



CIVIL AVIATION PUBLICATION

CAP 22

VOLUNTARY REPORTING

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CAP 22

VOLUNTARY REPORTING PROGRAMME

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1. INTRODUCTION

1.1 General

In accordance with ICAO Annex 19, the CAA has established a voluntary reporting system. The system is called the Voluntary Reporting Programme (VRP).

[Incident reporting programmes have proved to be valuable tools in the identification of safety and security related issues and the definition of corrective actions.] In those specific incidents involving human error, the availability of an independent, voluntary and confidential reporting medium has provided valuable additional information to that available through the formal or mandatory reporting systems.

[The CAA Voluntary Reporting Programme is an independent confidential reporting programme for those employed in the civil aviation industry to report safety and security related incidents and events.

1.2 Objective

The key objective of the voluntary and confidential reporting system is to enhance the safety and security of aviation activities through the collection of reports on actual or potential safety or security deficiencies that would otherwise not be reported through other channels.] Such reports may involve occurrences, hazards or threats relevant to the safety of our aviation activities. This system does not eliminate the need for formal reporting of accidents and incidents, as well as the submission of mandatory occurrence reports to the CAA.

It provides a channel for the voluntary reporting of aviation occurrences or hazards relevant to our organization's aviation activities, while protecting the reporter's identity.

1.3 Voluntary Reporting Programme (VRP)

Although accident/incident rates in commercial air transport operations have reduced to an extremely low level, the number of accidents with Human Factors causes has not declined at the same rate and thus are now the dominant cause in major accidents. [VRP is a voluntary confidential reporting scheme for aviation and it allows any person who has an aviation safety or security concern to report it to the CAA confidentially. Protection of the reporter's identity is a primary element of the scheme.]

Noteworthy features of VRP include:

- (a) Independence;
- (b) Broad availability (including flight crew members, Air Traffic Controllers, licensed aircraft maintenance engineers, cabin crew and the general aviation community);
- (c) Confidentiality of reporters' identities;
- (d) [Analysis by experienced safety or security officers, as applicable;]



- (e) Newsletters with broad distribution to improve safety standards by sharing safety or security information; and

2. PROGRAMME OVERVIEW

2.1 What may be reported with VRP?

Any matter may be reported if it endangers, or could endanger the safety of an aircraft. These matters are reportable safety concerns in the following areas;

- (a) flight operations;
- (b) hangar aircraft maintenance;
- (c) workshop component maintenance;
- (d) technical fleet management;
- (e) inventory technical management;
- (f) engineering planning;
- (g) technical services;
- (h) technical records;
- (i) line maintenance;
- (j) ground operations; or
- (k) [aviation security.]

2.2 Who may make a VRP report?

[Generally, a VRP report may be made by anyone who observes or becomes aware of a reportable safety or security concern. Specifically, flight crew members, Air Traffic Controllers, licensed engineers, approved maintenance organisations, cabin crew members, dispatchers can report events that they feel have a bearing on safety or security.

If you belong to any aviation operational areas or departments, you can contribute to aviation safety or security enhancement through VRP by reporting on occurrences, hazards or threats relevant to your organization's aviation activities.]

2.3 How are VRP reports processed?

VRP pays particular attention to the need to protect the reporter's identity when processing all reports. Every report will be read and validated by the Chief Operating Officer.



The Chief Operating Officer may contact the reporter to make sure he understands the nature and circumstances of the occurrence/hazard reported and/or to obtain the necessary additional information and clarification.

When the Chief Operating Officer is satisfied that the information obtained is complete and coherent, he will de-identify the information and enter the data into the CAA database. Should there be a need to seek input from any third party, only the de-identified data will be used.

The VRP, with the date of return annotated, will eventually be returned to the reporter. The Chief Operating Officer will endeavour to complete the processing within ten (10) working days if additional information is not needed. In cases where the Chief Operating Officer needs to discuss with the reporter or consult a third party, more time may be needed.

If the Chief Operating Officer is away from his office for a prolonged period, the alternate Chief Operating Officer will process the submission. Reporters can rest assured that every submission will be read and followed through by the Chief Operating Officer.

Relevant de-identified extracts may be shared within the company as well as with external aviation stakeholders as deemed appropriate. [This will enable all concerned personnel and departments within the company as well as appropriate external aviation stakeholders to review their own operations and support the improvement of aviation safety and security as a whole.

If the content of a submission suggests a situation or condition that poses an immediate or urgent threat to aviation safety or security, it will be handled with priority and referred, after de-identification, to the relevant organizations or authorities as soon as possible to enable them to take the necessary remedial actions.

