

NPA/24/52

Title of Proposal: RA 1022 – Senior Operator – Air Safety Responsibilities

RA(s) or Manual Chapter(s): Whole Document

Organizations and / or business sectors affected: Whole Regulated Community

RFC Serial No: MAA/RFC/2021/124, 2022/161 and 2022/262.

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N/A	N/A	N/A	N/A

Cross-references to Other Documents or Relevant Sources

Other MRP Amendments: N/A

Service Inquiry Recommendations: N/A

AAIB Recommendations: N/A

Other Investigation Recommendations: N/A

Any Other Document: N/A

Feedback Notes for the Regulated Community

The Regulated Community are invited to offer feedback about the proposed amendment in the following areas:

- Air or Flight Safety impact
- Operational impact
- Errors or omissions
- Timescale for implementation
- Cost of implementation
- Amendment to internal processes/orders
- Resourcing the outcome of change

- (Contract amendments because of the change)

The format for feedback is available within a single Excel Template file on both internal and external MAA websites; it is important to use this format to ensure that your responses are considered and answered correctly.

Summary of Proposed Amendment

Objective: To ensure that RA 1022 remains up-to-date with current MoD aviation terminology and policy.

Changes made: RA 1022 has been amended to incorporate RFC’s and the change to Quinquennial reviews.

Impact Assessment: Minimal.

Consultation Period Ends: 15 November 2024

The consultation period for this proposed amendment ends on the stated date. Please send your feedback, using the Response Form, via email to DSA-MAA-MRPEnquiries@mod.gov.uk

MAA Approval

Post	Name	Rank	Signature
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RA 1022 – Senior Operator – Air Safety Responsibilities

Rationale

Aviation Duty Holders (ADH)¹ are responsible for implementing effective Air Safety Management Systems (ASMS) and ensuring that Risk to Life (RtL) of their air operations are at all times As Low As Reasonably Practicable (ALARP) and Tolerable. The absence of independent review of Air Safety issues may result in poor Risk Management and Air Safety decision making. To support ADHs in discharging their responsibilities they will appoint a Suitably Qualified and Experienced Person (SQEP) Crown Servant Senior Operator (SO)² to provide independent Air Safety oversight, Assurance and operator support.

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1022(1): Senior Operators

Regulation 1022(1)

Senior Operators

1022(1) Each ADH **shall** be supported by a SQEP Crown Servant SO.

Acceptable Means of Compliance 1022(1)

Senior Operators

1. Each ADH **should** issue their SO with a Letter of Authority (LoA) detailing their responsibilities.
2. When the issuer of a LoA departs their post, all LoAs issued by that individual **should** remain valid for a maximum of 3 months or until a new LoA is issued.

SDH SO

3. Each SDH **should** select and appoint a SQEP SO³ to provide them with advice on operating RtL and Air Safety Assurance. Where an appointed SDH SO does not meet these criteria in Table 1, the SDH **should** inform **▶**⁴ MAA Head of Operating Assurance (DSA-MAA-Operating-Assurance-Hd).
4. SDH SOs **should** provide their SDH with Assurance that:
 - a. ODH ASMS and Air System Safety Cases (ASSC) **▶ fully** **◀** support the ODH Air System ALARP and Tolerable assessments.
 - b. Operating practices **▶ within** **◀** their **▶ Area of Responsibility (AoR)** **◀** are to the **▶ standard required by the SDH.** **◀**
5. SDH SOs **should** provide their SDH with advice on:
 - a. Operating and operational RtL. While the Operational Commander (Op Comd) is responsible for operational Risk, the **▶ SDH** **◀** SO **should** be aware of operational considerations to ensure operating aspects within the purview of the ODHs are appropriately considered.
 - b. Operating issues associated with changes to the operating environment or context and the Acquisition of new Air Systems or air capabilities.
 - c. Air Safety measures, such as new equipment, procedures or Air System Modifications, proposed by ODHs in support of their ALARP and Tolerable position.

ODH SO

6. Each ODH **should** select and appoint a suitably experienced Aircrew as **▶ an** **◀** SO to provide them with independent specialist operator support in delivering their Air Safety responsibilities. Where the selected ODH SO does not meet the criteria in Table 1, the ODH **should** inform the SDH SO and, additionally for essential criteria, the MAA **▶**⁴ (DSA-MAA-Operating-Assurance-Hd).

¹ Consists of three levels of coverage: Senior Duty Holder (SDH), Operating Duty Holder (ODH) and Delivery Duty Holder (DDH).

² See Table 1 – SO SQEP Criteria.

³ SDHs may or may not appoint an ODH as their SO, depending on circumstances and their preference in accordance with RA 1020 – Aviation Duty Holder **▶** **◀** – Roles and Responsibilities.

⁴ **▶ Informing the MAA does not negate the need to submit an Alternative Acceptable Means of Compliance, Waiver, or Exemption in accordance with MAA03: MAA Regulatory Processes.** **◀**

**Acceptable
Means of
Compliance
1022(1)**

- a. To ensure independent Air Safety oversight and Assurance the ►ODH◄ SO **should** be as separate as possible from the direct chain of command charged with delivery.
 - b. ODH SOs are not required to have been qualified on all types operated by the ODH but **should** be suitably experienced Aircrew able to critically review operating proposals raised by DDHs and Force Commanders (FC).
7. ODH SOs **should** provide their ODH with Air Safety Assurance that:
- a. ODH and DDH ASMSs and their contributions to the ODH ASSCs are fully supported by DDH determinations that Air System operations remain ALARP and Tolerable.
 - b. Operating RtL Air Safety Assessments are valid.
 - c. Operating standards are being maintained at an appropriate level.
8. ODH SOs **should** provide their ODH with the following:
- a. Independent scrutiny of DDH and FC proposals that concern Air Safety issues such as Risk Elevation, Duty Holder Advice Notes (DHAN) or equivalent, and Air Safety related Annual Budgetary Cycle (ABC) options.
 - b. Advice on operating and operational RtL. While the Op Comd is responsible for operational Risk, the ►ODH◄ SO **should** be aware of operational considerations to ensure operating Air Safety aspects within the purview of the ODH are appropriately covered.
 - c. Independent Air Safety Assessment of DDH Assurance, including Air Safety practice and Safety culture.
 - d. Where appropriate, advice on operating issues associated with Acquisition of new Air Systems and their developing ASSC.

