



Australian Government

Civil Aviation Safety Authority

SURVEILLANCE REPORT

Airservices Australia

ARN: 202210

Part 172

Level 2 Site Inspection - SY TCU

Surveillance Dates: 14/06/2022 to 11/07/2022

Executive Summary

This Surveillance Report outlines the results of a level 2 Site Inspection surveillance event No. 24241 conducted on Part 172 Air Traffic Services holder - Airservices Australia - Certificate CASA.172.0005 Revision No. 2.

Part 172 of Civil Aviation Safety Regulations 1998 (CASR) specifies the regulatory framework for the approval of air traffic services providers. It includes standards for air traffic facilities, safety management and the provision of air traffic services. Surveillance was conducted on the provision of Approach Control Service by Sydney Terminal Control Unit (TCU).

The previous surveillance event carried out was a level 1 surveillance conducted between 24 and 28 July 2019 at the authorisation holder's Sydney TCU premises. During that event, one Safety Finding and three Safety Observations were issued. The authorisation holder did not provide third-party audit reports prior to this event.

This surveillance identified four Safety Findings and three Safety Observations. The Safety Findings related to Insufficient Supervision, Training Management, Change Management and Documentation Management. The discovery of further findings within this area, during the current surveillance event, indicates that the system used by the authorisation holder to manage this element of the operation is still not effective in eliminating findings of this nature. It is expected the authorisation holder acts decisively to reduce the likelihood of a recurrence; however repeat findings will warrant further investigation by CASA.

The surveillance team acknowledges the authorisation holder's personnel for their cooperation, assistance, openness and disposition during the surveillance event.


Surveillance Lead
08/08/2022

Statement of confidential nature of the contents

This Surveillance Report is a confidential document between CASA and the authorisation holder. CASA will not disclose this report or its content to any third person except, in pursuance of its functions, with the express permission of the authorisation holder or as required by law.

Surveillance objective

The objective of the surveillance is to assess the ability and willingness of an authorisation holder to comply with all applicable legislative obligations.

Surveillance team

Name	Discipline
[REDACTED]	Aviation Safety Inspector
[REDACTED]	Aviation Safety Inspector

Dates and places – Onsite surveillance

Date	Location
18/06/2022 - 11/07/2022	Remote
14/06/2022 - 17/06/2022	Sydney TCU

Surveillance scope

The surveillance scope is the extent and boundaries of the surveillance activity.

Scope item	Findings Issued
ATS Operations	Nil
* Data & Documents	1
** Security	Nil
* Support Systems	1
Towers, Terminal Control Units and Area Control Centres	Nil
Personnel Rostering	2
Personnel Standards	1
Safety Assurance	Nil
Safety Policy and Objectives	1
Safety Risk Management	2

* Item added to original scope

** Item originally scoped but not completed

Summary of surveillance findings

Surveillance finding(s) are the result of the evaluation of the collected surveillance evidence against the surveillance criteria.

No.	Type	Subject/Title	Due Date
824503	SO	Mature requirement did not ensure sufficient staff were available to complete required tasks	N/A
824504	SO	Override facility as required by ICAO Doc 4444 (PANS ATM) Chapter six ineffective	N/A
824505	SO	Risk assessment methodology	N/A
728350	SF	Insufficient Supervisory Staff	29/08/2022
728351	SF	Training not conducted in accordance with MOS	29/08/2022
728352	SF	Reference documentation not maintained	29/08/2022
728353	SF	Change Management Procedure not followed - Traffic Manager	29/08/2022

A total of 7 finding(s) have been issued as a result of this surveillance. Of these finding(s) 4 are Safety Finding(s) that require a response by the due date.

Technical summary

ATS Operations

SY TCU was responsible for the provision of Approach Control Services, Flight Information Services and Alerting Services for the Sydney Basin.

Endorsements within Sydney TCU consisted of:

Sydney Approach (SYA)

SYA provided an approach surveillance service from 45 NM YSSY to the aerodrome. SYA provided the sequence for SYF when Director position was operational. The position was also responsible for sequencing through the use of tactical separation standards and speed control. SYA also provided Class C services to Wilton Parachute Operations.