The CAA staff will assess submissions for clarity, completeness and significance for aviation safety or security.] To do this, the staff may need to contact the reporter. Once satisfied that the submission is as complete as possible, the staff enter the de-identified content of the submission into the VRP database, which allocates it a unique identification number. VRP may use the de-identified version of the submission to issue an information-brief or alert bulletin to a person or responsible organisation in a position to take action in response to the safety concern.

2.4 What are the possible outcomes from a VRP submission?

The desired outcomes are any actions taken to improve aviation safety and security in response to the identified concern. This can include variations to standards, orders, practices, procedures or an education campaign.

2.5 Is an anonymous submission via VRP acceptable?

As a general rule VRP does not accept anonymous submissions. CAA staff cannot contact an anonymous reporter to verify the submission or to seek additional information. [Further, CAA staff must be satisfied that the reporter's motivation for reporting is aviation safety and security promotion and that the reporter is not attempting to damage a rival or pursue a commercial/industrial agenda.]



2.6 Why Confidential Reporting Works

When organizations want to learn more about the occurrence of events, the best approach is simply to ask those involved. People are generally willing to share their knowledge if they are assured.

Their identities will remain protected.

There is no disciplinary or legal consequences.

A properly constructed **confidential, voluntary, non-punitive** reporting system can be used by any person to safely share information.

Only de-identified comments can be discussed within the CAA.

2.7 Mandatory Occurrence Report or VRP?

VRP is a separate scheme to the Mandatory Occurrence Reporting Scheme.

Note: Refer to CAP 21 – Mandatory Occurrence Reporting

3. REPORTING

3.1 What Do I Report?

[Safety or security-related incidents or events involving:]

- Yourself,
- Other people
- Your organisation or organisations you deal with.

Incidents/events can include:

- Errors
- Individual performance
- Health & Safety matters affecting Operating Procedures
- Regulatory aspects
- Unsafe practices

3.2 What Do I Not Report?

To avoid doubt, the following matters are not reportable safety issues under a VRP:



- acts of unlawful interference with an aircraft;
- industrial relations issues and/or terms and conditions of employment problems;
- conduct that constitutes an offence under Civil Law;
- Incidents or events with no safety content; and
- Issues involving conflicts of personalities.

3.3 When Do I Report?

- you wish others to benefit from an important "Lesson Learned"
- When other reporting procedures are not appropriate or are not available
- When you are concerned to protect your identity
- When you have exhausted company/regulatory reporting procedures without the issue having been addressed

Note: The CAA publishes submissions anonymously, but does not accept anonymous reports.

3.4 How to Submit/Comment

To facilitate consistent reporting and subsequent storage and analysis of data, a Centrik web-portal on line reporting system has been established. This Centrik web-portal can be used for all types of occurrence, including reports under the Voluntary (Confidential) Reporting System. Guidance material to assist in the submission process can be found at Appendix 5.

4. SUMMARY

[Confidential reporting aims to improve our understanding about human factors issues that affect the safety and security of air transport operations. It is a confidential reporting system that aims to encourage reporting, yet without identifying the reporter. It does this, so that incidents and events that would not ordinarily come to light are examined for the lessons they can provide on improving aviation safety and security.] There is no doubt that a truly confidential system provides a worthwhile adjunct to the mandatory reporting systems and has manifestly been successful in its objectives.



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APPENDIX 1

VOLUNTARY OCCURRENCE REPORTING USING CENTRIK

1. Introduction

The following contains guidance on the new voluntary occurrence reporting submission web-portal introduced by San Marino CAA.

In accordance with ICAO Annex 19, the CAA has established a voluntary reporting system. The system is called the Voluntary Reporting Programme (VRP).

In this regard, CAA is adopting a new voluntary occurrence reporting system for the management of reports including their relevant follow-up submissions and analysis. CAA will be utilising a designated Centrik web-link as the reporting portal. This web-link will be directly linked to CAA's database and all information will be stored and recorded in the Centrik software database and administered by the CAA.

This quick-reference guide serves as a tool to assist users with the simple steps of the new reporting system which will be introduced among organisations/operators under the oversight of the CAA.

The new Centrik reporting portal (<https://smar.centrik.net/SMS/Case/ExternalReport.aspx>) must be used instead of the former Appendix 1 (now removed from this document) in order to ensure that data is automatically submitted to the CAA's database. The same Centrik portal may also be used by individuals who would like to submit an occurrence report that needs to be brought to the attention of the CAA.

New Report Submissions

The link <https://smar.centrik.net/SMS/Case/ExternalReport.aspx> will open the following web page:

Introduction	
Step 1	<p>Do you wish to submit a new report or an update to a previous report or draft?</p> <p> <input type="radio"/> Submit a new report <input type="radio"/> Submit an update to a previous report <input type="radio"/> Update a draft report </p> <p style="text-align: center;">Next</p>

Step 1: Select 'Submit a new report'. Other options are submit an update to a previous report that has been submitted or update a report that has been drafted but not submitted.

