

RA 1024 - Accountable Manager (Military Flying)

Rationale

► *Defence Contractor Flying Organizations (DCFO) that operate Air Systems on the UK Military Aircraft Register but not in the UK MOD Service Environment¹ operate under the Contractor Flying Approved Organization Scheme² (CFAOS). The delivery of safe aviation demands the assignment of an individual, legally accountable for ensuring that aviation Risks to Life (RtL) are As Low As Reasonably Practicable (ALARP) and Tolerable. This RA requires CFAOS organizations to appoint an accountable individual, the Accountable Manager (Military Flying) (AM(MF)), to maintain standards and Air Safety primarily focused on RtL. ◀*

Contents

1024(1): Roles and Responsibilities ► ◀

1024(2): Appointment and Qualifications ► ◀

1024(3): Post-Holders

Regulation

1024(1)

Roles and Responsibilities

1024(1) AM(MF)s **shall** ► ◀ actively manage Air Safety via an Air Safety Management System (ASMS) to ensure that RtL are ► **ALARP³ and Tolerable** ◀ within their defined Areas of Responsibility (AoR). ► ◀

Acceptable Means of Compliance

1024(1)

Roles and Responsibilities

1. ► **AM(MF)s should** be accountable for the maintenance of standards and safety primarily focused on RtL. ◀
2. AM(MF)s **should**:
 - a. Cease aviation operations if RtL are identified that are not demonstrably ► **ALARP and Tolerable**. ◀
 - b. Challenge any actions or measures, proposed or implemented, that may result in the activities for which he is responsible in the management of RtL, no longer being ► **ALARP and Tolerable**. ◀
 - c. Ensure the following are established and maintained:
 - (1) An ASMS in accordance with (iaw) RA 1200⁴.
 - (2) An Operations Manual which conveys how the organization meets the requirements of the MAA Regulatory Publications (MRP).
 - (3) A Flight Safety organization iaw RA 1400⁵.
 - (4) An effective Quality Management System (QMS), certified by a national accreditation body, with a scope appropriate to the organization's aviation operations.
 - (5) An Occurrence Reporting and Error Management System iaw RA 1410⁶.
 - d. Promote and lead by example an Engaged Air Safety culture⁷.
 - e. Act as the organization's senior point of contact with the MAA.

¹ ► As defined in MAA02: MAA Master Glossary. ◀

² The CFAOS is the ► approval ◀ mechanism underpinning the competence of DCFOs that operate Air Systems on the UK Military Aircraft Register but not ► under the Aviation Duty Holder (ADH) construct.

³ Refer to RA 1210 – Ownership and Management of Operating Risk (Risk to Life).

⁴ Refer to ◀ RA 1200 – Defence Air Safety Management.

⁵ ► Refer to ◀ RA 1400 – Flight Safety.

⁶ ► Refer to ◀ RA 1410 – Occurrence Reporting.

⁷ See the MAA Manual of Air Safety (MAS).

**Acceptable
Means of
Compliance
1024(1)**

3. AM(MF)s **should** ensure that:
 - a. All flying activity is conducted in accordance with the limitations as articulated in one of the following:
 - (1) Military Permit to Fly⁸.
 - (2) Release To Service⁹.
 - (3) Certificate of Usage¹⁰.
 - b. Any significant changes to his operating responsibilities or to his supporting safety system/organization that may affect the discharge of his Air Safety responsibilities are reported immediately to the MAA.
 - c. The ASMS is fully supported by all relevant service and commodity support organizations, through appropriate Service Level Agreements or other mechanisms.
 - d. They liaise with and share any pertinent Air Safety information with ADHs and other AM(MF)s, particularly with other operators of the same **▶ or ◀** similar Air Systems.
4. AM(MF)s **should** be supported by post-holders covering the following areas to provide them with specialist support in delivering their Air Safety responsibilities:
 - a. Flight Operations¹¹.
 - b. Crew Training¹².
 - c. Ground Operations.
 - d. Continuing Airworthiness¹³.
 - e. Any other areas that may impact the delivery of safe aviation operations, such as Design or Production.

