

ฝ่ายสมควรเดินอากาศและวิศวกรรมการบิน กองตรวจสอบผู้ดำเนินการเดินอากาศ โทร. 0 2568 8840-1 PL

ที่ กพท 19 (AO)/912

วันที่ 20 ตุลาคม 2559

เรื่อง รับรอง Surveillance / Inspection Policy and Procedures

เรียน ผอ.กพท.

ตามที่ได้มีการปรับปรุงโครงสร้างองค์กรของ กพท. รวมถึงมีการแก้ไขปรับปรุงกฎ ระเบียบ และข้อบังคับของ กพท. นั้น

AIR ได้จัดทำ Surveillance / Inspection Policy and Procedures เพื่อใช้เป็นแนวทาง ในการจัดทำแผนการตรวจสอบผู้ดำเนินการเดินอากาศ สำหรับพนักงานฝ่ายสมควรเดินอากาศและวิศวกรรม การบิน ทั้งนี้ AIR ได้จัดทำร่าง Surveillance / Inspection Policy and Procedures เป็นที่เรียบร้อยแล้ว ซึ่งมีรายละเอียด ตามร่างฯ ที่แนบมาพร้อมนี้

จึงเรียนมาเพื่อโปรดพิจารณาให้การรับรอง และลงนามในหน้าปกคู่มือฯ ที่แนบ ต่อไปด้วย  
จะขอบคุณยิ่ง



(นายจรพัฒน์ มากลั่น)

ผจก.AIR

ลงนามแล้ว



(นายจุฬา สุमानพ)

ผอ.กพท.

26 ต.ค. 2559

# **CIVIL AVIATION AUTHORITY OF THAILAND (CAAT)**

## **Surveillance/Inspection Policy and Procedures**

## FOREWORD

The Civil Aviation Authority of Thailand (CAAT) intends to implement regulatory safety oversight program to promote and ensure compliance with national and international aviation regulations and standards, collectively prescribing an acceptable level of aviation safety.

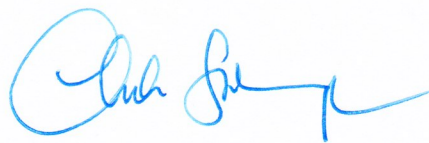
In conducting regulatory surveillance and inspections, and documenting the activity process, CAAT will be able to assess and demonstrate an aviation organization's level of compliance with regulatory requirements. Adherence to the guidance herein is imperative and will ensure that audit or inspection policies and procedures are uniformly applied throughout aviation activities in Thailand.

To maintain overall effectiveness of the audit or inspection activity, CAAT's approach to each organization is transparency, with a high degree of professionalism, using experience, skills and communication as essential ingredients. CAAT's audit and inspection program must be fair and equitable in its application.

The document has established the policy and procedures upon which CAAT Annual Surveillance Plan for AOC holders will be developed. This fills a very important legal requirement in the discharge of CAAT's legal mandate as provided in the Civil Aviation Board Requirement 85, Item 9 Audit and Inspection of Air transport Operations.

Comments, feedback, including recommendations for future amendment action are invited and should be forwarded to Director General of CAAT.

This Surveillance/Inspection Policy and Procedures has been approved and published under the emergency decree on The Civil Aviation Authority of Thailand, B.E. 2558



Chula Sukmanop

Director General of The Civil Aviation Authority of Thailand

## **FOREWORD**

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Chula Sukmanop

Director General of The Civil Aviation Authority of Thailand

## LIST OF AMENDMENTS

[illegible]

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## DEFINITIONS

The following terminology is specific to this manual and to those portions of air safety, procedure control manuals that pertain to audits and inspections:

**Audit** -- an in--depth review of the activities of an organization to verify compliance with regulatory requirements (Within the contents of this document, this term is being used interchangeably with surveillance and/or inspection);

**Audit activities** -- those activities and procedures through which information is obtained to verify compliance with regulator's requirements;

**Audit finding** -- non-- compliance with a specified regulatory requirement, identified during a surveillance/inspection and documented on a finding form;

**Audit plan** -- the annual plan of scheduled and non--scheduled surveillance and inspections approved by the CAAT;

**Audit program** --the CAAT program that promotes compliance with aviation regulatory requirements that collectively prescribe an acceptable level of aviation safety;

**Audit report** -- a report that outlines the audit process and provides a summary of the surveillance/inspection findings;

**Audit team leader** -- A CAAT Inspector designated by the Thailand Civil Aviation Authority to lead and conduct of an inspection or surveillance of a CAAT document holder;

