

# GCAA ADVISORY CIRCULAR

73 High Street Kingston Georgetown **TEL. NOs**: (592) 225 6822; 225 0778; 227 8111 **FAX:** (592) 225 6800

GUYANA E-mail: director-general@gcaa-gy.org

AIRWORTHINESS AC NO: GCAA AC/AIR-023

**SUBJECT:** 

## VOLUNTARY REPORTING SYSTEM (VRS)

DATE INITIATED: INITIATED BY: 01-11-2016 Director Aviation Safety Regulation

#### 1. PURPOSE

- a. This Advisory Circular (AC) provides information and guidance for the Guyana Civil Aviation Authority (GCAA) Voluntary Reporting System (VRS).
- b. The GCAA has established a Mandatory Occurrence Report (MOR) system pursuant to Regulation 82 of the Guyana Civil Aviation (Air Navigation) Regulations (GCARs). In addition to the MOR system, the GCAA hereby establishes a "Voluntary Reporting System" (VRS), which is separate and independent from the MOR system, to facilitate the collection of information on actual or potential safety deficiencies that may not be captured from all aviation stakeholders through the MOR system.
- c. The VRS is a separate reporting system and it shall be managed totally independent from all other reporting systems, including the MOR system. The VRS will ensure that relevant data on safety is reported, collected, stored, protected and disseminated. It is not the purpose of this activity to attribute blame or liability. The VRS is also designed to accept anonymous reports.

#### 1. AUDIENCE

This AC affects owners and operators of aircraft operated in Guyana, all personnel working in the aviation industry and the general public.

#### 2. CANCELLATION

Not applicable.

#### 3. EFFECTIVE DATE

This AC is effective 15<sup>th</sup> November, 2016.

#### 4. CHANGES

Not applicable.

#### 5. RELEVANT REFERENCES

- a. Guyana Civil Aviation (Air Navigation) Regulations [GCARs] 82.
- b. Annex 19 to the Convention on International Civil Aviation; and
- c. ICAO DOC 9859.

#### 6. Contact Information

#### **Director General of Civil Aviation**

73 High Street, Kingston, Georgetown, Guyana Phone: (592) 225 6822, FAX: (592) 225 6800 E-mail: director-general@gcaa-gy.org **Director Aviation Safety Regulation** 

Phone: (592) 225 0778 E-mail: dasr@gcaa-gy.org

#### 7. FORM TO BE USED

Persons wishing to make a voluntary report are encouraged to make their report on VRS Form #: GCAA/VRS/001. However, the report may also be written on paper and submitted to the GCAA. (Refer to Appendix A to this AC for VRS Form #: GCAA/VRS/001.)

#### 8. BACKGROUND INFORMATION

- a. Air transport is considered as one of the safest forms of travel. However, projected increase of air traffic in the near future, and Guyana's forested and mountainous terrain in its hinterland, has and may continue to cause challenges to aircraft operational safety. The Director General of Civil Aviation (DGCA) is therefore faced with a significant challenge if he wants to continue to protect the travelling public.
- b. Experience has often shown that before an accident occurs, a number of incidents and numerous other deficiencies that preceded the accident have revealed the existence of safety hazards.
- c. The improvement of the safety of civil aviation requires a better knowledge of these occurrences to facilitate analysis and trend monitoring in order to initiate corrective action.
- d. When an occurrence involves aircraft registered or operated in Guyana, this occurrence should be reported even when it happened outside the territory of Guyana.
- e. Various categories of personnel working in civil aviation and even the general public observe occurrences, the reporting of which may positively contribute towards the prevention of accidents, and should therefore report them.
- f. The efficiency of detection of potential hazard would be greatly enhanced by the exchange of information on such occurrences.

#### 9. THINGS FUNDAMENTAL TO THE EFFECTIVENESS OF THE VRS

#### 9.1 Trust

The reporters must be certain that the information will not be used against them; otherwise they will be reluctant to report their mistakes. A positive safety culture in an organisation provides the foundations of a successful occurrence reporting system.

#### 9.2 Non-punitive

The reporting person must be protected against legal, administrative or disciplinary sanctions, except in case of gross negligence, criminal activity or intent.

