

	TANZANIA CIVIL AVIATION AUTHORITY DIRECTORATE OF SAFETY REGULATIONS PERSONNEL LICENSING	Revision: 1 Advisory Circular
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GUIDANCE TO LICENCE HOLDERS AND APPROVED TRAINING ORGANISATIONS ON SURVEILLANCE AND CORRECTIVE ACTION

1.0 PURPOSE

This Advisory Circular is issued to provide guidance and information to holders of personnel licences, ratings, certificates and authorisations, and to Approved Training Organisations (ATOs), on the surveillance carried out by the Authority after the issue of a licence or approval. It explains how surveillance is planned and conducted, what the Authority expects from licence holders and ATOs before, during and after surveillance, how findings are classified, and how Corrective Action Plans (CAPs) are prepared, submitted through the Civil Aviation Service Portal (CASP) and closed.

2.0 REFERENCES

- 2.1 The Civil Aviation Act, Cap. 80;
- 2.2 Regulations 8, 11, 101, 107, 112, 190, 193, 195 and 197 to 206 of the Civil Aviation (Personnel Licensing) Regulations, 2017 as amended;
- 2.3 Regulations 9, 12, 13, 16, 17, 30 and 42 to 46 of the Civil Aviation (Approved Training Organization) Regulations, as amended; and
- 2.4 Corrective Action Request (CAR) Form TCAA/FRM/SR/GEN-12A and Corrective Action Plan (CAP) Form TCAA/FRM/SR/GEN-13A.

3.0 ABBREVIATIONS AND DEFINITIONS

Term	Meaning
ATO	Approved Training Organisation
Auditee	The licence holder or ATO subject to surveillance
CAP	Corrective Action Plan – the auditee's plan, with root cause analysis and risk assessment, to correct a finding and prevent recurrence, submitted on Form TCAA/FRM/SR/GEN-13A
CAR	Corrective Action Request – Form TCAA/FRM/SR/GEN-12A, on which the Authority records and issues a finding and its level
CASP	Civil Aviation Service Portal – the Authority's online platform in which surveillance reports, CAPs, evidence and closure are recorded
Chief PEL	Chief Personnel Licensing
DSR	Director of Safety Regulation
Finding	A non-compliance with a regulatory requirement, approval condition or approved procedure, supported by objective evidence
Focal point	The person nominated by the ATO to coordinate surveillance with the Authority
Observation	A matter that is not a non-compliance but where improvement is recommended

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Term	Meaning
Root cause	The underlying reason why a non-compliance occurred, which, if removed, prevents it from happening again
Surveillance	All audits, inspections and checks carried out by the Authority after the issue of a licence or approval to verify continued compliance

4.0 APPLICABILITY

- 4.1 This Advisory Circular applies to holders of licences, ratings, certificates and authorisations issued by the Authority, including pilots, aircraft maintenance engineers, air traffic controllers, cabin crew members and flight operations officers, and to instructors, ATC On-the-Job Training Instructors (OJTIs), examiners and Aviation English assessors who train, assess or examine on behalf of the Authority.
- 4.2 It applies to all domestic ATOs and to foreign ATOs approved, validated or accepted by the Authority, and to any training conducted under that approval, validation or acceptance, whether delivered in or outside the United Republic of Tanzania.

