Transport Canada Transports Canada

Staff Instruction

Subject: **Targeted Inspection Program**

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1.0 Introduction

1.1 Purpose

(1) This Staff Instruction (SI) describes the procedures to be used by Transport Canada Civil Aviation (TCCA) to initiate, design and evaluate Targeted Inspection campaigns on Canadian Aviation Document holders.

1.2 Applicability

(1) This document is applicable to all TCCA personnel involved in the surveillance program.

1.3 Description of changes

(1) Not applicable.

2.0 References and requirements

2.1 Reference documents

(1) It is intended that the most recent versions of the following reference materials be used in conjunction with this document:

(a) Civil Aviation Directive (CAD) QUA-018 – Civil Aviation Strategic Safety Risk Management Framework;

(b) CAD SUR-008 – Surveillance Policy;

(c) Staff Instruction (SI) QUA-014 - TCCA Technical Program Evaluation;

(d) SI SUR-001 – Surveillance Procedures;

(e) SI SUR-028 - Surveillance Planning Instructions;

(f) Targeted Inspection worksheet template: RDIMS 18002079;

(g) Targeted Inspection Campaign Report template: RDIMS 16765117; and

(h) Targeted Inspection Campaign Report Management Response template: RDIMS 18002444.

2.2 Cancelled documents

(1) Not applicable.

2.3 Definitions and abbreviations

(1) The following **definitions** are used in this document:

(a) **Compliance**: the state of meeting regulatory requirements.

(b) **Enterprise**: the holder of one or more TCCA issued Canadian Aviation Documents (CADs) under a single Accountable Executive. For example, a company holds an Approved Maintenance Organization Certificate, an Air Operator Certificate, an Approved Training Organization Certificate, or a Design Organization Authority. The term “enterprise” is intended to denote that surveillance is conducted on the whole enterprise rather than on an individual CAD holder.

(c) **Executive Sponsor**: PBC member who sponsors a TI campaign, approves the TI campaign project charter, campaign plan, and campaign report, and is accountable for follow-up action.

(d) **Hazard**: a condition that could cause or contribute to an aircraft incident or accident.

(e) **Non-compliance**: the failure to meet regulatory requirements.

(f) **Regulatory Requirements**: the Canadian Aviation Regulations and standards as well as any documentation required by reference.

(g) **Risk**: the assessed predicted likelihood and severity of the consequence(s) or outcome(s) of a hazard.

(h) **Safety**: the condition to which risks are managed to an acceptable level, where acceptable level from a TCCA perspective is on-going compliance with regulatory requirements.

(i) **Scope**: the areas of enterprise operations that will be subject to the TI campaign activity.

(j) **Subject Matter Expert**: a person who is knowledgeable about a specific subject or topic.

(k) **Targeted Inspection**: a surveillance program tool designed to combine CAD holder compliance monitoring with gathering evaluative information that provides TCCA with data on how certain regulatory requirements, programs and guidance materials have generally been applied across a group or sector.

(2) The following **abbreviations** are used in this document:

(a) **AOPR**: Analysis & Occurrence, Planning and Reporting;

(b) **CAD**: Canadian Aviation Document;

(c) **CADORS**: Civil Aviation Daily Occurrence Reporting System;

(d) **CASA**: Civil Aviation Safety Alert;

(e) **NOO**: National Oversight Office;

(f) **OMC**: Operational Management Committee;

(g) **PBC:** Civil Aviation Program Business Committee;

(h) **RDIMS**: Records, Documents, and Information Management System;

(i) **SME:** Subject Matter Expert;

(j) **TCCA**: Transport Canada Civil Aviation;

(k) **TI**: Targeted Inspection;

(l) **TPEC**: Technical Programs, Evaluation and Coordination; and

(m) **TSB**: Transportation Safety Board.

3.0 Background

(1) TCCA conducted the first TI campaign in 2016, to determine the effectiveness of CASA 2014-03 and CASA 2015-04 in improving practices by airline operators to assess and mitigate the risks associated with unstable approaches. Previously TCCA did not use a specific surveillance tool to inspect safety issues that were not regulated.

(2) TCCA formally introduced TIs in the 2018-19 surveillance cycle as another surveillance program tool available for TCCA to utilize when/where appropriate to support the overall aviation safety system, not normally directed at a specific enterprise.

