 Policy	SARG Management System	
FS-SA-PO-001	SARG Safety Assurance Policy	
Drafted/Modified by: XXXX		Issue No: 2
Approved by: XXXX		Date: 20 March 2019

1 Introduction

- 1.1 The purpose of the CAA Safety & Airspace Regulation Group (SARG) Safety Assurance (SA) team is to provide confidence to the Director of SARG (DSARG) and the CAA Board that the CAA is:
- meeting its safety regulatory obligations;
 - that the Regulatory Safety Management System (RSMS) is effective; and
 - that safety improvement activities are effective.
- 1.2 Through this function, improvements to SARG's processes, competence and culture can be identified and implemented to ensure the organisation, its people and the RSMS continue to deliver the right safety outcomes.
- 1.3 The Head of Future Safety will be accountable for the development and delivery of all Safety Assurance activities.

2 Purpose

- 2.1 The purpose of this policy document is to:
- support all aspects of the SA process;
 - set the standard approach for the way SA is conducted within SARG; and
 - define the processes and systems that support SA.

3 Scope

- 3.1 This policy is applicable to all CAA colleagues directly involved in the SARG SA process. It is indirectly applicable to CAA colleagues across all the other CAA groups.

4 Roles and Responsibilities

- 4.1 Several key roles enable SA:
- Head of Future Safety
 - Safety Assurance Lead
 - Safety Assurance Specialist
 - Safety Assurance Assistant
 - Safety Assurance Review team member

5 Policy

Safety Assurance Reviews

- 5.1. Safety Assurance Reviews may be requested by the Board, the CEO, DSARG or a member of the SARG Leadership Team, or may be instigated by the Safety Assurance team. The objective of a Safety Assurance Review is to:
- Examine a specific, reasonably narrow topic in detail

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- Establish any broader lessons to be learned from a single topic examination
 - Focus on those areas of greatest risk to the CAA or which may yield the greatest opportunities for improvement with respect to consumer or public safety
- 5.2 Safety Assurance Reviews may focus on topics such as:
- Elements of regulatory oversight activity such as the oversight of a specific sector
 - Actions undertaken in respect of a specific regulatory decision or series of decisions, e.g. general oversight of a specific entity or the decision to suspend an approval
 - The response taken by the CAA when reviewing policy/procedures following individual incidents or accidents
 - The response taken by the CAA when adverse safety trends within a sector have been identified
 - Proposed changes to regulatory oversight activity or policy
 - Findings raised by other audit mechanisms, e.g. AAIB reports, EASA & ICAO audits, external safety assurance reviews, to ensure that such findings are being closed in a timely fashion and lessons learned across the organisation
 - Compliance with State Safety Programme obligations
- 5.3 Prior agreement for the initiation of all Safety Assurance Reviews shall be obtained from the Head of Future Safety and the Review shall comply with SA Policy / Process. The Head of Future Safety shall be provided with:
- an outline of the proposed Review and its objectives, including a clearly defined scope and problem statement;
 - an indication of priority / timeline; and
 - contact details for the Review focal point / project manager (if the Review is to be undertaken by a SARG department other than the SA team)
- 5.4 Safety Assurance Reviews shall:
- Be standardised
 - Be consistent
 - Be systematic
 - Adhere to Just Culture principles
 - Mirror Mind@Work Multi Perspective Problem Solving (MPPS) principles
 - Focus on lessons identified rather than mistakes made
 - Be undertaken without apportionment of blame
 - Be timely in terms of feedback, lessons identified and implementation
- 5.5 Safety Assurance Review teams shall include (as a minimum):
- A Review focal point / project lead
 - Individuals who can maintain neutrality and objectivity
 - Individuals who are independent of the department / subject matter being reviewed
- 5.6 When conducting a Safety Assurance Review, individuals shall be expected to display mind-sets and behaviours such that they are:
- Evidence Led
 - Objective in their analysis
 - Willing to go beyond the immediate explanation to identify organisational and systemic factors
 - Able to communicate findings in a way that maximises the likelihood of positive change
 - Creative in thought
 - Able to rationalise perspectives and interests