5.0 GENERAL INFORMATION

- 5.1 **Why the Authority conducts surveillance.** The Authority's responsibility does not end with the issue or renewal of a licence or approval. Surveillance confirms that licences, ratings and approvals remain valid, that holders remain competent, that training is delivered in accordance with the approved programmes, and that the Regulations and conditions of approval continue to be met.
- 5.2 **Annual risk-based surveillance plan.** Each year the Chief PEL prepares a risk-based Annual Surveillance Plan, which is approved by the Director of Safety Regulation before the start of the year. The frequency and depth of surveillance of each licence holder or ATO depend on its risk rating, which takes into account its compliance history, training volume and complexity, examination results, staff turnover, occurrence reports and complaints, and the effectiveness of previous CAPs. Every ATO is inspected at least once a year (ATO regulation 9(1)).
- 5.3 Surveillance may be:
- planned – included in the approved plan and normally notified within fourteen (14) days in advance;
 - unannounced – conducted without prior notice;
 - follow-up – conducted to verify that corrective actions have been implemented; or
 - ad hoc – approved by the Director of Safety Regulation in response to reports of non-compliance, examination or skill-test irregularities, accidents or incidents linked to training, complaints, changes notified under ATO regulation 16, or overdue or ineffective CAPs.
- 5.4 **Access and inspection.** Inspectors of the Authority carry official credentials and present them on arrival. A licence holder shall present the licence for inspection on request (PEL regulation 193), and the Authority has unrestricted access at any time to an ATO's facilities,

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records, personnel and equipment on presentation of valid inspector credentials (ATO regulation 9(2)).

5.5 **Electronic licences.** Electronic licences are verified by scanning the QR code. A screenshot, static image or printout that cannot be verified is not accepted as evidence of a valid licence.

5.6 **Duty to comply.** A person who fails to comply with a direction of the Authority is deemed to have contravened the Regulations (PEL regulation 200; ATO regulation 46). Obstructing an inspector, or giving false information or altered records during surveillance, may lead to enforcement action (paragraph 10.0).

6.0 GUIDANCE TO LICENCE HOLDERS

6.1 A licence holder shall at all times:

- a) keep the licence, ratings, medical certificate, English language proficiency (ELP) and recent experience valid, and not exercise privileges that are not valid (PEL regulation 11(1));
- b) have the electronic licence available on a mobile device, or at the work site in a form that can be verified, when exercising its privileges (PEL regulation 190);
- c) keep the personal logbook and records required for the licence complete and accurate, including, for air traffic controllers, the ATC logbook signed in UTC before exercising privileges (PEL regulations 107(2) and 112);
- d) not alter, mutilate or destroy any licence, logbook or record (PEL regulation 198); and
- e) notify the Authority through CASP of any change of address (PEL regulation 195) and of any rating that has ceased to be valid (PEL regulation 101(4)).

6.2 During surveillance, an inspector may:

- a) verify the licence by QR code and check ratings, recency, type currency, medical certificate and ELP validity against CASP;
- b) observe the holder exercising privileges, or carry out or observe a competency or proficiency check;
- c) review logbooks and training, OJT and recency records; and
- d) at an ATC unit, confirm that each controller on duty holds a rating validated for that unit, including controllers transferred from another unit.

6.3 Instructors, OJTIs and examiners shall act only within their written authorisation from the Authority, keep their authorisation current, and keep complete records of the training, tests and checks they conduct, which may be examined during surveillance.

6.4 The licence holder shall cooperate with the inspector, answer questions truthfully, and make the licence and records available without delay. Where a finding is raised, the holder shall respond in accordance with paragraph 9.0.

7.0 GUIDANCE TO APPROVED TRAINING ORGANISATIONS

7.1 An ATO shall maintain continued compliance with the Regulations, its conditions of approval and training specifications, its Training and Procedures Manual (ATO regulation 17) and its approved training programmes.