4.0 Targeted Inspection campaigns

4.1 Objectives

(1) TI campaigns are intended as a short-term safety oversight approach, normally lasting no more than a year.

(2) The objectives of a TI campaign are to:

(a) Understand how CAD holders interpret and apply regulatory requirements;

(b) Identify what factors, elements, or conditions may be contributing to safety concerns;

(c) Study operations that are not regulated (e.g. ground operations);

(d) Inform TCCA management of current or emerging risks to the Aviation Safety Program;

(e) Gather data to support decision-making;

(f) Aid policy development;

(g) Provide evidence to evaluative questions and methodologies;

(h) Investigate risk severity which can help identify potential risk mitigation options;

(i) Continuously improve TCCA safety processes and programs.

(3) To ensure a TI campaign is effective, the scope must be specific in order to capture the most useful information.

4.2 Identification

(1) A TI campaign may be appropriate to assess safety concerns in response to triggers such as:

(a) TSB Watch List items or TSB investigation report recommendations;

(b) Situations where regulatory requirements are minimal or are difficult to enforce;

(c) Underlying safety issues or trends which are apparent through risk indicators or analyses;

(d) An increase in the frequency of incidents, accidents, and occurrences reported in CADORS;

(e) Increased length of time since the area/sector was last inspected by TCCA;

(f) TCCA's Strategic Safety Risk Assessment Working Group has identified the area/sector as high risk; and

(g) Risk Indicators used for surveillance planning are high for a certain sector or segment of the industry.

(2) A TI campaign may be proposed by TCCA personnel, through line management to their OMC or PBC member, who is responsible for contacting the OMC Chair to put the proposal forward for consideration by OMC. The OMC Chair shall notify the Chief of TPEC when OMC recommends the conduct of a TI campaign.

(3) When the need for a TI campaign has been identified, TPEC National Programs shall:

(a) Jointly develop an Issue Paper with the proponent of the TI campaign. The Issue Paper outlines the safety issue, background, considerations, options, and recommendation for a TI campaign including objective, scope, expected benefits, risks, and required resources;

(i) Options should include methods to obtain the information needed for decision-making on the safety concern identified in 5.1(1). For example, if the objective is to determine whether regulatory change is needed, the Issue Paper should answer:

(A) Who is the decision-maker?

(B) What information is needed for the decision-maker?

(C) What are the options to obtain that information (e.g. survey, virtual interviews, structured stakeholder engagement, internal or external data sources, etc.)?

(D) What are the pros and cons of each option?

(E) Why is a TI campaign being recommended as the best option?

(b) Send the draft Issue Paper to applicable SMEs for the subject area of the TI campaign and to OMC members, to validate that the identified safety concern merits a TI campaign;

(c) Incorporate feedback from OMC and from SMEs into the Issue Paper;

(d) Send the final Issue Paper to the Chief of TPEC for review and forwarding to the Director of Standards.

4.3 Approval

(1) The Director of Standards shall:

(a) Present the Issue Paper to PBC for approval and allocation of required resources for the TI campaign;

(b) Notify the Chief of TPEC of PBC's decision.

(2) When a TI campaign is approved by PBC, TPEC National Programs shall:

(a) Add the approved TI campaign to the National Oversight Plan;

(b) Discuss and seek consensus on the implementation strategy for the TI campaign at the AOPR-MC and OMC tables;

(c) Develop a Project Charter and Campaign Plan (including sampling plan if applicable), and send these to the Chief of TPEC for review and approval by the Executive Sponsor;

(d) Seek support for the project charter from OMC before it is presented to PBC for approval.

Note: An example of a TI campaign project charter can be found in RDIMS 17007042; an example of a TI campaign plan in RDIMS 14050487.

4.4 Design and development

(1) For each TI campaign, TPEC National Programs shall:

(a) Develop a TI worksheet using the template RDIMS 18002079 as a baseline;

(b) Develop questions following the methodologies described in SI QUA-014;

(i) The intent is to develop open-ended qualitative questions that cannot be answered "yes" and "no", thereby leading the interviewee to elaborate further on their practices and processes.

(c) Coordinate with applicable SMEs to obtain feedback on the draft questions;

(d) Incorporate feedback from SMEs into the questions and worksheet;

(e) Send the final worksheets to the Chief of TPEC for review and approval;

(f) Send the approved worksheets to OMC members for distribution to their inspectors;

(g) Create a master folder and regional subfolders in RDIMS for saving completed worksheets with supportive evidence.

