

**AOP 09 –**  
*Compliance*  
*Monitoring System*  
*(CMS)*



## **1.4 Training**

Correct and thorough training is essential to optimise compliance at LBA. In order to achieve significant outcomes of such training, LBA will to best endeavours, ensure that all personnel understand the objectives as laid down in this AOP.

Those responsible conducting Audits will receive training on this task. Such training will cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording

## **1.5 Compliance Monitoring Areas**

LBA's compliance monitoring process is divided into 4 areas

- Regulatory (EASA/CAA)
- Internal (LBA departments and documents)
- External (Third Party/Contracted) Compliance Monitoring.
- Air Traffic Services

LBA will monitor the compliance of these 4 key areas by means of Auditing and Performance Based Monitoring. This is referred to as the LBA Oversight Planning Cycle (LBAOPC)

## **1.6 LBA Oversight Planning Cycle (LBAOPC)**

LBA has developed an Oversight Planning Cycle (LBAOPC) to enable it to systematically review all areas of the operation to ensure continued compliance with LBA/CAA/EASA regulations. This by extension will allow LBA to assure itself of continued safe practices across all areas of the operation falling into the scope of the LBAOPC. LBA has determined an 'Audit Schedule' that highlights the frequency each area of the operation will be audited. This is documented in SECTION 30 – Audit Schedule.

LBA may at any time, based on information obtained via its Performance Based Monitoring amend the Audit Schedule should it have reasonable grounds to suspect any third party not conforming with LBA/EASA/CAA policies and procedures.

## **1.7 Audits**

### **1.1.1 Process**

Audits will be conducted by persons deemed competent in accordance with, Para 25.3/25.4. Audits may be conducted by one or multiple representatives from LBA. All audits will be carried out in confidence, the results of all audits will remain confidential to those companies or departments having been audited, the results of the audit including any non-compliance with the agreed actions and timescales will be discussed at the audit out brief. All reported non-compliances should be dealt with using the best endeavours by company having been audited, any delay on agreed actions and time scales could however be elevated to the Operations Director.

All Audits will be conducted in accordance with the LBAOPC and the company being audited will be advised in advance of the date and time that LBA intends to conduct the Audit.

### **1.1.2 Out briefs**

Out briefs will provide the opportunity for the results of the Audit to be discussed with the relevant department / organisations manager. Non Compliances will be agreed and time scales on corrective actions signed for.

### 1.1.3 Follow Up

Should there be any RED or AMBER category findings, LBA will conduct a 'follow up' meeting to ensure that all agreed corrective measures have been actioned in the specified period.

## 1.8 Non Compliance - Classification

All findings documented during audit will be categorised based on severity. These Categories can be found below. The table outlines the required action period for the relevant department to rectify the agreed non-compliance.

COLOUR	CATEGORY	REQUIRED ACTION PERIOD
RED	LEVEL 1	1 WEEK
AMBER	LEVEL 2	3 MONTHs
YELLOW	Observation	ADVISORY - BEFORE NEXT AUDIT
GREEN	Compliant	-

## 1.9 Non Compliance – Definitions

### 1.9.1 Level 1

Where LBA determines that the level of compliance and/or safety performance of an department or third party has fallen to the extent that there is a potential or significant risk to flight safety, a Level 1 finding will be made. LBA will take action in accordance with the relevant regulation, which may result in provisional or substantive suspension of operating permit, intervention or the party being put under special oversight measures.

### 1.9.2 Level 2

This action may be taken where we identify a non-compliance but determine that the nature of that non-compliance is such that there is no immediate risk to safety. We will require the organisation or individual to develop an action plan acceptable to us that will restore compliance within 3 months, or at a pre-arranged follow up audit.

### 1.9.3 Observation

LBA expects the department or third party to take this advice seriously and act on it appropriately. Observations will usually be raised as the result of an audit or inspection when best practice is not being followed, or when it is anticipated that the auditee, although currently in compliance, is unlikely to remain so unless appropriate action is taken. The observation must be addressed prior to the next audit.

## 1.10 Performance Based Monitoring (PBM)

LBA will also be conducting performance based monitoring of all of its internal departments third parties that fall within its LBAOPC. Performance based monitoring is a process whereby LBA will develop a comprehensive risk picture across all of its operation to build up a holistic view of the safety and compliance based performance of all respective areas. Data will be continuously gathered by various means, particularly the Safety Incident Reporting System during the specified period that will all be collated on the individual / third parties file. This will enable LBA to have a clear picture of the company's safety performance prior to audit.