Sydney Approach West (SAW)

SAW was responsible for arriving and departing aircraft into or out of YSRI as well as processing Departures to the West and North West. SAW airspace was the lateral confines of R469, R470 and R494 from A025 to FL280.

Sydney Operations Solo (SOS)

This position was a night shift/curfew endorsement only and allowed for staff who did not hold all of the appropriate endorsements to provide Air Traffic Services (ATS) to all traffic operating within 45 NM during the curfew period.

Sydney Departures (SYD)

SYD, consisting of Sydney Departures South (SDS) and Sydney Departures North (SDN); was responsible for traffic departing Sydney to 45 NM Sydney from ground level to FL280 as well as air work and scenic flights within the Control Zone. SDS/SDN provided Class C services for Wollongong and Wyong Parachuting operations.

Sydney Departures West (SDW)

SDW was responsible for arriving and departing traffic into or out of YSBK. SDW also processed Sydney departing traffic to the West and North-West.

Sydney Precision Approach Runway Monitor (PRM)

PRM endorsement qualified suitable rated staff to monitor independent parallel approaches in IMC. This endorsement allowed the controller to issue breakout instructions to aircraft via an override function over the associated Sydney Tower ADC frequency. PRM endorsements were described in the ATS Licensing and Certificates Manual Appendix A. SY TCU staff are not required to be a Fully Endorsed Controller (FEC) within Sydney TCU. Training opportunities for the PRM endorsement was based on organisational requirements. PRM was not being used at the time of surveillance and evidence provided indicated that there was no facility to continue PRM usage following the proposed move to Melbourne.

Sydney Director (SYF)

Sydney Director consisted of Sydney Director West (SFW) and Sydney Director East (SFE). SYF was responsible for providing a surveillance approach service to Sydney. The function ensured an orderly flow of arriving traffic to parallel or single runways by providing vectors and sequencing to final approach.

Sydney Planner (SPL)

SPL was responsible for all coordination with external units and was the conduit between requests to enter Class C airspace and the appropriate controlling authority.

Sydney Flow (SFL)

SFL endorsement entitled the holder to tactically manage the Sydney Arrival Sequence. Typically, this was be done prior to 150 NM Sydney.

Sydney Radar Information (SRI)

SRI endorsement provided a Flight Information Service in Class G airspace. SRI and SPL generally operated as a combined position.

Sydney Traffic Manager (SYTM)

The Sydney Traffic Manager had overarching responsibility for service provision, airspace management and staff management within the Sydney TCU as specified in local instructions and in the National ATS Administration Manual. The Traffic Manager endorsement did not contribute to FEC status and was trained for on a business needs requirement. SYTM provided direct supervision at all times.

During daily periods of regular traffic, the Sydney TCU normally operated up to 13 control positions consisting of Sydney Approach (North and South), Sydney Director (East and West), Sydney Departures (North and South), Sydney Departures West, Sydney Approach West, Sydney Radar Information, Sydney Planner, Sydney Flow and Sydney Precision Runway Monitors (East and West).

During periods of light traffic, Sydney Approach normally combined with Sydney Director and/or Sydney Flow. Sydney Departures normally combined with Sydney Departures West, Sydney Approach West, Sydney Radar Information and Sydney Planner. During single person operations (curfew hours) all positions were normally combined onto a single console using the SOS endorsement. It was expressed on multiple occasions that the SYTM position was considered a risk mitigator for the SOS endorsement not having adequate knowledge of all the airspace.

Parallel runway operations

Sydney's closely spaced parallel runway operations were managed by SY TCU using a combination of dependant and independent separation standards. In addition to the standards for parallel operations outlined within ICAO DOC 4444, SY TCU utilised Independent Visual Approaches (IVAs) as outlined within the Part 172 MOS para 10.4.5. IVA's are a non-ICAO compliant procedure that permits SY TCU to conduct independent operations during VMC without staffing the PRM position.