Note: An example of a TI campaign worksheet can be found in RDIMS 14926519.

(2) Each TI campaign worksheet shall contain the following elements:

(a) **Introduction** at the beginning to explain the purpose and scope of the TI;

(b) **Evaluative Questions** specific to each TI which will allow TCCA to view a topic of interest from a sector, regional or national point of view;

(c) **Guidance** for inspectors to be used during the TI to provide additional context on what is being evaluated and suggested methodology;

(d) **Additional guidance** in case follow-up or re-phrasing is required to suit the operation;

(e) **Post-site/Reporting** explains how to name, process and file the completed worksheets in RDIMS;

(f) **Results and Recommendations** include findings of potential non-compliance to applicable regulatory requirements and whether to escalate for further action;

(g) **Review and Approval** by regional management;

(h) **Information Management Requirements** provides an index of records with the corresponding RDIMS numbers.

4.5 Inspection and reporting

(1) Inspectors shall:

(a) Conduct the TI according to the procedures in SI SUR-001 and the guidance on the TI worksheet;

(b) Save all completed worksheets, collected records, notes, and other evidence acquired during the TI in the applicable RDIMS regional subfolder that was created per 4.4(1)(g).

(i) More information on saving items to folders can be found in RDIMS 11353108.

(c) Report the worksheets as completed to the inspector's regional AOPR unit or applicable Program Integration unit for the National Operations and National Aircraft Certification branches.

(2) The applicable units (regional AOPR units, Program Integration units of the National Operations and National Aircraft Certification branches) shall:

(a) Maintain a log of completed TIs;

(b) Report accurate completions to TPEC National Programs for tracking and reporting purposes at the end of each quarter.

(i) Reporting requirements are outlined in the quarterly reporting call-out e-mail from TPEC National Programs.

(3) TPEC National Programs shall:

(a) Follow up with inspectors if clarity is required on the worksheets or for missing information.

Note: The collection of evidence, identification and issuance of findings and observations, and the escalation of surveillance activities are the same as those used during Process Inspections as outlined in SI SUR-001.

4.6 Evaluation and recommendations

(1) TPEC National Programs shall lead the following activities, with support from applicable parties (the proponent of the TI campaign, applicable SMEs for the subject area of the TI campaign, regional AOPR units, Program Integration units of National Operations and National Aircraft Certification):

(a) Collate results from all the completed regional TIs to obtain a national perspective of the area of concern;

(b) Analyze the final results looking for national, regional and/or certificate holder-specific safety concerns or trends;

(c) Develop recommendations to address the objectives of the TI campaign and any areas of concern;

(i) Recommendations should be specific and concise, start with a verb, focus on corrective action, and state the action owner.

(d) Prepare a final report on the results of the TI campaign, including any areas of concern and recommendations;

(i) Use TI Campaign Report template RDIMS 16765117 and Management Response template RDIMS18002444.

(e) Send the report and management response form to the Chief of TPEC for review and approval by the Executive Sponsor and presentation to PBC;

(f) Prepare a communication for the Executive Sponsor to distribute the approved TI Campaign Report to all applicable internal parties.

Note: An example of a TI campaign database can be found in RDIMS 15076719; and an example of a TI campaign report in RDIMS 16848327.

4.7 Follow-up

(1) TPEC National Programs shall:

(a) Prepare a TI Campaign Recommendations tracking spreadsheet;

(b) Follow up with the action owner for each recommendation quarterly after the TI Campaign Report was distributed until recommendations are fully actioned;

(c) Update the TI Campaign Recommendations tracking spreadsheet to reflect status provided by each action owner;

(d) Notify the Chief of TPEC quarterly regarding action status of TI Campaign Recommendations;

(e) Prepare an email for the Chief of TPEC to notify the Executive Sponsor when the TI Campaign recommendations are fully actioned.

Note: An example of a TI Campaign Recommendations tracking spreadsheet can be found in RDIMS 16713558.

5.0 Information management

(1) All information management practices shall respect applicable privacy issues where appropriate.

6.0 Document history

(1) Not applicable.

7.0 Contact us

For more information, please contact:

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We invite suggestions for amendment to this document. Submit your comments to:

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