Australian Government
Civil Aviation Safety Authority

Annex 1 to CSM Surveillance Manual - Surveillance Standards and Protocols

Version	5.0 - January 2022
Approval Tier	Four
Owner	National Manager Surveillance
Responsible Area Manager	Manager Surveillance Services
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1   Overview

This Annex defines the standards to be met and protocols to be followed by inspectors and, where relevant, associated staff and Managers, in relation to the conduct of surveillance, including:

- Maintenance of Competency and Currency
- Authorisation Holder Performance Indicator (AHPI) – word pictures
- Protocols for Conducting Inspections and Surveillance
- Sampling
- Records Management
- Information Capture Protocols for Findings
- Safety Finding Instructions
- Aircraft Survey Report (ASR) Instructions
- Safety Observation Instructions
- Surveillance Report Instructions
- Occurrence Management (including ATSB/CIRRIS, Unsafe Behaviour and Low flying reports)
- Quality Assurance Program
- Safety Assurance Reviews (SAR).

2   Maintenance of Competency and Currency

Prior to undertaking tasks associated with surveillance and using the Surveillance IT tool, all personnel are to receive training to ensure they have the required understanding and knowledge of the surveillance framework, their roles and responsibilities with regards to surveillance and the supporting tools. Development and delivery of this training is a joint responsibility between Training Branch (TB) and the Regulatory Oversight Division (ROD) and applicable National Operations and Standards (NOS) groups. Completion of all learning initiatives are captured within CASA's learning management system (LMS) managed by TB. Further information is detailed within the [CASA Training Branch Quality Manual](#).

It is a requirement that all personnel maintain an acceptable level of currency and competency in conducting surveillance through the following:

- receiving foundational and recurrency training on:
  – system standards and requirements
  – surveillance procedures, processes and methods
  – risk management procedures, processes and method
  – CASA's Enforcement Policy and the Coordinated Enforcement Process (CEP)

- completing surveillance-related on-job-training (OJT) tasks and activities
- attaining a satisfactory or higher level of assessment made during the performance review and evaluation through CASA's Performance Appraisal and Communication Scheme (PACS) in regard to surveillance
- a requirement to participate in a minimum of four surveillance events annually.

All personnel associated with the management and conduct of surveillance are required to participate in regular surveillance events, commensurate with their role, to maintain their competency. If an individual fails to maintain this level of competency, they are to inform their immediate manager so that action can be taken to ensure they are competent to perform surveillance tasks.

To regain currency and within each 12-month period, personnel are required to actively participate and contribute to, under supervision, in:

- a single Level 1 surveillance event, or
- two Level 2 surveillance events.

If at any time an individual considers they do not have the confidence to undertake their surveillance tasking they should raise their concerns with their immediate manager to discuss what options are available to assist the individual in reaching an appropriate level of competence.

Each inspector is responsible for monitoring and managing their own currency and competency requirements and each manager is responsible for overseeing relevant records of these requirements as well as the results of training, qualifications and any recurrent training for all CASA staff under their control. Relevant training records are to be recorded in CASA's LMS.

This requirement will be monitored and included as part of the Quality Assurance Program.

2.1 Surveillance Roles and Responsibilities Surveillance Manager Checklist

It is the responsibility of personnel performing the role of Surveillance Manager (SM) through appointment or higher duties to ensure they are fully aware of the roles and responsibilities associated with the role they are performing and that they are confident to do so. It is the responsibility of the National Manager Surveillance to monitor and manage the recency and confidence requirements of personnel being appointed to an Surveillance Manager role or those performing higher duty roles and to keep appropriate training records to demonstrate that personnel hold the required skills to do so.

A checklist of items to be addressed in any appointment or move to higher duties is available. (See Form 1544 Surveillance Roles and Responsibilities once complete should be saved onto F18/6403-2.

3 AHPI – word pictures

An AHPI assessment is completed in Sky Sentinel using the AHPI tool. The AHPI tool is a questionnaire-based tool consisting of a number of factors and sub-factors. These factors are associated with organisational characteristics and performance commonly thought to affect or relate to safety performance behaviour. An AHPI must consist of either verbal or onsite communication with an Authorisation Holder (AH). At a minimum a verbal conversation should be held with the AH every 6 months for a Category 1 or Group A AH or every 12 months for a Category 2 or Group B and C and/or at the completion of a Significant Change regulatory service task or a surveillance event. Each sub-factor is rated using the most appropriate word picture (see below). The classification of AH into appropriate groups is carried out by the NSSP owner on an annual basis, with input from business areas as necessary.

- **Note:** **I**nspectors should use the nationally consistent and digitised set of questions while carrying out an AOC or AMO AHPIs to improve their accuracy. This set of questions will serve as information to support the conduct of the AHPI in Sky Sentinel.

   This does not replace the AHPI to be conducted in Sky Sentinel.

Questionnaires

- AOC AHPI Questionnaire
- AMO AHPI Questionnaire

Table 1: Management Factors

Management Factors	
Sub-factor	**Time in industry**
Description	Score according to the authorisation holder's time in industry relevant to this activity.
Score	**Word Picture**
1	Authorisation holder (with >5 years' operating history) with few or minor changes within the organisation.
2	Authorisation holder (with >5 years' operating history) with significant changes within the organisation.
3	Relatively new authorisation holder (with <5 years' operating history).
4	Authorisation holder (with <5 years' operating history) with significant changes within the organisation.
5	New authorisation holder (i.e. no surveillance history).
6	Don't know
Sub-factor	**Stability**
Description	Score according to the authorisation holder's internal stability.
Score	**Word Picture**
1	Authorisation holder with few or minor changes to operation, controlled growth/decline, low management and staff turnover, no financial issues, no political issues and no industrial relations concerns.

Management Factors	
2	Authorisation holder experiencing 2 of the following issues: • changes to operation • expansion or contraction beyond capability and capacity • political issues • merger/take-over activity • management and staff turnover • financial concerns • industrial relations tensions.
3	Authorisation holder experiencing 3 of the following issues: • changes to operation • expansion or contraction beyond capability and capacity • political issues • merger/takeover activity • management and staff turnover • financial concerns • industrial relations tensions.
4	Authorisation holder experiencing 4 of the following issues: • changes to operation • expansion or contraction beyond capability and capacity • political issues • merger/take-over activity • management and staff turnover • financial concerns • industrial relations tensions.
5	Authorisation holder with 5 or more of the following issues: • changes to operation • expansion or contraction beyond capability and capacity • political issues • merger/take-over activity • management and staff turnover • financial concerns • industrial relations tensions.
6	Don't know

Sub-factor	Senior management attitude
Description	Score according to the predominate senior manager(s) attitude to compliance and safety.
Score	Word Picture
1	Senior manager(s) have cultivated a strong safety culture with proactive attitude towards regulatory compliance and safety.
2	Senior manager(s) have a positive attitude towards regulatory compliance and safety.

Management Factors	
3	Senior manager(s) have an accepting attitude towards regulatory compliance and safety.
4	Senior manager(s) have an inconsistent attitude towards regulatory compliance and safety.
5	Senior manager(s) have a poor attitude to regulatory compliance and safety.
6	Don't know
Sub-factor	**Control**
Description	Score according to the level of control the authorisation holder has over its functions, resources and personnel.
Score	**Word Picture**
1	Tight control with a majority of organisational functions contained within the authorisation holder and all supplier/3rd party providers considered low risk.
2	Few and/or minor aspects of the organisation's operations are outsourced or leased with most supplier/3rd party providers considered low risk.
3	Several aspects of the organisation's operations outsourced or leased and/or some suppliers/3rd party providers considered medium risk.
4	Many and/or major aspects of the organisation's operations outsourced or leased and/or some suppliers/3rd party providers considered medium to high risk.
5	Majority of organisational functions outsourced and resources, facilities and equipment leased, with many supplier/3rd party providers considered high risk.
6	Don't know
Sub-factor	**Procedural conformance**
Description	Score according to the existence of, and authorisation holder's adherence to, formalised procedures.
Score	**Word Picture**
1	Procedures are conformed to consistently.
2	Procedures are conformed with and only minor, irregular deviations.
3	Procedures exist but deviations are common although in practice these deviations address inadequacies in procedures.
4	Deviations from procedures are condoned and may or may not address inadequacies in procedures or safety hazards.
5	Little or no procedures are in place, most with little or no effectiveness against real safety hazards present.
6	Don't know

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Table 2: Organisational Factors

Organisational Factors	
Sub-factor	**Safety-related decision making**
Description	Score according to the authorisation holder's decision-making process.
Score	**Word Picture**
1	Clearly defined systematic, data-driven process incorporating consultation, analysis and consideration of both regulatory compliance and safety outcomes.
2	Defined process, however, not fully implemented with results focused on safety outcomes.
3	No defined process but effective decisions made meeting minimum safety outcomes.
4	No defined process with decisions made failing to achieve minimum safety outcomes.
5	No defined process with decisions made by individuals with no consultation or analysis and no clear consideration for safety outcomes.
6	Don't know
Sub-factor	**Communication**
Description	Score according to the authorisation holder's management of communication both internally and externally. This includes communication with the regulator and other key stakeholders.
Score	**Word Picture**
1	Communication throughout the organisation is clear, consistent and understood.
2	Communication is mostly effective with the basic message understood.
3	Communication is partially effective although some messages fail to be understood.
4	Communication systems are basic and ineffective with failures in understanding.
5	Communication is extremely poor
6	Don't know
Sub-factor	**Documentation**
Description	Score according to the authorisation holder's level of documentation.
Score	**Word Picture**
1	Well-designed, structured and effective documentation that is clear and consistent and delivers desired outcome.
2	Documentation exists and document-control procedures are followed.
3	Documentation exists but deviations from document-control procedures are common.

