CHAPTER 23

CONTINUING SURVEILLANCE

0.0 LIST OF EFFECTIVE PAGES

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1.0 PURPOSE

This chapter is issued to provide guidance and procedures for continuing surveillance of certificated Air Operator Certificate (AOC), Approved Maintenance Organization (AMO) or AOC holder with equivalent maintenance system approval and Continuing Airworthiness Management Organization (CAMO).

2.0 REFERENCES

2.1 Part 5 of the Nigeria Civil Aviation Regulations

2.2 Part 6 of the Nigeria Civil Aviation Regulations

2.3 Part 9 of the Nigeria Civil Aviation Regulations

2.4 AOC Modular Surveillance Checklist CL:O-AWS0027

2.5 AMO Modular Surveillance Checklist CL:O-AWS007A

2.6 General Aviation Audit Checklist CL:O-AWS041

2.7 CAMO Facility Audit Checklist CL:O-AWS030

2.8 Non-Conformance Finding Form: AC-AWS023

2.9 Summary of Audit Findings Form: AC-AWS023A

2.10 Aircraft Ramp Inspection Notices: AC-AWS023B

3.0 GUIDANCE AND PROCEDURES

3.1 General Information

3.1.1 Continuing surveillance by the NCAA on certificate holders' operations is an inherent system of certification and is essential part of NCAA responsibility to ensure that the required standards are maintained. The authority for this continuing surveillance is contained in regulations 9.1.1.11 and 6.2.1.9.

3.1.2 The required surveillance and inspections shall be planned and the areas to be covered will be essentially the same as those examined during the original certification process and will include at least a re-evaluation facilities, personnel, certifying staff, tools, equipment and materials, airworthiness data, certification of maintenance, Continuous Airworthiness Records, MORs, detailed procedures, quality system, products among others.

3.1.3 The NCAA has an annual plan of inspections and observations of each certificate holder to ensure that they continue to meet the basis for issuance of the approvals given

during the original certification.

3.1.4 If the NCAA determines that there are safety issues, the certificate holder will be requested to take the necessary action to achieve a mutual resolution. Correction of some of these issues may require "document evaluation," "satisfactory demonstration," and "acceptance or approval." It should be noted that, even when there are no certificate requests for certification actions, the AOC holder is being "re-certificated" on an annual basis.

3.1.5 The certificate holder is responsible for conducting all operations in full compliance with applicable:

- ICAO Standards
- Nigeria Civil Aviation Regulations

If at any time, the certificate holder and its operations are found not to be equal to or exceeding these standards, this could be the basis for suspension and/or revocation of the certificate.

3.2 Post Certification inspections

Following the completion of the certification, the NCAA will continue to do a heightened level of surveillance to ensure that the certificate holder transitions smoothly into a mature status. This is not considered a part of the original Inspection and Demonstration Phase, but is in fact an extension of the concept of early validation of certificate holder. The certification team will discuss and produce post certification surveillance programme that will be incorporated into the annual surveillance programme.

3.3 Surveillance and Inspection Programme

The surveillance and inspection Programme for each certificate holder will contain both planned and random events. An annual Programme of required minimum inspections for each certificate holder will be developed in November for the coming calendar year. These individual inspections will be assigned to specific quarters of the year and to specific inspectors for accomplishment no later than December 15. Other, more random, inspections will be scheduled on a weekly basis to sample the on-going operations of certificate holders.

3.3.1 Issuance of Quarterly Inspection Requirements

The General Managers responsible for AOC, AMO, CAMO and GA will ensure that quarterly inspection requirements have been issued based on the following guidelines for planning of minimum required annual inspections. The validity periods for these inspection requirements will be from January through March, April through June, July through September, and October through December. These requirements will be submitted for review and signature of the Director, Airworthiness Standards no later than 15 days prior to the beginning of the next applicable period.

Each authorization will be specific to the certificate holder, listing the minimum required inspections for that quarter and the inspectors who are assigned to the inspections. It will be the responsibility of the inspectors assigned to schedule and complete the inspections listed in these authorizations within the time period specified.