Independent Operations increased aerodrome capacity by reducing the required separation standards provided either the final approach was monitored by a dedicated controller (PRM) or during visual conditions (IVA).

At the time of surveillance, independent operations (PRM) were not being conducted and CASA was advised that PRM endorsements had expired due to lack of recency. Console allocation following the proposed move to Melbourne also did not contain a provision for PRM. This did not represent a safety concern as dependant operations may be used in PRM absence. However, as traffic returns to normal, the absence of PRM can be expected to negatively impact capacity at SY. This would be further exacerbated if CASA discontinued the use of IVA in order to remove the difference from ICAO.

Sydney Long Term Operating Plan

The Airservices 2020-21 Annual Report Appendix A: Ministerial Expectations advised four ministerial directions remained current, including the 1996 Handling of aircraft noise at Sydney and other federal airports and the 1997 Progressive implementation of Sydney Long Term Operating Plan (LTOP).

The LTOP included the following statements that remained relevant to SY TCU operations and this report:

"The 1997 Ministerial Direction relating to the Sydney Long Term Operating Plan will continue to guide the operation of Sydney Airport."

"It is proposed that any additional risk imposed by runway changes be mitigated through the enhancement of on-shift management of procedures and staff resources, focusing authority and accountability of Air Traffic Services staff to a core position. Further mitigation of risk will be achieved through improved planning to runway changes where runway in use is not retained to a critical downwind criteria, necessitating short notice changes. Further strategies will be identified and documented during the implementation process."

LTOP page 16 and 255 included obligations on AA for "...close consultation with the Civil Aviation Safety Authority...necessary to ensure...any new proposals for revised operating arrangements...consistent with safety requirements."

Personnel Rostering

Operational staff

As evidenced by SY TCU Group Status Report (GSR) and published rosters, staff resources were barely adequate to ensure AA was able to meet their service provision obligations. ANS Workforce Deployment Planning Procedure (C-PROC0289) v6 outlined a system whereby a "mature" number was published that should ensure sufficient staff

existed to meet the following requirements:

- Operational shifts
- Breaks
- Recreation (and remote locality) leave
- Familiarisation
- Check and standardisation (admin time as well as recency, progress, simulator and final training checks)
- Refresher training
- Mandatory enterprise training
- AA Enterprise Agreement
- Group Training Specialist Staffing

The GSR demonstrated that although SY TCU was at or close to the mature number, however there existed insufficient staff to fill all operational shifts. Specifically, rosters were produced with significant vacancies. Consequently, the published mature number did meet the requirements of C-PROC0289 v6.

AA Retirement Incentive Scheme (RIS) outcomes had a significant impact and multiplier effect on SY TCU resources, where SYTM staff released to RIS had to be released prior to the end of June due to external factors. The RIS had an unbalanced effect on the senior control positions within SY TCU. As staff released for RIS were the more experienced controllers, SY TCU lost many FLOW and SYTM qualified staff. Additionally, this created a flow on effect to the more junior control positions as the OJTI that would normally be available to conduct training were required to upskill for both FLOW and SYTM positions.

Safety Observation 824503 refers.

Supervision

As a result of low number of experienced staff, SY TCU only had one full time and two part time controllers qualified to staff the SYTM role. The published supervisory model was for direct supervision to be provided at all times by the SYTM. Due the inadequate SYTM staff resource numbers, supervision was not provided as published on at least six occasions since the beginning of 2022.

Deficient SY TCU supervision was noted in seven CIRRIIS events over the course of the surveillance activity. CASA also noted that regular CIRRIIS reports of a similar nature have continued after the surveillance exit meeting exceeding eleven individual entries.

As required by Part 172 to the CASR, TMA Contingency Plan (ATS_CP_0085) v2 outlined the contingency plan for SY TCU. The contingency plan included direction to be followed should the SYTM or the SFL position be unavailable. No evidence was provided of a post incident review being conducted following these contingency activations.

Safety Finding 728350 refers.

AA was undergoing multiple projects to change the level of supervision at SY TCU. These included:

- Nationwide Supervision Structure Model which included removal of the Operations Manager (OM) Positions.
- Redefine the SYTM role as a Shift Manager (SM).
- An intent to remove overnight SYTM coverage, programmed from 12 July 2022.