Organisational Factors	
4	Documentation exists but deviations from document-control procedures are condoned by the organisation.
5	Little or no documentation exists or, where it exists, it is ineffective and/or actively ignored.
6	Don't know
Sub-factor	**Training and competency**
Description	Score according to the authorisation holder's training system and staff competence to perform their role.
Score	**Word Picture**
1	Competence (including technical and non-technical skills) of all personnel is actively managed through established training programs and assurance.
2	Staff complete a planned training regime designed to meet regulatory requirements however it does not include participant competency verification.
3	Staff complete training in accordance with basic regulatory requirements without any system to verify that the training is delivering the identified need.
4	Staff complete training but it is ad-hoc and inconsistent, with no competency verification.
5	Significant portions of the organisation are untrained and/or incompetent with no processes in place to manage the training.
6	Don't know
Sub-factor	**Safety assurance**
Description	Score according to the authorisation holder's assurance activities.
Score	**Word Picture**
1	Proactive and reactive processes (including internal audits etc.) are implemented and are tied to safety outcomes and regulatory compliance.
2	Proactive and reactive processes exist and are tied to safety outcomes or regulatory compliance but partially implemented.
3	Reactive processes exist but are partially implemented or tied to safety outcomes or regulatory compliance.
4	Reactive processes exist (e.g. ad hoc audits) but are carried out with limited connection to regulatory compliance or safety outcomes.
5	No assurance processes exist.
6	Don't know

Table 3: Operational/Environmental Factors

Operational/Environmental Factors	
Sub-factor	**Operating environment**
Description	Score according to the authorisation holder's geographical, physical and complexity of operating environment and how the internal systems are effective in this environment.
Score	**Word Picture**
1	Simple operating environment with systems suitable to the environment in place.
2	Complex operating environment with systems and personnel working together to manage all emerging issues.
3	An operating environment with the systems and personnel working together to manage most issues as they emerge.
4	Simple operating environment with the systems and personnel not suitable to address issues as they emerge.
5	Complex operating environment with systems and personnel ill-suited to manage operations as issues emerge.
6	Don't know
Sub-factor	**Facilities and equipment**
Description	Score according to the quality, suitability and availability of the authorisation holder's facilities and equipment.
Score	**Word Picture**
1	Facilities and equipment exceed minimum standards with ample availability, are well maintained and are available for all parts of the organisation.
2	Facilities and equipment meet minimum standards and are generally available, although may be limited at peak times, are adequately maintained and are available for all parts of the organisation.
3	(1 of the following exists) • below minimum standards • limited in availability at peak times • poorly maintained • limited in availability across the organisation.
4	(2 of the following exist): • below minimum standards • limited in availability at peak times • poorly maintained • limited in availability across the organisation.

Operational/Environmental Factors	
5	(3 or more of the following exist): • below minimum standards • limited in availability at peak times • poorly maintained • limited in availability across the organisation.
6	Don't know
Sub-factor	**Human resources**
Description	Score according to the quality, suitability, availability and currency of the authorisation holder's human resources and associated data (e.g. training records etc.)
Score	**Word Picture**
1	Human resources and data exceed minimum standards with availability of personnel, well-maintained human resource data systems, available across the organisation and are used effectively.
2	Human resources and data meet minimum standards; personnel are generally available, although may be limited at peak times; human resource data systems are adequately maintained and available for all parts of the organisation and are used effectively.
3	1 of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
4	2 of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
5	All of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
6	Don't know
Sub-factor	**Technical data**
Description	Score according to the quality, suitability, availability and currency of the authorisation holder's technical data.
Score	**Word Picture**
1	Technical data exceed minimum standards, well-maintained data systems, available across the organisation and are used effectively.
2	Technical data meet minimum standards; data systems are adequately maintained and available for all parts of the organisation and are used effectively.

Operational/Environmental Factors	
3	1 of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
4	2 of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
5	All of the following exists: • below minimum standards • use by the organisation is ineffective • limited availability across the organisation.
6	Don't know

Table 4: Safety Outcomes

Safety Outcomes	
Sub-factor	**Regulatory history – Breaches (Legislative Breach or Direction)**
Description	Score according to the authorisation holder's history of breaches within the last 3 years, including Safety Alerts, Safety Findings, ASRs.
Score	**Word Picture**
1	No breaches.
2	Breaches with all finalised within appropriate timeframes.
3	Breaches but mostly acquitted without issue.
4	Breaches but problematic acquittal process and/or with recurring breaches.
5	Recurring breaches that are rarely acquitted without issues.
Sub-factor	**Regulatory history – Safety Observations**
Description	Score according to the authorisation holder's attitude and actions in relation to Safety Observations issued as a result of CASA surveillance within the last 3 years.
Score	**Word Picture**
1	No observations issued.
2	All Safety Observations issued are acknowledged by the authorisation holder and are considered for their potential for improvement of their aviation system.
3	Some Safety Observations issued are acknowledged by the authorisation holder and are considered for their potential for improvement of their aviation system.
4	Safety Observations issued are occasionally acknowledged by the authorisation holder however they are not considered for their potential improvement of their aviation system.
5	The authorisation holder has a poor attitude to Safety Observations issued or not acknowledged.
Sub-factor	**Regulatory history – Enforcement**
Description	Score according to the authorisation holder's history with regulatory enforcement actions within the last 3 years.
Score	**Word Picture**
1	No enforcement action.
2	Enforcement action taken and resolved.
3	Enforcement action underway or still in force on minor issues.
4	Enforcement action underway or still in force on moderate issues.
5	Enforcement action underway or still in force on significant issues.

Safety Outcomes	
Sub-factor	**Safety Occurrences**
Description	Score according to the authorisation holder's accident, incident and undesired safety-related event history as it relates to aviation safety within the last 3 years.
Score	**Word Picture**
1	No record of involvement or implication in any safety occurrences.
2	No record of involvement or implication in any accident or serious incident but has experienced minor safety-related events.
3	Involvement or implication in one serious incident or a significant number of minor incidents.
4	Involvement or implication in one accident and/or multiple serious incidents.
5	Involvement or implication in multiple accidents and/or serious incidents.
Sub-factor	**Other safety issues or concerns**
Description	Score according to the presence of any other safety issues (not involving a breach or Safety Observation) raised through CASA activities and external parties within the last 3 years. (Intelligence, ASA reports, complaints, regulatory service activity)
Score	**Word Picture**
1	No safety issues or concerns.
2	A few minor safety issues or concerns based on reports received from third parties.
3	Multiple minor safety issues or concerns based on information received and/or reports from third parties.
4	Significant and/or multiple safety issues or concerns based on information received and/or reports from third parties.
5	Significant safety issues or concerns based on information received and/or reports from third parties.

4 Protocols for Conducting Inspections and Surveillance

Certain CASA officers are authorised to conduct inspections and surveillance to ensure authorisation holders are complying with the aviation legislation.

Officers are authorised to conduct inspections under various regulatory provisions of the CAR 1988 and the CASR 1998. (See both the general procedures in the CSM and the [Enforcement Manual](#) on Access, Gathering Evidence and Handling Exhibits, Note Taking, Interviewing and Detaining Aircraft.)

Officers should always determine whether they are authorised for these purposes. If there is any uncertainty in relation to the power to conduct an inspection of any organisation, CASA managers should contact Legal, International and Regulatory Affairs (LIRA) Division for advice.

Authorised CASA officers conducting routine inspections under the *Civil Aviation Regulations 1988* (CAR) do not need to seek consent to enter an airfield or facility. However, as a matter of policy and courtesy, where possible, CASA officers will make contact with the occupier or owner.

If CASA officers do not produce their identity card when asked to do so, they are not authorised to conduct an inspection and any access may be denied by the occupier or owner.

As to whether consent is required for a CASA officer to take photographs or capture video footage during the conduct of an inspection, the matter depends on where the photographs or video are being taken.

If an aircraft is parked on premises which the CASA officer is lawfully entitled to access without requiring permission from the aircraft owner, e.g. an accessible area at an aerodrome, then the officer may photograph the aircraft without the need for the consent so long as the officer does not otherwise interfere with the aircraft.

Where a CASA officer wishes to take a photograph of an aircraft or something else that is located inside a hangar or within some other private premises, they need not expressly ask for permission to commence taking photographs, but, if the occupier of the premises asks them to stop, they should cease at that point.

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5 Protocols for Regulatory Services Inspectors interaction with Sky Sentinel

All Regulatory Service Inspectors and Managers have been provided access to all Authorisation Holders (AH) in Sky Sentinel (SS) on the understanding that if an Inspector finds something that requires a surveillance branch response they should:

- enter a formal comment into the AH's SS comments section.

Should a Regulatory Service Inspector conduct a Significant Change, a general comment should be placed in SS.

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6 Sampling

Sampling is a process that helps an inspector gain confidence that a system, process or procedure under review is in control and producing the desired output. This is done by examining a representative portion of the total population of items available for review. Following this review, it would be possible to make a reliable conclusion regarding the overall level of conformance of the applicable system, process or procedure. This conclusion is based on the probability that all items that may, or may not, conform have an equal chance of being selected.

6.1 Random sampling

While random sampling is typically used, various other sampling techniques may also be used. In a random sample, each item in the population has a specified probability of being selected.

Samples may be selected based on:

- numerical sequence (e.g. every tenth record)
- computer generated selection
- a record being produced on a particular day of the week
- letters of the alphabet.

The inspector must document the method used to select samples and save this into the surveillance worksheet and Records Management System (RMS).

For sampling to be truly independent, and free from potential conflict, samples must be selected by the inspector and not the authorisation holder. This includes personnel selected for interviews as well as records selected to be reviewed.

Inspectors can use this information to determine if a system, process or procedure is effective. The number and severity of any deficiencies found can be analysed to determine the degree of conformance of that system, process or procedure and whether or not a finding will be issued.

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7 Level 2 - Desktop Surveillance Record Review

A review of the documentation listed below may be considered when carrying out a desktop surveillance event and is not intended to be an exhaustive list nor a list whereby all documents should be reviewed. Inspector discretion should be used where more documentation be required.

This is also an opportunity to undertake an audit of existing information in RMS reviewing information within the preceding 12-month period will provide appropriate background for this event type (e.g. regulatory services, ATSB/CIRRIS occurrences, etc).

Utilisation of the Power BI Reports on Authorisation Holders (AH) should also be used as part of the review. These reports consolidate data from various internal CASA systems in one location.

7.1 Documents/Manuals/Reports

The following documents should apply to most authorisations/approvals where available:

- current manual suites if applicable (e.g. Aerodrome Manual and Wildlife Hazard Management Plan, Operations Manual suite, etc.)
- key personnel (continued compliance and/or changes to positions) e.g. Accountable Manager, Responsible Manager, Quality Assurance Manager & Safety Manager, DAMP Officer
- third party audits
- internal audits
- CASA surveillance reports, AHPIs, safety findings pending verification, safety observation responses.
- Self-Reported Deficiencies (Sky Sentinel)
- EAP Case jobs.

7.1.1 AOC

Prior to commencing the review, the surveillance lead should ensure current versions of all applicable manuals are obtained from the Authorisation Holder. Additionally, an appropriate number of records should be obtained to ensure adequate sampling is conducted.

- organisational structure
- operational personnel
- key personnel
- training and checking organisation and systems
- Training and Checking Manual
- personnel (incl logbooks)
- training and checking records
- approved training and checking system
- Safety Management
- DAMP
- accident and incident reporting
- FRMS (Flight and Duty Records)

- change management
- fuel policy
- flight check systems
- authorisation holder specific approvals (e.g. PBN, LVO, EDTO, etc.)
- load control
- operations manual
- operational activity (including time flown in each activity type)
- meeting records
- list of online aircraft.