**Certification** -- the process of determining regulatory compliance and competence qualification.

**Characteristic** -- any distinct property or attribute of a product, process, service or practice of which compliance to a regulatory requirement can be measured;

**Combined audit** -- an audit that targets more than one functional area;

**Confirmation** --the assurance that findings are in accordance with data obtained from different sources;

**Compliance** -- the state of meeting regulatory requirements;

**Corrective action plan (CAP)** -- a plan submitted in response to findings. The CAP outlines how the organization proposes to correct the deficiencies documented in the findings;

**Documented** -- that which has been recorded in writing, photocopied or photographed and then signed, dated and retained;

**Finding** -- non-- compliance with a regulatory requirement; **Finding**

**form** -- a form used to document a finding;

**Follow--up** --the final audit phase that focuses on corrective action to findings issued during an audit;

**Functional area** -- air operator, maintenance training organization, approved maintenance organizations

**Functional area procedure manual** -- a manual (or manuals) that contain audit and inspection policies and procedures that are specific to that functional area and which includes the checklists, forms and guidance materials that will be used by inspectors in the course of their audit and inspection activities;



**Inspection** -- the basic activity of an audit or surveillance, involving the systematic assessment of a specific characteristic of an organization to verify compliance with regulatory requirements. The term also refers to inspector tasks exercised in the performance of this activity;

**Non-- compliance** -- the failure to meet regulatory requirements;

**Observation finding** -- a subjective determination that identifies the possible need to revise a regulatory requirement or a non--regulatory CAAT policy, procedure or guideline;

**Practice** -- the method by which a procedure is carried out;

**Procedure or process** -- a series of steps followed methodically to complete an activity. This includes: the activity to be done and individual(s) involved; the time, place and manner of completion; the materials, equipment, and documentation to be used; and the manner in which the activity is to be controlled;

**Quality assurance review (QAR)** -- a review that measures the level of compliance to national policies, standards, procedures and guidelines;

**Sampling** -- the inspection of a representative portion of a particular characteristic to produce a statistically meaningful assessment of the whole;

**Scope** -- the number of functional areas, and specialty areas therein, that will be inspected, and the depth (back in time) of the review;

**Specialty audit** -- an audit that targets a single functional area;

**Specialty area** -- an area within a functional area that identifies common or similar requirements and for which checklists are provided and named after that specialty area, or after specific elements within that specialty area;

**Standard** -- an established criterion used as a basis for measuring an organization's level of compliance;

**Team member** -- the individual appointed by the audit team leader to participate in an audit;

**Verification** -- an independent review, examination, measurement, testing, checking, observation and monitoring to establish and document that, processes, practices, services and documents conform to regulatory requirements. This includes confirmation that an activity, condition or control conforms to the requirements specified in regulations, standards, specifications, program element descriptions, and technical procedures;

**Working papers** -- all documents required by the auditor or audit team to plan and implement the audit. These may include inspection schedules, assignments, checklists and various report forms.



## **ABBREVIATIONS**

AO	Air Operator Certificate Division
ASIP	Annual Surveillance/Inspection Plan
AFF	Audit Finding Form
AMO	Approved maintenance organization
AOC	Air Operator Certificate
CAP	Corrective Action Plan   CRF Confirmation Request Form
DGCA	Director General Civil Aviation Authority
ICAO	International Civil Aviation Organization
SDRs	Service Difficulty Reports
QAP	Quality Assurance Program
QAR	Quality Assurance Review
SARP	Standards and Recommended Practice
CAAT	The Civil Aviation Authority of Thailand
SMS	Safety Management System
TCAR	Thailand Civil Aviation Regulations