There shall be a quarterly review of surveillance activities, inspections and incidents reports by FSG Quarterly reviews will include inspections, incidents, findings from Operations, Airworthiness and Personnel licensing/ Medicals. Items reviewed will include follow up actions / enforcement actions, trends affecting safety and need to increase or refocus future Operators Inspections. Risk analysis and Safety Management system (SMS) concepts will be used in the quarterly reviews.

3.3.2 Minimum Required Audits and Inspections

Audits and Inspections are to be carried out in modules for AOC and AMO while CAMO, GA and aircraft at the intervals stated below, the frequency of which may be increased at the discretion of the DAWS. The audit modules shall be based on AOC and AMO Modular Surveillance, CAMO and GA Audit Checklist. Foreign airlines will be inspected under FASAP and foreign AMO will be audited whenever a Nigeria registered aircraft is at the facility for maintenance and during 24mths renewal interval or via desk or remote audit.

The AOC and AMO Modular Audit programme designed by the Directorate of Airworthiness Standards for continuous surveillance of air operators (AOC) and Approved Maintenance Organisation (AMO). The Programme has been designed to complete the AOC/AMO Modular Audit Checklist within the Validity of the AOC/AMO cycle. The Surveillance programme utilised a robust and comprehensive Checklist (CL O-AWS027 for AOC and CL: O-AWS007A for), which consisted of 18 and 16 Modules respectively. All audit activities are managed in a surveillance database using MS Excel and back up to cloud storage. The database will be explain later in this chapter.

The content of the Audit Checklists are tabulated below:

S/N	Module	AOC (CL: O-AWS027)	AMO (CL: O-AWS007A)
1	Module 1	Maintenance Responsibility	Housing & Facilities Requirements
2	Module 2	AOC Maintenance System	Personnel & Training
3	Module 3	Maintenance Management	Certifying Staff
4	Module 4	Maintenance Records	Tools, Test Equipment and Materials
5	Module 5	Aircraft Technical Log	Airworthiness Data
6	Module 6	Maintenance Release	Certification of Maintenance
7	Module 7	Modification and Repairs	Maintenance Records
8	Module 8	Maintenance Programme	Occurrence Reporting Procedures
9	Module 9	Reliability Monitoring	Detailed Procedures
10	Module 10	Mandatory Occurrence Reporting	Quality System: Central
11	Module 11	Quality System: Central	Quality Audits Departmental
12	Module 12	Quality System: Audits	Privileges of the Approval
13	Module 13	Authorisations	Limitations on the AMO
14	Module 14	Changes to AOC	Changes to the Approval
15	Module 15	Housing & Facilities	Product Audit
16	Module 16	Certifying Staff	N/A
17	Module 17	Tools and Equipment	N/A
18	Module 18	Airworthiness Data	N/A

The procedures involved in the surveillance are described below:

AOC Audit Activities

- **Planning** – The Surveillance Unit is responsible for planning the AOC and AMO surveillance for both scheduled, non-scheduled operators and the AMOs. The Audit Modules are split within the AOC/AMO validity period. The planning phase normally consists of selection of the audit team members, the modules to be audited at specific intervals. Planning of the audit schedule is risk based such that more focus is paid to AOC holders with overdue open findings or two modules with high numbers of findings.

- **Audit Preparation** - The audit team is expected to review sections of the MCM relevant to the modules to be audited and communicate with the operator's Quality Manger on the audit dates.

- **Audit Notification** - This is the stage where an air operator is notified about an upcoming audit schedule by the Authority. Normally a two (2) weeks' notice is given to an air operator prior to the commencement of the audit. In addition, the team members are also notified at this stage to ensure adequate preparation.

- **Conduct of the audit** – Conduct of the audit consist of the process involved in the audit starting from the opening meeting to the audit debrief meeting. At any instant, the audit is normally scheduled for an average of 2-3 working days or more depending on the complexity of operation of the AOC. Audit team members are provided with an audit in-brief and out-brief guides for time management.