#### 9.3 Inclusive Reporting Base

The systematic approach to safety management requires that voluntary reporting be targeted at all aspects of aircraft operation, such as flight operation, cabin safety, aircraft maintenance, air navigation services, aerodrome operation, etc. Also, collecting information on the same occurrence from different perspectives provides for a complete analysis and understanding of events, and consequently of the hazards and their effects.

#### 9.4 Confidentiality

Non-punitive systems are based on confidential reporting. The person reporting an event must be sure that his identity and other information will not be disclosed, however, it may be used to identify any other physical or legal personalities involved.

#### 9.5 Ease of Reporting

Submitting a report should be as easy as possible for the reporter. The reporting forms should be readily available to anyone wishing to file a report. They should be easy to compile, provide adequate space for narrative and make maximum use of the "tick off" format. The forms should encourage safety improvement suggestions, such as how to prevent reoccurrence of a hazard or deal with it.

#### 9.6 Acknowledgement

To encourage further submission of reports the service provider should clearly communicate to its personnel that the voluntary reports are a valuable safety asset and acknowledge the efforts made by reporting persons. Whenever possible, feedback on the actions taken in response to a report shall be provided to the reporting person.

#### 9.7 Promotion

The de-identified information received from the voluntary reporting system should be made available to the aviation community in a timely manner. A variety of information dissemination methods should be used to achieve maximum exposure, for example monthly newsletters, periodic summaries, safety bulletins published on internet etc. Such promotional activity may help motivate people to further improve the reporting of safety occurrences. Therefore, the DGCA established the VRS to facilitate collection of data information on actual or potential safety deficiencies that may not be captured by the MOR System

#### 10. **DEFINITIONS**

- **10.1 Accident**: An occurrence associated with the operation of an aircraft which, in the case of a manned aircraft, takes place between the time any person boards the aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the aircraft is ready to move with the purpose of flight until such time as it comes to rest at the end of the flight and the primary propulsion system is shut down, in which:
  - a. A person is fatally or seriously injured as a result of:
    - 1) being in the aircraft, or
    - 2) direct contact with any part of the aircraft, including parts which have become detached from the aircraft, or
    - 3) direct exposure to jet blast, except when the injuries are from natural causes, self-inflicted or inflicted by other persons, or when the injuries are to stowaways hiding outside the areas normally available to the passengers and crew; or

- b. The aircraft sustains damage or structural failure which:
  - 1) Adversely affects the structural strength, performance or flight characteristics of the aircraft, and
  - 2) would normally require major repair or replacement of the affected component, except for engine failure or damage, when the damage is limited to a single engine, (including its cowlings or accessories), to propellers, wing tips, antennas, probes, vanes, tires, brakes, wheels, fairings, panels, landing gear doors, windscreens, the aircraft skin (such as small dents or puncture holes), or for minor damages to main rotor blades, tail rotor blades, landing gear, and those resulting from hail or bird strike (including holes in the radome); or
- c. The aircraft is missing or is completely inaccessible.
- **10.2 Incident**: An occurrence, other than an accident, associated with the operation of an aircraft which affects or could affect the safety of operation.
- **10.3 Hazard**: A hazard is generically defined by safety practitioners as a condition or an object with the potential to cause death, injuries to personnel, damage to equipment, structures or environment, loss of material, or reduction of the ability to perform a prescribed function.

#### 11. MANAGEMENT OF THE VOLUNTARY REPORTING SYSTEM

#### 11.1 Introduction

- a. Aviation safety today is about looking ahead, so safety concerns may be addressed adequately, proactively and to every possible extent predictively. The DGCA routinely monitors aviation industry service providers' activities to identify precursors and trends in order to prevent future accidents.
- b. The objective of VRS is to capture hazards which may not have been reported through other channels like the MOR. All aviation stakeholders are encouraged to utilise the VRS in order to voluntarily report safety information that may be critical to identify potential hazards.
- c. All aviation organisations approved by DGCA are required to ensure that their employees are made aware of the VRS. It is the intent of the VRS to resolve safety concerns through corrective actions rather than through punishment or enforcement. Therefore, the VRS will contribute to the improvement of safety by ensuring that relevant information on safety is reported, collected, stored, protected and disseminated.