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- 7.2 The ATO shall nominate a focal point for surveillance and inform the Authority of the name and contact details. During surveillance, the ATO shall ensure that the Accountable Manager, the Quality Manager, the Head of Training and the relevant instructors and examiners are available.
- 7.3 The ATO shall give inspectors access to its personnel, students, facilities, equipment, simulators, training devices and records, and shall provide originals or certified copies of documents when requested.
- 7.4 The ATO shall keep training records, including student records, progress reports, assessment forms and examination files, for at least ten (10) years (ATO regulation 44), in a form that allows them to be sampled during surveillance.
- 7.5 The ATO shall notify the Authority through CASP within thirty (30) days of any change to the Accountable Manager, Quality Manager, instructional staff, facilities, equipment or training programmes (ATO regulation 16).
- 7.6 The ATO shall operate a quality system with independent internal audits and feedback to the Accountable Manager (ATO regulation 13), and shall make internal audit reports and corrective actions available to the Authority on request.
- 7.7 During surveillance of an ATO, the Authority may examine:
- a) the qualifications, licences, authorisations and competency of management personnel, instructors and examiners;
 - b) the training manuals, syllabi and approved programmes, and their implementation;
 - c) student records, progress reports, assessment forms and examination files, by sampling;
 - d) training sessions, simulator exercises, briefings, examinations and skill tests;
 - e) facilities, equipment, simulators, training devices and record-keeping facilities (ATO regulations 12 and 30); and
 - f) the quality system and the effectiveness of previous corrective actions.
- 7.8 A foreign ATO may be subject to desktop reviews, renewal inspections and on-site visits, including of simulators, training facilities, instructors and examiners provided under wet lease arrangements, and of training records, on the basis of the approval issued by its State of approval.
- 8.0 WHAT TO EXPECT DURING SURVEILLANCE**
- 8.1 Every surveillance follows the eight steps of the Authority's inspection and surveillance procedure (Personnel Licensing Manual, Section 5.4), as shown in Figure 1.

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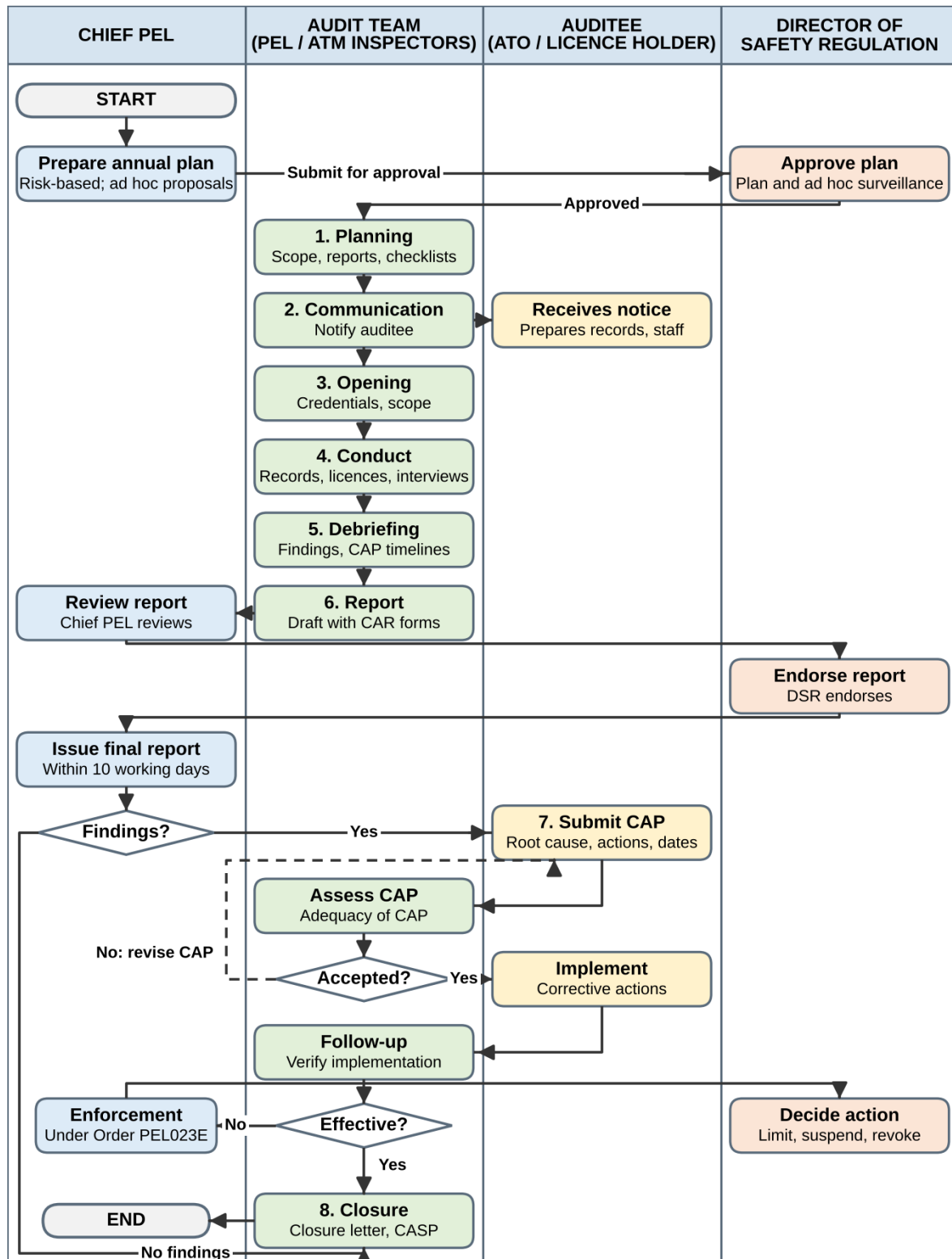