7.1.2   AOC/142

- current exposition
- compliance statement
- organisation and personnel
- certificates, permissions, approvals, and exemptions
- key personnel
- familiarisation training
- instructors and examiners
- change management
- training management
- safety management
- fatigue management
- internal training and checking including HFNTS
- personnel and student logs and records.

7.1.3   CAMO / AOC (Airworthiness)

- approved maintenance programs (AMP) / SOM review
- maintenance systems (approval employee, SOM/AMP/reliability)
- exposition review
- items tracked and the intervals from software program for a sample aircraft type/s
- AD compliance records
- approval and training of CAMO employees
- airworthiness review work pack
- sample of flight tech logs and base maintenance CRS / MR
- Sample of MEL items invoked
- instructions for Continuing Airworthiness (ICA) review
- investigation of defects via request
- airworthiness control (access to relevant approved data, maintenance records, logbook entries)
- airworthiness reviews (including review employee)
- maintenance contracts with Part 145 or other organisations.

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7.1.4   Delegates

- delegate work packs
- delegate management notification system (DMNS) (Activity Report, Aircraft Types)
- documents supplied to CASA within prescribed timeframes
- compliance with instrument conditions
- weight and balance charts issued.

7.1.5   AMO

- exposition/maintenance manual review
- approved supplier assessments
- shelf life intervals register (verify)
- change management process review
- sample of SMS reports, corresponding actions, meeting minutes
- aircraft logbooks
- facility photos (particularly if CASA holds previous photos – review for changes)
- list of instructions for continuing airworthiness
- aircraft or aeronautical product work packs
- current calibrated tooling list
- Part 145 induction records
- employee authorisation records (including assessment)
- DAMP reports.

7.1.6   SMS (LC/HCRPT, P142 & P145)

- current SMS manual
- safety meeting minutes (6 months)
- SMS training records
- HF/NTS training records (if applicable)
- number of change management activity
- sample of change management docs
- audit plan (12 months)
- sample action outcomes (internal audits, meetings, occurrences and investigations)
- number of reported occurrences/hazards
- sample of occurrence management
- number of investigations
- sample of investigations
- review risk assessment practices within occurrence reporting, change management and investigation activities
- number of risk assessments
- sample of risk assessments
- newsletters (6 months) if applicable
- FDAP documentation (i.e. meeting minutes, briefing docs, etc - if applicable)
- ERP training and information on conducted exercises.

7.1.7   Part 141

Prior to commencing the review, the surveillance lead should ensure the current version of the operations manual is obtained from the Authorisation Holder. Additionally, an appropriate number of records should be obtained to ensure adequate sampling is conducted.

- compliance statement
- organisation and personnel
- certificates, permissions, approvals, and exemptions
- key personnel
- familiarisation training
- instructors
- change management
- training management
- quality system
- fatigue management
- exposition/operations manual
- personnel and student logs and records
- copy of the current register of aircraft used for flight training (Form 4B12 in SOM)
- sample of training records if possible.
- accident/incident reports
- current status of head of operations qualifications, i.e. dates of most recent IPC, FPC, EPC & flight review (as applicable)
- number of flight tests conducted by the Head of Operations in the required time period
- student pass rate.

7.1.8   Dangerous Goods (non-AOC holders)

- current Instrument/Exemption - it may be up to 3 years old and not include current regulatory or ICAO references or conditions that are added or removed from new instruments
- current manuals
- current forms
- for shippers:

    – request copies of recent dangerous goods transport documents
    – safety Data Sheets
    – dangerous goods process and procedure documents
    – obtain details of UN specification packaging used
       test reports or user reports.

- review website (if applicable).

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7.1.9   Dangerous Goods Training

- review current Instrument - it may be up to 3 years old and not include current regulatory or ICAO references or conditions that are added or removed from new instruments
- request copies of documents, e.g. current forms, training materials, course certificate, training record for recent course, copies of current exams, etc. to see if they have been kept up to date
- review training provider website (if they have one) for accuracy of course information
- consider requesting access to log in to an online training course to complete the course and review the course material

7.1.10   AOC – Dangerous Goods

- review OPSPEC for dangerous goods
- review Compliance Statement relative to Civil Aviation 1988 section 23 and Civil Aviation Safety Regulations Part 92
- review Operations/Dangerous Goods Manual
- review authorisation holder dangerous goods acceptance checklists for radioactive materials and for other dangerous goods, dangerous forms, etc.
- request copies of recent internal/third party audits if they are willing to share them
- consider sending a self-audit form to the operator specific to dangerous goods
- review authorisation holder's website for dangerous information relative to cargo and relative to passengers.

7.1.11   Part 171

- MET reports
- technical certification reports
- AirServices team meeting minutes (Previous 3 months)
- current organisational chart.

7.1.12   Part 172

- local instructions
- letter of agreement
- business continuity plan
- contingency plan
- training manual
- instructor guides
- temporary local instructions
- circulars
- directives
- Manual of Air Traffic Standards Supplements
- licencing and training – assessment folders
- Operational Risk Assessment (ORA) provide.

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7.1.13   Part 139

- completed serviceability inspection outcomes (defined date range to be given to the authorisation holder)
- permanent NOTAM requests
- temporary NOTAM requests
- technical inspection reports (where available)
- SMS reviews (where available)
- AEP committee meeting minutes (where available)
- wildlife hazard management data (where available).

7.1.14   MANUFACTURING

- list of Form 001s issued in the preceding period since last surveillance
- samples of Job/work packs including but not limited to:
- job traveller/worksheet
- material certificates
- test reports
- heat tapes
- NDT reports
- Form 001 issued
- calibration records
- applicable to the tooling utilised in the subject job/work packs
- authorised persons records
- task authorisations
- training and qualification records
- specimen signatures
- stamp records.

7.1.15   Subpart 21.M IOA

- approval documents including Engineering Orders, Form 979, technical data, Flight Manual Supplements.

7.1.16   Subpart 21.J

- approval documents including Engineering Orders, Form 979, Technical data, Flight Manual Supplements
- training plans and training records
- authorised persons' interview and appointment records
- documents related to appointment of subcontractors.

8   Aircraft Ramp Inspection

8.1   Purpose

The aircraft ramp inspection procedure provides guidance for the conduct of a ramp inspection that is carried out on an Australian registered aircraft. The primary purpose of this inspection is to evaluate the degree of regulatory compliance and operational fitness of a flight that is about to depart or has recently arrived. Ramp inspections allow inspectors to observe and evaluate the methods and standard operating procedures used by an operator's personnel during the period immediately before or after a flight. The observation enables the inspector to determine compliance with regulatory requirements and the operator's documented procedures. The ramp inspection may be conducted as a full ramp inspection or part of a specific targeted campaign which concentrates on certain aspects only. Where the scope of the inspection is limited, the extent of the scope should be recorded. The ramp inspection should be conducted in an unbiased manner in order to provide CASA with a random sample regarding the conduct of aircraft operations.

8.1.1   Reference Documents

Regulatory references

- reg 302(2) of CAR 1988 – Production of licences
- reg 305 of CAR 1988 – Access of authorised persons
- reg 61.340 of CASR 1998 – Production of licence documents, medical certificates and identification

CASA documents

- CSM Chapter 2, 3 & 4 (Level 2 Surveillance Event)
- Form 1420 Aircraft Ramp Inspection Checklist
- Form 1420i Aircraft Ramp Inspection Checklist Instructions
- CASA-04-5115 - For Aircraft below 5700kgs.

Note: Form 1420 and 1420i are primarily for aircraft in Regular Public Transport (RPT) operations, however they can also be utilised as guidance for aircraft used in non-RPT operations. Form CASA-04-5115 is used for Aircraft below 5700kgs.

8.2   Process

> **Note:**   Form 1189 is not mandatory for Ramp Checks

Method of conduct

A ramp inspection may be conducted at any reasonable time the aircraft is parked at a gate or ramp location and a member of the crew or maintenance personnel are in attendance conducting pre-flight preparations for a flight or post flight duties. It is preferable that the pilot in command be in attendance. Advance notice to the operator of a ramp check is not required. Inspection activities should be conducted so as not to interfere with the crew or disrupt scheduled operations. However, should an inspector have factual evidence that indicates the safety of the flight may be compromised, the inspector has a duty of care to satisfy

themselves that the flight is safe to continue. This consideration overrides any other constraint on the conduct of the ramp inspection.

Note: Should a safety of flight issue be identified, an Inspector may raise either a Safety Alert and/or an Aircraft Survey Report (ASR) in accordance with the CSM section 4.

Where there are a number of inspectors on the ramp check, the Lead Inspector should brief all inspectors on their role and assign sections of the checklist to each member.

Ensure all inspectors have the required safety and personal protective equipment, and that ASIC and CASA ID cards are worn and clearly visible.

Record the time when the inspection commences and ceases as evidence, should there be any accusations of disruption or delays.

If there is a company representative present, introduce the team and state your intention to conduct the ramp check and discuss how access to the tarmac can be achieved.

The Lead Inspector should introduce themselves to the aircraft captain at the earliest convenience, stating the purpose of the inspection and requesting co-operation and assistance where required.

Where a defect is brought to the attention of the pilot in command and the pilot has entered it into the maintenance release, the inspector may choose not to raise an ASR. Should the Inspector/Team be required to raise an ASR follow the instructions in the ASR Chapter of this Annex.

Qualifications

Inspectors who have received training, for example Regulatory & Technical Training and/or On the Job Training Program are qualified to conduct ramp checks, however inspectors should only comment on items with which they are familiar (e.g. if not qualified or familiar with an item, it should not be assessed).

Controls

Under no circumstances should an inspector operate a system or any equipment or request any crew member to do so in such a manner that it is not in accordance with normal operating procedures.

When checking compliance with cabin/flight deck safety equipment, it is acceptable for an inspector to open readily accessible storage areas (e.g. overhead bins and storage cabinets).

Assessment criteria

When an item meets the specified requirements/criteria, checklist items should be marked as "S" (Satisfactory), or alternatively "U" (Unsatisfactory) if they do not meet requirements/criteria. If the checklist item is not applicable to the aircraft being inspected, mark as "NA" (Not Applicable).

If any item is marked unsatisfactory on the checklist, the inspector should provide a comment detailing the reason for the outcome and obtain sufficient and appropriate evidence to support the assessment.

Note: If a checklist item was not assessed due to time constraints or lack of inspector familiarity, a horizontal line should be drawn through the associated assessment box on the checklist.

Personal safety

When aircraft arrive, depart and during turnarounds there is significant activity around the aircraft that can present as significant hazards. Vehicles that are servicing the aircraft, baggage handling machinery and refuelling are just some of the activities that occur. Inspectors must maintain good situational awareness when on the ramp, and in particular when moving around an aircraft and be aware of vehicles approaching and departing the aircraft, as well a trip hazards that may be present.

Inspectors should ascertain if any company or airport specific workplace safety briefing or training is required before entering a specific area.

