RA 1032 – Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations - Roles and Responsibilities

Rationale   *Many organizations, within and external to Defence Aviation (DA) and the Defence Air Environment (DAE)[1, 2], deliver and supply aviation-related services and / or resource to Aviation Duty Holders (ADH) and / or Accountable Managers (Military Flying) (AM(MF)) in order that ADHs / AM(MF)s can deliver operating output. Such ADH-Facing Organizations and AM(MF)-Facing Organizations (AA-Facing Organizations) are responsible for delivering safe aviation services and actively supporting ADHs and / or AM(MF)s in their delivery of safe aviation and the management of Air Safety. Therefore, appropriate Assurance is required such that ADHs / AM(MF)s have a complete understanding of the Risks that such organizations may bring to their operations. Without this Assurance a compromised level of Air Safety may exist. This RA requires that ADHs, AM(MF)s and AA-Facing Organizations understand their responsibilities towards the Assurance of aviation-related services and / or resource provided by AA-Facing Organizations.*

Contents   **Definitions relevant to this RA**

1032(1): Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (Internal)

1032(2): Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (External)

Definitions   **Definitions relevant to this RA**

1.   **ADH-Facing Organization.** An ADH-Facing Organization is an organization that delivers or supplies aviation-related services[3] and / or resource directly or indirectly to an ADH, and whose activities and decisions could affect the Air Safety of an ADH's operations and / or the ability of an ADH to mitigate associated operating Risk to Life[4] (RtL) to As Low As Reasonably Practicable (ALARP) and Tolerable.

2.   **AM(MF)-Facing Organization.** An AM(MF)-Facing Organization is an organization that delivers or supplies aviation-related services[3] and / or resource directly or indirectly to an AM(MF), and whose activities and decisions could affect the Air Safety of an AM(MF)'s operations and / or the ability of an AM(MF) to mitigate associated operating RtL[4] to ALARP and Tolerable.

3.   **AA-Facing Organization.** For the purpose of this Regulation, an inclusive term that denotes an ADH-Facing Organization and / or an AM(MF)-Facing Organization, which has the following subsidiary definitions:

   a.   **AA-Facing Organization (Internal).** An AA-Facing Organization (Internal) is any AA-Facing Organization:

      (1)   That is part of the Ministry of Defence (MOD)[5], or

---

[1] For definitions of DA and DAE, refer to MAA02: Military Aviation Authority Master Glossary.

[2] DA and the DAE encompasses the operation of all UK military registered Air Systems and the operation of civil registered Air Systems by the MOD.

[3] This includes, but is not limited to, providers of aviation support and facilities such as: Aerodromes; aviation-capable Ships; Air Traffic Services (ATS) and other Air Traffic Management (ATM) Organizations; Medical / Occupational Health; Aeronautical Information; Fire & Rescue; Air System storage and Maintenance; Aerodrome landing aids and ground services; Heads of Establishment (HoE); Defence Equipment and Support; Design Organizations; Maintenance Organizations; Type Airworthiness Authorities / Managers; Military Continuing Airworthiness Managers; Delivery Teams; Defence Infrastructure Organization; Service career management agencies; and Top-Level Budget Capability and planning staffs.

[4] Refer to RA 1210 – Ownership and Management of Operating Risk (Risk to Life).

[5] Including those regulated by any other Regulatory body(s) (eg the Civil Aviation Authority (CAA), Defence Maritime Regulator, etc).

Definitions	(2) That is part of a Contractor Flying Approved Organizations Scheme (CFAOS) organization[5], or
	(3) Where there is a direct contract in place with an MOD / CFAOS organization and the MOD / CFAOS organization is the sole or primary recipient of services provided.
	b. **AA-Facing Organization (External).** An AA-Facing Organization (External) is any AA-Facing Organization that is not an AA-Facing Organization (Internal).

Regulation 1032(1)	### Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (Internal)
	1032(1) AA-Facing Organizations (Internal) **shall** deliver and supply safe aviation-related services and / or resource to ADHs / AM(MF)s.

Acceptable Means of Compliance 1032(1)	### Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (Internal)

AA-Facing Organizations (Internal)

4.   Heads of AA-Facing Organizations (Internal) **should**, actively support ADHs / AM(MF)s in their delivery of safe aviation and management of Air Safety, by:

   a.   Identifying the ADHs / AM(MF)s that they support.

   b.   Establishing and maintaining an Air Safety Management System (ASMS)[6] that:

      (1)   Interfaces appropriately with the ASMS(s) and Air System Safety Case(s) (ASSC)[7] of the ADHs / AM(MF)s being supported and;

      (2)   Provides appropriate Assurance of the aviation-related services and / or resource delivered to supported ADHs / AM(MF)s[8, 9].

   c.   Establishing and maintaining formal and robust mechanisms and means of communication with supported ADHs / AM(MF)s.

   d.   Ensuring that they:

      (1)   Understand their inputs to and effects on the supported ADH's / AM(MF)'s ASSC(s), specifically the ASSC arguments they support, and the evidence they **should** provide.