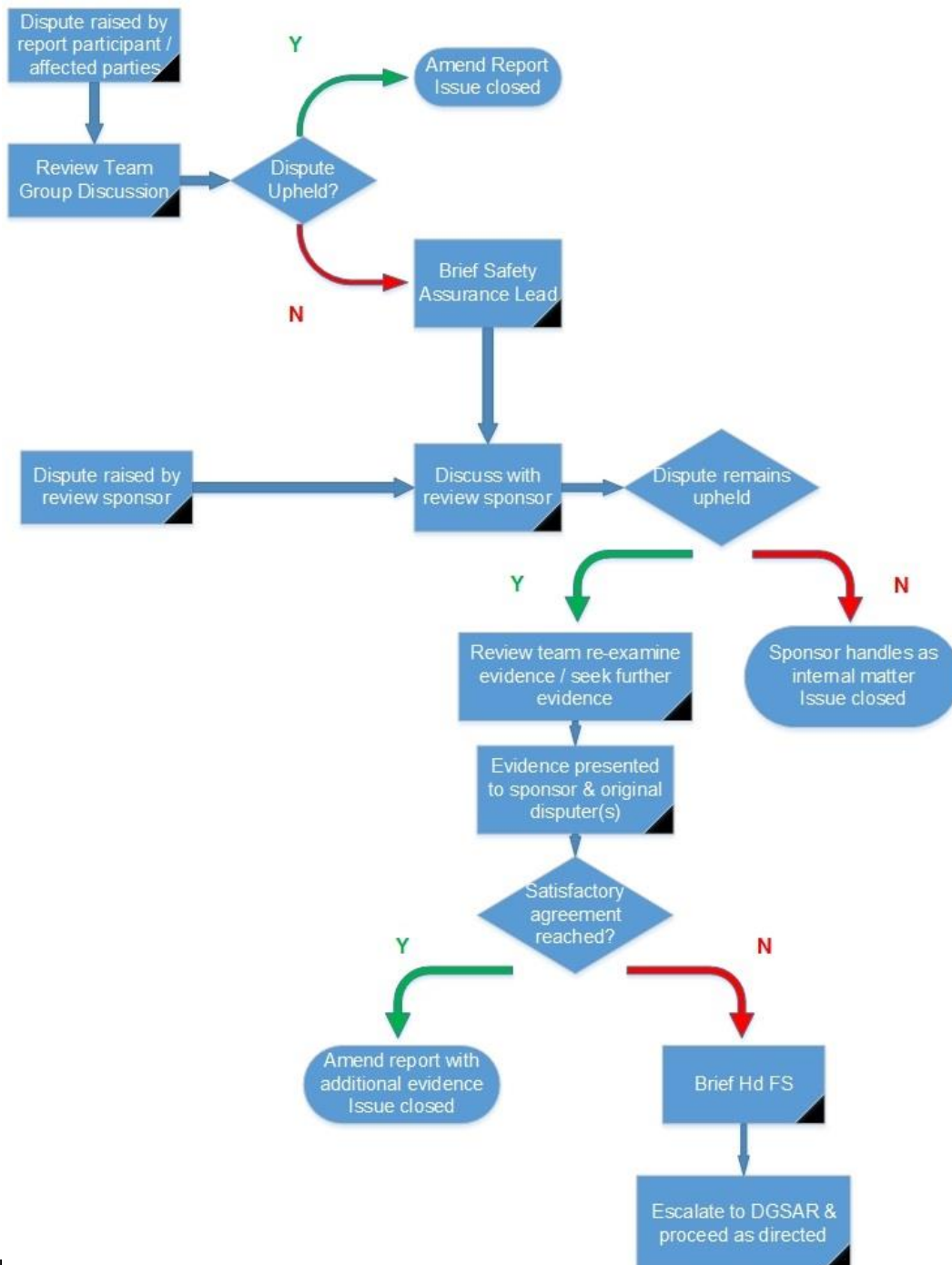
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- Trustworthy and confidence inspiring
- 5.7 The Sponsor of all Safety Assurance Reviews shall be a member of the ExCo or SARG LT.
- 5.8 Within the scope of a Safety Assurance Review and in fulfilling the required objectives, there shall be no barrier to the Review team's activities; individuals shall be empowered to 'go anywhere' and 'speak to anyone'. It should be noted that adherence to medical confidentiality, GDPR regulation and other data protection requirements is paramount.
- 5.9 In undertaking a Safety Assurance Review, the following methodology shall be utilised (where appropriate):
- Problem Statements to detail the intent and purpose of the Review
 - Bow Tie analysis to enable a repeatable methodology for future use when reviewing similar events and to identify barriers that may have been absent or ineffective
 - Risk / impact assessments to highlight the benefit/dis-benefit of implementing Review recommendations
- 5.10 In mirroring Mind@Work MPPS principles, Safety Assurance Reviews shall include (as a minimum):
- An initial Review team kick off meeting to include an outline of the Review objectives, the Terms of Reference, rules of conduct/agreements and expected workload / timelines
 - Gathering and assessment of background written material and data
 - Analysis of any relevant legal position and variations compared to EASA or ICAO regulations
 - Determination of relevant interviewees
 - Undertaking of interviews
 - Development of insights
 - Utilisation of BowTie XP to determine which safety barriers might be missing or ineffective, including using the Regulatory Bow Tie
 - Determination of any interventions that may be required
 - Provision of a Final Report
- 5.11 Internal CAA stakeholder engagement shall include (as a minimum):
- Notice of intent to commence, clearly indicating the intended objectives
 - Feedback to participants during the Review and **prior** to the publication of findings, including an opportunity for participants to review the Final Report for factual inaccuracies **prior** to onward transmission
 - Sharing of a Final Report (redacted if required prior to wider publication), identifying findings, recommendations and lessons identified
- 5.12 Unless inappropriate, the Final Report shall be escalated in the following order:
- Review of draft report by participants
 - Review of draft report by Review Sponsor
 - Review of draft report by Department Head (if different to Sponsor)
 - Review of draft report by Head of Future Safety (if different to Sponsor)
 - Review of draft report by SARG LT
 - Review of Final Report by DSARG
 - Submission of Final Report to ExCo/Board (as appropriate)