Whilst on the ramp, inspectors should use appropriate safety equipment and personal protection equipment suited to the environment. At a minimum, inspectors should wear a high visibility jacket and hearing protection. However, certain operators and aerodromes may specify additional equipment which should be covered in the workplace safety briefing.

Reference: Airside Safety Awareness course in Regulatory & Technical Training.

8.3   Records

When conducting this procedure, [Form 1420](#) or [CASA-04-5115](#) should be completed by the assessing inspector(s). If the ramp check is conducted as part of surveillance, the form should be included in the associated surveillance file. In all cases, the form must be entered into an appropriate RMS file.

9 Records Management

Surveillance records must be maintained in a clear, succinct manner and provide a chronological history of surveillance activities and events. It is important that all relevant surveillance documents are adequately filed. Titling guidance can be found on the Surveillance - RMS Titling Conventions.

Surveillance records must include background documents, forms, files, notes and reports that relate to surveillance activities with all such documentation saved to the RMS. Documentation may originate from all phases of a surveillance event and be saved throughout the event's duration. Examples include documented decisions from Surveillance Planning Meetings, certificates, scoping formation, preparation checklists, worksheets, surveillance notification, correspondence from an authorisation holder, emails sent to the authorisation holder, third-party audits, notes from an inspector, Entry/Exit meeting records, Surveillance Reports, findings and the evidence relating to that finding and documentation relating to the follow up of findings. All documentation should be saved to RMS prior to the Surveillance Report being issued; this includes documentation that may not relate to any findings issued.

Correspondence/documentation may be unclassified; however, if the security access for the document and/or electronic file is initially assigned as unclassified and sensitive material is subsequently added, this added content then determines the security access classification. (See CASA Protective Security Manual – Section 3 Information Security and/or Information Management Manual – Section 4 Information Security). Contact should be made with Information management if assistance is required with reclassifying files/folders/documents.

9.1 Data management protocols

Data management is to be completed in accordance with CASA's Information Management Manual.

Table 5: Records Management Accountabilities

Position	Accountabilities
National Manager Surveillance	Ensure: • staff responsibilities for local records/documentation handling are informed, reiterated and verified • records are handled and retained as described in the records Management Manual • retention times are followed as required by CASA's Records Disposal Authorities
Surveillance lead	Ensure: • Form 1189 is utilised and saved to RMS • all surveillance documents are filed in accordance with processes described in the Records Management Manual by the surveillance team • the documents retained relating to surveillance are complete, accurate and suitably titled. Also see Surveillance - RMS Titling Conventions

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Position	Accountabilities
Surveillance Manager	Ensure: • Form 1189 is used for applicable events • Events are kept at 'recommended' until they are certain the event will proceed • internal and external timeframes are met
Inspector/surveillance team member	Ensure: • Form 1189 is utilised to scope (applicable events) • all surveillance documentation is filed and suitably titled • evidence related to each Safety Finding are accurately titled following Surveillance - RMS Titling Conventions • only relevant photographs are saved into RMS and given a name reflective of the photo contents • all appropriate fields are completed in Sky Sentinel
Surveillance Technical Officer (STO)	Ensure: • appropriate file is created for the surveillance process • all records and documentation produced by the STO are actioned and filed at appropriate stages of the surveillance event • all records/documentation are received and filed prior to the finalisation of the surveillance event by the surveillance team.

10 Information Capture Protocols for Findings

10.1 Findings – Titling

When writing a finding title ensure an appropriate and pertinent single line entry is used. The title needs to clearly distinguish the particular finding and allow the record to be easily identifiable in Sky Sentinel. Examples of correctly worded findings are:

- unauthorised Class A maintenance activity
- provision of oxygen – Equipment standards
- provision of oxygen – Crew duties
- heightened risk – Flight crew scheduling (could apply to a Safety Observation).

More guidance can be found at Surveillance - RMS Titling Conventions.

10.2 Findings – Standardised regulatory reference

To ensure standardisation and easy identification of regulatory references in Safety Findings, Safety Alerts and ASRs, the following instructions must be followed:

- do not include the penalty units
- do not include the strict liability references or breach of conditions
- insert the exact wording of the regulation into the finding template (Criteria field) as it is written in the Australian Government Federal Register of Legislation website
- the year of the regulation is cited without brackets e.g. CAR 1988
- do not add square brackets [ ] or any extra punctuation unless specified in the legislation
- use capitals as depicted in the reference
- if the number in the legislation is listed as a roman numeral, keep the number in this format
- do not spell out the regulation in full. Use the abbreviated form except when the section or regulation is used to commence a sentence.
- for references to the Act use 's' to denote a reference to a sub-section or section, for example s 2AA(1)(a) of the CAA 1988
- for the CAR and CASR, use 'reg' to denote a reference to a regulation or sub-regulation, for example reg 42R(1)(b)(i) of CAR 1988
- individual paragraphs and subparagraphs within the CAR Schedule and the CAO are abbreviated by the use of 'para' – for example, para 6.2(a) of CAO 48.1.

Note: Referencing Safety Finding head of power.

A Safety Finding must be issued against a regulatory head of power. If a Safety Finding records a breach of a Civil Aviation Order (CAO) or Manual of Standards (MOS) the relevant section of the CAO and/or MOS must be cited. However, the relevant regulation or Act provision must also be referenced as the overarching head of power. For example, the Part 135 MOS Chapter 11.20 (1) (a) requires that a piston-engine aircraft operated above 15,000 feet under the Instrument Flight Rules must be equipped with an altitude alerting system. 135 MOS Paragraph 11.20 (1) (a) is partly a direction made under CASR 135.370 (1). A breach of

that provision would be recorded in a Safety Finding as follows: 'para 11.20 (1) (a) Part 135 MOS and reg 135.370 (1) of the CASR 1998.

Table 6: References to provisions of the Civil Aviation Act 1988

Legislation Example	Cite/Reference Example
20AA Flying unregistered aircraft etc.	section 20AA of the Civil Aviation Act 1988 (CAA 1988) or s 20AA of the CAA 1988
20AA(1) A person must not fly an aircraft within Australian territory unless:	- subsection 20AA(1) of the Civil Aviation Act 1988 (CAA 1988) or s 20AA(1) of the CAA 1988
(a) the aircraft is registered under the Civil Aviation Regulations; or	- paragraph 20AA(1)(a) of the Civil Aviation Act 1988 (CAA 1988)
(b) the aircraft is, under this Act or those regulations, not required to be registered under those regulations; or	or s 20AA(1)(a) of the CAA 1988
(c) the aircraft:	
(i) is employed in private operations; and	- subparagraph 20AA(1)(c)(i) of the Civil Aviation Act 1988 (CAA 1988)
(ii) possesses the nationality of a contracting state	or s 20AA(1)(c)(i) of the CAA 1988

Table 7: References to provisions of the Civil Aviation Safety Regulations

Legislation Example	Cite/Reference Example
42.030 Continuing airworthiness requirements—all aircraft 2) The requirements are that:	- regulation 42.030 of the Civil Aviation Safety Regulations 1998 (CASR 1998) or reg 42.030 of the CASR 1998 - subregulation 42.030 (2) of the Civil Aviation Safety Regulations 1998 (CASR 1998) or reg 42.030 (2) of CASR 1998
(a) the registered operator has ensured that the requirements mentioned in Division 42.C.2 are met for the aircraft; and (b) if maintenance has been carried out on the aircraft since it was last operated for a flight—one of the following documents has been issued for the aircraft in relation to the maintenance: (i) a certificate of release to service; (ii) an equivalent document issued in accordance with an NAA arrangement mentioned in regulation 42.301;	– -paragraph 42.030(2)(a) of the Civil Aviation Safety Regulations 1998 (CASR 1998) or reg 42.030(2)(a) of CASR 1998 -subparagraph 42.030 (2)(b)(i) of the Civil Aviation Safety Regulations 1998 (CASR 1998) or reg 42.030(2)(b)(i) of CASR 1998

Table 8: References to provisions of the Manual of Standards

Legislation Example	Cite/Reference Example
Chapter 1 Requirements for CAMO	-chapter 1 of the Part 42 Manual of Standards or chapter 1 Part 42 MOS
1.2 Continuing airworthiness management exposition	-paragraph 1.2 of the Part 42 Manual of Standards or para 1.2 part 42 MOS
1.2.1 The CAMO must have an exposition that contains at least the following information: (a) a statement signed by the accountable manager to confirm that the CAMO will provide continuing airworthiness management services in accordance with Part 42 of CASR 1998, this MOS and its exposition at all times;	-subparagraph 1.2.1(a) of the Part 42 Manual of Standards or subpara 1.2.1(a) Part 42 MOS
145.A.25 Facility requirements	-paragraph 145.A.25 of the Part 145 Manual of Standards or para 145.A.25 Part 145 MOS
(a) An AMO must have facilities for the provision of maintenance services that are appropriate for carrying out maintenance of the kind that is being carried out in the facilities. In particular, the facilities must be to a standard that provides an environment that: 1. is appropriate to the weather conditions that prevail at the time that the maintenance is carried out.	-paragraph 145.A.25(a)1. of the Part 145 Manual of Standards or para 145.A.25(a)1. Part 145 MOS

Table 9: References to provisions of the Civil Aviation Regulations 1988

Legislation Example	Cite/Reference Example
42R Approval of Changes	- regulation 42R of the Civil Aviation Regulations 1988 (CAR 1988) or reg 42R of the CAR 1988 - subregulation 42R(1) of the Civil Aviation Regulations 1988 (CAR 1988) or reg 42R(1) of CAR 1988
(a) CASA or an authorised person received a request for approval of a change to an approved system of maintenance;	- paragraph 42R(1)(a) of the Civil Aviation Regulations 1988 (CAR 1988) or reg 42R(1)(a) of CAR 1988

10.3 System elements – question development

To enable an inspector to evaluate an authorisation holder's systems and to enhance standardisation, the following guidelines must be followed.

Questions should generally relate to key areas of the authorisation holder's systems. They should be written in such a way as an inspector would ask an authorisation holder. They must be relevant to the element being assessed and follow the points below:

- questions should be written with the logical starting point with the system element being evaluated clearly in mind as the answers may require the inspector to digress to pursue the necessary evidence to prove the level of risk mitigation
- questions should generally be of an open questioning type requiring more than a 'Yes/No' answer, i.e. the questions should be of the 'How', 'Show me' and 'Why' style
- sufficient key questions must be created or selected to ensure that all four MSM attributes are covered
- prompts can be added as required, but these should not be key questions. For example, a prompt such as 'Ensure record ABC 7.2 is checked for procedural correctness and compliance', may be added based on received intelligence.