#### 11.2 VRS Administrator

The Director Aviation Safety Regulation (DASR) shall be Administrator of the VRS and he is responsible for its management. The DASR is the only person authorised to receive VRS reports. He will de-identify all reports before assigning them to concerned personnel for their response. He will treat all data regarding the identity of the reporter as "highly confidential". Upon completion of necessary inquiry/investigation, the DASR will update the risk register with the outcomes of the investigation/inquiry and provide feedback to the reporter (where reporter has submitted contact details).

#### 12. REPORTING PROCEDURE

- a. Immediate reports may be made via the GCAA Occurrence and Safety Incident Reporting Telephone Hotline (592) 608 4222 since this is a 24-hour dedicated service. However, reporters are encouraged to make reports in writing.
- b. Reports submitted via email will be de-identified at the level of the DASR. It is assured that no punitive action will be taken against the reporter of a voluntary report unless the reported infringement relates to unlawful/criminal/deliberate/gross negligent unsafe actions committed by the reporter.
- c. Individuals may also submit a voluntary report directly to DGCA or the registry should they wish to do so, but in the interest of aviation safety they are strongly advised also to notify their employers, preferably by a copy of the report, unless confidentiality is considered essential. Any voluntary report submitted to the DGCA or registry must be immediately passed on the DASR.
- d. The DASR will make every possible effort that relevant de-identified safety information derived from the analysis of reports, are made available to all parties so that it can be used for improving safety.
- e. It is understood that the reporter is a person making a disclosure in the public interest, concerning safety. The reporter entrusts the information, assisting the Authority in taking necessary action in order to enhance safety. The identity of the reporter should not be compromised, as this is considered a serious violation of the Authority's work ethics.
- f. The DASR as the Administrator of the VRS is entrusted with the responsibility of protecting the public interest and the safety of the travelling public. Since the reporter provides information to the Authority with the understanding that the Authority would protect the reporter, it is a breach of trust to divulge the reporter's identity.
- g. Accordingly, the Authority will make every possible effort not to disclose the name of the person submitting the report unless required to do so by law or unless, the person concerned authorises disclosure.
- h. The DASR will de-identify all reports before sending the request for information to any entity. Additionally, he will not use the text nor the wording provided in the report when communicating with other entities, in order to avoid the possibility of an organisation identifying the reporter's way of writing. In any case, the DASR will try to amend the text in a way that it will be impossible for anyone to identify the reporter.
- i. Information related to this is sorted according to the policy below, following their deidentification:
  - 1) Information concerning criminal offenses, which will be referred promptly to Security Authorities and the DGCA.
  - 2) Information concerning accidents, which will be referred promptly to the DGCA and the person in charge of the Guyana Aircraft Accident and Incident Investigation Unit (GAAIIU); and
  - 3) Time-critical information which, after de-identification, will be promptly referred to the DGCA and other interested parties.
  - 4) All reports will be stored in the VRS database and will be acted upon.

Note: The reporter may choose to remain anonymous. Should the report be sent by email, the DGCA and DASR will never attempt to identify or trace the IP address of the reporter.

