



# IFALPA

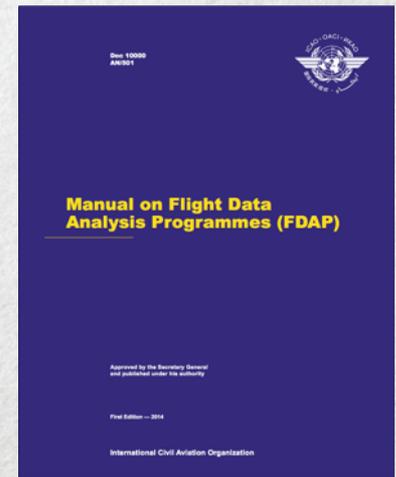
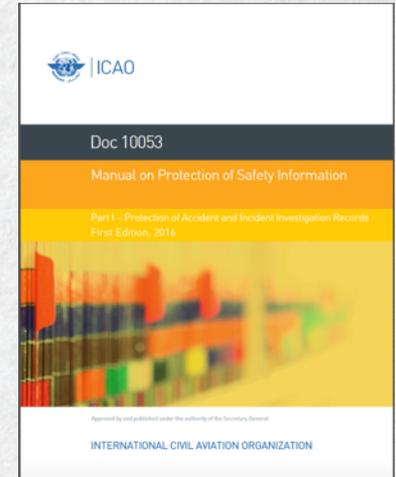
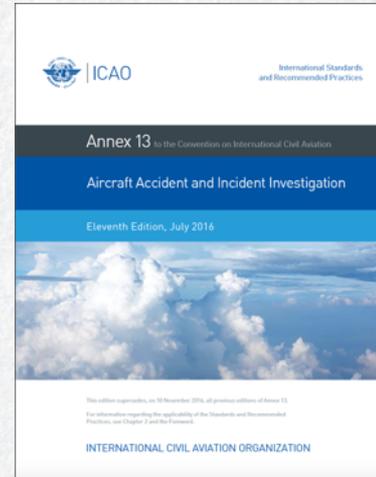
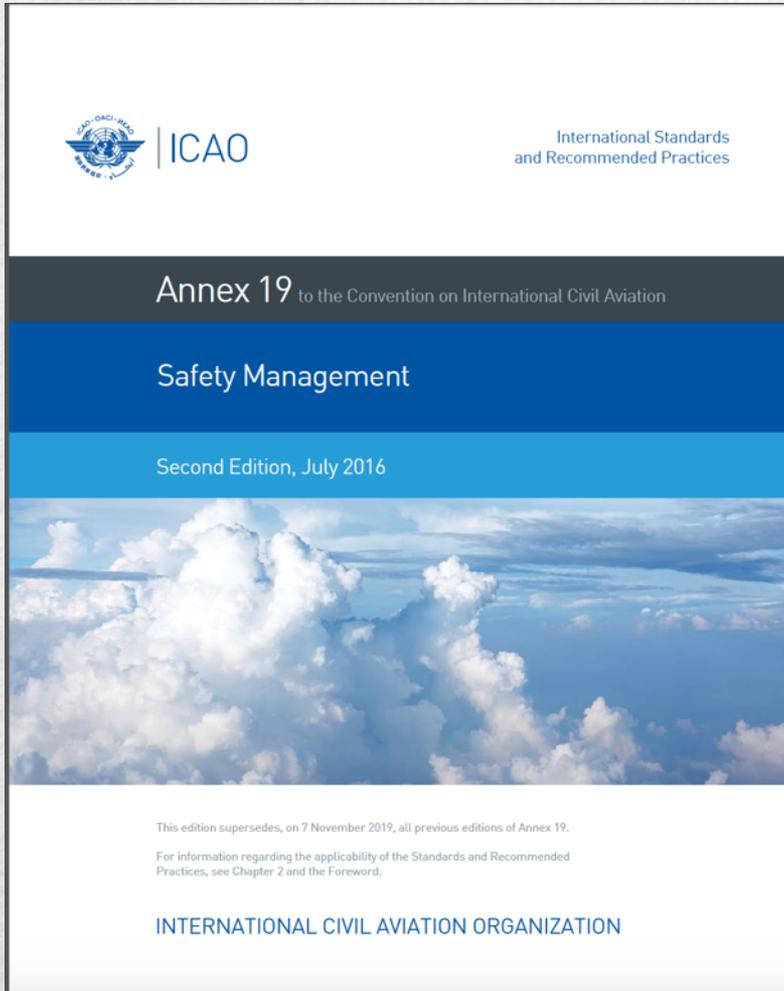
The Global Voice of Pilots