10.4 System elements – questioning technique

To enable an inspector to fully evaluate an authorisation holder's systems the inspector should ask questions covering all of the MSM attributes. If a response to a question on a particular aspect of an attribute is deficient, further questions relating to the deficiency should be asked to establish the degree of control the authorisation holder has in its ability to mitigate the safety risk.

Continue questioning until sufficient evidence is obtained to determine if the authorisation holder is managing the safety risks associated with the system element being assessed.
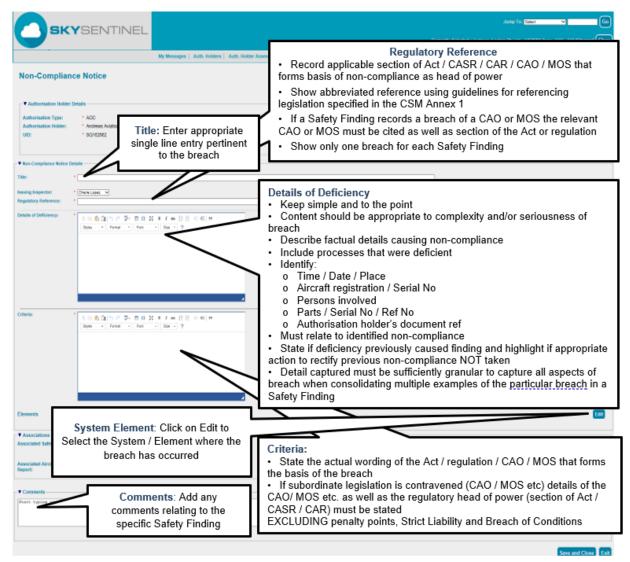
11 Safety Finding Instructions

Figure 1: Safety Finding Instructions
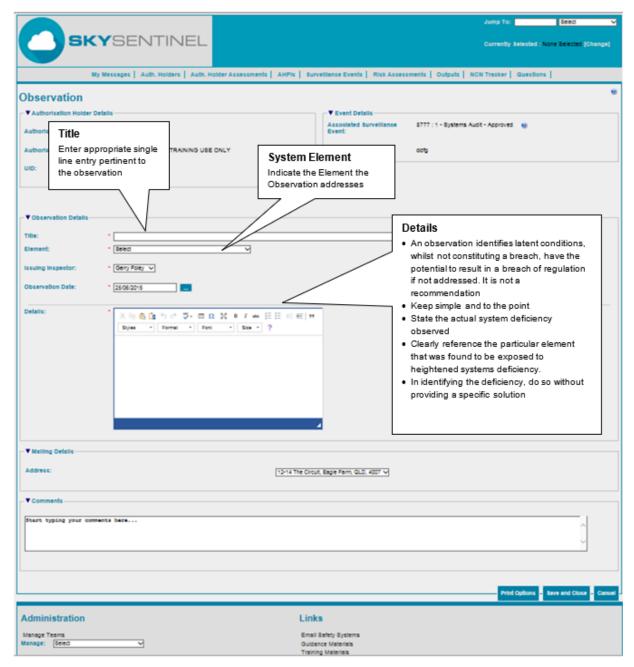
12 Safety Observation Instructions

Figure 2: Safety Observation Instructions

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13 Aircraft Survey Report Instructions

Note: *Code 'A' ASRs must be shown individually on separate forms* while Code 'B' and 'C' ASRs can be listed on one form. ASRs unless specified have a 365 day validity.
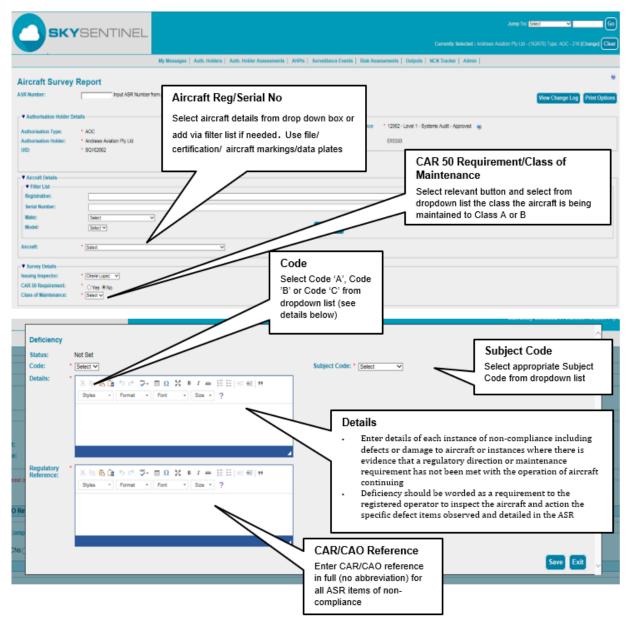

Figure 3: Aircraft Survey Report Instructions

13.1 ASR Codes

All ASR items of non-compliance must be recorded as Code 'A' Code 'B' or Code 'C'.

Acquittal process: Under normal circumstances, the surveillance team member who initially issues the ASR (issuing inspector) is also responsible for the acquittal process. Should the issuing inspector be unable/unavailable to acquit then the Surveillance Manager must select an alternative inspector who will take responsibility for verifying action taken and the acquittal process .

Note: Issuing Inspector makes contact before issue with the COM/NM and Surveillance Manager.

Code 'A' ASRs must be shown individually on separate forms while multiple Code 'B' and/or Code 'C' ASRs can be listed on one form.

An ALERT and a File Note must be placed against the VH on EAP AR with ASR details.

Note: Unless specified on the ASR an ASR has a 365-day life span.

13.1.1 Code 'A'

A Code 'A' ASR is a direction under CASR 11.245 to have maintenance carried out on the aircraft before further flight.

Only use a Code 'A' ASR (after discussion with the Surveillance Manager who will alert the National manager Surveillance when:

- defects or damage that may affect the safety of flight have been detected, or
- you have evidence that a regulatory direction or maintenance requirement has not been met and continued operation of the aircraft may affect the level of safety.

Note: If it is believed that, in the interests of safety, action should be taken to prevent an aircraft from flying because of a failure to comply with a requirement, consideration should also be given to whether detention of the aircraft or enforcement action is necessary. In either case this must be referred to the NM for consideration of enforcement action.

Note: Issuing Inspector contact the NM, Surveillance Lead and the Surveillance Manager regarding possibility of ASR Issue.

In situations where the registered operator is being directed to do something other than perform maintenance, then the Manager, Litigation, Investigations and Enforcement should be contacted so that they can review the draft ASR.

Whenever issuing a Code 'A' ASR:

- make sure the defect, damage or non-compliance is clearly stated, and specify the relevant regulatory reference(s)
- make sure that the wording of the ASR includes instructions to inspect the aircraft and rectify, replace, repair, remove, install, secure, fit, inspect, investigate etc, as relevant
- deliver the ASR to the registered operator or operator by email but follow up by phone to ensure receipt. If there is a risk that the aircraft may be flown in this situation, then also affix a copy of the ASR prominently to the aircraft if the use of the

quadruplicate paper form has been utilised taking into consideration the cosmetic damage affixing the ASR may do to an aircraft.

- make every effort to contact the registered operator, the owner, or any person likely to fly the aircraft and advise the nature of the defect, damage or non-compliance.

If contact cannot be achieved, the issuing inspector must affix a copy of the ASR to the aircraft in a position where it will be seen by anyone trying to gain access to the aircraft taking into consideration the cosmetic damage affixing the ASR may do to an aircraft.

The following is a non-exhaustive list of examples of when a Code 'A' direction would typically be issued:

- AD/PA-23/89 has not been carried out
- aircraft does not comply with AD 2013-0263 – Engine controls
- CASA ramp inspection has identified corrosion on four of six aileron hinge fittings. Prior to further flight an appropriately qualified LAME must carry out an assessment on all aileron attachment hinge fittings. Any hinge fittings with damage outside allowable damage limitations must be rectified prior to further flight
- before further flight, an assessment to be carried out on the R/H outboard flap track attachment to the rear spar and rectify as required – exfoliation corrosion evident.

Note: If in any doubt, contact and seek the advice of an AWI.
Note: On return to the office advise surveillance@casa.gov.au of ASR issuance who will add an alert and a file note onto EAP against the aircraft by registration mark and a copy of the ASR will be saved on to RMS Aircraft File.
The issuing Inspector should actively manage the Code A ASR to ensure responses are received and appropriate action has been taken by the registered operator.

Note: The STO will monitor the ASR when it is acquitted so that the file note can be closed and the alert inactivated.

Prior to the 365-day expiry the issuing Inspector must review the ASR to confirm that it can be closed and/or if it should be re-issued.

13.1.2   Code 'B'

Use the 'Code 'B' direction to bring a defect or damage to the attention of the registered operator, the pilot or operator where:

- it is considered that the defect or damage is minor, or
- the inspection does not enable a determination as to whether the defect or damage is major.

A Code 'B' ASR is a direction pursuant to CASR 11.245 to have defects or damage assessed and rectified as necessary.

The registered operator, the pilot or operator is responsible for assessing the defects or damage and having them rectified.

As the wording of the ASR for Code 'B' items already contains the direction to have the items assessed and rectified as necessary, there is no need to give further directions.

The defect or damage must be clearly stated, and the relevant regulatory reference(s) specified.

The following is a non-exhaustive list of examples of when a Code 'B' direction would typically be issued:

- corroded screw heads on fin and rudder panels
- rear LH lap belt chaffed – please check serviceability of all seat belts
- RH main wheel appears under pressured
- propeller control labels worn – check all required placards/decals are present and legible
- fuel calibration card appears to be missing
- compass card is not evident.

Note: On return to the office advise surveillance@casa.gov.au of ASR issuance who will add an alert and a file note onto EAP against the aircraft by registration mark and a copy of the ASR is saved on to RMS Aircraft File.
The STO will monitor the ASR for acquittal so that the alert can be inactivated, and file note closed.

Note: Prior to the 365-day expiry the issuing Inspector must review the ASR to confirm that it can be closed and/or if it should be re-issued.

13.1.3   Code 'C'

A Code 'C' item is a formal notification to a registered operator of a non-compliance with a requirement or condition imposed under the CARs or CASRs that, in the judgment of the surveillance team member, from the inspection carried out, will not have an immediate lowering effect on safety, but is required to be assessed and/or rectified.

Code 'C' items may include any equipment referred to in:

- the CARs
- the CAOs
- a company maintenance requirement
- the type certification documents
- the applicable maintenance requirements.
- a direction issued pursuant to CAR 38(1) i.e. airworthiness
- directives (ADs) or a previous ASR.

When issuing a Code 'C' direction, the relevant regulation or requirement pertaining to the non-compliance must be specified.