## **1.11 Documentation**

### **1.11.1 Audit Notification Form (ANF)**

LBA will issue an Audit Notification Form (ANF) to advise the recipient of the intended date of the audit. This form can be found in APPENDIX 28.

### **1.11.2 Compliance Audit Review Form (CARF)**

All compliance based Audits that are conducted will be recorded on a Compliance Audit Review Form which can be found in APPENDIX 27. This form will be held indefinitely on the individual department/third party's file.

### **1.11.3 Follow up Audit Form (FUAF)**

If there are any Red or Amber findings during the initial Audit, LBA will conduct a Follow up Audit to ensure that the agreed mitigation has been implemented within the time frames agreed. This will be documented on a Follow up Audit Form. This can be found in APPENDIX 30. This form will be held indefinitely on the individual department/third party's file.

## **2 SECTION 2 - Regulatory**

### **2.1 General**

Under the requirements stipulated by EASA/CAA, LBA will conducting Audits to ensure compliance against EU Regulation 139-2014 & AMC-GM-ADR. The audit frequency for all relevant areas is reflected in the Regulatory OPC contained in this AOP.

### **2.2 Documentation Required for Audit**

Regulatory audits will be documented on the Generic Audit Form located in APPENDIX 1 of the Aerodrome Manual or via the CAA Question Banks for the related regulation.

### 3 SECTION 3 - Internal

#### 3.1 General

Under the requirements stipulated by EASA/CAA, LBA will be conducting Audits on all relevant internal departments at LBA. Particular attention will be paid to departments that have staff & equipment or providing services to safety critical areas of the operation. The purpose of the audits will be to assure LBA that the individual departments are complying with the rules stipulated in the LBA Aerodrome Manual and any other relevant regulatory documents. LBA will also be looking to ensure the departments are taking an integrated approach to LBA regulations to ensure that all staff and management are familiar with the rules and procedures.

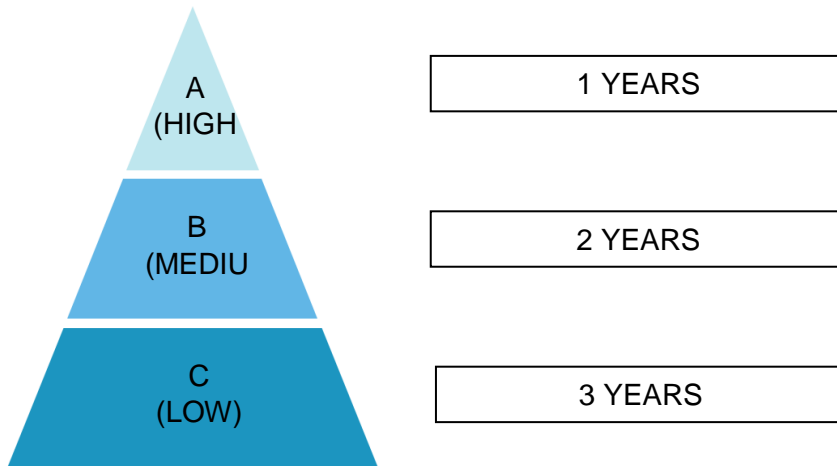
#### 3.2 Internal -Classification

LBA will initially determine the level of oversight required based on the complexity of the individual department and will continually evaluate and reassess to determine if further categorisation is required.

The categorisation of department will determine the frequency of Audit as shown in the complexity triangle below. All departments will be made aware of their categorisation. LBA may choose to amend any department's category dependant on its safety performance during the cycle.

Departments are categorised based on numerous factors such as past safety performance and the Safety Critical Nature of the service provided. Irrespective of safety performance, the 5 Core operational teams (AGL, ATE, RFFS, AOU, ATC) will always be categorised as class A departments on the complexity triangle to ensure constant oversight and maintenance of high safety standards.

##### 3.2.1 Complexity Triangle



#### 3.3 Documentation Required for Audit

FORM	YES	NO
Audit Notification Form	X	
Compliance Audit Review Form	X	
Operating Permit		X
Follow Up Action Form	IF REQ	

### **3.4 Auditable Areas**

LBA will be auditing its own departments against the rules and regulations stipulated within the Aerodrome Manual and other relevant policy documents. Audits may also cover incident data using information submitted to the SIR system, findings based upon safety and performance inspections and other performance indicators.

