



www.caa.co.uk/international



Going further than ever before to raise aviation standards worldwide

The CAA International Group



www.caainternational.com
Part of the UK CAA International Group



Limitations of Prescriptive Surveillance

Mark Vincent (MSc) PBR Principle

Scope

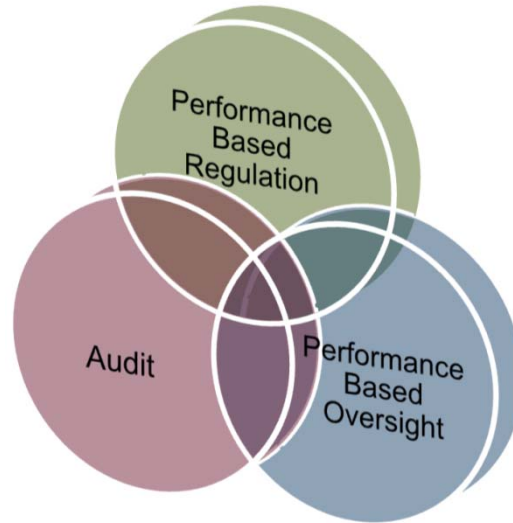
- What is a Prescriptive approach?
- What are the limitations of a Prescriptive approach?
- Introduce Performance and Risk Based Surveillance
- Summary
- Questions



CAA Performance Based Terminology



The UK CAA uses



Performance Based Surveillance

Risk Based Surveillance

Audit and Assurance

Surveillance

Prescriptive Based Surveillance

Risk Based Oversight

What is Prescriptive Surveillance

- Audit based
- Regular and scheduled
 - Compliance
 - Rule Bound
 - Repetitive
- Checklist orientated approach
 - Focus on schedule and pattern
 - Can be prepared for

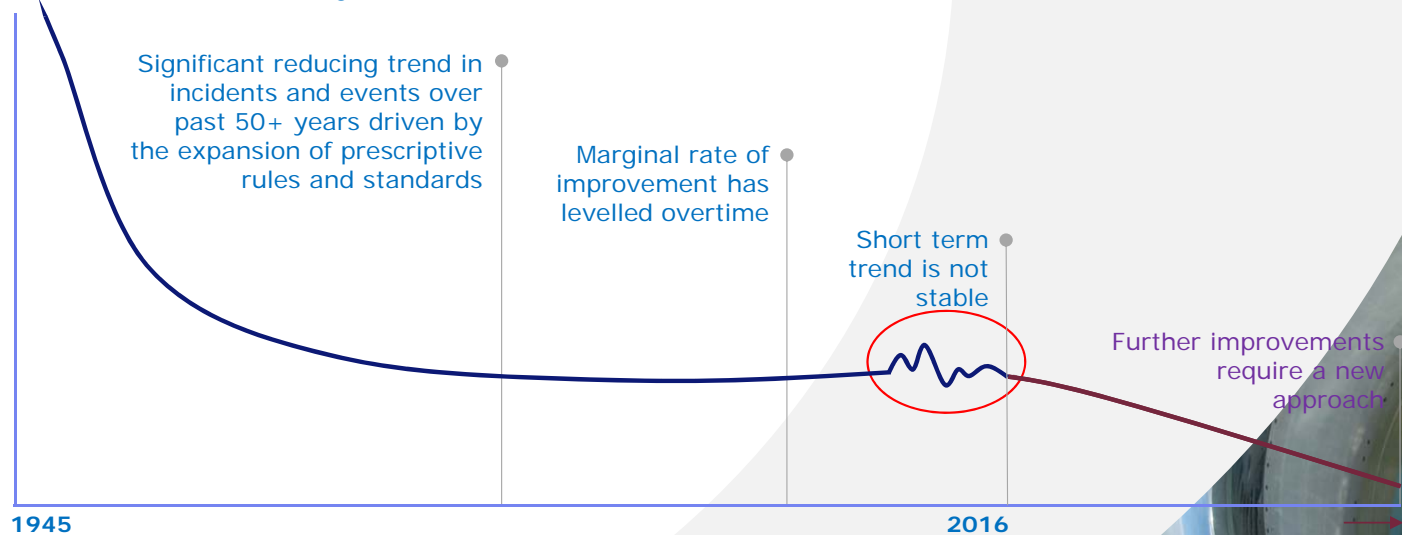


Prescriptive Surveillance

From a UK CAA oversight perspective:

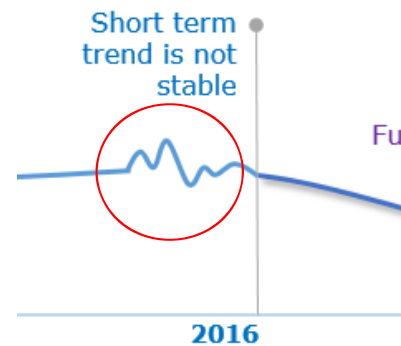
- Required to improve safety
- Compliancy based

Illustrative rate of safety incidents from 1945

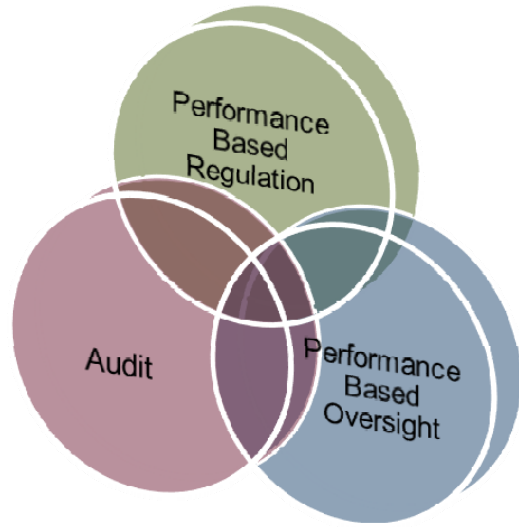




What are the Key Limitations of Prescriptive Surveillance?