The following is a non-exhaustive list of examples of when a Code 'C' direction would typically be issued:

- documents show the flight of 6.5 hours conducted on 29/11/93 has not been recorded in the aircraft records – CAR 43B refers
- the flight manual does not contain amendment G3 – CASR 135.04, 91.095 refers
- reweighing is overdue by 3 months – CAO 100.7 paragraph 3.2 refers
- airframe registration lettering on port side of tail and cabin exit decals are illegible – Sub paragraph 7.1 (b) Part 45 MOS and reg 135.040 (1) of the CASR 1998 refer.

Note: Information copies of the ASRs may be handed to the registered operator, flight crew or maintenance staff at the time of the surveillance event. The information copies are only to be issued as previously agreed with an organisation or operator.

STO will add a file note to the Aircraft and a copy of the ASR will go on to the Aircraft File.

Note: Prior to the 365-day expiry the issuing Inspector must review the ASR to confirm that it can be closed and/or if it should be re-issued.

14 Surveillance Report Instructions

Surveillance reports should be concise and use simple language. The report must be descriptive, be a statement of fact and include the following items:

- title page
- executive summary (mandatory) Using the Surveillance Report and Findings Work Instructions - Standard Wording
- statement of confidential nature of contents
- statement of surveillance objective
- surveillance team
- dates and locations (for onsite surveillance)
- surveillance scope
- summary of findings (associated with the surveillance event)
- reference documents (used or sited and both internal authorisation holder documents, third-party audits and eg CAR's CASR's.)
- key people (interviewed during the surveillance, not only "Key Personnel" eg CEO and CP but all who were interviewed).

Table 10: Surveillance Report Contents

Surveillance Report Contents	
Title page	- Authorisation holder (pre-populated) - ARN (pre-populated) - Authorisation type (pre-populated) - Dates of surveillance (pre-populated) - Report title (free text descriptor that can be added as appropriate but should not duplicate pre-populated report title) (Optional).
Executive Summary (Mandatory)	The Executive Summary should be written by the surveillance lead in collaboration with the surveillance team. The Surveillance Report and Findings Work Instructions - Standard wording should be used wherever possible. The summary's purpose is to draw the reader's attention to the important issues covered by the report. It provides the reader with an overview of the report's essential information. The summary should say as much as possible in the fewest possible words and therefore, every word should count. It must be self-sufficient and be understood in isolation. Typically, it is written last to ensure it accurately reflects the report's content.
Statement of confidential nature of the contents	A generic statement relating to the confidentiality of the report. (pre-populated).
Surveillance objective	The objective of the surveillance is to assess the ability and willingness of an authorisation holder to comply with all applicable legislative obligations.(pre-populated).
Surveillance team	Identification of the surveillance lead and team members, including those in attendance at the entry/exit meeting. (pre-populated).

Surveillance Report Contents	
Dates and locations (Onsite/Remote surveillance)	In chronological order, insert the date(s) and locations where the onsite activities were conducted, including the entry and exit meetings. This field is also used to inform if the Surveillance was conducted in the CASA Office as a desktop review.
Surveillance scope	The Surveillance scope table is the extent and boundaries of the surveillance and a count of findings issued.
	The surveillance scope shall be generated using either Form 1189 or other acceptable methods and must be saved and stored on RMS as this provides SME context as to the selected scope reasoning.
	Note: The scope is pre-populated from the Surveillance Event page. Any changes to the scope must be performed in the event, which must be reopened to allow for changes.
Summary of surveillance findings	List of findings, including the finding number, finding type, finding subject/title and, if applicable, the due date (pre-populated).
Documents used as standards and reference (Mandatory unless there were no documents reviewed)	A list of all documents that have been reviewed or used while conducting the event, including document reference number/version and title. Including third-party audit reports, Work packs, CAR/CASR and CAOs etc. Internal CASA Forms such as the scoping form should not be included.
Key people interviewed during the surveillance (Mandatory unless no-one was spoken to)	A list of the people who were interviewed during the event, including their name, position and date(s) interviewed.

Note: The Surveillance Report and Findings Work Instructions - Standard wording is available the Document Catalogue.

15 Occurrence Management

15.1 Overview

Safety occurrence data (intelligence) relates to an aviation safety event which involves the holder of a civil aviation authorisation.

Section 9 (1)(g) of the Civil Aviation Act 1988 (the Act) assigns the following as part of CASA's functions: 'conducting regular reviews of the system of civil aviation safety in order to monitor the safety performance of the aviation industry, to identify safety-related trends and risk factors and to promote the development and improvement of the system'.

The CSM details the surveillance methods by which CASA carries out certain functions under the Act.

One aspect of CASA's surveillance activities is the review of safety occurrence data to determine whether a potential safety issue exists or there has been a regulatory breach. The occurrence management process requires the surveillance of safety occurrences at various levels. Reviewing and assessing these occurrences is an integral part of the surveillance process with the outcomes of the assessment having a direct link to the Authorisation Holder Performance Indicator (AHPI).

Surveillance is conducted as a:

- Level 2 – Unscheduled – Occurrence – Desktop
- Level 2 - Unscheduled – Occurrence - Site
- as outlined in Section 3.3.1.2 of the CSM. Should a surveillance event be approved from an ATSB report, the Accident Liaison Office must be advised before commencement. See Strategic Services Standard Operating Procedures– for the occurrence reporting and ATSB guidance.

The Occurrence Management section of this annex provides guidelines for surveillance on occurrences with regard to:

- the occurrence management accountabilities
- the requirements for conducting an unscheduled surveillance event of a safety occurrence in terms of:

  – What is a safety occurrence desktop review?
  – How is the safety occurrence information accessed?
  – How is the safety occurrence data assessed, analysed, prioritised and categorised?
  – What level of surveillance activity is required to be conducted? What follow-up action is required by CASA?

15.2 Occurrence criticality definitions

Each safety occurrence must be assessed for criticality to assist in determining the scope and priority of any follow up activity. Likelihood has not been considered as the event would have already taken place.

Critical occurrences fall into four classification types:

- Catastrophic occurrence
- Critical occurrence
- Serious occurrence
- Minor occurrence.

Table 11: Criticality definitions

Classification	Description
Catastrophic occurrence	An occurrence with fatalities
Critical occurrence	A complete loss/failure of the aviation system(s), or a destructive failure, impacting directly on the safe operation of the aircraft
Serious occurrence	A partial loss/failure of the aviation system(s), potentially impacting on the safe operation of the aircraft
Minor Occurrence	Degradation of the aviation system(s) or part thereof, not impacting directly on the safe operation of the aircraft.

Likelihood criteria		Consequence criteria				
		No damage to aircraft	Possible damage to aircraft	Probable damage to aircraft	Possible harm to persons	Probable harm to persons
From past operator experience, it would be *usual* for the event to reoccur in routine circumstances	Almost certain	Serious	Critical	Critical Extreme	Critical Extreme	Critical Extreme
From past operator experience, the event will probably reoccur in routine circumstances	Likely	Serious	Serious	Critical	Critical Extreme	Critical Extreme
The event is *unusual* but may reoccur at some time if operator cannot manage circumstances	Possible	Minor	Serious	Serious	Critical	Critical Extreme
Unusual however, the event could reoccur under some circumstances	Unlikely	Minor	Minor	Serious	Critical	Critical Extreme
Very *unusual* event which could only reoccur in exceptional circumstances	Rare	Minor	Minor	Minor	Serious	Critical

Figure 4: Likelihood/Consequence criteria

15.3 Accountability

CASA policy requires that safety occurrences be assessed and considered for any potential follow-up action. Manager Monitoring and Response acts on behalf of Surveillance Managers and is accountable for complying with the following standards:

- monitoring the ATSB Aviation messaging system via SMS
- providing an Aviation Incident Brief (Form 7642) to NM, Surveillance for any catastrophic occurrences that occur in their area of responsibility

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- the automated daily occurrence information report is to be reviewed daily and annotated using the criteria listed in this annex.

Assessing a safety occurrence:

- the annotated report is saved into RMS under the naming convention of Surveillance Monitoring
- a Level 2 surveillance event is assigned and planned for those occurrences annotated for follow-up and is recorded in Sky Sentinel as a new surveillance event annotating in comments the ATSB/CIRRIS reference details from the spreadsheet.

Note: *Non-AOC operators – Occurrences involving operations not authorised by CASA - will also be assessed using the process and support forms. For Non-AOC operators who require adding to Sky Sentinel - this will be done under the Authorisation Type of ARH.

15.4 Safety occurrence review

A safety occurrence desktop review is a process carried out by the Monitoring and Response Surveillance team The process ensures that safety occurrence data is accessed, reviewed, assessed for criticality and assigned for follow- up (if required). Safety occurrence data is currently sourced from organisations as set out in the following table.

Table 12: Safety occurrence sources

Report name	Source
Short Message Service (SMS) ATSB Aviation Message	ATSB
ASIR (Air Safety Incident Report) – Daily Occurrence Notifications	ATSB
CIRRIS (Corporate Integrated Reporting and Risk Information System)	Airservices Australia
Unsafe Behaviour Reporting	Aviation Group Corro
Low Flying Aircraft Reporting	Aviation Group Corro
Internal Reports	All of CASA

Note: The daily safety occurrence information received from the ATSB and Airservices has not been verified. This is a key point to note for staff when contacting the authorisation holder to establish if the details, facts and circumstances are a true reflection of the occurrence. In addition, as ATSB and Airservices occurrence information may be dated, when the occurrence occurred should be considered when reviewing such information

The process and personnel used by the surveillance team to conduct the daily review of occurrence information is to follow the surveillance team's guidance and the consolidated annotated report must be recorded in RMS on the Response Surveillance Occurrences and Events Sheet under F21/15406.

15.5 Accessing information

Access to the ATSB Aviation messaging system (SMS) is controlled by the Accident Liaison Office. Accident or incident messages are received by the NM, Surveillance and Manager Monitoring Response Surveillance and are assessed for follow up action upon receipt.

ASIR and CIRRIS occurrence data is stored in CASA's Data Warehouse. The allocated Inspectors must review occurrence reports daily. Access to the report is by:

- automatic distribution – a daily e-mail is automatically sent to a nominated e-mail account. Management of internal distribution is the responsibility of the Monitoring and Response Surveillance Manager.
- (Optional) Direct access to the Business Objects platform – this allows the assessor to extract the information directly. The direct access option provides the user more filtering options.

Note: Direct access can be gained by sending a request to CASA's IT support or logging a request through the CASA Service Desk.

Note: User guidance on the information found within the body of the business objects daily reports can be found in the 'key' summary document, located on the intranet site. [Aviation Occurrence Search Report](#)

Unsafe Behaviour and Low Flying Aircraft reports are processed by the Correspondence Team in the Coordination & Safety Systems Branch - and where required follow up action on these reports is managed by the Monitoring and Response Team.