- **Validation of Audit Findings** – this is the process that occurs immediately after an audit process is completed. The validation is organised by the Head of the surveillance Unit. The process involves reviewing the audit findings and observation noted during the audit in participation with the audit team members and the Principal Maintenance Inspector of the audited air operator.

- **Reporting** – Reporting is the process of submitting the audit report to the air operator after the findings are validated. During the audit debrief the team members are required to notify the auditee that the report will be submitted within 10 working days after the audit. The report consists of a letter of conveyance, executive report and the audit checklist that includes the audit findings/observations.

- **Operators' Feedback** – The operators are required to submit a Root Cause Analysis (RCA) and Corrective Action Plan (CAP) to address each of the findings noted during the audit. The operators' feedbacks are evaluated immediately to determine if the RCAs and CAPs are found satisfactory. If found satisfactory then they are accepted. Normally a timeline is given for an air operator to close each of the findings noted. The target date for a finding depends on the level. Level 1 finding is required to be close immediate, level two (2) within 3 months timeframe while level three (3) is considered an observation.

- **Review of CAP** - The PMI is expected to review the CAP for acceptability; If unacceptable the operator is informed and required to resubmit;

- **Management of open audit findings tracking -** The audit findings are tracked on a continuous basis and a briefing provided weekly to the GM(AOC &S) for AOC and GM (AMOC&S) for AMO.

- **Follow-up on Overdue audit findings** - PMIs are followed by staff under AOC & S for closure of finding(s) raised from their respective airlines. The AMO Inspectors ensure necessary follow up on audit findings are conducted to ensure safe maintenance practices. The follow up may be performed by the audit team or any other Inspector.

- **Closure of findings and audit reports** - Upon submission of satisfactory audit closure evidence the audit report is updated and closed up

Surveillance Database

The Surveillance database is designed to keep all the records of activities from planning to closure of audit findings. The database consists of different sections: Planner, Report Register, Tracker, and Summary. There are two separate database for AOC and AMO. However, the template and the management process are identical.
Planner - The Planning section consists of the annual plan for each of the AOC holders and AMO, which contains the audit areas and audit period.
Register - The report Register contains the audit reference numbers and, the activities dates from audit through validation to a closure date of each audit carried out.
Tracker - The report tracker is the section of the database where the surveillance unit keep records of each finding with the corresponding Root Cause Analysis (RCA), Corrective Action Plan (CAP) and status of closure. The tracker allows the department to follow up with overdue audit findings based on the CAP target date.

Summary- the summary section of the database address the summary status of audits – planned, Open, and Closed. The summary sheet provides a summary breakdown of the findings recorded based on level and whether open or closed.

CAMO, GA and aircraft will be audited/inspected at the frequency below:

- **Manuals conformity.** One (1) inspection each calendar year for all the approved manuals.

- **Housing and Facilities.** One (1) inspection each calendar year of the hangar facilities and support shops. Where the hangar is on lease, the hangar will be inspected and the planned schedule visits will compared with the hangar availability.

- **Personnel and Training.** One (1) inspection per each calendar year of the personnel qualifications and training records.

- **Airworthiness Data.** One (1) inspection each per calendar year.

- **Certification of Maintenance.** One (1) inspection each per calendar year.

- **Continuing Airworthiness and Maintenance Records.** One (1) inspection each per calendar year

- **Station inspections.** One inspection each 12 months period for each AOC holder conducting scheduled passenger service.

- **Quality System.** One (1) inspection each per calendar year
- **Tools, Equipment and Materials.** One (1) inspection each per calendar year.
- **MORs.** One (1) inspection each per calendar year.
- **Products.** One (1) inspection each per calendar year.
- **Ramp Inspection.** Minimum of one per week (may be increased by the Principal Inspector).
- **Maintenance Spot Inspection.** Based on the approved maintenance programme.
- **Continuing Airworthiness Responsibility, Management and Systems.** One (1) inspection each per calendar year
- **Modifications and Repairs**. One (1) inspection each per calendar year
- **Reliability Monitoring.** One (1) inspection each per calendar year

3.3.3. Findings

The following levels shall be applied to the findings during the AOC, AMO and CAMO audit

Level 1 Finding

Means any significant non-compliance with Nig. CARs, which would lower the maintenance standards and probably hazard an aircraft. It includes non-compliance with authorizations and limitations or on aircraft components that the AOC/AMO/CAMO may have on their operations specifications.