Figure 1: Surveillance and corrective action process

- 8.2 **Notification.** For planned surveillance, the Audit Team Leader notifies the auditee in writing, email or verbally, normally not less than fourteen (14) days in advance, confirming the date, time, scope, key personnel required and documents to be made available. The

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auditee should prepare the documents in advance and confirm attendance of key personnel. Unannounced surveillance is conducted without prior notice.

- 8.3 **Opening meeting.** On arrival, the inspectors present their credentials and the Audit Team Leader holds an opening meeting to introduce the team, confirm the scope, schedule and method, explain how findings are classified and how the CAP process works, and agree focal points. The auditee may ask questions about the process at this stage.
- 8.4 **Conduct of the surveillance.** The inspectors examine documents and records by sampling, observe activities, inspect facilities and interview personnel. Copies of records, photographs and interview notes may be taken as objective evidence. The auditee should provide the information requested promptly and should not alter any record during or after the surveillance.
- 8.5 **Closing meeting (debriefing).** At the end of the on-site activities, the Audit Team Leader presents the preliminary findings and observations, their regulatory basis and level. The auditee may comment and present additional evidence at this meeting. Each finding is issued on the Corrective Action Request (CAR) Form TCAA/FRM/SR/GEN-12A (sample at Appendix A), which states the finding number, the area audited, the level of finding, the description of the finding with its reference standard, and the date by which the CAP shall be submitted. The auditee signs to acknowledge receipt. Any immediate action taken for a Level I finding is recorded.
- 8.6 **Surveillance report.** The final report, with the CAR forms and instructions for corrective action, is issued to the auditee through CASP within ten (10) working days of the closing meeting. For an ATO, this report is the written notification of deficiencies under ATO regulation 9(5).

9.0 FINDINGS AND CORRECTIVE ACTION

- 9.1 Levels of finding. Each finding is given one of the following levels, which determines the time allowed for corrective action:
- a) **Level I (Serious Finding)** – a non-compliance that lowers safety or the integrity of training, testing or licensing, such as falsified records or certificates, a compromised examination, or training, testing or OJT conducted by persons with no authorisation from the Authority. It requires immediate action by the licence holder or ATO. The Authority may provisionally suspend the privileges concerned pending investigation (PEL regulation 197(1); ATO regulation 42(1)), and the CAP shall be submitted within seven (7) days;
 - b) **Level II (Major Finding)** – a non-compliance that does not present an immediate safety risk but affects compliance with the Regulations or the approved procedures, such as instructors whose licences, ratings or recency are not current, or training conducted under an outdated, unapproved revision of the Training and Procedures Manual. Corrective action shall be taken within thirty (30) days from the date the finding was identified;
 - c) **Level III (Minor Finding)** – a non-compliance of an administrative nature with low safety impact, such as incomplete record entries or minor documentation errors. Corrective action shall be taken within ninety (90) days from the date the finding was identified; and

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d) **Observation** – an opportunity for improvement with no regulatory breach. No CAP is required, and the observation is reviewed at the next surveillance.