15.6 Assessing a Safety Occurrence

SMS – ATSB Aviation Messaging System

Upon receipt of an ATSB occurrence SMS the Monitoring and Response Manager will assess the incident to establish whether it meets the catastrophic occurrence category and should it be deemed to meet this category will carry out the following:

- establish who the registered operator is by conducting an aircraft registration search using the Aircraft Registration Module in EAP. Also available is the [Civil aircraft register | Civil Aviation Safety Authority (casa.gov.au)](#)
- determine whether the registered operator is an Air Operator Certificate or Operating Certificate holder
- if the registered operator is an Air Operator Certificate or Operating Certificate holder; carry out an EAP search to obtain the organisation's key position holders contact details
- where appropriate contact the Authorisation Holder key position holder and request information on the incident
- as soon as practicable email the NM Surveillance, with a brief description of the information on hand at that stage
- within twenty-four (24) hours provide an incident brief (Form 7642) to the EM ROD.

Upon receipt of an ATSB occurrence SMS the Manager Monitoring and Response Surveillance will assess the incident to establish whether it meets the critical or serious

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occurrence category or that the incident may become a newsworthy item, the Manager will carry out the following:

- establish who the registered operator is by conducting an aircraft registration search using the Aircraft Registration Module in EAP. Also available is Civil aircraft register | Civil Aviation Safety Authority (casa.gov.au)
- determine whether the registered operator is an Air Operator Certificate or Operating Certificate holder
- if the registered operator is an Air Operator Certificate or Operating Certificate holder; carry out an EAP search to obtain the organisation's key position holders contact details
- where appropriate contact the Authorisation Holder key position holder and request information on the incident.

Refer to Section 15.10 of this Annex for follow up actions.

Daily Occurrence Reports

The content of the daily Occurrence Reports is not for trend analysis purposes and each occurrence is to be considered on its individual merits. Occurrences in the report have not been confirmed or validated by CASA and are for information purposes only.

The Monitoring and Response Manager on behalf of the NM Surveillance must ensure that all safety occurrences are assessed to determine:

- the criticality of the occurrence has been determined
- what occurrences, if any, should be assigned follow-up level 2 surveillance event type and entered into Sky Sentinel, if appropriate, as a surveillance event
- the ALO have been notified that a follow-up surveillance event has been raised IAW the CASA/ATSB MOU Section 6.3
- that all accountabilities have been met.

Note: Manager Monitoring and Response Surveillance must follow up on all Loss of Separation (LOS) occurrences involving or related to an RPT aircraft where the assessment indicates the occurrence was caused by pilot error.

Note: If a follow up surveillance event to an occurrence is required as per CSM requirements. This requirement is independent of the authorisation holder's oversight posture.

15.7 Unsafe Behaviour & Low Flying Aircraft Reports

Communications and Reporting Team in Quality and Coordination (previously known as AVG Corro) manages incoming reports utilising a "Reporting Tracking Register" (RTR) in RMS and should it be ascertained that a CASA response is required, they will email the report RMS File reference number to the Surveillance Services Manager for an appropriate response.

The Surveillance Services Manager (SS) must ensure that all reports received are assessed to determine:

- that all reports have been allocated correctly by the Communications and Reporting Team
  - the criticality of the reported unsafe behaviour or low flying report

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–   If no further action is required, the Communications and Reporting Team is notified that there is no further action required and update the (RTR) with appropriate commentary.

- what reports, if any, should be assigned follow-up level surveillance event type and entered into Sky Sentinel, if appropriate, as a surveillance event and the RTR updated
- that all accountabilities have been met.

15.8 Assessing an occurrence criticality

Each safety occurrence must be assessed for criticality to assist in determining the scope and priority of any follow up activity. Likelihood has not been considered as the event would have already taken place.

Table 13 provides guidance on the criticality, follow-up classification and follow-up action required. All assessed safety occurrences that require more detailed follow-up are considered to be Level 2 surveillance events, with surveillance requests entered into Sky Sentinel as a Class A, B or C surveillance type as detailed in Table 13 Definitions included in the table are mapped to four classification types:

- Catastrophic
- Critical
- Serious
- Minor.

Table 13: Occurrence critically determination

Criticality Description	Sky Sentinel Surveillance event type	Review Action Type
Catastrophic An occurrence with fatalities.	Record as one of the following: • Level 2 – Unscheduled – Occurrence investigation Request – Desktop • Level 2 – Unscheduled – Occurrence investigation Request – Site.	As a rule, CASA does not conduct an onsite field investigation following a fatal aircraft accident. However, in accordance with the CASA/ATSB Memorandum of Understanding (MoU), CASA personnel may be involved in aviation safety investigations as an observer, appointed as a special investigator, or technical advisor to an ATSB investigation team. If CASA does elect to initiate a safety and regulatory review it shall do so for the purposes of identifying and rectifying any pertinent safety issues. ATSB, Coronial and other investigations are governed by their respective legislation and are outside the scope of the CSM and this Annex. CASA will monitor the outcomes of any such investigations. All CASA activities associated with Catastrophic occurrences must be coordinated through the, ATSB Liaison Officer (ALO).
Critical Complete loss/failure of the aviation system(s), or a destructive failure, impacting directly on the safe operation of the aircraft	Class A Record as applicable: Level 2 – Unscheduled – Occurrence Investigation Request – Desktop Follow-up (possible Level 2 – Unscheduled –Occurrence investigation Request – Site)	For details of follow up action see Section 15.10.1 – Follow–up action – Class A
Note:	The National Manager Surveillance should consider that the ATSB may investigate a safety occurrence. If CASA elects to conduct Class A or B follow-up, notification must be sent to the ATSB as per the section 6.3 of the CASA/ATSB MoU. When a parallel investigation occurs, be aware the ATSB generally places a protection order on certain records or equipment relating to the occurrence. In all circumstances, notify (by email) CASA's ATSB Liaison Officer (ALO) whenever a Class A or B follow-up is considered necessary and a comment entered in Sky Sentinel.	

Criticality Description	Sky Sentinel Surveillance event type	Review Action Type
Serious A partial loss/failure of the aviation system(s), potentially impacting on the safe operation of the aircraft	Class B Record as applicable: • Level 2 – Unscheduled – Occurrence investigation Request – Desktop • Level 2 – Unscheduled – Occurrence investigation Request – Site	Independent desktop and/or site visit may be required depending on the history of the operator If no immediate follow up is determined to be required, the event must be followed up during the next scheduled surveillance event. A CASA Inspector may contact the operator and complete a Safety Occurrence Request for Information (Form 997) to establish the circumstance of the occurrence, before making any further judgement For details of follow up action see Section 15.10.2 – Follow-up action – Class B
Minor Degradation of the aviation system(s) or part thereof, not impacting directly on the safe operation of the aircraft.	Class C (If follow up action is to be taken) Record as: • Level 2 Unscheduled Occurrence Investigation Request – Desktop	Generally, no further action is required A CASA Inspector may contact the operator and complete a Safety Occurrence Request for Information (Form 997) to establish the circumstance of the occurrence, before making any further judgement For details of follow up action see Section15.10.3– Follow-up action – Class C

When conducting follow-up of an occurrence, the Monitoring and Response Surveillance Manager must consider the authorisation holder's oversight posture, as determined by the authorisation holder's current AHPI and "System Risk Indicator" scores. The posture status may change the investigation class and the level of follow-up action. For example, an authorisation holder under 'active' posture may have a minor occurrence that CASA determines warrants the authorisation holder to conduct an internal investigation, or it may warrant an inspector contacting the authorisation holder and completing the Safety Occurrence Request for information (Form 997) or alternatively; requesting the authorisation holder complete and return the Safety Occurrence Request for Information- to establish the circumstance of the occurrence, before making any further judgement.

In all cases when determining the type of investigation, the Monitoring and Response Surveillance Manager must monitor the authorisation holder's internal investigation.

Table 14: Decision criteria for issuing CAR 1988 regulation 301 notices of demand after a non-fatal aircraft accident or serious incident

Type of Civil Aviation Operation2	CASA issue 301 notice/s3 (Y/N)	ATSB field investigation4 (Y/N)
Passenger transport - large aircraft	Y	Y
Passenger transport - small aircraft (includes low-capacity RPT, Charter, RFDS, SAR, EMS, law enforcement, off-shore, humanitarian or charity flights)	Y	Y
Other commercial (fare paying) recreation (for example – joy flights)	Y	Y
Aerial work with participating passengers (for example geo-survey and news media)	Y	Y
Other aerial work (for example aerial application and aerial mustering)	N	Possible
Private (private transport/personal business high performance aircraft, warbirds, parachute operations)	Possible	Possible
High risk personal recreation/sports aviation/experimental aircraft operations	N	N

On advice from a NM Surveillance to commence an SAR; The CAR 301 notices may be issued subject to the NM's approval.

The CASA Officer responsible for carrying out the SAR will request Surveillance Services to commence the process using Form 1559 - Safety Assurance Review Aircraft Accident Worksheet.

Refer section 17 Safety Assurance Review process.

Refer Section 13.5 of the CASA Enforcement Manual for "Procedures in Relation to Obtaining Evidence."

Note: To be read in conjunction with Working Arrangements between the CASA and the ATSB facilitate timely access to certain documents."

Note: These broad categories do not correspond with current or projected CASA classification of operations categories. Rather, they are broad categories using well understood language to help staff quickly understand the magnitude of and likely CASA response to a particular event.

Note: There will be exceptions to these general guidelines. CASA's response will, in part, be a function of the significance of potential safety issues

Note: There will be exceptions to these guidelines. ATSB's selective investigation policy concentrates the ATSB's resources on investigations most likely to enhance aviation safety for the travelling public.

15.9 Scope

It is important that for each safety occurrence assigned for surveillance there is a clear understanding of the impact of any potential safety issues, regulatory breaches and the corrective actions put in place or that will be required. For each occurrence assigned for surveillance, the scope must be determined.

The scope defines the boundaries within which the surveillance event is to be carried out and defines the event or activities to be examined. The systems and elements set out in the relevant authorisation type annexes, and contained within Sky Sentinel, may be applied in scoping the event.

When determining the scope, consider the level of surveillance event required. This could be one or a combination of the following:

- On-site surveillance event
- Desktop review and/or site visit, or
- monitoring the authorisation holders' internal audit/safety investigation.

Schedule a new surveillance event (Direct Entry Event – Approve without normal process) with any relevant comments included in the comments section as necessary if follow up action to the occurrence findings is required.

Note: On-site in this context does not mean a field investigation involving an assessment of the impact zone and associated wreckage. On-site relates to attending an operator's or other applicable entities' premises where evidential material may be obtained.

15.10 Follow-up action

15.10.1 Class A

When an occurrence meets the Class A criteria, the following actions take place:

- the NM – Surveillance, or the Manager Monitoring Response Surveillance contacts the Accident Liaison Office (ALO) to discuss the level of accident or incident if required
- the Manager Monitoring and Response Surveillance through the STO: Enters the occurrence into Sky Sentinel via the 'Add New Surveillance Event' (Direct Entry Event – Approve without normal process) function as a Level 2 Unscheduled Occurrence Investigation Request – Site surveillance type, or for non-AOC events, into RMS.