## 4 SECTION 4 - External

### 4.1 General

Under the requirements stipulated by EASA/CAA, LBA will be conducting Audits on business partners, subcontractors and any other third parties supplying services for or at LBA. Particular attention will be paid to third parties who have staff & equipment operating in safety critical areas of the operation. The purpose of the audits will be to assure LBA that the individual company is complying with the rules stipulated in the LBA Aerodrome Manual and any other relevant regulatory documents. LBA will also be looking to ensure the Third Party is taking an integrated approach to the rules to ensure that all staff and management are familiar with the rules and procedures.

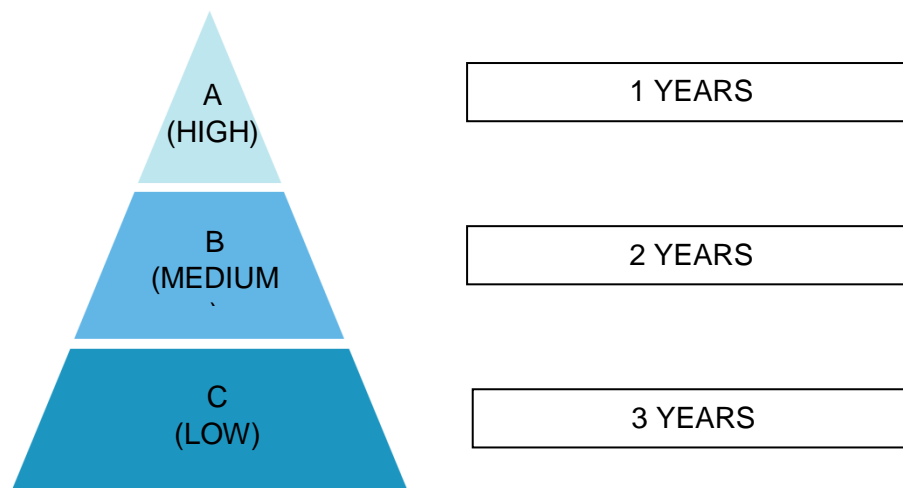
### 4.2 Third Party -Classification

LBA will initially determine the level of oversight required based on the complexity of the individual companies operation and will continually evaluate and reassess to determine if further categorisation is required. The categorisation of company will determine the frequency of Audit as shown in the complexity triangle below. All companies will be made aware of their categorisation. LBA may choose to amend any company's category dependant on its safety performance during the cycle.

Companies are categorised by LBA based on numerous factors, some of these are listed below:

- Number of staff working in Safety Critical Areas.
- Number of assets operating in Safety Critical Areas.
- Complexity / Safety Critical nature of the service being provided.
- Third parties resilience to cope with seasonal operational pressures.
- Safety and Compliance performance based on the results of the respective PBM

#### 4.2.1 Complexity Triangle



### 4.3 Documentation Required for Audit

FORM	YES	NO
Audit Notification Form	X	
Compliance Audit Review Form	X	
Follow Up Action Form	IF REQ	




#### 4.4 Audit Areas Example

LBA will be auditing its Third Parties against the rules and regulations stipulated within the Aerodrome Manual and other relevant documents. Below is a list of potential areas LBA will be auditing on and provides business partners with a reference of where to find the respective guidance to ensure compliance with the respective rules.

SAMPLE AUDITABLE AREAS		
No	Area	Document Reference
1	Airside Security	AOP 01
2	Accident and Incident Reporting	AOP 03
3	Apron Management	AOP 13
4	Foreign Object Debris	AOP 14
5	Airside Driving and Vehicle Permits	AOP 15
6	Winter Operations	AOP 16
7	Environmental Procedures	AOP 18
8	Aviation Fuel Management	AOP 22
9	Drugs & Alcohol Policy	Aerodrome Manual - Section 63
10	Amendments of LBA Aerodrome Manual	Aerodrome Manual – Section 1
11	Amendments of LBA SMM	Aerodrome Manual Section 3
12	Safety Practices	Aerodrome Manual Section 3
13	Safety Practices	Aerodrome Manual Section 3
14	Training	Aerodrome Manual – Section 5
15	Vehicle Maintenance Records (General)	-
16	Safety Promotion	Aerodrome Manual Section 3
17		
18		

## 5 SECTION 5 – Associated Documents

### 5.1 APPENDIX 27 - Compliance Audit Review Form (CARF)

					
LBA - Compliance Audit Review Form (CARF)					
AUDIT SUMMARY					
Company/Department Name					
Company Risk Classification					
Company/Department Representative					
Auditor Name					
Audit Date					
Audit Time (From - To)					
Audit Location					
CARF Completion Date					
PREVIOUS AUDIT 'YELLOW OBSERVATIONS'					
			Requirements Met		
Observation		Comments		Yes	No
AUDIT FINDINGS					
	Item/Area Audited	Finding	Mitigation	Classification	
1					
	Item/Area Audited	Finding	Mitigation	Classification	
2					
	Item/Area Audited	Finding	Mitigation	Classification	

