



ADVISORY CIRCULAR

SLCAA-AC-AGA027-Rev.00

SIERRA LEONE CIVIL AVIATION AUTHORITY

EFFECTIVE DATE: 31st JULY 2021

Preparation and Submission of Corrective Action Plan (CAP)

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1 GENERAL

Sierra Leone Civil Aviation Authority Advisory Circulars from Aerodrome and Ground Aid Department (AGA) contain information about standards, practices and procedures that the Authority has found to be an Acceptable Means of Compliance (AMC) with the associated Regulations.

An AMC is not intended to be the only means of compliance with a regulation, and consideration will be given to other methods of compliance that may be presented to the Authority.

1.1 Purpose

This Advisory Circular provides guidance for aerodrome operators in the preparation and submission of a corrective action plan acceptable to the Authority.

1.2 Reference

- (a) SLCAR Part 14A – Aerodrome Design and Operations Standards
- (b) SLCAR Part 14C – Certification of Aerodromes
- (c) SLCAA-AC-AGA001-Rev.00 – Certification of Aerodromes

1.3 Status of this AC

This is the first AC to be issued on this subject.

2 INTRODUCTION

- (a) A safety audit is an in-depth review of the activities of an organization that is carried out to verify conformance to regulatory requirements. Non-conformances with applicable/specified regulatory standards or the organizations approved standard operating procedures identified during an audit is referred to as a finding and is documented for further action. The severity of audit findings may range from minor to significant. Following each audit, the inspectors will prepare comprehensive reports outlining the audit process and provide a summary of the audit findings;
- (b) Non compliances may also be identified from a variety of sources including specific operational events, internal assessment, investigations and observations made during daily work performance. All identified non-compliances, constitute findings and must be recorded and addressed as if they were identified during safety audits even if they do not warrant notification to the Authority.
- (c) For each finding generated during the safety audit, the accountable manager concerned, shall develop a corrective action plan (CAP) for acceptance by the Authority. The plan will outline how the organization proposes to correct the deficiencies.

3 DEVELOPING THE CORRECTIVE ACTION PLAN

- (a) As an initial step, the accountable manager shall define the findings, by collecting and evaluating relevant information to determine the facts and causal factors (including root causes) that led to the non-compliances. The responsible unit responsible for the function or activity where the non-compliance was identified, should have a clear understanding and description of the finding supported by the facts and causal factors in order to develop the most appropriate and timely corrective actions to resolve the findings and prevent re-occurrence.
- (b) The second step in the process is to identify the action that must be taken in order to mitigate the finding. Corrective actions must be overt and constructed in the style of performance objectives. A performance objective typically consists of an action verb (a word describing an action) and a direct object (the person, facility or procedure affected by the action expressed by the verb). The criterion for performance will be the prescribed regulatory requirement. In addition, the time frame for accomplishment of the set objectives should be determined. It is necessary to ensure that the performance is measurable in a safety oversight context.

3.1 Approval and Implementation of Corrective Action Plans

- (a) All CAPs shall be submitted to the Authority for acceptance. Accepted CAPs shall be sent to the aerodrome operator for implementation and copies kept in appropriate inspection or audit files to facilitate follow up actions.
- (b) The Authority's Inspectors will follow up the implementation of the CAP until the Authority is sure that the finding has been mitigated. Thereafter, a letter is forwarded to the organization concerned that the inspection/audit is closed.

4 TYPES OF CORRECTIVE ACTION

4.1 Short-Term Corrective Action Plan

This action corrects the specific non-conformance specified in the inspection/audit finding and is preliminary to the long-term action that prevents re-occurrence of the problem. Short-term corrective actions will be completed:

- (i) by the date/time specified in the CAP; or
- (ii) per the accepted corrective action plan.

4.2 Long-Term Corrective Action Plan

- (a) Long-term corrective action has two components. The first component will involve identifying the root cause of the problem and indicating the measures the Aerodrome Operator(s) will take to prevent a re-occurrence. These measures should focus on a system change. The second component is a timetable for the implementation of the long-term corrective action. Subject to the following paragraph, long-term corrective actions will take place within ninety (90) days and will include a proposed completion date.
- (b) Where the short-term corrective action taken meets the requirements for long-term corrective action, this shall be stated in the long-term corrective action section on the corrective action form.

4.3 Corrective Action Plan Submission

- (a) The cover letter of the inspection/audit report will require the Aerodrome Operator to submit:
 - (i) where applicable, corrective action forms for each finding requiring corrective actions by the date specified in the corrective action section of the finding form; and
 - (ii) a corrective action plan addressing all other findings within 35 days from the date of receipt of the report. This deadline will not be extended without prior approval of the DG, SLCAA;
- (b) Corrective action plans received from the Aerodrome Operator should include completed corrective action forms and where applicable, supporting documentation that may take the form of technical record entries, purchase orders, memoranda, revised inspection/audit procedure checklist, manual amendments etc. A sample corrective action form is attached as Appendix A of this AC.