The ATSB Liaison Officer:

- provides specialist accident investigation advice, including as a member of the Critical Occurrence Management Group
- assists investigative teams as directed by CASA
- provides regulatory based support to ATSB's accident investigations as required
- works in collaboration with other specialists within CASA
- coordinates CASA's examination of, and responses to, ATSB reports including monitoring CASA's actions in relation to established action plans.

15.10.2 Class B

When an occurrence meets the Class B criteria, the following actions take place:

- Manager Monitoring and Response Surveillance: Determines the level of follow-up action required, considering the oversight posture of the authorisation holder (Routine/Enhanced/Active).

If further action is required, the Manager Monitoring and Response Surveillance:

- assigns the Surveillance Lead
- through the STO raises an event file in EDRMS

Note: The Manager Monitoring and Response Surveillance may seek assistance from other Surveillance Managers for Inspectors to lead, likewise Surveillance Managers may request one of their Inspectors lead. If other Inspectors are necessary, to either lead or participate, they can be drawn from any section of ROD with their Managers permission.

The Surveillance Lead:

- contacts the authorisation holder for further information and/or have them complete a Safety Occurrence Request for Information (Form 997), and in the event the incident relates to the operation of an aircraft; may also have them complete the Pilot Questionnaire and Response (Form 998)
- assesses the authorisations holder's response, and
- advises the Manager Monitoring and Response Surveillance of recommendation by email, of either.

    – No Further Action and the reasons for the decision, or
    – Further action required.

Note: A summary of all interactions with the authorisation holder are to be entered in Sky Sentinel as formal comments and documents, records of conversations etc. entered in EDRMS.

The Manager Monitoring and Response Surveillance reviews the decision.

If further action required the Manager Monitoring and Response Surveillance, with the STO:

- informs the relevant Surveillance Manager of the decision
- raises a Level 2 Surveillance event
- assigns or reassigns the surveillance lead
- determines the dates
- determines the surveillance is either Desktop, Remote or On-site
- determines the team
- advises the scope
- for either surveillance option the Surveillance Lead compiles a report as per CSM Section 4.6.14 – Level 2 Surveillance Report.

If the result of the Level 2 is not satisfactory, the Manager Monitoring and Response Surveillance, in consultation with the relevant Surveillance Manager decides on the next steps IAW the CSM.

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Note: A summary of all interactions with the authorisation holder are to be entered in Sky Sentinel as formal comments and documents, records of conversations etc. entered in EDRMS.

15.10.3 Class C

Generally, no further action is required on a Class C Occurrence.

When an occurrence meets the Class C criteria, the Monitoring and Response Surveillance Manager:

- determines whether follow-up action may be warranted by considering the oversight posture of the authorisation holder (Routine/Enhanced/Active) and either:

    – takes no action but continues to monitor the authorisation holder, or
    – contact's the authorisation holder and requests the authorisation holder to investigate the occurrence and provide a report detailing the outcome of the initial investigation within 21 calendar days of the request being made, or
    – send a Safety Occurrence Request for Information (Form 997) and in the event the incident relates to the operation of an aircraft; may also send the Pilot Questionnaire and Response (Form 998).

- if further follow-up action is required, enters the occurrence into Sky Sentinel via the Schedule a new surveillance event (Direct Entry Event – Approve without normal process) function as a Level 2 – Unscheduled Occurrence– Desktop Review.
- assesses the authorisation holder's response
- if a report is to be issued, prepare as per the requirements of CSM on Level 2 – Surveillance Reports.

Note: A summary of all interactions with the authorisation holder are to be entered in Sky Sentinel as formal comments.

15.11 Reporting Guidelines

It is important when a surveillance event is initiated by CASA that results of the event are captured clearly and concisely in a surveillance report. The following is a guide to assist the level of report necessary:

- on-site surveillance events are currently not conducted by the ALO. For a critical occurrence, the ALO will facilitate CASA interaction with the ATSB investigation. If CASA elects to conduct a parallel surveillance event for the purposes of taking safety-related regulatory actions, the ALO will aid the surveillance team conducting the event as required. There is currently no prescribed format for compiling the report, but ICAO Annex 13 provides a framework for the types of information that are commonly collected and analysed
- for a Level 2 desktop review or a site visit, of a Class B (Serious) occurrence, a report is required in accordance with the Section 4.6– Level 2 – Surveillance Report - surveillance event reporting requirements
- no report is required for a Class C (Minor) occurrence if it is decided that no follow up action is required. However, if further action is taken, a report must be compiled as per the requirements of Section 4.6 – Level 2 – Surveillance Report of the CSM with all documentation relating to the occurrence stored in RMS.

In all cases, the Manager Monitoring and Response Surveillance or the Surveillance Manager should determine the scope and objective and monitor the authorisation holder's internal investigations. If during the course of any of the surveillance options, including the assessment and review processes, it is determined that a breach has occurred, then consideration must be given to issuing a Safety Finding in accordance with the CSM or consider using the coordinated enforcement process.

In addition to entering information in Sky Sentinel, all reports (CASA reports and/or copies of the authorisation holders' investigation reports) and any other documents relating to surveillance must be stored in RMS using the standard naming conventions.

16 Quality Assurance Program

The objective of all activities relating to the quality assurance program in connection with the CASA Surveillance Framework is to provide assurance to CASA:

- that standards required in the CASA Surveillance Framework are maintained by users
- that CSM processes are adhered to in all applicable surveillance activity
- there is standardisation and consistency across the organisation
- that information capture to identify systemic issues within the CASA Surveillance Framework is being undertaken.

16.1 Surveillance Quality Assurance Review

The Surveillance QAR is commissioned as an element of accountability within Regulatory Oversight Division's (ROD) business as usual approach to national oversight with an emphasis on continual improvement. The reviews will focus on CASA's interactions with the subject operator prior to, during and subsequent to the referenced surveillance activity.

16.1.1 Methodology

The Executive Manager – ROD will assign this task via a [Terms of Reference (TOR)] document to the Manager Surveillance Services, who may seek the assistance of other personnel as required.

The methodology of the review will include, but not be limited to:

- review of surveillance related documentation
- appropriateness of surveillance scope
- conformance with CSM requirements
- relevance and appropriateness of findings
- documented evidence in support of findings
- review of any relevant regulatory services
- interviews with relevant CASA personnel
- interviews with relevant industry participants.

In identifying such action as may be necessary or appropriate for CASA to improve the quality of its activities, this review will have regard to:

- process and procedures followed by the surveillance team and adherence to the CSM
- whether the surveillance findings were proportionate to issues identified by the surveillance team
- whether CASA adhered to the Regulatory Philosophy
- CASA's regulatory posture with regard to subject operator at the time of the surveillance event
- any significant learnings for CASA from the review; and
- any further matters that might be considered relevant by the EM ROD given the results of the review.

Recommendations and observations from a review may be referred to the Oversight Executive Group for information and/or action. ROD QAR's will be aligned to the Quality Assurance Framework and work within the Regulatory Oversight Divisions broader Quality Assurance activity.

16.1.2   Raising concerns about the review process

Should a CASA staff member have concerns about the conduct of an ROD QAR, they are encouraged to raise the concern with the COM/Branch Manager/NM in the first instance. If the staff member is not satisfied with the response or has a concern about the conduct of the COM/Branch Manager/NM, the staff member should contact The EM ROD.

16.1.3   Review timeframe

It is anticipated the QARs will be completed within thirty days of commissioning; this may be varied with the approval of the EM ROD.

17 Safety Assurance Review (SAR)

Note: ROD to keep Accident Liaison Office informed in recognition and compliance with the following paragraphs in the ATSB/CASA MOU.

2.2 Clause 6.3 from MOU. If CASA commences an audit, surveillance operation or investigation that relates directly to a matter the ATSB is known to be investigating or an unresolved safety issue identified by the ATSB in an investigation and notified to CASA, CASA will inform the ATSB as soon as reasonably practicable.

8.3 CASA agrees that if a CASA officer is known to have information which CASA reasonably believes could assist the ATSB in the performance of its investigative functions in relation to a particular matter, CASA will undertake to advise the ATSB of the existence of that information as soon as reasonably practicable.

In the event of an accident, a serious incident or other aviation-related occurrence where CASA has not initiated a Regulatory and Safety Review (RSR) and the accident/incident or occurrence is assessed as having potentially significant implications for CASA regulatory functions, the EM ROD may direct that a Safety Assurance Review (SAR) be conducted.

The purpose of a SAR is to enable ROD to determine, as quickly as possible in the circumstances, and on the basis of the best available evidence, whether any urgent safety-related action needs to be taken by CASA in order to eliminate or minimise the likelihood of a recurrence of a similar or related event.

17.1.1 Terms of Reference

In identifying such action as may be necessary or appropriate for CASA to take in the interests of safety, Terms of Reference (TOR) - Safety Assurance Review (SAR) will have particular regard to:

- CASA's regulatory posture with regard to the operator(s) at the time of the accident/incident or occurrence including recent surveillance, regulatory services and enforcement activity
- any immediate action CASA might consider necessary in the interest of aviation safety
- any significant learnings for CASA from the specific accident/incident or occurrence
- any further matters that might be considered relevant by the EM ROD given the circumstances of an accident/incident or occurrence.

17.1.1.1 Scope

The ROD SAR is commissioned as an element of ROD's business as usual approach to national oversight. The SAR will focus on CASA's interactions with an organisation prior to an accident/incident or occurrence as well as a review of the factual information relating to the accident/incident or occurrence. If during the conduct of the SAR information identifies a significant regulatory breach or risk to flight safety, the matter will be referred to coordinated enforcement.

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17.1.1.2   Methodology

The EM ROD will assign the task to NM - Surveillance, who may seek the assistance of other CASA staff as required.

The methodology of the Review will include, but not be limited to:

- review of documentation
- interviews with relevant CASA personnel
- interviews with relevant industry participants.

Recommendations and observations from an SAR will be managed by the Oversight Executive Group.

17.1.1.3   Raising concerns about the review process

Should a CASA staff member have concerns about the conduct of an SAR, they are encouraged to raise the concern with the NM Surveillance in the first instance. If the staff member is not satisfied with the response or has a concern about the conduct of the NM Surveillance, the staff member should contact EM - ROD.

17.1.1.4   Review Timeframe

It is anticipated the SARs will be completed within thirty days of commissioning; this may be varied with the approval of the EM – ROD.

Note: When conducting a SAR, the person assigned to conduct the review will utilise the approved report template Form 1559 - Safety Assurance Review Aircraft Accident Worksheet.

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