Nationwide supervision restructure

[REDACTED]

SYTM redefined to SM

[REDACTED]

SYTM was a position created following the SY LTOP implementation as directed by the Minister in 1997 (see LTOP above). The differences between SYTM and the more generic SM role were the result of this direction.

AA had conducted a gap analysis on the difference between the roles, however controllers remained concerned that local knowledge gained from SY TCU experience would be lost in the change.

The LTOP further directed AA to consult with CASA regarding changes to this position. No evidence was available that this consultation had occurred or was planned.

Reduction of SY TM coverage

[REDACTED]

[REDACTED]

[REDACTED]

- 1 [REDACTED]
- 1 [REDACTED]

[REDACTED]

Safety Finding 728353 refers.

Personnel Standards

Training and Checking Program

Instructor guides

The Sydney Approach/Director (SYA/SYF) Instructor Guide (C-GUIDE0222) V9 and Sydney Departures West/Sydney Approach West (SDW/SAW) Instructor Guide (C-GUIDE0597) V5 information included several references to trainee workbooks. CASA was advised SY TCU trainee workbooks had been discontinued for at least 10 years as Ongoing Training did not want more controlled documents and the obsolete information had missed editorial review by SY TCU.

Sydney Precision Runway Monitor (SPS) Instructor Guide (C-GUIDE0591) V3 effective 8 January 2019 appeared to have exceeded the maximum 3-year review interval requirement published in ATS Documentation Procedures (ATS-PROC-0039) V39.

Safety Finding 728352 refers.

Personnel licensing and qualifications

CASA reviewed AA SharePoint portal for ATS training and licensing file samples of randomly selected SY TCU staff. Sampling of the provided files was affected by limited content and missing artefacts. These issues are addressed under TM TNA courseware below.

Surveillance staff experienced difficulty in obtaining the required training files and multiple requests needed to be made to regulatory engagement to obtain all necessary training and licensing files.



TM TNA and Course

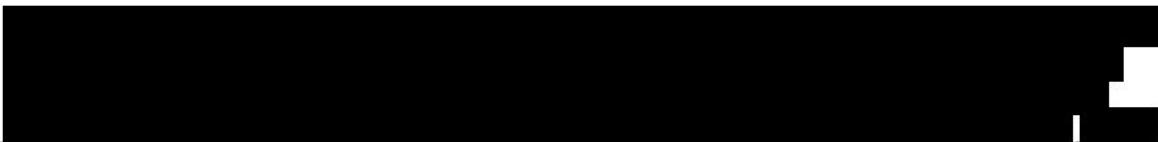
There was no published SYTM training course. CASA was advised a SYTM course structure was under development, however no final documentation had been published. Both the CASR and AA training system permit training to be conducted, on a limited basis, without a published course provided that a Training Needs Analysis (TNA) was completed, and the temporary course was defined within the TNA. Sampled SYTM staff files did not contain a TNA for SYTM training. As a result, training course information to support staff and provide required check standards for the SYTM position appeared to be limited to a generic SM course rather than include obligations associated with local unit operations.

Safety Finding 728351 refers.

Safety Management

Change Management

Move to Melbourne



Supervision

Documentation change process to split SYTM tasks between the core position objectives and the Sydney OM role was ineffective. OCA for the Sydney Basin was described as being the Sydney OM, and OCA for the SY TCU the SYTM, however these responsibility areas overlapped and there was no clear local arbiter position for OCA decisions. Staff interviewed had differing interpretations of what responsibilities lay with which supervisory position.

SYTM discrepancies

The SY TCU LTOP core position SYTM description was not consistent across all SYTM references in documentation. SY TCU documentation included varied 'SYTM', 'TM' and 'SYTM/SM' position descriptors.

NAAM, LTOP, unit level LoA and SY TCU LI on the OCA area of responsibility did not appear to be aligned and potentially conflicting responsibility areas within the SY TCU may affect unit operations and LTOP obligations.