Action for level 1 finding

In the case of an initial application for approval, no approval shall be issued until all level 1 findings are corrected.

In the case of a re-issue or surveillance, the AOC/AMO/CAMO approval should be provisionally suspended in whole or in part depending upon the extent of the level 1 finding until corrective action has been taken. A follow up visit to the AOC/AMO/CAMO may be necessary to verify corrective action depending on the nature of the level 1 finding.

Level 2 Finding

Means any non-compliance with Nig.CARs which could lower the maintenance standard and possibly hazard an aircraft. It includes non-compliance with authorizations and limitations or on aircraft components that the AOC/AMO/CAMO may have on their operations specifications.

Action for level 2 finding

In the case of an initial application for approval a provisional approval valid for a maximum 3-month period may be given to allow time for the level 2 findings to be corrected.

In the case of a re-issue or surveillance, the AOC/AMO/CAMO should be given a maximum of 3 months extension to their approval to complete the corrective action and written notice to that effect should be given to the AOC/AMO/CAMO. Failure to comply with the 3-month time scale will cause the approval to expire. A follow up visit to the AOC/AMO/CAMO may be necessary depending on the nature of the level 2 finding.

Level 3 finding

An observation intended to give background information. A level 3 must not include any information suggesting non-compliance with Nig. CARs.

Action for level 3 findings

Inform the company

3.3.4 Deficiencies/Findings

If a deficiency is observed during the inspection, the audit team shall record the deficiency in the **NON-CONFORMANCE FINDING FORM No: AC-AWS023 and/ or SUMMARY OF AUDIT FINDINGS: AC-AWS023A**. The operator and the audit team must agree on the corrective action plan and the target date. For deficiency that is a violation of the regulations, the audit team should follow the procedures detailed in the **Compliance and Enforcement Handbook**.
For ramp inspection, **AIRCRAFT RAMP INSPECTION NOTICE FORM NO: AC-AWS023B** should be issued and the operator representative must be made to enter it in to the technical logbook.

For AOC, AMO and CAMO audit, the **NON-CONFORMANCE FINDING FORM No. AC-AWS023 and/ or SUMMARY OF AUDIT FINDINGS**: **AC-AWS023A** must be used by the audit team.

Findings along with the audit report must be submitted to the General Manager responsible for safety oversight of the certification held by the audited company within one (1) week of the audit. The audit findings must be discussed by the following to validate the audit findings:

1. General Manager responsible for safety oversight of the certification held by the audited company
2. The audit team
3. The Principal Maintenance Inspector and other Aviation Safety Inspectors with oversight responsibility on the audited company
4. Any other person deem fit by the management

The audit report must be sent to the audited company within two (2) weeks of the audit. The audited company should be given two (2) weeks to submit corrective action plan from the date of receipt of the audit report.

3.3.5 Surveillance based on risk management system

Selection of a particular aircraft to inspect will normally be done at random in a non-discriminatory manner. The Authority will apply the principle of risk management: to identify Operations perceived to present a higher safety risk and as a result, will conduct additional inspection activities aimed at those Operations that can be linked to specific:

a) State of the Operator or State of Registry;

b) Aircraft type;

c) Nature of Operations (scheduled non-scheduled, cargo, air taxi, etc.)

d) Foreign Operator; or

e) Individual Aircraft

The directorate will meet regularly to identify operations perceived to present a higher safety risk by discussing the Occurrence database analysis carried out by safety Deficiencies and Incident Analysis (SDIA) unit, audit reports and Ramp Inspection reports based on which the minimum required inspection is increased by a factor determined at the meeting.