DDH SO

9. Each DDH **should**:
- a. Select and appoint a SQEP² SO to provide them with independent specialist operator support in delivering their Air Safety responsibilities. Where the selected DDH SO does not meet the criteria in Table 1, the DDH **should** inform►4◄ the ODH and MAA (DSA-MAA-Operating-Assurance-Hd).
 - (1) For DDH AoR with a single Air System, the DDH SO **should** either be currently or previously qualified on type.
 - (2) For DDH AoRs with multiple Air Systems, DDH SOs **should** be currently or previously qualified on one type, but are not required to be currently or previously qualified on all types. Additionally, they **should** be suitably experienced Aircrew able to critically review operating proposals raised by Squadron Commanders or equivalent for Air Systems within the DDH's AOR.
 - b. To ensure independent Air Safety oversight and Assurance the ►DDH◄ SO **should** be as separate as possible from the direct chain of command charged with delivery.
10. DDH SOs **should** provide their DDH with Assurance that:
- a. DDH ASMS and DDH contribution to ASSCs are fully supported by DDH determinations that Air System operation remains ALARP and Tolerable.
 - b. Operating RtL assessments are valid.
 - c. Operating standards are being maintained at an appropriate level.
11. DDH SOs **should** provide their DDH with the following:
- a. Independent scrutiny of Force Element Air Safety issues such as Risk Elevation, DHAN or equivalent, and Air Safety based ABC options.
 - b. Advice on operating and operational RtL. While the Op Comd is responsible for operational Risk, the ►DDH◄ SO **should** be aware of

Acceptable Means of Compliance 1022(1)

operational considerations to ensure operating Air Safety aspects within the purview of the DDH are appropriately covered.

c. Independent assessment of DDH Assurance including Air Safety practice and Safety culture.

d. Where appropriate, advice on operating issues associated with Acquisition of new Air Systems and their developing ASSC.

Table 1 SO SQEP Criteria

Essential SQEP Criteria	DDH SO	ODH SO	SDH SO
Previous aviation command and / or supervisory experience (minimum level of experience)	OF3	OF4	OF5
▶ Successfully ◀ complete Duty Holders Air Safety Course (DHASC) ▶ ⁵ ◀	X	X	X
Certificate of Qualification on Type (CQT) (SO for single Air System)	X		
CQT on at least one type within AoR (SO for multiple Air Systems)	X		

Desirable SQEP Criteria	DDH SO	ODH SO	SDH SO
Assurance activity experience	X	X	
CQT on at least one type within AoR (SO for multiple Air Systems)		X	
Central Flying School accredited Q-Qualification	X		
Joint HQ staff experience	X	X	X
Resource planning / Delivery Team / Financial Military Capability staff experience		X	X
Deployed (exercise or operations) command experience	X	X	X

Guidance Material 1022(1)

Senior Operators

12. It is not expected that ADH SOs will personally complete the actions that are detailed in the Acceptable Means of Compliance above. It is expected that ADH SOs will direct working arrangements using suitable staff, such as Air Safety and Standards, to provide the necessary information to enable an independent (derived from outwith the direct delivery chain) view to be formed.

13. The SO plays a key role supporting the ADH in discharging their Air Safety responsibilities. This is not about being the most SQEP on type but is about being experienced enough to undertake critical analysis of Air Safety related operating issues. Separated from the pressures of delivery, the experienced Aircrew SO, specifically selected by the ADH, provides independent oversight of flying operations.

14. For single type ADH Organizations the SO would ideally be qualified and current on type but where this is impracticable, a previous qualification on type may be considered by an ADH, set against the prospective SO's time away from flying.

15. Similarly, for multi-type ADH Organizations, the SO would ideally be qualified and current on one or more of the types in the AoR, but where this is impractical, a previous qualification on one or more of the types may be considered by an ADH, set against the SO's time away from flying. Additionally, ADHs may need to assess whether a potential multi-type SO has the breadth of military aviation experience pertinent to the range of Air Systems within the AoR.

16. Removed from the direct pressures of delivery, the SO's value is in forming a view of unit Air Safety culture and the performance of the ADH's ASMS. Through oversight of unit operating and Air Safety Assurance (1st Party Assurance and 2nd Party Assurance) the SO can assure the ADH that the appropriate operating

⁵ ▶ Refer to RA 1440 – Air Safety Training. ◀

**Guidance
Material
1022(1)**

standards are being met and that operating procedures⁶ are fit for purpose, or, when this is not the case, highlight any areas of deficiency and suggest action to rectify identified shortfalls.

17. The SO plays an important role in guarding against groupthink through their challenging of existing norms and use of a questioning culture. It is important that the SO critically considers contributions to decisions that elevate or inform higher level ADHs of emerging Air Safety operating RtL.

Draft for NPA

⁶ Such as ►ADH◄ and unit Flying Orders, Aircrew elements of Air System Document Set and Standard Operating Procedures / Tactics Techniques and Procedures.