## **CHAPTER 1**

### **SURVEILLANCE POLICY – GENERAL**

#### **1.1 SURVEILLANCE/INSPECTION POLICY**

- 1.1.1 State capability for appropriate certification and surveillance of aviation certificate holders (air operators, approved maintenance organizations, approved training organizations, etc.) has been the central theme of the ICAO Universal Safety Oversight Audit Programme (USOAP) since the notion of “safety oversight” was adopted by the ICAO Council and the ICAO Assembly in 1995.
- 1.1.2 Thailand, as an ICAO Contracting State and active supporter of ICAO programs welcomed the introduction of safety oversight audits during all stages of its development and has undergone several assessments and audits, including an audit under the ICAO Continuing Verification Mission (ICVM) – the new face of ICAO’s safety oversight audit program.
- 1.1.3 Thailand is very much aware of its obligations for safety oversight and is committed to the ideals of ICAO and all of its safety--related programs. To this end, it has tasked its national civil aviation authority, The Thailand Civil Aviation Authority (CAAT) to adapt safety and efficiency as its central theme and to spare no effort in order to achieve the highest possible degree of safety and efficiency in civil aviation activities.
- 1.1.4 In addition to implementing proper certification process in--line with ICAO requirements and guidelines and accepted international best practices, the has also developed and implemented an Surveillance/Inspection Policy and Procedures as the basis for conducting audits, surveillance and/or inspections of aviation service providers in accordance to established national and international standards, recommended practices and guidance material.
- 1.1.5 This Document – The Surveillance/Inspection Policy and Procedures has been developed to provide the necessary guidance both to the CAAT Inspectors and the aviation industry on the policies and procedures that are implemented in the Thailand to ensure continuing demonstration of capabilities and adherence to established regulations by service providers.
- 1.1.6 The CAAT as the primary agency of Thailand for all civil aviation related activities accepts that an audit policy is a responsibility inherent to the State as of the date it elects to join the international aviation community as an ICAO Contracting State. Accepting the obligations of a Contracting State and the responsibilities that come as part of the obligation, the CAAT has developed and implemented a number of policies, procedures and guidance material to enable

it meet those same obligations and uphold international Standards and Recommended Practices (SARPs) adopted by the ICAO Council.

- 1.1.7 The surveillance/inspection policy adapted and approved for implementation in Thailand consists of:
  - a) Developing an annual surveillance plan
  - b) Conduct of surveillance
  - c) Recording and reporting surveillance activities
  - d) Analyzing surveillance data and
  - e) Follow-up resolution of safety issues
- 1.1.8 This Manual is, therefore, published to be a very important safety tool that would significantly contribute to the CAAT's safety oversight capabilities and assist in achieving:
  - a) Effectiveness
  - b) Efficiency and
  - c) Consistency
- 1.1.9 In the process, Thailand would be enabled to effectively meet its international obligation for aviation safety as an ICAO Contracting State.
- 1.1.10 Further, effective implementation of the policy and procedures contained in this manual should contribute towards:
  - a) Improving compliance of national and international standards;
  - b) Provision of constructive feedback to and from the aviation industry; and
  - c) Enhancing awareness the aviation community on safety-related issues.

## **1.2 SURVEILLANCE OBJECTIVE**

The proper discharge of the State's safety oversight responsibility demands that CAAT certify and approve all aviation activities in accordance with the pertinent requirements of Thailand and that of ICAO and internationally accepted best practices, as applicable. This certification and approval process is essentially operationalized through a detailed inspection of the proposed activities to assure compliance with international and national regulations. CAAT Inspectors should assure maintenance of compliance demonstrated during initial certification and approval through planned surveillance. In a nutshell, the objective of surveillance policy and procedure is to ensure that certified aviation service providers maintain, throughout the life of their operation, the level of standard that they have demonstrated during the initial certification/approval.

## **1.3 SURVEILLANCE/INSPECTION PLANNING**

- 1.3.1 The annual surveillance/inspection plan shall consider both the aviation industry safety maturity and the CAAT resources. The audit plan should address the following items as applicable:
  - a) objective;
  - b) scope;
  - c) a description of the organization being audited;
  - d) methodology;
  - e) communications;

- f) specialist assistance
- g) parallel findings and observations;
- h) budget;
- i) organization management personnel;
- j) team composition; and
- k) audit schedule.

1.3.2 The objective of the annual surveillance plan is to conduct at least quarterly inspections of certification/approval holders and as necessary conduct additional surveillance/inspections as deemed necessary, including random and spot checks.

1.3.3 Maximum resources will be directed at those companies where safety risk has been assessed to be higher and more frequent monitoring has been found to be necessary.

#### **1.4 SURVEILLANCE PLANNING FACTORS**

1.4.1 Surveillance planning main factors include but are not limited to:

- a) finance and labour difficulties;
- b) high turnover in key management personnel;
- c) unacceptable incident/accident rate;
- d) frequent change of out-sourced services such as maintenance, training etc.;
- e) poor Internal Audit or Quality Assurance Program; and
- f) weak safety resolution/conformance record.