      (2)   Are appropriately engaged with the supported ADH / AM(MF) ASSC governance structure.

   e.   Ensuring that they identify and formally communicate to relevant ADHs / AM(MF)s any decision, activity or change in the AA-Facing Organization's operating context that has the potential to introduce new or increased RtL into the ADH's / AM(MF)'s operations, or which could affect the ADH's / AM(MF)'s achievement of mitigating the operating RtL to ALARP and Tolerable.

   f.   Ensuring that their personnel are:

---

[6] Refer to RA 1200 – Air Safety Management.
[7] Refer to RA 1205 – Air System Safety Cases.
[8] This **should** also include Assurance of any organizations commissioned by AA-Facing Organizations (Internal) to provide any aspect of these services / support (whether via commercial or other means / agreement such as a Memorandum of Understanding (MoU)).
[9] Where Assurance activity is undertaken on behalf of an AA-Facing Organization (Internal) by another organization or Regulator, eg ATM Standards or the CAA on a unit's ATS, then this may provide the necessary Assurance without the need for duplication. However, this does not remove the requirement for the AA-Facing Organization (Internal) and the relevant ADH / AM(MF) to be satisfied that the scope of the Assurance activity is adequate.

Acceptable Means of Compliance 1032(1)

(1) Appropriately competent, qualified and current regarding Air Safety training[10].

(2) Suitably qualified and experienced to deliver the expected aviation-related services to supported ADHs / AM(MF)s.

g. Ensuring that any supporting equipment is adequately resourced, managed and maintained in accordance with relevant Regulations, Orders, and manufacturer's procedures / instructions.

h. Ensuring that all Air Safety reportable Occurrences are reported, managed and appropriate action taken[11].

i. Ensuring that they actively promote, and demonstrate leadership commitment to, an Engaged Air Safety culture.

ADH / AM(MF)s

5. ADHs / AM(MF)s **should**:

a. Identify the AA-Facing Organizations (Internal) that support them.

b. Establish formal and robust mechanisms and means of communication with all AA-Facing Organizations (Internal) that support them.

c. Ensure that AA-Organizations (Internal) that support them are aware they are supporting the ADH / AM(MF) and understand their responsibilities to them as detailed in paragraph 4.

d. Ensure that their ASMS:

(1) Interfaces appropriately with the ASMS(s) of AA-Facing Organizations (Internal).

(2) Provides appropriate Assurance of the aviation-related services and / or resource being delivered by AA-Facing Organizations (Internal).

e. Ensure that:

(1) They formally communicate to AA-Facing Organizations (Internal) any decision, activity or change in the ADH's / AM(MF)'s operating context (such as change in operating environment, the acquisition of new Air Systems or air capabilities) where that has the potential to affect either an AA-Facing Organization (Internal)'s operations, or its inputs to and effects on the ADH's / AM(MF)'s ASSC(s).

(2) The inputs to and effects on their ASSC(s) from AA-Facing Organizations (Internal) are fully supported by rational arguments and appropriate evidence.

f. Ensure that they assess the Risks introduced to their operations by AA-Facing Organizations (Internal) and that RtL remains ALARP and Tolerable[12, 13].

Guidance Material 1032(1)

Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (Internal)

6. Heads of AA-Facing Organizations (Internal) are not ultimately responsible for ensuring that Air Safety RtL are ALARP and Tolerable; however, they are individually accountable to the ADH / AM(MF) for the requirements placed upon them as set out in this RA (and any other applicable RAs and / or Regulations).

7. Heads of AA-Facing Organizations (Internal) must ensure compliance with the relevant elements of the MAA Regulatory Publications (MRP) and the relevant Regulations of any other relevant Regulatory Bodies.

---

[10] Refer to RA 1440 – Air Safety Training.
[11] Refer to RA 1410 – Occurrence Reporting and Management.
[12] Refer to RA 1020 – Aviation Duty Holder - Roles and Responsibilities.
[13] Refer to RA 1024 – Accountable Manager (Military Flying).

Guidance Material 1032(1)	8. Where organizations provide direct support to an ADH / AM(MF), it is likely readily apparent to the ADH / AM(MF), and the organization, that the organization is an AA-Facing Organization (Internal).

