon the operation.
Level 2	Any non-compliance with a Specific Requirement or Operations Manual Requirement, which could lower safety standards and possibly hazard flight safety. Remedial action is required within an agreed period up to a maximum of 90 days.	Remedial action is required within an agreed period up to a maximum of 90 days.
Observation	A process or practice not in accordance with industry best practice or guidance material, or that indicates a trend that could lead to a future non-compliance, which may include a failure to continue to satisfy the Authority in accordance with ANO Article 6.	Remedial action not mandatory depending on Operator documented response of assessment. No timescale.

8. Response to Safety Oversight Reports

8.1 Corrective Action Plans

- 8.1.1 Operators shall respond to any audit/inspection report in a timely manner by the submission of a Corrective Action Plan (CAP) document within two weeks of any audit/inspection. In view of the severity of Level 1 Findings, any report containing such Finding shall be responded to separately with urgency for the specific Finding.
- 8.1.2 The Corrective Aviation Plan shall be submitted to the Authority prior to corrective actions being implemented for acceptance and again following completion of actions for verification or follow-up.
- 8.1.3 All Corrective Action Plans and implementation shall be channeled through the Quality Assurance process for verification and validation prior to submitting to the Authority. The Authority expects that the Quality Manager reviews and accepts all root causes to ensure that the planned corrective action will address the issue.

8.2 Contents of a Corrective Action Plan

8.2.1 Corrective Action Plans shall be submitted to the Authority in an acceptable format and contain the following elements:

- Audit Report Reference
- Finding Reference
- Finding
- Root cause
- Planned corrective action and target date
- Implemented Action and date

8.3 Root Cause Analysis

8.3.1 The root cause analysis is a necessary and fundamental part of an audit process. The objective of the analysis is to analyse the nature of the Finding and examine all possible failures in systems and processes. In many cases it may indicate failures in training, policies, processes, control or quality control that have to be addressed. The Authority will not accept as a general trend, root causes indicating such terms as “oversight”, “mistake”, “error”. The analysis has to run deeper and examine “why”.

8.3.2 The proposed corrective action shall address the root cause and not purely the finding. Operators shall also have a process to ensure that Findings that are repetitive are examined closely in relation to past root cause analysis.

8.4 Report Closure

8.4.1 Unless agreed with the Authority in view of the nature of some of the findings and extended anticipated closure period, all audit report shall be closed within a period of 90 days. Should the Authority note a general trend of non-response to audit reports in such a timely manner, the matter will be brought to the attention of the Accountable Manager for immediate attention.

9. **Annual Reviews**

9.1 Annual Report

9.1.1 Approximately three months prior to the expiry of the AOC, an Annual Review is undertaken by the Authority examining predominantly all safety oversight aspects of the programme including Continuing Airworthiness leading to the production of an Annual Report.

9.1.2 The Annual Report will include:

- The outcome of all audits and inspections conducted in the audit cycle
- A current status of all audits and inspections conducted in the audit cycle
- A summary of the Operator’s performance over the 12-month period
- Items of interest the Inspectorate wishes to bring to the attention of Authority’s and Operator’s senior management
- The level of satisfaction as to the competence of the Operator and recommendations pertaining to the renewal/continuation of the AOC

9.2 Annual Review Meeting

9.2.1 An Annual Review meeting will be organised by the Inspectorate at least 3 weeks prior to the expiry of the AOC to discuss the contents of the annual report with the operator.

9.2.2 The Annual Review meeting shall be attended by the following personnel

General Manager- Safety Regulation
Head of Flight Operations and Flight crew Licensing Inspectorate
Flight Operations Inspector

Accountable Manager
Nominated Post Holder – Flight Operations
Nominated Post Holder – Crew Training
Nominated Post Holder – Ground Operations (if required)
Quality Manager
Safety Manager

10. **Queries**

10.1 Any queries as a result of this Safety Notice should be addressed to Head of Flight Operations and Flight Crew Licensing Inspectorate at the following e-mail address:
hfo@scaa.sc

11. **Cancellation**

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Head Flight Operations and Flight Crew Licensing Inspectorate

Event Column Entries

AA	Annual Audit
AR	Annual Review
C	Cabin Flight Check
Ex	Examiner Check
F	Flight Check
MA	Mid-Term Audit
MR	Man File Review
R	Ramp Check
SPA	Special Purpose Audit
T	Training Check

Scope Column Entries

G	Ground Check
Df, Dr, Dt	Document Check
O	Organisation Competency Check
Q	Quality Check
S	Safety Management System
SOC	Special Objective Check
Td	Training Check- Training Devices
To	Training Check- Organisation
Tp	Training Check- Programmes
Tt	Training Check- Testing