1.4.2 Risk Indicators:

In prioritizing surveillance activities, CAAT shall monitor closely the usual industry risk elements/indicators such as:

a) *Financial Change*

The effects of financial difficulties and the subsequent impact on operations and maintenance actions are potential indicators of operational safety. Examples could be “cash on delivery” demands made by suppliers; delays by the company in meeting financial obligations such as rent, payroll or fuel bills; spare-part shortages; and repossession of aircraft or other equipment.

b) *Labour Difficulties*

Labour unrest may occur during periods of seniority list mergers, union contract negotiations, strikes, or employer lockouts, and may warrant increased regulatory monitoring.

c) *Management Practices*

Management controls employment, salaries, equipment, training and operational/maintenance processes. It can ensure that operations and maintenance functions are performed in a controlled and disciplined manner, or it can adopt a *laissez faire* approach. Management can also determine how quickly problems are solved and weak processes rectified. These factors all determine the extent of regulatory monitoring required.

d) *Poor Internal Audit or Quality Assurance Program*

Some larger companies and maintenance organizations have adopted formal quality controls. These may be in the form of a Quality Assurance Program or

formal internal audits. The absence of these programs may influence the frequency of monitoring, inspections or audits.

e) *Change in Operational Scope or Additional Authorities*

Changes such as a new level of aircraft operations and associated service will require increased regulatory monitoring.

f) *Changes in Contracting for Services*

Any changes to aircraft handling or maintenance contracts may require increased monitoring to ensure that the company has conformed to regulatory requirements.

g) *High Turnover in Personnel*

A loss of experienced personnel or lack of employee stability may be the result of poor working conditions or management attitudes that result in operational inconsistencies or the inability to meet or maintain regulatory requirements. This situation will require increased monitoring.

h) *Loss of Key Personnel*

The replacement of operations managers, maintenance managers, chief pilots or other key personnel within a company will require increased regulatory monitoring to ensure a smooth transition.

i) *Additions or Changes to Product Line*

Any changes to a product line may require increased monitoring to ensure that appropriate regulatory requirements have been met.

j) *Poor Accident/Incident or Safety Record*

Incidents or accidents that occur during company operations may be an indicator of the company's level of conformance and require additional monitoring, inspection or audits.

k) *Merger or Takeover*

Any merger or change in controlling management may require additional regulatory monitoring or inspection after initial recertification.

l) *Regulatory Record*

A company's record of previous inspections and audits, the promptness with which the company has completed its CAP and its overall conformance history are indicators that will influence the frequency of monitoring, inspections and audits.

1.4.3 Although inspection and audit frequency will be determined by those factors outlined in paragraph 2.6.2, risk indicators are very important when determining whether a company should be subject to additional special purpose or more frequent inspections. A list of these indicators, with an explanation of each, follows. The ranking of each indicator may vary according to circumstances within the company when it is evaluated.

## **CHAPTER 2**

### **SURVEILLANCE PROCEDURES**

#### **2.1 TYPES OF SURVEILLANCE**

The type of surveillance/inspection to be conducted is determined by the circumstances under which the audit is convened:

##### **2.1.1 *Initial Certification Inspection***

- a) Prior to the issuance of an aviation document, all areas of a company will be inspected to ensure that it has conformed to the required regulations and standards. With respect to air operator certificate (AOC) applicants and applicants for an approved maintenance organization (AMO), the procedure follows the process that has been detailed in the AOC Certification Procedures Manual, based on the five phases of certification that are recommended by ICAO (See ICAO Doc. 8335 – Manual of Procedures for Operations Inspection, Certification and Continued Surveillance);
- b) Inspection on initial certification is Phase four – Demonstration (Compliance Evaluation) of the Five---phased process and shall be conducted to demonstrate the applicant's capability to undertake the activities that are applied for in the safest possible manner. Once an applicant for a certificate or approval has been issued an aviation document, he would be advised of the consequent surveillance/inspection activities that could be conducted at any given time but at least once within the first six months of operation.

##### **2.1.2 *Annual Surveillance/Inspection***

The annual surveillance/inspection activity is conducted on the basis of a scheduled surveillance plan that is published annually and made known to the concerned industry and a random, un---scheduled inspection that would be conducted with a notice of less than 24 hours. Surveillance/Inspections conducted under the annual surveillance plan would constitute at least 3 scheduled inspections and two un-scheduled (random) inspections.

##### **2.1.3 *Additional Authority Surveillance/Inspections***

Additional authority inspections may be conducted prior to the granting of additional authority. This inspection would normally be initiated with the company requesting for additional rights/authority and would be conducted depending on resources that are available to the CAAT and normally would not require specific notification as when it would be conducted.

##### **2.1.4 *Routine Conformance Inspection***

This inspection relates to the Annual Inspection mentioned in 2.1.2 above. Surveillance is conducted either as part of the scheduled annual surveillance plan or as part of the non---scheduled (random) inspection. With respect to the routine conformance inspection, a company would be initially provided with the annual plan and then contacted approximately seven to sixty days prior to the planned audit date to confirm the audit schedule. The complexity of the routine conformance audit will determine the

lead---timeforcontactwiththecompany.