3				
	Item/Area Audited	Finding	Mitigation	Classification
4				
	Item/Area Audited	Finding	Mitigation	Classification
5				
	Item/Area Audited	Finding	Mitigation	Classification
6				
	Item/Area Audited	Finding	Mitigation	Classification
7				
	Item/Area Audited	Finding	Mitigation	Classification
8				
	Item/Area Audited	Finding	Mitigation	Classification

9				
	Item/Area Audited	Finding	Mitigation	Classification

*Copy and paste tables above if more space is required.*

NOTES
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FOLLOW UP AUDIT
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Are there any Red or Amber findings / is a follow up audit required? (Circle As Appropriate)	YES	NO
Date scheduled		


SIGNED
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*Signing below is to confirm that the audit has been conducted fairly and objectively and the findings and subsequent mitigations / time scales have been agreed by all parties.*


Audited Party				
	Company	Print Name	Date	Sign
1				
2				

Leeds Bradford Airport				
Auditor				
Countersigned				


## 5.2 APPENDIX 28 - Audit Notification Form (ANF)

	
LBA Audit Notification Form (ANF)	
SUMMARY	
<p>This form is to notify <b>XXXXXX</b> that LBA intends to conduct an audit on your department/business in line with its requirements stipulated by Commission Regulation (EU) No. 139/2014 and ADR.OR.005 (b) (11). Specific details regarding the Audit, including dates and times can be found below.</p> <p>This Audit aims to provide LBA with the assurance that the respective department/third party is complying with the LBA Aerodrome Manual and by extension, is meeting the requirements stipulated by the European Aviation Safety Agency &amp; the Civil Aviation Authority.</p> <p>Please ensure best efforts are made to accommodate this audit and there is a representative from your department/business to accommodate the Auditor for the duration of the visit.</p> <p>This Audit is conducted in accordance with the LBA Oversight Planning Cycle (LBAOPC) stipulated in the Aerodrome Manual – AOP 9. Please familiarise yourself with this document prior to Audit to ensure you are fully aware of what is required of you.</p>	
DETAILS	
Audit Date	
Audit Start Time	
Audit Finish Time	
Audit Location(s)	
Auditor's Name	
AREAS INTENDED FOR AUDIT	
Area	LBA/EASA/CAA Ref
<p><i>Please be advised the above list is not definitive and is only intended to provide an overview of what the Auditor is likely to cover. LBA may amend the audited areas at any time.</i></p>	

### 5.3 APPENDIX 29 – Operating Permits (OP)

				
OPERATING PERMIT (OP)				
SUMMARY				
<p>This permit is issued to</p> <p style="color: red; font-weight: bold;">XXXXXX</p> <p>by</p> <p>Leeds Bradford Airport Ltd</p> <p>To acknowledge that <span style="color: red;">XXXXXX</span> has satisfactorily demonstrated safe working practices and is complying with LBA regulations and guidance stipulated in the LBA Aerodrome Manual. All third parties remain ultimately responsible for the safe delivery of their contracted service in accordance with their own operating regulations. LBA reserves the right to review, audit and investigate any third party it has reasonable grounds to suspect is not conforming with LBA policies and procedures.</p>				
DETAILS				
Permit Issue Date				
Company Risk Classification				
Third Party				
	Company	Print Name	Date	Sign
1				
2				
Leeds Bradford Airport				
Signed				
Countersigned				

## APPENDIX 30 - Follow up Audit Form

			
LBA – Follow Up Audit Form (FUAF)			
AUDIT SUMMARY			
Company/Department Name			
Company Risk Classification			
Company/Department Representative			
Auditor Name			
Initial Audit Date			
Follow Up Audit Date			
Audit Time (From - To)			
Audit Location			
FUAF Completion Date			
PREVIOUS AUDIT 'RED/AMBER OBSERVATIONS'			
			Requirements Met
Observation	Comments	Yes	No
<i>Copy and paste tables above if more space is required.</i>			
SIGNED			
<i>Signing below is to confirm that the audit has been conducted fairly and objectively and the observations/comments have been agreed by all parties.</i>			
Audited Party			
	Company	Print Name	Date
1			Sign
2			
Leeds Bradford Airport			
Auditor			
Countersigned			