Safety Finding 728352 refers.

Document change management

LoA_615

SY TCU operational documentation included 'Polair Orange' Priority and Covert Operations (LoA_615) V4 effective 30 June 2016. The current version was not compliant with AA documentation amendment procedures; however, CASA was advised the document was in the process of being updated.

Safety Finding 728352 refers.

LoA_371

ATS Agreement – Sydney TCU, Bankstown Tower and Camden Tower LoA_371 V27 effective 4 January 2022 included obsolete references to the Melbourne ORM as well as to Bankstown Airports Limited.

Safety Finding 728352 refers.

LoA_3131


System Management/Interaction between ML SS and Sydney TCU LoA_3131 V11 effective 7 October 2021 clause 5 had obsolete details on an MDPDS display in the TCU.

Safety Finding 728352 refers.

AIP DAP

AIP DAP no longer contained information that supported the following documents:

- Sydney TCU Local Instructions (ATS-PROC-0049) V103, paras 11.1.8.1, 11.1.8.3 16 and 11.1.8.4 34, contained coded reference details for deleted specific LTOP based operations where dependent approaches to a wet runway with tailwind required all jets to be assigned either Runway 16R or 34L.
- Sydney Noise Management Procedures (LoA_3181) V20 para 3.19 referred to AIP DAP NAP runway selection criteria that had been deleted.



Safety Finding 728352 refers.

Risk assessment and mitigation

AA had recently converted their standing risk profiles to a new system. This transition required existing risks statements to be transferred to a new format. The profiles continued to be known as Operational Risk Assessments (ORA). No evidence was provided on the transition methodology however the following was noted:

- The SY TCU ORA functional level threats and causes managed by Sydney TCU included “Land and Hold Short”, however this procedure had never been operationally active at Sydney Airport. There was also no crossing runway mode information, although other runway operations were included, in the SY TCU ORA.
- The ORA also included a ‘RWY7’ information display error and invalid reference to Mount Boyce radar, as Mount Boyce radar had been decommissioned four and half years earlier.
- Risks and specified treatment identified in the LTOP Ministerial direction were not addressed within the ORA. Specifically, use of a “core role” in supervising SY TCU
- Overnight SYTM was identified as a mitigator for the SOS role during CASA’s previous visit yet was not contained within the ORA.

Safety Observation 824505 refers.

Facilities – ATS equipment

Information displays



Override facility

In accordance with ICAO Doc 4444 (Procedures for Air Navigation Services – Air Traffic Management) 16th Edition - para 6.7.3.4.1, use of the dependant runway standard required an override facility to enable the monitoring controller to override Tower communications in the event of loss of separation. The ADC override (APP/DIR multi-press) facility was commissioned however the HMI employed required several steps to achieve system access.

Due to this configuration, SY TCU LI procedures advised staff to use alternative methods to relay urgent instructions. i.e. coordinate directly with ADC. Whilst the procedures included a note that the LI activation process applied until a single-button solution is established the system improvement to provide APP/DIR with access to a single ADC override button had yet to be implemented.

Safety Observation 824504 refers.

Documents used as standards and reference

Document Name
ATS_CP_0085 v2 TMA ATS Contingency Plan, 28 January 2021
ATS-MAN-0067 v18 Group Rostering Manual 8 May 2019
C-GUIDE0222 v9, 16 February 2021
C-GUIDE0591 v3, 8 January 2019
C-GUIDE0597 v5, 16 February 2021
C-MAN0108 ATS Training Operations Manual v21, 3 August 2021
C-PROC0289 v6 ATC Workforce Planning Procedure 18 October 2021
LoA_3131 v11, 7 October 2021
LoA_3181 Sydney Noise Management Procedures version 20 effective 27 May 2021
LoA_371 v27, 4 January 2022
LoA_615 v4, 30 June 2016
SY TCU Local Instructions (ATS-PROC-0049) version 103, effective 22 April 2022
The Long Term Operating Plan for Sydney (Kingsford Smith) Airport and Associated Airspace, processed dated by the Dept. Industry, Science & Tourism, 11 February 1997