9.   Where organizations provide indirect support to an ADH / AM(MF), it may not be clear whether the organization is an AA-Facing Organization. In such cases the ADH / AM(MF) is responsible for determining whether an organization is an AA-Facing Organization (Internal) or not. However, where an organization believes it may be supporting an ADH / AM(MF) it nonetheless needs to engage with the relevant ADH / AM(MF), whether or not the ADH / AM(MF) has initiated dialogue.

10.   If doubt exists as to whether or not an AA-Facing Organization is an AA-Facing Organization (Internal), clarification can be sought from the MAA[14].

11.   In certain circumstances a context-based judgement may have to be made regarding whether an organization that theoretically delivers or supplies aviation-related services and / or resource (either directly or indirectly) to an ADH / AM(MF) actually does so in practice, and therefore is considered an AA-Facing Organization. To be considered an AA-Facing Organization under this RA, the organization's activities and decisions will have a direct or indirect effect on the Air Safety of an ADH's / AM(MF)'s aviation operations and / or the ability of an ADH / AM(MF) to mitigate associated operating RtL to ALARP and Tolerable. For example, it could be assessed that an organization solely supplying in-flight magazines for passengers has no impact on Air Safety, and therefore not an AA-Facing Organization; however, if the same organization were to supply Passenger Safety cards or aeronautical publications for the operating Aircrew then that aspect of its service provision would have an impact on Air Safety, and thus the organization would be considered an AA-Facing Organization. In any such cases the responsibility to determine whether an organization is an AA-Facing Organization is the responsibility of the affected ADH / AM(MF) based upon the arguments they have made, and the supporting evidence identified in their ASSC.

12.   AA-Facing Organizations (Internal) do not need to be part of the same organization as the supported ADH / AM(MF) nor, when part of the same organization, are they required to be directly subordinate to or in the same chain-of-command / line management as the supported ADH / AM(MF).

13.   Where an AA-Facing Organization (Internal) is supported by a distinct subsidiary or secondary AA-Facing Organization (Internal), it may be appropriate to consider the single or multiple AA-Facing Organization(s) (Internal) under the responsibility of the Head of the primary AA-Facing Organization (Internal). Such cases need to be formally documented between the ADH / AM(MF) and the Head of the primary AA-Facing Organization (Internal).

14.   An ADH / AM(MF) may themselves be an AA-Facing Organization (Internal) to another ADH / AM(MF) through the provision of aviation-related service and / or resource to the other ADH / AM(MF)[15].

15.   It is likely that many Heads of AA-Facing Organizations (Internal) will also be a provider of aviation-related services and / or resource to recipient organizations outside DA and the DAE (eg to the Armed Forces of other nations' or to organizations neither part of the MOD or a CFAOS organization). While such cases are not regulated by this RA, Heads of AA-Facing Organizations (Internal) nonetheless must comply with all relevant national or international legal requirements, Regulations and procedures. Furthermore, in such situations Heads of AA-Facing Organizations that are part of the MOD are required to apply appropriate judgement and apply the principles of this RA so far as possible and / or practicable pertaining to the operating context. |

---

[14] Contact via DSA-MAA-MRPEnquiries@mod.gov.uk.
[15] Such as when an ADH / AM(MF) delivers an airborne service (eg air-air refuelling or 'red air') to another ADH / AM(MF), or provides flying training to, or check flights on, another ADH's / AM(MF)'s Aircrew.

Regulation 1032(2)	**Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (External)**
	1032(2) ADHs / AM(MF)s **shall** ensure that Air Safety is not compromised through the delivery and supply of aviation-related services and / or resource by AA-Facing Organizations (External).

Acceptable Means of Compliance 1032(2)	**Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (External)**
	16. ADHs / AM(MF)s **should**:
	a. Identify AA-Facing Organizations (External) that support them and;
	b. Where possible and practical, establish appropriate mechanisms and means of communication with such AA-Facing Organizations (External).
	17. ADHs / AM(MF)s **should** ensure that their ASMS:
	a. Ensures their ASSC(s) address any RtL introduced through the delivery of aviation-related services and / or resource by AA-Facing Organizations (External).
	b. Interfaces appropriately[16] with the ASMS(s) of AA-Facing Organizations (External).
	c. Provides appropriate Assurance of the aviation-related services and / or resource being delivered by AA-Facing Organizations (External)[17, 18], specifically that:
	(1) Personnel are suitably competent, qualified and experienced to deliver the expected aviation-related services to supported ADHs / AM(MF)s.
	(2) Supporting equipment is fit-for-purpose and appropriately maintained.
	d. Provides appropriate Assurance that the AA-Facing Organization (External) is complying with all relevant national or international legal requirements, Regulations and procedures.
	e. Requires that all Air Safety reportable Occurrences involving AA-Facing Organizations (External) that directly or indirectly affect the ADH's / AM(MF)'s operations are reported, managed and appropriate action taken[11, 19].
	18. Where an AA-Facing Organization (External) supports an ADH's / AM(MF)'s operations then, where practicable, ADHs / AM(MF)s **should** ensure that:
	a. The AA-Facing Organization (External) is aware that it is supporting the ADH's / AM(MF)'s operations.
	b. The AA-Facing Organization (External) understands its responsibilities to and effects on the ADH's / AMMF)'s operations.
	c. ADHs / AM(MF)s formally communicate to the AA-Facing Organization (External) any decision, activity or change in the ADH's / AM(MF)'s operating context (such as change in operating environment, the acquisition of new Air