## **IFALPA's Perspective on Protection of Safety Data, Safety Information and Related Sources**

***Captain Jaffar Hassan, IFALPA Regional VP Asia East***

# Data Protections - ICAO Documents



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- (Annex 1) ATO - Approved Training Organization
- (Annex 6 Part I and III) Commercial airplane and helicopter Operator
- (Annex 8) AMO - Approved Maintenance Organizations
- (Annex 8) Aircraft Type - Design and Manufacturers
- (Annex 11) ANSP
- (Annex 13) Accident and Incident Investigation
- (Annex 14) Aerodrome operators

# ICAO - Doing it right!



ICAO Annex 13, 11th edition (Amendment 15) effective in 2016 and Doc 10053, Manual on Protection of Safety Information, Part I – Protection of Accident and Incident Investigation Records

The key amended SARPs are; to define the accident investigation authority with the provision on cooperation between the investigation authorities and judicial authorities, the independence of investigations authority, **the protection of investigation records** and to build up the effective Regional Accident and Incident Investigation Organisations (RAIO).

# Safety Related Activities



Reactive activity - Accident Investigation

Proactive activity - FDAP

## ANNEX 6

For an Proactive activity like FDAP, ICAO has already provided SARPS in Annex 6 and Annex 19 the protection and use of flight recorder recordings in routine operations (outside the scope of an Annex 13 investigation).

## DOC 10000

Detailed guidance is also contained in Doc 10000 - Manual on Flight Data Analysis Programmes (FDAP) first edition published in 2014.

# Critical Element 4 (CE4)



Fourth critical element in State Safety Oversight  
Qualified Technical Personnel.

# Protections - National and Operator Level



## Prerequisites for an Effective FDAP (Doc 10000, chapter 3)

- Protection of FDA data
- Pilots' Involvement
- Positive Safety Culture

### 3.2 INVOLVEMENT OF FLIGHT CREWS

As with successful incident reporting systems, the **trust** established between management and its flight crews is the foundation for a successful FDAP. For most operators this will be accomplished through an association, while for others the State authority may be the custodian of flight crew involvement under the limitation of the due “duty of care”. Here it is incumbent upon management to provide assurance of the FDAP intent, conditions of use and protection given to its employees. This trust can be facilitated by:

- a) early **participation of the flight crew representatives** and/or authority representatives in the design, implementation and operation of an FDAP; and
- b) a **formal agreement** between management and the flight crews, and/or authority identifying the procedures for the use and protection of data.

# IFALPA FDAP Agreement



## TEMPLATE AGREEMENT FOR A FLIGHT DATA ANALYSIS PROGRAMME (FDAP)

*Developed and endorsed by IFALPA's Accident Analysis and Prevention (AAP) Committee, November 2015*

*Note. The acronym used in this document – FDAP - is the ICAO acronym for such Programmes, which can also be described by other names such as Flight Data Monitoring (FDM), OFDM (Operational Flight Data Monitoring (OFDM) or FOQA (Flight Operations Quality Assurance (FOQA).*

**Agreement for a Flight Data Analysis Programme (FDAP)**  
**Statement of Understanding between [Airline] and [Pilot Association]**  
**Dated .....**

### **1 GENERAL INTENTIONS**

- 1.1 As with successful incident reporting systems, the trust established between management and the flight crews who are being monitored is the foundation for a successful FDAP. It is understood by both parties that the greatest safety benefit will be derived through FDA by working in a spirit of mutual co-operation and trust towards improving safety. A punitive management regime will suppress honest and open reporting and render an FDAP pointless. A rigid set of rules can be obstructive, limiting or counter-productive, and it is preferred that those involved in an FDAP should be free to explore new solutions by mutual consent, always bearing in mind that the FDAP is a safety programme, not a disciplinary tool.
- 1.2 The primary purpose of the FDAP is the pro-active and non-punitive use of digital flight data from routine operations to improve aviation safety. Any remedial actions triggered by the discovery of a concern should aim at preventing recurrence or reversing an adverse trend, and adding to general operational knowledge (lessons learned). Such actions may include changing Standard Operating Procedures (SOPs) and/or manuals, and seeking to raise the awareness of the pilots.
- 1.3 Concerns raised by the FDAP should, where possible, be resolved without identifying the crew involved. The Programme is not meant to be used for individual performance feedback and under no circumstance can individual crews be targeted. On rare occasions when confidentiality needs to be withdrawn, this Agreement gives procedures to be followed.
- 1.4 It is recognised that documentation of actions taken following FDAP investigations may need to be retained. Such documentation will be held in a confidential database and will not be placed on a pilot's file.

# Conclusion