- 5.13 The escalation process described in paragraph 5.12 may be circumvented to allow for significant findings to be highlighted to appropriate individuals in a timely fashion, as deemed necessary by the Review focal point, such that interventions may be made quickly. In such instances, the Safety Assurance Lead should be fully briefed. The colleagues listed in paragraph 5.12 above should be informed of the situation as soon as practicable and the standard process should be followed once the immediate urgency has passed.
- 5.14 Where possible, any critical comments or complaints received by the Review focal point / lead pertaining to the content of the Final Report or the conduct of the Review itself should be addressed collaboratively by the focal point / lead and the commenter. In the event of a dispute that cannot be satisfactorily resolved, the following dispute resolution process should be utilised:



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- 5.15 Following completion of a Safety Review, the Review focal point / lead should seek feedback on the process from:
- Review participants
 - Review Sponsor
 - Department Head (if different to Sponsor)
- 5.16 Following completion of a Safety Review, the Review focal point / lead should seek feedback from the Review team on their experience during the process. Additionally, the CAA Recognition Scheme should be utilised to publicly thank colleagues for their involvement in the process. If appropriate, feedback may be provided to the relevant line manager(s) for colleague personal development purposes.
- 5.17 All feedback received as described in paragraphs 5.15 and 5.16 above should be uploaded to the CAA Regulatory Bowtie for the purposes of Safety Assurance team continuous improvement and to measure the ongoing effectiveness of relevant control barriers. This information may also be utilised for ongoing assessment of Maturity as measured against the CAA's Safety Maturity Model.