#### 2.1.5 *Special Purpose Audit*

A special purpose audit is one conducted to respond to special circumstances other than those requiring an initial certification audit, an annual surveillance/inspection, an additional authority audit or a routine conformance audit. For example, a special purpose audit may be convened with little or no notice and focus on specific areas of concern arising from safety issues. A “no---notice” audit may preclude certain team members’ activities and responsibilities that would be normally associated with other types (common/joint) of inspections.

#### 2.1.6 *Frequency of inspections*

- Main base which include inspection of operation control, Manual inspection to be conducted at least one every year.
- Training course will be observed at least one every year for each air operator
- Station facility inspection to be conducted at least one every year for each operator.
- Ramp inspections. Schedule inspection at least one per aircraft type and at least one un-schedule inspection per aircraft type for each operator.

### 2.2 **CAAT ANNUAL SURVEILLANCE/INSPECTION PLAN**

- 2.2.1 CAAT Directorates that has responsibility for regulating, certifying or approving an aviation activity that requires continued surveillance to ensure the maintenance of safety standards shall develop an annual surveillance/inspection plan, in line with the policies and procedures that are contained in this manual, for all the organizations they are responsible for.
- 2.2.2 Directorate developed annual plans shall contain surveillance activities of the scheduled and non---scheduled types, as well as other random inspections deemed to require prior planning.
- 2.2.3 The annual surveillance plan shall contain two parts – a six months plan that has been confirmed and an additional six---months plan that is considered tentative but would be confirmed at least three months prior to the conduct of the inspection.
- 2.2.4 Certified and approved aviation organizations that are candidates for a continuing surveillance shall be notified of the scheduled surveillance/inspection activity at least three months in advance.

### 2.3 **SURVEILLANCE PLAN AND PROGRAM APPROVING AUTHORITY**

The approval of the annual surveillance/inspection plan, development of surveillance programs including the conduct of the surveillance/inspection shall be approved by the Director General of CAAT.

### 2.4 **ASSIGNMENT OF INSPECTORS**

- 2.4.1 The Director of the CAAT responsible for regulating and controlling a specific industry has the responsibility of assigning Inspectors that would conduct the inspection of the target organization. However, in the case of the inspection of an AOC holder, the Directors of the AIR and OPS Directorates shall coordinate and have joint responsibility of assigning Inspectors who would be responsible to inspect areas of common



responsibility.

- 2.4.2 The AOC Certification AIR/OPS Coordination Policy and Procedures Manual was developed to provide guidance on the certification and surveillance of AOC holders in the areas that are common both to the Operations and Airworthiness Directorate.

### SURVEILLANCE/INSPECTION AUTHORIZING TABLE

Inspection Category	Scope and Administrative	Approving Authority
Surveillance/Inspection Plan	Annual, Spot and Special Plan	AO
<del>Common</del> Joint assigning of Inspectors and date(s) for inspection	-----	-----
Specialist Assign Inspector(s) and date	As per application and or annual plan Notify all concerned and facilitate travel as necessary	Concerned Directors <del>according to AOCR</del> and as per CAAT delegation
Surveillance/Inspection report	Notify all concerned and facilitate travel as necessary	Directors' as per CAAT delegation
Corrective Action Plan	Approve and send Surveillance/Inspection report to all concerned -----Assure timely submission of CAP and follow--up of implementation	Concerned Directors Concerned Directors' as appropriate through delegation of Inspectors
Validation and closure of findings	Determine through visit as appropriate completion of implementation	Assure all the paper work is completed and notify as appropriate the closure of Surveillance/Inspection file

## 2.5 ASSIGNMENT OF INSPECTION TEAM LEADERS

- 2.5.1 Depending on the size of the inspection to be conducted, it may be necessary to assign an Inspection Team Leader. Even if the size of the Inspection Team is limited, as long as there are more than one person involved, it would be necessary to assign one of them as the Inspection Team leader responsible for effectively leading and completing the surveillance/inspection process.

- 2.5.2 Inspection Team Leader is appointed by the Director responsible for the activity to be inspected. However, where the surveillance/inspection is to be made jointly, a team leader shall be appointed and shall take up all the necessary pre--inspection preparation in accordance with the guideline contained in the AOC AIR and OPS Coordination Policy and Procedures Manual.

