

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 4955 - Findings - MRP Part M Subpart G

Rationale

Following the Notification of an Assurance finding by the MAA on a Military Continuing Airworthiness Management Organization, it is essential that the Regulatory non-compliance or other non-conformance is appropriately addressed and actioned by the Military Continuing Airworthiness Manager (Mil CAM). If the findings are not acted upon by the Mil CAM, the Continuing Airworthiness of the Air System(s) may be compromised. This RA requires Root Cause Analysis (RCA) to be carried out on all findings, and observations (where applicable), to enable the identification and rectification of all issues, to reduce the likelihood of Reoccurrence.

Contents

4955(1): Findings

4955(2): Corrective Actions

4955(3): Observations

Regulation 4955(1)

Findings

4955(1) After receipt of notification of MAA findings the Mil CAM **shall** devise and execute a Corrective Action Plan (CAP) to demonstrate how the Finding and the Root Cause will be rectified to reduce the likelihood of Reoccurrence.

Acceptable Means of Compliance 4955(1)

Findings

1. All findings **should** be investigated and rectified using an RCA approach, tool, or technique¹. Instructions for the use of RCA **should** be detailed in Part 2 of the Continuing Airworthiness Management Exposition.
2. Issues or required work identified in an Aircraft Product Sample (APS) report², **should** be actioned to the satisfaction of the MAA within the period stipulated in the notification.
3. Where necessary the Mil CAM **should** take immediate containment actions to preserve Air Safety.
4. The CAP **should** be provided to the MAA in accordance with MAA03³ and include the RCA, corrective actions, preventative actions and the implementation plan.

Guidance Material 4955(1)

Findings

Findings

5. There are 2 types of MAA findings³, non-compliance and non-conformance, each of which can lead to the MAA raising a Corrective Action Requirement (CAR). Findings are sub-divided into 2 levels as follows:
 - a. Non-compliance:
 - (1) Level 1: A failure to meet MRP Part M Regulation, that could lead to a major Risk to Air Safety.
 - (2) Level 2: A non-compliance that is judged not to be a Level 1.
 - b. Non-conformance:
 - (1) Level 1: A deviation from or an omission of a requirement that may contribute to a major Air Safety Risk.

¹ Guidance can be found in Civil Aviation Authority – [CAP 1760 Effective Problem Solving and Root Cause Identification Stage 6](#) or [JSP 940 MOD Policy for Quality; Part 2: Guidance](#) and training is available through [MAA Training Courses](#) as applicable.

² Details of issues and work required are found in the APS Report Annex A: MAA APS Summary of Areas Requiring Further Attention.

³ Refer to MAA03: MAA Regulatory Processes: Annexe F: MAA Assurance.

**Guidance
Material
4955(1)**

(2) Level 2: A non-conformity that is judged not to be a Level 1.

6. Issues or required work identified in an APS report² may not be non-conformities or non-compliances that necessarily lower the Safety standard and possibly compromise Air Safety. The action taken by the Mil CAM against each Annex A serial needs to be proportionate following evaluation. An entry in the Air System Technical Log, receipt of Type Airworthiness Authority (TAA)⁴ technical advice or similar action, may be all that is required to close out an individual APS Report Annex A serial to the satisfaction of the MAA. Following evaluation, in some circumstances it will be necessary to conduct further investigation, RCA and develop a Corrective Action Plan.

Route Cause Analysis

7. RCA is meant to focus on why the finding occurred not the who or what was responsible. Establishing the root Cause(s) often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, technical, human, organizational, etc.) in addition to the direct factors.

8. A narrow focus on single events or failures, or the use of a simple, linear model, such as a Fault Tree Analysis, to identify the chain of events that led to the finding may not properly reflect the complexity of the issue, increasing the Risk that important factors to be addressed to prevent a Reoccurrence will be missed. An inappropriate or partial RCA could lead to 'quick fixes' that only address the symptoms of the finding.

9. A peer review of the results of the RCA may increase its reliability and objectivity.

**Regulation
4955(2)**

Corrective Actions

4955(2) The actions in the CAP **shall** be implemented to the satisfaction of the MAA and within the agreed timescales³.

**Acceptable
Means of
Compliance
4955(2)**

Corrective Actions

10. After receipt and acceptance of the CAP has been confirmed by the MAA, the Mil CAM **should** implement the actions within the agreed period.

11. The Mil CAM **should** inform the MAA when the CAP has been completed and provide sufficient evidence to justify closure.

**Guidance
Material
4955(2)**

Corrective Actions

12. CAPs generated by the Mil CAM in response to issues identified in an APS report Annex A that are not non-compliances or non-conformances as per Guidance Material Paragraph 6 of this RA, do not need to be submitted to the MAA but will be retained as a record.

**Regulation
4955(3)**

Observations

4955(3) Any observations³ noted during MAA Audits **shall** be given due consideration by the Mil CAM, and any decisions taken in respect of those observations recorded.

**Acceptable
Means of
Compliance
4955(3)**

Observations

13. For each negative observation notified by the MAA, the Mil CAM **should** analyse the related issues and determine when actions are needed.

14. The Mil CAM **should** record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

⁴ Where the Air System is not UK MOD-owned, Type Airworthiness (TAW) management regulatory Responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAW Responsibilities TAM may be read in place of TAA as appropriate throughout this RA.

**Guidance
Material
4955(3)****Observations**

15. The handling of the observations may follow a process similar to the handling of findings by the Mil CAM.

Intentionally Blank for Print Pagination