9.2 For Level II and Level III findings, the CAP shall be submitted by the date stated on the CAR form, which the inspector sets according to the level of finding.

9.3 **Preparing the CAP.** The auditee shall prepare a CAP for each finding on the Corrective Action Plan (CAP) Form TCAA/FRM/SR/GEN-13A (sample at Appendix B), completing:

- a) the finding number, name of the operator or service provider, date of audit, area audited and level of finding, as stated on the CAR form;
- b) the description of the finding, copied as issued, with the reference standard;
- c) the root cause(s) of the problem – why the non-compliance occurred, and not only what went wrong;
- d) the proposed corrective action(s) that correct the finding and remove the root cause, including any similar cases elsewhere in the organisation, with the action office responsible and the estimated implementation date of each action;
- e) the risk assessment of the CAP – for each action, the risk if it is not fully implemented, its likelihood and impact, and the mitigation measures; and
- f) the estimated compliance date, with the name, signature and/or stamp of the Accountable Manager, Quality Manager, Safety Manager or licence holder, and the date.

9.4 A CAP that only repeats the finding, that corrects the specific case without addressing the root cause, or that has no risk assessment, will not be accepted.

9.5 **Submitting the CAP.** The completed and signed CAP Form shall be uploaded in CASP against the surveillance report by the date on the CAR form. The Authority evaluates the CAP within ten (10) working days and records its evaluation in the "CAA Corrective Action Plan Evaluation" part of the form: CAP accepted or rejected, comments, and the proposed follow-up (on-site, off-site or administrative) and its date. A rejected CAP is returned with written reasons and a new submission date.

9.6 **Implementing the CAP.** The auditee shall implement the accepted actions by the estimated implementation dates and upload the evidence of completion in CASP, such as amended manuals, updated records, training attendance lists or internal audit reports. The Authority verifies implementation by the follow-up method stated on the CAP Form.

9.7 **Extension of time.** Where an action cannot be completed within the period for its level of finding, the auditee shall request an extension through CASP before the due date, giving the reasons and a revised date. The Chief PEL may grant an extension where justified.

9.8 **Closure.** When the corrective actions for a finding have been implemented and verified, the inspector records the finding as closed on the CAP Form, with the name, signature and date of closure. When all findings are closed, the Authority closes the surveillance and issues a closure letter to the auditee through CASP. The results are used to update the auditee's risk rating for the next annual surveillance plan.

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10.0 FAILURE TO RESPOND AND ENFORCEMENT

- 10.1 Where a CAP is not submitted, is rejected twice, or is not implemented on time, or where non-compliance is significant or repeated, the matter is escalated by the Chief PEL to the Director of Safety Regulation and handled in accordance with Order TCAA-O-SR-PEL023E.
- 10.2 Enforcement actions are graduated and risk-based, and may include counselling, remedial training, written warnings, increased surveillance, limitation of privileges or of the ATO approval, suspension, variation or revocation of the licence, rating, authorisation or ATO certificate, administrative penalties and referral for prosecution (PEL regulations 197 and 204 to 206; ATO regulations 42 to 46).
- 10.3 Except where immediate safety action is required, the licence holder or ATO is given an opportunity to be heard before an enforcement decision is taken.
- 10.4 The holder of a licence, rating, authorisation or certificate that has been suspended, varied or revoked shall surrender it to the Authority within fourteen (14) days (PEL regulation 197(3); ATO regulation 42(4)). The status of the electronic licence or approval is updated in CASP and is shown when its QR code is verified.

11.0 REPORTING OF NON-COMPLIANCE

Any person who knows of a violation of the Regulations shall report it to the Authority (PEL regulation 199). Licence holders and ATOs are encouraged to report to the Authority any non-compliance they identify themselves, together with the corrective action taken. Self-identified and promptly corrected non-compliance is taken into account when the Authority determines the response.