**Guidance
Material
1024(1)**

Roles and Responsibilities ▶ ◀

5. The CFAOS is the **▶ approval ◀** mechanism underpinning the competence of DCFOs that operate Air Systems on the UK Military Aircraft Register but not in the UK MOD Service Environment.
6. AM(MF)s will meet with the MAA as required to allow the MAA to examine the higher-level Safety Management of the operation.
7. **Air Safety Chain.** AM(MF)s have a personal level Duty of Care for the personnel under their control; those who, by virtue of their temporary involvement in aviation activities, come within an AM(MF)'s AoR, and the wider public who may be affected by their operations. They are thus accountable for the safe operation of **▶ Air Systems ◀** in their AoR and for ensuring that RtL is **▶ ALARP and Tolerable. ◀** The Air Safety AM(MF) governance model does not absolve managers at any level of their broader, enduring Duty of Care responsibilities under Common Law and the Health and Safety at Work Act (1974).
8. **AM(MF) Responsibilities.**
 - a. The first line of defence in Air Safety is the establishment of an Engaged Air Safety Culture as defined in the MAS. The AM(MF) has a key role to play in establishing and sustaining such a culture, and it is imperative that Accountable Managers at all levels lead by example in nurturing and developing an Engaged Air Safety Culture.

⁸ ▶ Refer to RA 5880 – Military Permit to Fly (MRP 21 Subpart P).

⁹ Refer to RA 1300 – Release To Service.

¹⁰ Refer to RA 1123 – Certificate of Usage for Military Registered Civil-Owned Aircraft.

¹¹ To include test and evaluation when in the organization's CFAOS approval schedule.

¹² To cover aircrew training provided by the organization.

¹³ This would typically be an MRP Part 145 organization and Continuing Airworthiness Management Organization (CAMO). ◀

**Guidance
Material
1024(1)**

- b. During the life cycle of an Air System, AM(MF) responsibilities apply to the following:
- (1) First and/or second parties for whom an AM(MF) is made explicitly responsible, whether permanently or temporarily assigned, who are involved in the operation of the Air System.
 - (2) Third parties exposed to risk as a result of operation of the Air System.
- c. The detailed governance mechanisms employed by AM(MF)s can be tailored to the scale and nature of the aviation activity via the ASMS.
- d. AM(MF) responsibilities also apply to any ADHs that interface with the organization's ASMS.
- e. Following any significant change to an AM(MF)'s responsibilities, the MAA will review the relevant AM(MF) endorsement.
9. **Operations Manual.** Reference is frequently made to the 'Operations Manual', which would normally follow the format¹⁴ of the MRP. However, this may be fulfilled by alternative means, such as orders or instructions. Where an alternative is used, a clarifying document must be provided which clearly demonstrates how the requirements of the MRP are met.

**Regulation
1024(2)**

Appointment and Qualifications ▶◀

- 1024(2) CFAOS organizations **shall** appoint a Suitably Qualified and Experienced Person (SQEP) to be the AM(MF), ▶who is◀ appropriately empowered to undertake their role.

**Acceptable
Means of
Compliance
1024(2)**

Appointment and Qualifications ▶◀

10. An AM(MF) **should** normally be:
- a. A Senior Manager within the organization who has formal responsibility for the delivery of safe aviation operations.
 - b. Directly appointed at main board level¹⁵ and supported by competent post-holders.
11. CFAOS organizations **should** ensure that their AM(MF) has:
- a. The freedom and authority to undertake his role.
 - b. The resources available to ensure that Air Safety is not compromised.
12. AM(MF) nominees **should**:
- a. Apply to the MAA for endorsement of their suitability to undertake the role of AM(MF).
 - b. Expect to attend an MAA endorsement interview at which they will be required to provide evidence of suitability for role.