- The UK CAA exists to protect the interests of the UK public – in Safety, Market Regulation and Consumer Protection.
- The introduction of Risk Based Surveillance is changing the way SARG carries out its oversight and collects, analyses and uses safety risk information.
- Ratchet effect in terms of safety trend.
- Resource intensive
- May not identify Sector wide safety risks
- Limited ability to paint a full safety picture
- Knowledge may not always be shared with the right people
- Compliance based systems could be restricted due to the checklist methodology.



Risk Based Surveillance

“DO THE RIGHT THING, THE RIGHT WAY AT THE RIGHT TIME WHILST ENCOURAGING AN ORGANISATION OF EXPERTS TO BECOME AN EXPERT ORGANISATION.”



External drivers for the introduction of RBS



The idea that regulators should gather more, better information about safety risks and use it to prioritise activity is well established.

- **ICAO** – have called for a new approach to State-level oversight and improvement of aviation safety (Annex 19 on Safety Management).
- **EASA** – describe the creation of risk-based regulations and leading safety performance indicators as two of their key strategic goals.
- **UK Government** – Better Regulation Principles require regulatory activity to be “*targeted, proportionate and based on a comprehensive understanding of risk.*”



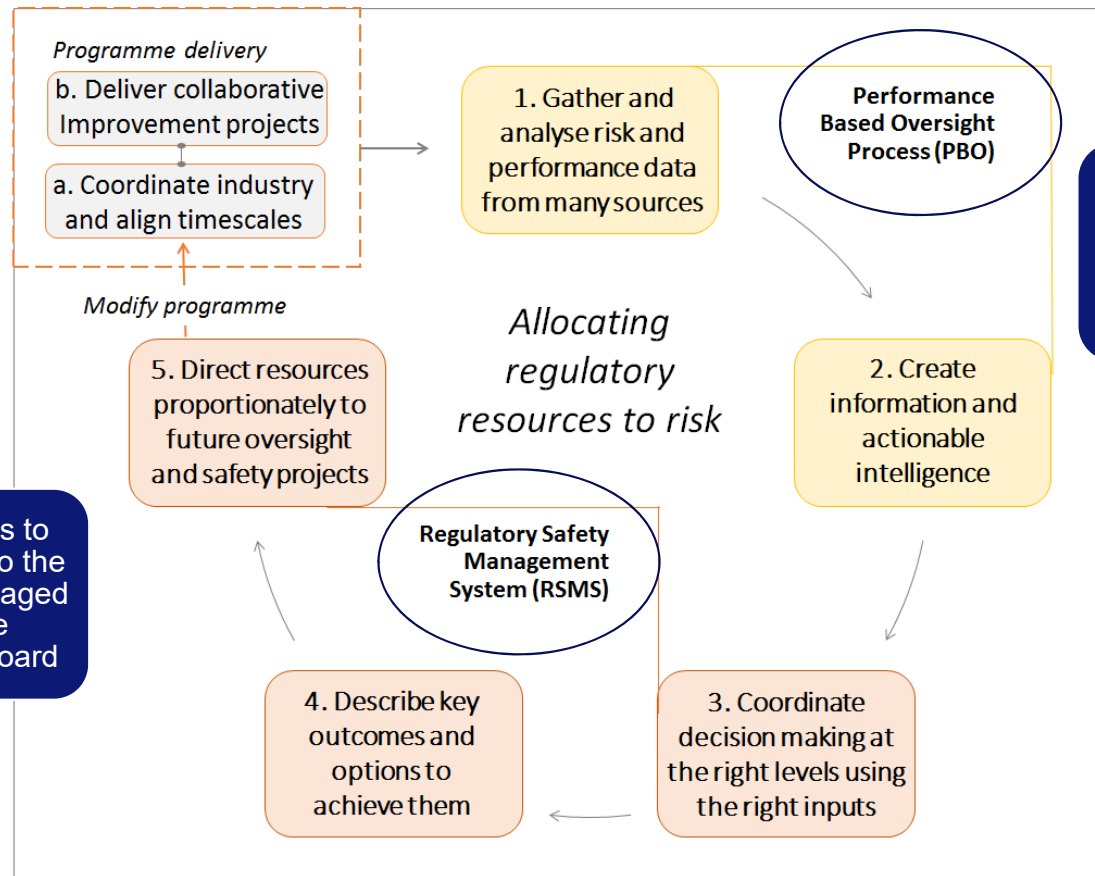
HM Government

Addressing the Limitations of Prescriptive Surveillance



- The UK CAA has moved to risk based surveillance approach
- This does not replace the requirement for prescriptive surveillance approaches
- Enhances the data available to assess, respond, understand and mitigate the risks associated with aviation
- Enables the delivery of resource to risk.

The Emergence of Risk Based Surveillance



Performance Based oversight is the area where data is gathered, analysed and considered. It is turned into actionable data and combined with intelligence that is gathered from external sources

The purpose of the RSMS is to ensure that the safety risks to the UK consumer are being managed effectively and to provide assurance to the UK CAA Board

Summary

- Prescriptive, compliance based regulatory oversight will still make a valuable contribution in assessing the whole risk picture
- To create a full sector risk picture it is essential that new methods of surveillance or oversight are considered – the UK CAA has adopted the RBS approach
- Positive results evident through a performance and risk based approach. Industry has become engaged with risk and performance based approach.



Questions?





UK Civil Aviation Authority
International

Aviation House
Gatwick Airport South
West Sussex RH6 0YR
United Kingdom

www.caainternational.com