#### 13. EXAMPLES OF REPORTS

- 13.1 In case of a flight crew member, the description should ideally address, additional information on the airspace, weather conditions, visibility, location (altitude, distance from or to, etc.), if more than two aircraft were involved, if shift work and/or working conditions were an issue.
- 13.2 In case of maintenance reporter, the description should ideally address if it was associated with:
  - 1) a log book entry;
  - 2) training, if it is a factor;
  - 3) work cards, manuals, lighting, briefing, if it is an issue;
  - 4) the occurrence observed (was the occurrence observed during inspection, testing, repair, scheduled maintenance);
  - 5) maintenance (was the snag deferred when the problem was detected);
  - 6) the outcome of the occurrence (was there any similar event in the past?).
- 13.3 In the case of an Air Navigation Services staff reporter, information should ideally include, but is not limited to:
  - 1) procedures (incomplete, inaccurate, inadequate, prone to misinterpretation, etc.);
  - 2) Documentation (deficiencies, incorrect or misleading wording, out of date version, etc.);
  - 3) training (deficiencies, out of date content or curriculum, etc.);
  - 4) equipment (operation, ergonomics, maintenance, reliability, defects, etc.);
  - 5) working environment (ambient noise, temperature, lighting, furniture, etc.);
  - 6) communications (breakdowns, confusion, call-sign confusion, poor English Language Proficiency, etc.);
  - 7) duty time (hours on duty) issues;
  - 8) weather if relevant.
- 13.4 In case of a cabin crew reporter information should ideally include, but is not limited to:
  - flight information such as number of passengers, route, destination, time since take off, departure time, etc.;
  - 2) aircraft information such as aircraft model, number of seats, number of exits;
  - 3) cabin activity such boarding service, tray service, cart service, safety related duties, etc.;
  - 4) weather information;
  - 5) lighting information;
  - 6) what was the reporter's location in the aircraft during the event;
  - 7) what was the reporter's activity at the time of the event;
  - 8) if the event resulted in a passenger injury;
  - 9) if a passenger was involved;
  - 10) if the crewmember was injured.
- 13.5 In case of a ground handling reporter, information ideally should include the position of the reporter during the event, experience, time of the day/or night, etc.

13.6 In case of a passenger reporter ideally as much information as possible. It will be beneficial for the person accessing the voluntary reports to have some background information of the reporter (total years of experience, number of aircraft flown in the past and present, etc.).

#### 14. FEEDBACK TO THE INDUSTRY

A Safety Bulletin will circulate lessons learnt from such reports to members of aviation community. Specific problems or trends shall be brought to the attention of the appropriate authorities and preventive measures followed up. In case the reporter chooses to provide contact details, the DASR as the VRS Administrator might elect to communicate in case there is a need for additional clarification.

#### 15. REPORTING TIME AND LANGUAGE

- a. There is no time limitation to submit a report. However, in the interest of safety, time critical information may be reported at the earliest opportunity.
- b. Reports shall be submitted in English. Reporters are encouraged to use the **VRS FORM** "GCAA/VRS/001". See Appendix A to this AC for a copy of the VRS form.

Approved by:

Lt. Col (Ret'd.) Egbert Field

Director General of Civil Aviation Guyana Civil Aviation Authority

### APPENDIX: A VOLUNTARY REPORT SYSTEM FORM

FORM NO.: **GUYANA CIVIL AVIATION AUTHORITY** GCAA/VRS/001 **VOLUNTARY REPORT SYSTEM FORM** This **FORM** is not for reporting of accident, serious incidents or criminal activities. This **FORM** shall be used to report hazards or safety deficiencies. 2. Mark clearly at the top "Confidential" and provide contact address, telephone number and email address (if one is available.) 3. The completed form shall be sent to the Director General of Civil Aviation, Guyana Civil Aviation Authority, 73 High Street, Kingston, Georgetown, Guyana. **DATE OF OCCURRENCE LOCATION OF OCCURRENCE** AREA RELEVANT TO HAZARD OR OCCURRENCE (TICK [✓] AS APPROPRIATE) □ Flight Operations □ Engineering □ Cargo Services □ Security and Investigations □ Airport Services □ Inflight Services ☐ Human Resources □ Other (specify): IF HAZARD OR OCCURRENCE INVOLVES AIRCRAFT, STATE **AIRCRAFT TYPE AIRCRAFT AIRCRAFT OPERATOR FLIGHT NUMBER REGISTRATION PHASE OF FLIGHT** □ Standing □ Taxiing □ Take-off □ En-route □ Manoeuvring □ Approach □ Altitude □ Visibility □ Wind □ Cloud PLEASE FULLY DESCRIBE THE HAZARD OR OCCURRENCE (INCLUDE SUGGESTIONS TO PREVENT SIMILAR OCCURRENCES AND CONTINUE ON A BLANK PAPER IS NECESSARY)

#### **REPORTER'S INFORMATION**

(The information below is voluntary in nature and will be held in confidence if submitted. The reporter reserves the right to furnish or not to furnish the information required below)

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NAME	ADDRESS	OCCUPATION/DESIGNATION
TELEPHONE NUMBER	E-MAIL ADDRESS	SIGNATURE