**Guidance
Material
1024(2)**

Appointment and Qualifications ▶◀

13. **Senior Manager.** The term Senior Manager will be taken to mean a manager who possesses the authority to make independent decisions on Air Safety without recourse to superiors or executives. He will normally sit at Board level (or equivalent divisional level) or, if reporting to a relevant Board, to have delegated authority. Where the organization wishes to nominate an alternative candidate to one at Board level the organization will be required to demonstrate that the candidate holds equivalent authority to execute Air Safety decisions.

¹⁴ ie Operations Manual entries corresponding to *inter alia* MRP sections, numbering, regulatory headings etc.

¹⁵ Upon which the Managing Director, Chief Executive Officer or equivalent usually sit.

**Guidance
Material
1024(2)**

14. **Suitability.** 'Suitability' for the AM(MF) role means being able to demonstrate appropriate knowledge and understanding of the ASMS and relevant documents that prescribe safety processes and standards. This includes, but is not limited to, the following:
- a. MRP.
 - b. ASMS.
 - c. Operating risk.
 - d. Air Safety.
 - e. Continuing Airworthiness, including the MAA Maintenance Approved Organization Scheme and Continuing Airworthiness Management Organization.
 - f. Roles and responsibilities of the AM(MF).
 - g. Knowledge and understanding of subordinate post-holder roles and responsibilities.
15. **AM(MF) Submission.** In the first instance, AM(MF) nominees must apply to the MAA for endorsement using an MAA ►CFAOS◄ Form 4¹⁶. Thereafter, and in consultation with the MAA, supporting evidence for interview must be provided to the MAA CFAOS Branch¹⁷ at least ►10 working days◄ prior to interview. The organization's Contractor Flying Organization Exposition¹⁸ (CFOE), ASMS and Operations Manual, which communicate how the CFAOS organization intends to meet the requirements of the MRP, will provide the ►foundation◄ of the AM(MF) submission, which is required to support the MAA endorsement interview. Further evidence required in the AM(MF) submission will include, but is not limited to:
- a. Organization structure, to allow understanding of the AM(MF)'s position within the organization, including appropriate explanation of the powers held and relational links to post-holders.
 - b. Explanation of the AM(MF)'s independence, including access to adequate resource, to allow enactment of MRP requirements without hindrance.
 - c. The organization's future aspirations, where applicable.
 - d. A tailored CV detailing the AM(MF)'s professional background highlighting, where applicable, any involvement with aviation operations.
16. **Endorsement Interview.** The AM(MF) endorsement interview will be led by senior MAA staff and may last up to 2 hours. The preferred location is the MAA Bristol Headquarters; however, the interview may be conducted by other means, agreed on a case-by-case basis. The interview will cover 3 broad areas¹⁹:
- a. A description of the AM(MF)'s roles and responsibilities.
 - b. A discussion regarding how the AM(MF) intends to comply with RA 1024 and the wider MRP.
 - c. A discussion of the evidence provided in the AM(MF) submission including, where applicable, the CFAOS organization's performance at previous audits.

**Regulation
1024(3)**

Post-Holders

1024(3) All CFAOS post-holders **shall** be approved.

¹⁶ The MAA ►CFAOS◄ Form 4 can be found on the CFAOS Approvals page of the MAA Website <https://www.gov.uk/government/publications/contractor-flying-approved-organization-scheme-cfaos>.

¹⁷ DSA-MAA-OA-CFAOS-Group@mod.gov.uk.

¹⁸ ►Refer to◄ RA 2501 – Contractor Flying Approved Organization Scheme.

¹⁹ Discussion topics are at Annex A.