General Safety Assurance

- 5.18 The Safety Assurance of SARG shall encompass:
- Embedding of Performance Based Oversight (PBO) across SARG
 - Embedding of the RSMS across SARG
 - Utilisation of actionable intelligence and leading indicators in decision making
 - Agreement of Safety Performance Indicators (SPIs)
 - Effectiveness of safety improvement activities
- 5.19 Safety Assurance shall be achieved by the undertaking of Safety Assurance Reviews as appropriate, along with observation of meetings, to include (but not be limited to):
- Internal Review Meetings (IRMs) to assess the embedding of PBO across SARG and the efficacy of the intelligence data provided
 - PBO Steering Group meetings to assess the further development of PBO policy/procedures and the embedding of PBO across SARG
 - RSMS Working Group meetings to assess the further development of RSMS policy/procedures and the embedding of the RSMS across SARG
 - Safety Review Panel (SRP) meetings to assess the embedding of the RSMS at capability team level and the degree of standardisation across SARG
 - Safety Review Committee (SRC) meetings to assess the embedding of the RSMS at SARG senior management level
 - Safety Leadership Group (SLG) meetings to assess the embedding of the RSMS at CAA director level
- 5.20 The Safety Maturity Model (SMM), colleague feedback and Safety Assurance Review findings shall be utilised to assess the maturity of colleague understanding of and competence in delivering PBO and in utilising the RSMS.
- 5.21 The SMM, colleague feedback and Safety Assurance Review findings shall be utilised to assess the maturity of the field force, intelligence and SARG management teams in enabling actionable, timely intelligence, leading indicators and trend analysis, and in delivering targeted safety improvement activities as a result.

The Regulatory Bow Tie

- 5.22 The Regulatory Bow Tie provides an objective and systemised way to:

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- Measure the effectiveness of regulatory barriers
- Identify where accountability lies
- Identify areas for internal improvement by highlighting potential gaps in oversight, resource, effectiveness or accountability
- Audit against a standardised and consistent model

5.23 The Regulatory Bow Tie has been developed by the SA team and will be utilised by this team as part of daily assurance activities.

5.24 Data collected from the SMM and Safety Assurance Reviews will be utilised to 'feed' the Regulatory Bow Tie.

The Safety Maturity Model

5.25 The SMM is a mechanism by which the CAA will measure its maturity against multiple criteria that collectively indicate the level of positive culture and consistent practices within the organisation. The SMM will be utilised to provide data to 'feed' the Regulatory Bow Tie.

5.26 SARG has undertaken to initially measure itself against the SMM, to agree targeted improvement activities and to subsequently re-measure itself against the SMM. The intent is to use the SMM as a tool to transition fully, through continuous improvement activities, towards being a better performance based regulator.

5.27 The SMM will be utilised to provide targets to measure the change over time. This may be at team, departmental, SARG or wider CAA level.

5.28 The SMM will be utilised to identify exemplars from comparative organisations, e.g. EASA, ICAO and non-aviation industry/regulators.

5.29 The SA team will oversee and coordinate the utilisation of the SMM. The measurement activities, agreement of targets and improvement activities will be managed by each department head and agreed by the LT.

Recommendations

5.30 Where Safety Assurance activities result in the formation of recommendations, appropriate owners, related actions and closure timescales shall be agreed with department heads. Where appropriate/necessary, DSARG shall have the final jurisdiction on the content, ownership and timescales of associated actions.

5.31 Recommendations and associated actions shall be recorded within Pentana for the purposes of ongoing tracking by the Safety Assurance team.

6 Related Documents

Document	Location
Safety Assurance Review – Initiation Notification Template	S&BA SharePoint
Safety Assurance Review – Initiation Meeting Template	S&BA SharePoint
The Regulatory Bow Tie	Access available via Safety Assurance Lead
The Safety Maturity Model	Access available via Safety Assurance Lead

7 Definitions and Abbreviations

SARG	Safety & Airspace Regulation Group
DSARG	Director, Safety & Airspace Regulation Group
SA	Safety Assurance
PBR	Performance Based Regulation
RSMS	Regulatory Safety Management System
PBO	Performance Based Oversight
SPI	Safety Performance Indicator
IRM	Internal Review Meeting
SRP	Safety Review Panel
SRC	Safety Review Committee
SLG	Safety Leadership Group
SMM	Safety Maturity Model