## **2.6 NOTIFICATION OF SURVEILLANCE**

- 2.6.1 Once the Inspection Team members are assigned and the dates for the surveillance/inspection has been confirmed as per the Approving Authority Matrix, it shall be communicated in writing to concerned AOC/AMO holders as appropriate, approximately two weeks in advance.
- 2.6.2 In the case that surveillance and inspection is conducted outside the home base, the names of the Inspection Team Leader and Members shall be communicated as early as possible to facilitate travel requirements and in all cases, at least four weeks prior to the start of the inspection.

## **CHAPTER 3**

### **CONDUCT OF SURVEILLANCE**

#### **3.1 General**

Three methods/steps of conducting surveillance/inspection have been identified to assist an Inspection Team to undertake their activities effectively. They are:

- a) *Observing*: May lead Inspection Team Members into areas that may or may not require further investigation.
- b) *Interviewing*: The success of an interview depends on the individual Inspector's skills. Each scenario will be different, and an Inspector needs to decide whether the interview approach would be formal or informal.
- c) *Recording & Documenting*: Do not rely on your memory and record relevant details immediately. Record findings and observations and they must be complete in detail for use in confirming and substantiating what you have seen and heard.

#### **3.2 PRE--SURVEILLANCE PREPARATION**

The pre--surveillance preparation starts by opening a Surveillance/Inspection File. Members of the Surveillance/Inspection Team should thoroughly familiarize themselves about the approved/certified company documents, authorizations and limitations. Check for incident and accident occurrences. Check also for any previous surveillances reports and if there are unresolved findings in their respective areas of specialty.

#### **3.3 PRE--SURVEILLANCE TEAM MEMBERS MEETING**

- 3.3.1 The team members should meet before the planned surveillance and brief each other on their respective areas. They need to evaluate all the outstanding issues and consult on how to coordinate their respective activities with the aim of standardizing and harmonizing their approach as well as the outcome of the inspection.
- 3.3.2 The Inspection Team Leader normally moderates such a briefing. If the Inspection Team found it necessary to have the support of a specialist to conduct the inspection, they should make this requirement known to the approving authority so that the required specialist would be assigned.

#### **3.4 ENTRY/OPENING MEETING**

- 3.4.1 The physical inspection process starts with the Entry/Opening Meeting and consists of evaluations, verifications and daily or timely briefings.
- 3.4.2 The entry/opening meeting should set the tone for the compliance evaluation and physical inspection and should be attended by the concerned organization's senior management and CAAT inspectors assigned to the audit.
- 3.4.3 The CAAT Inspection Team Leader or the specialist inspector should outline the audit process to the concerned organization's participants and confirm any administrative requirements so that the physical inspection may be conducted effectively and efficiently, while minimizing disruptions to the company's operation.
- 3.4.4 The entry/opening meeting should normally takes place

- on the concerned organization's premises;
- be attended by the concerned organization's senior management;
- specify audit details and procedures; and
- be brief, specific and courteous.

### **3.5 COMPLIANCE EVALUATION AND INSPECTION**

3.5.1 In the compliance evaluation stage, the company's level of conformance with regulations and standards contained in existing legislation and company control manuals should be assessed. Methodology that would assist the effective conduct of the evaluation process includes, but are not limited to:

#### **a) Interviews**

Interviews with company personnel are important during the evaluation phase to determine whether the control system documented in company manuals is that in use, and to assess the knowledge of supervisory personnel of their duties and responsibilities. Interviews may also confirm the validity of audit findings reached through observation or sampling. The following guidelines will be useful when preparing for an interview:

- i. prepare carefully prior to the interview by defining the areas to be explored and setting specific objectives;
- ii. explain why the interview is taking place;
- iii. use open questions and avoid complex questions or phrases;
- iv. listen carefully to answers and allow interviewee to do most of the talking;
- v. avoid being side-tracked from your original objectives;
- vi. ensure that questions are understood;
- vii. terminate the interview if the atmosphere becomes highly negative;
- viii. document all responses; and
- ix. thank the interviewee at the conclusion of the interview.

#### **b) Verification**

- i. During this phase, the audit team will gather information to determine the company's level of conformance.

Specifically, verification will:

- determine whether company controls are operating effectively and as intended;
  - determine whether the concerned organization's operation/activity conforms to the aviation regulations and standards contained in the audit checklists; and
  - analyze particular deficiencies to assess their effects and identify the causes.
- ii. Company files or records should not be accessed without appropriate company authorization and, when possible, company representatives should be present during the review of these files and records.
  - iii. If the review and verification phases do not provide sufficient confirmation of the company's level of conformance, further substantiation will be required to ensure that any evidence obtained up to that point supports the audit findings and conclusions. In short, other supporting documentation must be acquired and secured.
  - iv. Verification includes various types of inspections. These may be Aircraft Inspections (of each type of aircraft), Pre-Flight/Ramp Inspections, In-Flight

Inspections (sampling of company routes, i.e. domestic, international and new routes) and Base Inspections. These inspections may be carried out as coordinated inspections. For example, a Pre--Flight, a Flight Operations Inspector and an Airworthiness Inspector may conduct Ramp Inspection.