**Acceptable
Means of
Compliance
1024(3)****Post-Holders**

17. AM(MF)s **should**:
- a. Appoint and approve the following post-holders:
 - (1) Flight Operations¹².
 - (2) Crew Training¹³.
 - (3) Ground Operations.
 - b. Appoint appropriately approved²⁰ post-holders to cover Continuing Airworthiness and any other areas identified (as per RA 1024(1)) as appropriate to the structure of the organization.
 - c. Detail in the CFOE:
 - (1) A description of the functions and responsibilities of each post-holder within their AoR, including names, and any deputizing responsibilities and arrangements.
 - (2) The competencies, qualifications and skill sets required of post-holders within their AoR.
18. **Post-Holder Responsibilities.**
- a. The flight operations post-holder **should** be responsible for ensuring that all flying operations are in compliance with the MRP.
 - b. The crew training post-holder **should** be responsible for ensuring that all aircrew training provided by the organization is in compliance with the MRP.
 - c. The ground operations post-holder **should** be responsible for ensuring that all ground operations conducted are in compliance with the MRP.
 - d. The continuing airworthiness post-holder **should** be responsible, as a minimum, for assuring that the management and control of all continuing airworthiness activity is in compliance with the MRP.
 - e. All post-holders **should** be able to demonstrate the relevant knowledge, background and experience applicable to their role, and an appropriately detailed knowledge of the MRP.

**Guidance
Material
1024(3)****Post-Holders**

19. AM(MF)s may be post-holders, provided it can be clearly demonstrated that such appointments do not conflict with either their AM(MF) or post-holder responsibilities.
20. Individuals (including the AM(MF)) may be multiple post-holders; ie they may be appointed to more than one post-holder role.
21. Organizations may use any alternative titles for post-holders but must clarify the titles and responsibilities in the CFOE.

²⁰ Such as those holding appropriate approvals from the MAA, other AMs or ►ADHs.◀

ANNEX A

AM(MF) DISCUSSION TOPICS

1. Where does the individual holding AM(MF) responsibility sit within the company, especially with respect to control over resources and outputs, and what other posts are there at a peer or superior level?
2. If the AM(MF) is not a Board member, how is 'equivalent authority' managed, in accordance with the MRP?
3. Is the AM(MF) personally satisfied that he/she has sufficient freedom of manoeuvre and authority over resource?
4. Who are the post-holders within the organization?
5. How do elements/divisions/branches of the organization interact and, in particular:
 - a. How do the maintenance elements relate to the flight operations elements?
 - b. How is continuing airworthiness managed?
 - c. How are internal reports shared between areas?
 - d. Is there any seniority order between post-holders?
6. What orders, instructions, operations manuals are in place, or will be in place, following appointment of the AM(MF), and under whose authorizing signature?
7. How are changes to the MRP monitored?



8. How has the ASMS and ►any◀ associated Plans developed?
9. What are the links between it and other organizations Safety Management System (SMS) – for example the operators of the base at which flying is carried out?
10. How is the flying organization meeting any applicable Civil Aviation Authority (CAA) requirements for ►SMS and any associated Plans,◀ and how is this managed in relation to MAA requirements?
11. What external organizations are relied on and do they hold Approvals (eg Design Approved Organization Scheme (DAOS))?
12. Does the ASMS define links to external organizations?
13. What relationships are in place with other operators of the same and/or similar Air System, and how is Air Safety information shared (eg Occurrence Reports)?
14. Does the Organization treat ►Air Safety◀ separately or as part of Safety, Health and Environment (SHE), and are the differences/interfaces clear?
15. How is Air Safety culture developed and encouraged?



16. What is the defined Air Safety relationship between AM(MF) and post-holders, and how do they communicate formally with respect to RtL?
17. Where the AM(MF) does not have a background in aviation, how does he/she gain sufficient understanding of the issues?
18. Who has responsibility for RtL within the organization, and what is understood by this?
19. What is understood about the concepts of ►'ALARP' and 'Tolerable'◀ with respect to RtL?
20. Can the AM(MF) make RtL decisions without recourse to superiors?
21. How does the AM(MF) gain routine visibility of RtL and their routine management, whether arising from technical or operational sources?



22. What does a QMS need to be considered effective?
23. What are the AM(MF)'s intentions regarding first and second party Air Safety assurance?
24. What does the AM(MF) understand by root cause analysis?

25. How will the AM(MF) achieve Air Safety assurance of operations taking place away from where he/she is normally based?
26. How does the AM(MF) ensure Test ►and Evaluation◀ activity is undertaken within the limitations of the governing document?

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