Key people interviewed during the surveillance

Name	Position	Date
[REDACTED]	Line Leader	14/06/2022 - 11/07/2022
[REDACTED]	Line Leader	14/06/2022 - 11/07/2022



Safety Observation

Authorisation holder:	Airservices Australia	Issued Date:	08/08/2022
ARN:	202210	Safety Observation No:	824503
Contact address:	GPO Box 367 CANBERRA ACT	Postcode:	2601
Subject/Title:	Mature Requirement did not ensure sufficient staff were available to complete required tasks.		
System:	Personnel		
Element:	Personnel Rostering		

Safety Observation Details:

The calculated staffing requirements for SY TCU did not take into account endorsement mix and consequently fell short of AA's own requirement to provide sufficient staff to achieve:

- Operational shifts
- Breaks
- Recreation (and remote locality) leave
- Familiarisation
- Check and standardisation (admin time as well as recency, progress, simulator and final training checks)
- Refresher training
- Mandatory enterprise training
- AA Enterprise Agreement
- Group Training Specialist Staffing

Continued staff management in this manner could potentially place AA to a breach of reg 172.110 of the CASR should the low levels of staff lead to AA being unable provide the service listed on the Operator's Certificate at all times.

Issuing Inspector Name: [REDACTED]

A Safety Observation is a document used to advise an authorisation holder of:

- latent conditions resulting in system deficiencies that, while not constituting a breach, have the potential to result in a breach if not addressed, and/or
- potential areas for improvement in safety performance



Safety Observation

Authorisation holder:	Airservices Australia	Issued Date:	08/08/2022
ARN:	202210	Safety Observation No:	824504
Contact address:	GPO Box 367 CANBERRA ACT	Postcode:	2601
Subject/Title:	Override facility as required by ICAO Doc 4444 (PANS ATM) Chapter six ineffective.		
System:	Air Traffic Service		
Element:	Support Systems		

Safety Observation Details:

The ADC frequency override facility provided as compliance with PANS ATM para 6.7.3.4.1, whilst present, was not effective in providing an immediate response to a loss of separation.

In order to utilise the Dependant Parallel operations separation minima as defined in PANS ATM, the controller monitoring the approach was required to be provided with an override facility. The override facility provided at SY TCU was complicated and required significant time to use. Controllers had been advised that it was faster to complete regular coordination as though the override facility was not provided.

Additionally, the published procedure noted that a single button press was to be implemented at a later date.

An Airservices review of the override facility would be an opportunity for improvement to implement a system that provides more immediate intervention.

Issuing Inspector Name: [REDACTED]

A Safety Observation is a document used to advise an authorisation holder of:

- latent conditions resulting in system deficiencies that, while not constituting a breach, have the potential to result in a breach if not addressed, and/or
- potential areas for improvement in safety performance



Safety Observation

Authorisation holder:	Airservices Australia	Issued Date:	08/08/2022
ARN:	202210	Safety Observation No:	824505
Contact address:	GPO Box 367 CANBERRA ACT	Postcode:	2601
Subject/Title:	Risk assessment methodology		
System:	Safety Management		
Element:	Safety Risk Management		

Safety Observation Details:

The SY TCU Operational Risk Assessment was incomplete and contained reference to hazards that had not been present for a significant time.

An opportunity for improvement exists whereby an in-depth review of existing risks to service provision at SY TCU to ensure continued safe provision of ATS be conducted.

Issuing Inspector Name: [REDACTED]

A Safety Observation is a document used to advise an authorisation holder of:

- latent conditions resulting in system deficiencies that, while not constituting a breach, have the potential to result in a breach if not addressed, and/or
- potential areas for improvement in safety performance



Authorisation Holder:	Airservices Australia	
ARN: 202210	EDRMS Ref: F18/2829-5	Safety Finding Ref No: 728350
Contact address:	GPO Box 367 CANBERRA ACT	Postcode: 2601
Regulatory reference:	Reg 172.115 of the Civil Aviation Safety Regulations (1998)	
Subject/Title:	Insufficient Supervisory Staff	
System-Element:	Personnel - Personnel Rostering	

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner. Therefore CASA extends to the authorisation holder the opportunity to consider, comment on or object to this Safety Finding.