### 3.5.2 *Confirmation Request Form (CRF)*

The Conformance Request Form (CRF) is an effective inspection tool in the following cases:

- a) where evidence indicates an audit finding, the company will be given the opportunity to show otherwise;
- b) the auditor will determine the course of action to be adopted based on the concerned organization's response;
- c) the auditor will observe the state of the company records management system from the concerned organization's perspective;
- d) arbitrary audit findings based on subjective examples will be eliminated;
- e) the audit will not be surprised at the end of the audit, as all contentious issues will have been discussed openly during the physical audit;
- f) the auditor can concentrate on auditing rather than on researching company files and records; and
- g) the auditor will receive a signed document from the audit for inclusion in the supporting documentation package.

### 3.5.3 The Team Leader or the Specialist Inspector shall:

- a) explain the purpose of the entry meeting;
- b) introduce audit team members, including specialists and observers;
- c) state the objective, scope and depth of the audit;
- d) address the means of communication between the audit team and the concerned organization (interview, questions, and asking for evidence i.e. show me);
- e) explain that company officials will be briefed daily on progress of the audit;
- f) describe the manner in which any audit finding identified will be handled;
- g) establish a location and time for the exit meeting;
- h) emphasize that the purpose of an audit is to identify non--conformances and that enforcement action may result from any of these findings; and
- i) respond to all questions from the concerned organization.

### 3.5.4 *Daily Briefings*

- a) Two types of briefings could be planned for at the end of each inspection day. Those are the Inspector Team members' daily briefing and the briefing that may be provided to the concerned organization at the end of each day of inspection.
- b) Inspection Team daily briefing would enable the team members to compare notes, assess the various departments preparation and willingness to cooperate with the Inspectors, discuss any problem that may have been experienced by each team member and plan for the continuity of the inspection taking into account the experience gained.
- c) Daily (or any scheduled) meeting with the management of the concerned organization has to be agreed upon in advance and held to support the

surveillance/inspection activity for a successful end. This meeting would enable the Inspectors and the Company management to assess where areas of difficulties could reside and resolve or prepare for their resolution in a timely manner. It would also contribute to avoiding surprises or arguments at the end of the inspection process as management would have already been informed on pertinent issues before the closing meeting and the closing---day final briefing.

- d) In all cases, Inspection Team briefing and briefing to the management of the company under inspection should aim to:
- ensure adherence to the audit plan;
  - validate confirmation requests and audit findings;
  - resolve issues or problems arising from the day's activities; and update the approving authority if necessary.

## **CHAPTER 4**

### **POST SURVEILLANCE/INSPECTION FOLLOW--UP ACTION**

#### **4.1 AUDIT REPORT**

- 4.1.1 At the end of the surveillance/inspection process and following the closing meeting/briefing, the CAAT Inspection Team shall develop and prepare the surveillance/inspection report without further delay.
- 4.1.2 Pertinent contents of the findings and conclusion of the surveillance/inspection would have normally been explained to the management team of the company inspected and the counterparts to the Inspection Team.
- 4.1.3 If time permits, a draft report should be prepared and made available to the company, clearly explaining that this is only a draft report and may be changed after the Inspection Team had the opportunity to review and conform all the evidence that has been gathered. Submission of a draft report is advised but only if time and situation permits and only if all the inspected areas can be addressed in the same draft report.
- 4.1.2 Surveillance/Inspection Report
- The formal Surveillance/Inspection Report shall be prepared in Parts and, in the case of an air operator certificate holder, include:
- Part I – Introduction*, which summarizes the surveillance/inspection process and the content of the surveillance/inspection report;
- Part II – Executive Summary of Findings*, which summarizes the most significant findings for the information of the senior management of the concerned company and the relevant CAAT management;
- Part III – Airworthiness*, which contains the overall findings on aircraft airworthiness and maintenance activities;
- Part IV – Operations*, which contains the overall findings on flight operations; and *Part V – An Appendix*, which contains the audit findings for both airworthiness and operations.
- 4.1.3 The surveillance/inspection report will be a factual account of the inspection conducted. Inspectors should take care on its presentation that should not include subjective statements, suggestions or recommendations.
- 4.1.4 The approving authority will sign the covering letter and forward it, with a copy of the surveillance/inspection report, to the company. The letter will outline the procedure for responding to the surveillance/inspection findings and specify the required response time (days) from the time the company receives the report.
- 4.1.5 The Team Leader shall complete the Surveillance/Inspection Report for the Directors' signature and send to the concerned organization within seven days after the exit meeting.