Introduction	
Step 2	<p>Are you reporting as an individual or on behalf of an organisation?</p> <p> <input type="radio"/> As an individual <input type="radio"/> On behalf of an Organisation </p> <p> Back Next </p>

Step 2: The reporter selects whether the report is being submitted by an individual or else on behalf of an organisation.



Introduction

Step 3 Provide your details below:

Reported By (your name) **Required** E-Mail Address Telephone Number

Re-Enter E-Mail Address

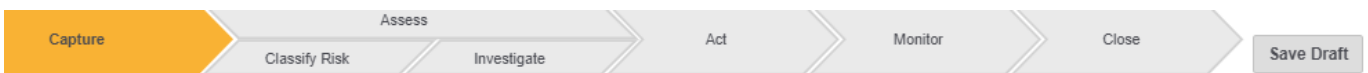
Organisation **Required** Position/Job

Add additional email addresses to notify when report is submitted?

Step 3: The individual is required to enter the details as necessary.

Note 1: A report cannot be submitted without populating the 'Orange-bordered' cell(s).

Note 2: The details populated by the submitter will automatically be pre-populated by Centrik on any subsequent submission.



General Information

Report Number: SM000182-2019-10 Occurrences Form: OCC - Occurrence Report

Report Title: Confidentiality:

Description: Event Date: Event Time (UTC, hh:mm):

Mandatory/Voluntary: Event Location:

If this is an update to a previous report, please specify what has been amended here:

Reported By (your name): E-Mail Address: Telephone Number:

Organisation: Position/Job:

Check the options that apply to this report:

- Was an aircraft involved in the occurrence?
- Was there an ATM contribution?
- Engine, Propeller or Part directly involved
- Did the occurrence happen on or near an aerodrome?
- Did the occurrence result in damage and/or injuries?
- Did the occurrence involve a runway incursion?
- Was the aircraft hit by a bird or other animal?
- Did the occurrence involve an airprox?
- Did the occurrence involve dangerous goods?
- Did the occurrence involve more than one aircraft?
- Were the weather conditions relevant?

- Report Management
- Finish and Submit
- Attachments

Step 4: After selecting the type of report, the submitter will be prompted with the respective occurrence report form.

Note 1: All mandatory fields are identified as 'Orange-bordered' cells. These need to be filled-in in order for the report to be accepted by Centrik. An error message with any missing fields will be prompted when trying to submit the report.



Note 2: When selecting the options additional tabs will be displayed requesting additional information applicable to the option selected.

Step 5: Once the mandatory fields are filled in from each respective Tab the user can submit the report by opening the ‘Finish and Submit’ Tab and click on the **‘Submit’** button.

Note: The report will be submitted only to the CAA. Any obligations required by the operator/organisation to report to third-party entities (ex: State of Occurrence) shall be done separately by the submitter.

Once the report is submitted, a unique code for the submitted report will be provided. These references must be retained, since they will serve as report identifiers when updating any previous submissions.

Updating a previously submitted report via the Centrik portal

The link <https://smar.centrik.net/SMS/Case/ExternalReport.aspx> will open the following page:

Step 1: Select the “Submit an update to a previous report”.

Step 2: Insert the submitter details as required.



Introduction	
Step 3	Provide details of the report to be updated: Report Number (e.g. SM000123-2019-09) Validation Code (e.g. 1AB2C3) <input type="text" value="Enter report number (e.g. sm000123-2019-09) (requ"/> <input type="text"/> <input type="button" value="Back"/> <input type="button" value="Update Report"/>

Step 3: The submitter is requested to input the Report Number (e.g. 000123) and the Validation Code (e.g. 1AB2C3) followed by clicking the **'Update'** button.

Step 4: Proceed with the necessary updating

Important Notes:

1. It is recommended that an email address is populated in the appropriate box when submitting a report. This will facilitate follow-up communication between the CAA and the organisation/operator.
2. All mandatory fields must be filled. In cases where details are not yet available, you can opt to choose a 'not specified' selection from the drop-down menu or else insert text manually. Reports will not be accepted by Centrik unless all mandatory fields are populated.
3. The risk classification is based on the ICAO model of Severity vs Probability (likelihood) matrix. It is important that a risk classification is performed for each report.
4. This portal submits reports only to the CAA. Any other reporting obligations referred to in the regulation in relation to an event (ex: Report to State of Occurrence, Aircraft Manufacturer, etc.) are to be handled by the operator.
5. Any difficulties encountered when submitting reports are to be reported to the CAA on info@smar.aero