It should also be noted that issue of a Safety Finding does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency:

Airservices Australia failed to provide enough suitably qualified and trained personnel who were able to supervise the provision of air traffic services at SY TCU as required by Reg 172.115 to the CASR.

SY TCU had insufficient staff to facilitate the direct supervisor requirement as published. This lack of qualified personnel led to Air Traffic Services being provided without the published level of supervision on at least six separate occasions.

Recent Safety Findings relating to 172.115 included:

- SF 727295 - 27/10/21- Under Enforcement action
- SF 725796 - 28/6/21 - Acquitted on 27/1/2022

Criteria:

Reg 172.115 of CASR (1998) – Supervisory Personnel

An ATS provider must have, at all times, enough suitably qualified and trained personnel who are able to supervise the provision of any air traffic service that it provides.

Issuing inspector: [REDACTED]

Date issued: 08/08/2022

Due date: 29/08/2022



Authorisation Holder:	Airservices Australia	
ARN: 202210	EDRMS Ref: F18/2829-5	Safety Finding Ref No: 728351
Contact address:	GPO Box 367 CANBERRA ACT	Postcode: 2601
Regulatory reference:	Reg 172.140 of the Civil Aviation Safety Regulations (1998)	
Subject/Title:	Training not conducted in accordance with MOS	
System-Element:	Personnel - Personnel Standards	

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner. Therefore CASA extends to the authorisation holder the opportunity to consider, comment on or object to this Safety Finding.

It should also be noted that issue of a Safety Finding does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency:

Airservices Australia failed to provide, at all times, a training and checking program in accordance with the Manual of Standard at SY TCU as required by Reg 172.140 to the CASR.

Two trainees conducted SYTM endorsement training without a published course or training needs analysis (TNA) to define an ad-hoc course. Additionally, those same trainees were not provided a Training agreement for SYTM training.

Recent Safety Findings relating to 172.140 included:

- SF 725825 - 16/7/21
- SF 725311 - 24/3/21
- SF 722817 - 8/10/19
- SF 722655 - 13/9/19

Criteria:

Reg 172.140 of CASR (1998) – Training and Checking Program

An ATS provider must, at all times, provide a training and checking program, in accordance with the Manual of Standards, to ensure that each member of its personnel who performs functions in connection with any air traffic service that it provides is competent to perform those functions.

Part 172 Manual of Standards

5.1.4.2 Training courses must be provided on the basis of a MOS Part 65 requirement, or training needs analysis or similar method.



- 5.1.4.3 The training programs for each course must be comprehensive and facilitate achievement of training goals through a syllabus which reflects required competencies. The syllabus must ensure compliance with relevant national and international requirements and CASA competency-based training standards.

C-MAN0108 ATS Training Operations Manual v21, 3 Aug 2021

9.1.1 Individual Training Needs Analysis

A TNA for an individual is required when training for an endorsement for which familiarisation is not deemed appropriate (i.e. the lapsed period of an endorsement is greater than six (6) months); and either:

- a. there is no approved published course
- b. an approved course exists, and:
 - i. it is not to be delivered in its entirety (i.e. the course is being shortened to reflect RPL/RCC for some components of the training program); or
 - ii. the course will include additional training elements including significant changes (i.e. technological, procedures).

9.3 A Training Agreement is a mechanism by which a trainee and Airservices can be assured of a common understanding of:

- the training and assessment schedule as per the unit Training Manual or TNA (where applicable)
- personnel involved in training and assessment
- roles and expectations of each participant in the agreement
- performance management options in response to unsuccessful training outcomes.

A Training Agreement is required for all endorsement training.

