



**Number: OPS SN-2014/03**

**Issue: 4**

**03 December 2018**

## **Compliance Monitoring Auditor Independence**

**This Safety Notice contains recommendations regarding operational safety.**

Recipients are asked to ensure that this Safety Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

**Applicability:** All Part CAT Operators

### **1. Introduction**

- 1.1 The purpose of this Safety Notice is to re-iterate the intent of the independence of auditors that form part of the Compliance Monitoring System required by EASA Part ORO.GEN.200.
- 1.2 AMC1 ORO.GEN.200(a)(6) states that the independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.
- 1.3 The Authority has taken note during its Safety Oversight activities that increasingly, operators are using internal and/or external personnel that are involved in the Compliance Monitoring process to undertake other operational tasks.
- 1.4 To illustrate the above, it has been noted that auditors are also involved in many cases in derivation and amendments of documentation such as the Operations Manuals, Continuing Airworthiness Management Exposition, Safety Manuals etc.... Such operational documentation should fall under the responsibility of the relevant operational department and post holder. Furthermore, in this case it should be noted that the Compliance Monitoring process should also include independent audits of the same manuals being derived. Clearly this poses a conflict and does not meet the intent of the requirement in providing for the required independence.

### **2. Independence of Auditors**

- 2.1 Operators shall identify all such possible cases of conflict and ensure that all personnel involved in the Compliance Monitoring process are not involved in activities subject to audit.
- 2.2 On the same note the Authority will only engage with personnel involved in the Compliance Monitoring Programme on matters concerning the Compliance Monitoring System.

**3. Queries**

- 3.1 Any queries as a result of this Safety Notice should be addressed to Head of Flight Operations and Flight Crew Licensing Inspectorate at the following e-mail address:  
[hfo@scaa.sc](mailto:hfo@scaa.sc)

**4. Cancellation**

This Safety Notice cancels OPS SN-2014/03 Issue 3

Head Flight Operations and Flight Crew Licensing Inspectorate