#### **4.2 PARALLEL REPORT**

- 4.2.1 An inspection may identify observations and/or deficiencies in, or the misapplication of aviation legislation, regulations, policies and procedures. Where an observation or deficiency indicates a need for revised policies, standards, procedures or guidelines, a recommendation shall be made to the CAAT for rectification.
- 4.2.2 Where a non--conformance to a regulatory requirement is found, and that requirement



required CAAT approval (i.e., document or manual approval), a finding

shall be made against the concerned organization (so that the non-conformance is resolved through the corrective action to be submitted by the company).

4.2.3 Findings that require a corrective action by CAAT shall be reported to the appropriate Director within seven days for rectification.

4.2.4 Findings directed at CAAT or anyone of its Directorates shall neither be included nor referenced in the surveillance/inspection report.

#### **4.3 RAMP INSPECTION REPORT**

Ramp inspection reports are reports generated resulting from an inspection that has been conducted on an operator during an operational phase of an aircraft on the ground. It should include, but not be limited, the following:

- a) Date / Location
- b) Inspectors name
- c) Aircraft Registration details
- d) Crew Details License
- e) Medical
- f) Technical library details
- g) Flight manual
- h) Flight crew operating manual
- i) Checklists
- j) Flight Plan details
- k) Load sheet
- l) Weight & balance calculations
- m) Maintenance release details
- n) MEL
- o) Location & serviceability of emergency equipment

**Note:** *If aircraft survey report & ramp inspection reports are used during a single inspection (event) the inspectors are to co-ordinate their findings. These reports may be used as supplementary findings to an audit report or an individually tasked event.*

#### **4.4 SPOT CHECK REPORT**

4.4.1 Spot check reports emanate from inspections conducted by flight operations or airworthiness inspectors conducting a product inspection. This may be associated with a surveillance/inspection but is normally an individually tasked event. It should identify the product inspected details, en-route inspection, port inspection, facility inspection, documentation inspection etc.

#### **4.5 RESOLUTION OF IDENTIFIED DEFICIENCIES**

4.5.1 The effectiveness of a programmed surveillance relies on the implementation or resolution of the non-confirming findings. This very important element starts with the submission of the corrective action submitted by the concerned company within the time limitation prescribed and accepted by the CAAT.

4.5.2 The fact that a corrective action is required is a declaration that the inspected service provider has been found to be operating below the minimum requirements and therefore would need to make the necessary changes to ensure continued capability.

4.5.3 It is the responsibility of the inspected service provider to resolve the identified

findings within the prescribed time. The relevant Directorate should establish a monitoring system to ensure that the corrective action has been implemented.

#### **4.6 DETERMINATION OF FINDING RESOLUTION PERIOD**

- 4.6.1 The following implementation dates for resolving identified findings shall be the benchmark against which the follow-up action is determined.
- 4.6.2 Surveillance/Inspection findings are classified according to the seriousness of the finding to flight safety as follows:

<b>DETERMINED ACTION LEVEL</b>	<b>IMPLEMENTATION PERIOD</b>
Immediate	Immediate No-Go
Short-term	Within 7 days from date inspection is completed or notified
Medium-term	Within 15-30 days from date inspection is completed or notified
Long-term	Within 45-60 days from date inspection is completed or notified

- 4.6.3 Where corrective action required by a finding is not put into place by a participant and advice to that effect not received by the Team Leader/Inspector by the due date, an enforcement action may be taken against the concerned service provider, with a warning that the action should be completed within the next 7 days after which date a more robust enforcement action that may also include suspension of certificate or approval.
- 4.6.4 It is CAAT policy that only in exceptional circumstances will extensions to due dates be granted. This will require the approval of AO Director and under specific circumstances the approval of the AIR Director.

#### **4.7 VALIDATION**

- 4.7.1 When a service provider indicates that an action plan has been completed and the identified deficiency rectified, CAAT Inspector(s) shall be assigned to conduct a validation inspection to verify the effective resolution of the identified deficiency.
- 4.7.2 Upon appropriately documented satisfactory resolution, the appropriate Director shall close the file opened for the specific purpose of the Surveillance/Inspection.

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