Issuing inspector: [REDACTED]

Date issued: 08/08/2022

Due date: 29/08/2022



Authorisation Holder:	Airservices Australia	
ARN: 202210	EDRMS Ref: F18/2829-5	Safety Finding Ref No: 728352
Contact address:	GPO Box 367 CANBERRA ACT	Postcode: 2601
Regulatory reference:	Reg 172.160 of the Civil Aviation Safety Regulations (1998)	
Subject/Title:	Reference documentation not maintained	
System-Element:	Air Traffic Service - Data & Documents	

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner. Therefore CASA extends to the authorisation holder the opportunity to consider, comment on or object to this Safety Finding.

It should also be noted that issue of a Safety Finding does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency:

Airservices failed to keep reference materials up to date and in a readily accessible form, as required by Regulation 172.160(2) of the CASR (1998).


The following documents were found to contain out of date information, conflicting information, or exceeded the review period specified in ATS Documentation Procedures (ATS-PROC-0039) version 39.

- C-GUIDE0597 v5
- C-GUIDE0222 v9
- C-GUIDE0591 v3
- LoA_615 v4
- LoA_371 v27
- LoA_3131 v11
- ATS-PROC-0049 v103
- LoA_3181 v20

Recent Safety Findings relating to 172.160 included:

- SF 728104 – 3/6/2022
- SF 725821 – 16/7/2021
- SF 725801 – 28/6/2021
- SF 725439 – 20/4/2021
- SF 725382 – 6/4/2021
- SF 723797 – 7/9/2020
- SF 723794 – 27/7/2020
- SF 723793 – 27/7/2020



Criteria:	
Reg 172.160 of CASR (1998) - Reference materials	
(2) The provider must keep the reference materials up to date and in a readily accessible form.	
Issuing inspector:	
Date issued:	08/08/2022
Due date:	29/08/2022



Authorisation Holder:	Airservices Australia	
ARN: 202210	EDRMS Ref: F18/2829-5	Safety Finding Ref No: 728353
Contact address:	GPO Box 367 CANBERRA ACT	Postcode: 2601
Regulatory reference:	Reg 172.145 of the Civil Aviation Safety Regulations (1998)	
Subject/Title:	Change Management Procedure not followed - Traffic Manager	
System-Elements:	Safety Management - Safety Policy and Objectives and Safety Management - Safety Risk Management	

Note: In applying the principles of procedural fairness, CASA approaches its regulatory functions in a consultative and collaborative manner. Therefore CASA extends to the authorisation holder the opportunity to consider, comment on or object to this Safety Finding.

It should also be noted that issue of a Safety Finding does not in any way prejudice CASA's prerogative to take at any time such regulatory or other legal action as may be appropriate in the circumstances.

Details of deficiency:

Airservices Australia failed to put into effect the safety management system policies, procedures, and practices necessary at SY TCU as required by Reg 172.145 to the CASR.

Changes were planned to the SYTM position without CASA consultation.

AA's Risk assessment policy and procedure as published in Airservices Risk Management Standard (AA-NOS-RISK-0001) V12 required the risk assessment to include engagement and consultation with appropriate stakeholders.

The Ministerial direction that lead to the creation of the SYTM endorsement stipulated a requirement that changes to the SYTM role required consultation with CASA. Although CASA does not regulate the ministerial direction, this inclusion confirms that CASA was a stakeholder for proposed changes and should have been consulted under AA's approved SMS.

Criteria:

Part 172.145 of CASR (1998) – Safety Management System

- (1) An ATS provider must have, and put into effect, a safety management system that includes the policies, procedures, and practices necessary to provide the air traffic services covered by its approval safely.
- (2) The safety management system must be in accordance with the standards set out in the Manual of Standards.
- (3) The provider must keep under review its safety management system and take such corrective action as is necessary to ensure that it operates properly.



AA-NOS-RISK-0001

6.1 Mandatory risk management requirements.

The following mandatory requirements detailed below must be applied by all Framework Owners when designing risk management processes, as well as Airservices employees when applying a risk management process:

...

6.1.3 Communication and consultation with appropriate internal and external stakeholders must take place throughout all steps of the risk management process.

Issuing inspector: [REDACTED]

Date issued: 08/08/2022

Due date: 29/08/2022