---

[16] Ideally any such interfaces **should** be via positive '2-way' engagement (to be expected where eg permanently based ADH / AM(MF) activity occurs at an Aerodrome operated by an AA-Facing Organization), but in many situations this may not be possible or practical; in such cases the ADH's / AM(MF)'s ASMS needs to ensure that it appropriately addresses all RtL introduced on the ADH's / AM(MF)'s operations through the services and / or resource provided by the AA-Facing Organization.

[17] This **should** also include organizations commissioned by AA-Facing Organizations to provide any aspect of these services / support.

[18] Where Assurance activity is undertaken on an AA-Facing Organization's behalf by another organization, eg the CAA on a unit's ATS, then this may provide the necessary Assurance without the need for duplication. However, this does not remove the requirement for the ADH / AM(MF) to be satisfied that the scope of the Assurance activity is adequate.

[19] Responsibility for reporting, management and follow-up actions will rest with the ADH / AM(MF).

Acceptable Means of Compliance 1032(2)	Systems or air capabilities) where that has the potential to affect either the supporting organization's operations, or its responsibilities to the ADH / AM(MF). d. Agreements / arrangements with AA-Facing Organizations (External) are recorded through formal documentation (such as an MoU).
Guidance Material 1032(2)	### Aviation Duty Holder-Facing Organizations and Accountable Manager (Military Flying)-Facing Organizations (External) 19. There is a regulatory requirement on ADHs / AM(MF)s to identify AA-Facing Organizations (External) that support them; however, it may not be possible to identify all such organizations from the outset (eg a short-notice requirement may require support from previously unidentified AA-Facing Organizations (External)). Nevertheless, ADHs / AM(MF)s will ensure that ASMS processes are in place to identify such AA-Facing Organizations (External) and that compliance with this RA is achieved. 20. Where organizations provide direct support to an ADH / AM(MF), it is likely readily apparent to the ADH / AM(MF), and the organization, that the organization is an AA-Facing Organization (External). 21. Where organizations provide indirect support to an ADH / AM(MF), it may not be clear whether the organization is an AA-Facing Organization. In such cases the ADH / AM(MF) is responsible for determining whether an organization is an AA-Facing Organization (External) or not. If an organization believes it may be supporting an ADH / AM(MF) it nonetheless needs to engage with the relevant ADH / AM(MF), whether or not the ADH / AM(MF) has initiated dialogue. 22. If doubt exists as to whether or not an AA-Facing Organization is an AA-Facing Organization (External), clarification can be sought from the MAA[14]. 23. In certain circumstances a context-based judgement may have to be made regarding whether an organization that theoretically delivers or supplies aviation-related services and / or resource (either directly or indirectly) to an ADH / AM(MF) actually does so in practice, and therefore is considered an AA-Facing Organization. To be considered an AA-Facing Organization under this RA, the organization's activities and decisions will have a direct or indirect effect on the Air Safety of an ADH's / AM(MF)'s aviation operations and / or the ability of an ADH / AM(MF) to mitigate associated operating RtL to ALARP and Tolerable. For example, it could be assessed that an organization solely supplying in-flight magazines for passengers has no impact on Air Safety, and therefore not an AA-Facing Organization; however, if the same organization were to supply Passenger Safety cards or aeronautical publications for the operating Aircrew then that aspect of its service provision would have an impact on Air Safety, and thus the organization would be considered an AA-Facing Organization. In any such cases the responsibility to determine whether an organization is an AA-Facing Organization is the responsibility of the affected ADH / AM(MF) based upon the arguments they have made, and the supporting evidence identified in their ASSC. 24. In cases where distinct subsidiary or secondary AA-Facing Organizations (External) logically sit under a primary AA-Facing Organization (External)[16] it may be appropriate to consider the whole as a single AA-Facing Organization (External). Any such cases need to be formally documented by the affected ADH / AM(MF).