**Quality Assurance Compliance with IATA IOSA and the relationship with an EASA Quality Assurance (QA) System**

In the context of Quality Assurance IATA Operational Standards Audit IOSA requires the following: -

Quality Assurance Program

The Operator shall have a quality assurance program that provides for the auditing of the management system, and of operations and maintenance functions, to ensure the organization is:

(i) Complying with applicable regulations and standards;

(ii) Satisfying stated operational needs;

(iii) Identifying areas requiring improvement;

(iv) Identifying hazards to operations;

***Note that item i) & ii) are covered by an EASA compliant Quality System***

Item iii) is a bit more contentious and would come under the area of performance auditing

Item iv) is not directly targeted by the EASA quality system which is looking at compliance not hazards

***(Also note that using the term hazard in isolation may be misleading as Hazards exist everywhere within aviation – Hazards in fact require to be qualified to identify those which carry a threat***)

(v) Assessing the effectiveness of safety risk controls.

***Note (v) this is a Performance Measure and is typically outside of the remit of an EASA Compliance Quality Assurance System - It is typically assessed using Safety System Key Performance Indicators (KPI) and other metrics***

***IATA advises***

The quality assurance program comprises two complementary functions: To monitor an operator's compliance with relevant regulations and standards, as well as to evaluate and continually improve operational safety performance. Such functions are elements of the Safety Assurance component of the SMS framework.

***Note EASA Treats the 2 subjects separately (however both roles may be performed by the same person)***

In some organizations the quality assurance program may have a different name (e.g. internal audit program, internal evaluation program).

A robust quality assurance program ensures a scope of auditing that encompasses all areas of the organization that impact operational quality in terms of safety and/or security.

***Note the following subject divisions and elements are defined by IATA In the case of EASA Maintenance operations consist of Continuous Airworthiness Management (CAMO)and separate Aircraft Maintenance (AMO)***

Operational functions include flight operations, operational control/flight dispatch, maintenance operations, cabin operations, ground handling and cargo operations.

This provision is designed to permit flexibility in the implementation of the quality assurance program. The structure and organization of the program within an operator's management system, whether centralized, non-centralized or a combination thereof, is at the discretion of the operator in accordance with its corporate culture and regulatory environment.

An effective audit program includes:

• Audit initiation, including scope and objectives;

• Planning and preparation, including audit plan and checklist development;

• Observation and gathering of evidence to assess documentation and implementation;

• Analysis, findings, actions;

• Reporting and audit summary;

• Follow-up and close out.

***Note the above audit elements are fully compliant with EASA requirements***

To ensure auditors gather sufficient evidence to produce realistic assessments during an audit, the program typically includes guidance that defines the various sampling techniques that are expected to be used by auditors in the evidence collection phase of the audit.

The audit process typically includes a means whereby the auditor and responsible personnel from the audited area have a comprehensive discussion and reach agreement on the findings and corresponding corrective actions.

Clear procedures are established to resolve any disagreement between the auditor and audited area.

All action items require follow-up to ensure closeout within an appropriate period of time.

The Operator shall appoint a manager with appropriate qualifications, authority and independence that is responsible for:

(i) The performance of the quality assurance program;

(ii) Ensuring communication and coordination with operational managers in the management of operational risk.

The manager of the quality assurance program is “operationally independent” in a manner that ensures objectivity is not subject to bias due to conflicting responsibilities.

To be effective, an individual designated as manager of the quality assurance program has appropriate qualifications for the position, which may include:

• Formal training or certification as a quality auditor;

• Relevant operational and auditing experience;

• Formal training in risk management.

Quality assurance audit activities may be centrally controlled or controlled within each relevant operational function as long as independence is maintained.

Typically, the manager of the quality assurance program has direct lines of communication to senior management to ensure the efficient reporting of safety and security issues, and to ensure such issues are appropriately addressed.

***Note in the EASA system the Quality Manager MUST have access to the Accountable Manager AM***

The Operator shall have a process for addressing findings that result from audits conducted under the quality assurance program, which ensures:

(i) Identification of root cause(s);

***Note an EASA compliant Quality Assurance System requires the Business Area Owner (Nominated Person NP) to be responsible for Root Cause.***

(ii) Development of corrective action as appropriate to address findings;

(iii) Implementation of corrective action in appropriate operational area(s);

(iv) Evaluation of corrective action to determine effectiveness.

Certain audit findings might fall under the category of hazards to operations. In such cases, the hazard would be subject to the risk assessment and mitigation process in the development of corrective action.

***Note the cross over into the SMS function handled differently within an EASA system***

The Operator shall have a process to ensure significant issues arising from the quality assurance program are subject to management review.

Management review of significant quality assurance issues supports the continual improvement of safety performance, which is an element of the Safety Assurance component of the SMS framework.

Such review permits senior management to consider significant issues of non-compliance in areas of the organization that impact operational safety and security, and to:

• Continually monitor and assess operational safety and security outcomes;

• Ensure appropriate corrective or preventive actions that address the relevant compliance issues have been implemented and are being monitored for effectiveness;

• Ensure continual improvement of operational safety and security performance.

The Operator shall have a means for disseminating information from the quality assurance program to management and non-management operational personnel as appropriate to ensure an organizational awareness of compliance with applicable regulatory and other requirements.

***Note several differences between the required EASA Management Evaluation of the Compliance System and the above – however developing a combined meeting to deal with QMS and SMS is perfectly feasible.***