12.0 RECORDS

The surveillance plan, notification, report, CAR forms, CAPs, evidence and closure letter are kept in CASP as the oversight history of the licence holder or ATO. The auditee should keep its own copies of the report, CAPs and evidence, and ATOs shall include them in their quality system records.



JOHN NZULULE
DIRECTOR OF SAFETY REGULATION

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APPENDIX A – SAMPLE CORRECTIVE ACTION REQUEST (CAR) FORM

Form TCAA/FRM/SR/GEN-12A, Revision 1. Completed by the inspector for each finding and issued to the auditee.

Finding No:	Name of Operator/Service Provider:	Level of Finding: ☐ Level I ☐ Level II ☐ Level III
Date of Audit:	Area Audited:	
Description Of Finding/deficiency: Reference Standard:		
Corrective Action Plan, Root Cause and Risk Assessment of the corrective action Plan to be submitted By: _____ no later than _____ (The time frame shall be determined by the Level of finding/deficiency)		
Name of Inspector(s):	Signature:	Date:
Note: <i>The description of deficiency Levels on safety.</i> Level I - (Serious Finding) requires immediate action by the operator/service provider, Level II- (Major Finding) requires corrective action to be taken within 30 days from the identification date and Level III- (Minor Finding) requires corrective action to be taken within 90 days from the identification date.		

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APPENDIX B – SAMPLE CORRECTIVE ACTION PLAN (CAP) FORM

Form TCAA/FRM/SR/GEN-13A, Revision 1. The first part is completed by the auditee for each finding; the "CAA Corrective Action Plan Evaluation" part is completed by the Authority.

CORRECTIVE ACTION PLAN (CAP)							
Finding No:	Name of Operator/Service Provider:		Level of Finding: ☐ Level I ☐ Level II ☐ Level III				
	Area Audited:						
Description Of Finding/deficiency:							
Root Cause(s) of Problem:							
Proposed Corrective Action(s)	Action Office		Estimated Implementation Date				
Risk Assessment of the corrective action Plan:							
Action	Risk if Not Fully Implemented	Likelihood	Impact	Mitigation measures			
<table border="1"> <tr> <td rowspan="2">Estimated compliance Date:</td> <td>Operator/ Service Provider's Representative/Quality Manager/Safety Manager:</td> </tr> <tr> <td>Name:</td> </tr> </table>					Estimated compliance Date:	Operator/ Service Provider's Representative/Quality Manager/Safety Manager:	Name:
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	Name:						

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	Signature and/or Stamp: Date:

CAA CORRECTIVE ACTION PLAN EVALUATION		
CAA RESPONSE/COMMENTS:		
☐ CAP Accepted		☐ CAP Rejected
Proposed Follow-Up: ☐ On-site ☐ Off-site ☐ Administrative		
Proposed Follow-Up Date:		
Inspector(s) Name:	Inspector(s) Signature:	Date:
Finding Closed: ☐ Yes	Finding Closed By: Name: Signature and Stamp	Date of closure:

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APPENDIX C – PREPARATION CHECKLIST FOR SURVEILLANCE

No.	Item to have ready	Applies to
1	Valid electronic licence on a mobile device, verifiable by QR code	Licence holders, instructors, examiners
2	Current medical certificate and ELP certificate	Licence holders
3	Up-to-date logbook and recency records (ATC logbook signed in UTC)	Licence holders
4	Written authorisations of instructors, OJTIs and examiners	Licence holders, ATOs
5	Approval certificate, training specifications and current Training and Procedures Manual	ATOs
6	Approved training programmes and syllabi	ATOs
7	Student records, progress reports, assessment and examination files (last 10 years)	ATOs
8	Instructor and examiner qualification files	ATOs
9	Internal audit reports and status of corrective actions	ATOs
10	Evidence that changes were notified within 30 days	ATOs
11	Status of CAPs from the previous surveillance	Licence holders, ATOs
12	Focal point and key personnel available on the agreed date	ATOs