4.4 Acceptance of the Corrective Action Plan

- (a) Where the corrective action plan is acceptable, the Aerodrome Operator shall be advised and the appropriate information (administrative/on-site follow-up, proposed completion date) will be entered on the corrective action form, or where applicable the corrective action tracking form, for the purpose of conducting follow-up. Functional databases should also be used to track the progress of inspection/audit follow up.
- (b) Before accepting CAPs for recorded findings that include long-term corrective actions exceeding 90 days, the Authority must be satisfied that the proposed corrective action is reasonable and that safety will not be jeopardized.

- (c) If the submitted CAP is not acceptable, the responsible Inspector/Auditor or other assigned persons will request that the plan be revised and re-submitted within 10 days of the request. Where the aerodrome operator is non-responsive to this action, an alternative course of action may be pursued, such action could include the sending of a Notice of Suspension of the Aerodrome Certificate to the organization by the Authority.

5 CORRECTIVE ACTION FOLLOW-UP

5.1 Follow-Up Process

- (a) Where the inspection/audit findings are of a minor nature and no threat to aviation safety exists, an “administrative follow-up” may be acceptable. All other findings will require “on-site follow-up” to ensure that non-conformances have been rectified and that the corrective actions are effective;
- (b) Progress will be monitored by the Authority, as the Aerodrome Operator implements corrective actions for identified inspection/audit findings. This will be accomplished by using the follow-up section on the corrective action form, the corrective action tracking form or functional database. Both forms identify the finding number, the type of inspection/audit follow-up (administrative or on-site) and the date upon which the corrective action was completed;
- (c) Long-term corrective actions that have been accepted will be followed-up by the Inspector or other assigned persons, who will advise the DG, SLCAA when the item is closed. This follow-up will be done through routine surveillance activities.

5.2 Inspection/Audit Follow-Up

Personnel assigned inspection/audit follow-up responsibilities will:

- (i) monitor the Aerodrome Operators to ensure that the 30 day response time for the submission of the CAP is observed, or where applicable, that corrective actions required by a specific date (indicated on the corrective action section of the finding form) have been implemented;
- (ii) ensures that the CAP prioritizes the most critical findings;
- (iii) ensure that each proposed corrective action will rectify the root cause of the finding to prevent its recurrence;
- (iv) determine that the Aerodrome Operator has developed an acceptable timetable for long term corrective actions, and ensure that the proposed completion date is indicated on the appropriate sections of the corrective action form, corrective action tracking form or entered in the applicable functional database;
- (v) determine for each corrective action plan item whether the follow-up is to be administrative or on-site and indicate so on the corrective action form, corrective action tracking form or applicable functional database;
- (vi) monitor the progress of the corrective action plan by maintaining the follow-up section of the corrective action form, the corrective action tracking form or applicable functional database and ensuring that the appropriate follow-up (administrative or on-site) has been conducted;
- (vii) ensure that all completed corrective action forms and corrective action tracking forms, together with any supporting documentation are placed in the Inspection/audit file; and

(viii) Advise the DG, SLCAA when all corrective actions have been completed.

5.3 Inspection/Audit Closure

- (a) To enable the Authority to close inspection/audits findings within 12 months following the acceptance of the CAP, the following process should be applied. The CAP should aim at having all corrective action in place within 90 days of acceptance by the Authority. If it is not possible to meet the set deadlines, special consideration may be required to ensure timely closure of the inspection/audit findings. Inspection/audit findings will be categorized as follows:
- (i) **An immediate safety issue** - corrective action must be carried out immediately in order for the aerodrome operator to continue with its activities. The finding should be written into the report.
 - (ii) **Corrected within 90 days** - the majority of findings should fall into this category. The accepted CAP must indicate that the long and short-term corrective action will be in place within 90 days. The Inspector will ensure follow-up actions are taken.
 - (iii) **Corrected between 90 days and twelve months** - where it is anticipated that the corrective action will take more than 90 days, a risk assessment shall be conducted by the operator, assessed and found to be satisfactory by the Inspector, prior to acceptance of the CAP.
 - (iv) **Longer than 12 months** - where it is not possible or reasonable to implement the corrective action within 12 months of the acceptance of the CAP, a risk assessment study should be conducted, in order to assess safety risks.
- (b) The inspection/audit can be closed by the Inspector 12 months after acceptance. The Inspector will confirm that all follow -up actions have been completed, entered in the functional database. After which the Authority will notify the aerodrome operator that the inspection/audit is closed.

APPENDIX A - SAMPLE CORRECTIVE ACTION PLAN FORM

Finding No:	Date:	Name of Aerodrome:
Description of Finding:		
Recommendation:		
Operator's Comments and Observations:		
Corrective Action(s) Proposed	Action Office	Estimated Implementation Date

Corrective action evaluation (follow-up taken):

Satisfactory (Yes/No)

Closed out Date:	Singed by Inspector:	Signed by Operator
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