

Why it is important for the Post Holder - Nominated Person to Ensure Quality Control Compliance in an EASA Approved Organisation

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It is very healthy within the organisation to ensure that the Post Holder is able to deliver Compliance Independently of the QM (CM) - Explain

Consider the Role of the Aviation Quality System within the European Aviation Safety Agency “EASA”

Consider the following role definitions and responsibilities:-

First, that the Accountable Manager is responsible for the Quality System which includes both elements of Quality Control and Quality Assurance;

Second, that the Quality Assurance Manager [Compliance Manager (CM)] is responsible for the auditing of all Compliance related elements of the organisation system. (The second point is important because it also includes the need for the Quality System to Audit the SMS System)

More About Organisation Compliance Both External & Internal

Please also consider when we speak about Organisational Compliance we are talking about compliance with all external regulatory requirements together with all the internal obligations driven by all internal company documentation, manuals and procedures.

The CM is required to head up the independent process for performing a gap analysis (auditing for conformity) of the organisations documentation systems and processes.

Any finding becomes a “discrepancy” and generates the need for “corrective action”.

QC Roles & Responsibilities

Quality Control is typically the responsibility of the individual post holders and business area owners.

Quality Control is delivered through the development of regulatory compliant organisational processes and procedures which are followed by suitably trained and competent organisational staff.

Independently all QC processes should be audited by the QA process.

Accountable Manager – Role and Responsibility

The organisation has an inherent obligation to ensure regulatory compliance and this is further enfranchised by the obligation of the Accountable Manager “AM” to sign a statement accepting responsibility for the financing of the organisation to remain in compliance with all mentioned requirements.

The Accountable Manager is not required to be a specialist in the way that the Post Holders are required to demonstrate specific background knowledge experience and competence to the regulator before being allowed to commence “Post Holder” Duties.

Protecting the Accountable Manager!

So we should also share the understanding that one of the many roles of the Post Holder (Nominated Person) is to protect the Accountable Manager by ensuring that all required compliances are satisfied in respect of the relevant business area.

Quality Manager / Compliance Manager Roles & Responsibility

It is incumbent on the CM / QM to ensure any identified deficiencies are also brought to the attention of the Accountable Manager in the most appropriate way. If necessary with the support of the PH / NP and Safety Manager.

The regulatory authority will perform “oversight” audits of the organisation, however it should be understood that the purpose of these audits is entirely different to the needs of the organisation.

Where does the Regulatory Authority (CA) – Fit into this story

The regulatory authority is off course not part of the organisations QC or QA process and independently assesses what they wish when they wish.

It should also be said that lack of awareness not identified by the regulatory does not exonerate the organisation anyway from compliance.

Further Considerations – The bottom line!

It is a fact that anything omitted in terms of oversight by the regulator due to time manpower or other constraints will not be missed by agencies such as the National Transportation Safety Board (NTSB) or Aircraft Accident Investigation Board (AAIB).

The Compliance Manager (CM) is also responsible to “protect” the Accountable Manager by ensuring that all significant organisational non-conformities are brought to the attention of the AM.

Once we accept the above we can focus on the importance of the CM / QM.

To finish with two comments:

The first is that if the CM/QM fails to identify organisation non-conformity he has let down the Accountable Manager.

The second is that if the regulator finds an organisational deficiency, it is possibly an indication of two deficiencies.

Once we accept the above we can focus on the importance of the CM / QM.

Therefore we could sum up and say the following:

An effective aviation quality and compliance system should generate few if any non-conformities during regulatory audits

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