Foreign Part-145: Safety management system assessment guidance
This guidance document is issued as a tool to support inspectors and Foreign Part-145 organisations in the assessment of the implementation of the safety management system requirements. This document does not include guidance for the assessment of the compliance monitoring function.

This document is complementary to the EASA management system assessment tool and includes specific items and references for the Foreign Part-145 organisations.

This document is made available to the Foreign Part-145 organisations and inspectors in the IFP platform.
### Reference

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### Inspection topics

- The organisation shall define its safety policy in accordance with UG.CAO.00024 (MOE 1.2).
- The safety policy shall:
  - be in line with UG.CAO.00024 (MOE 1.2).
  - be signed by the Accountable Manager.
  - be periodically reviewed to ensure it remains relevant and appropriate to the organisation.

### Specific requirements/expectations

- **Present**: There is a safety policy, signed by the Accountable Manager, which includes the minimum content identified in MOE User Guide chapter 1.2.
- **Suitable**: The safety policy is easy to read and understandable. The content is customised to the organisation.
- **Operational**: Accountable Manager and Senior Management take informed decisions in accordance with the safety policy. The safety policy is reviewed when necessary to ensure it remains relevant to the organisation.
- **Effective**: Accountable Manager and Senior Management have a clear understanding of the safety policy and are fully engaged in implementing it, being effectively involved in the MS and proactively managing safety policy.

### PSOE

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- **S**
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- **E**
### Reference Inspection topics Specific requirements/expectations PSOE Description


The organisation shall define safety objectives.

The safety objectives shall:
- form the basis for safety performance monitoring and measurement;
- reflect the organisation’s commitment to maintain or continuously improve the overall effectiveness of the SMS;
- be communicated throughout the organisation;
- be periodically reviewed to ensure they remain relevant and appropriate to the organisation.

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<tr>
<td>Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the organisation.</td>
<td>Safety objectives are relevant to the organisation and its activities. Safety objectives are understandable and clearly visible.</td>
<td>Safety objectives are being measured and regularly reviewed, are relevant and are communicated throughout the organisation. They are monitored through the Safety Review Board (or equivalent) and adjusted, when needed.</td>
<td>Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met.</td>
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</table>

- Assess whether the safety objectives are appropriate, relevant and in line with safety policy.
- Discuss with the accountable manager and the nominated persons about the organisation’s safety objectives and verify they are clearly understood.
- Objectives are defined that will lead to an improvement in processes, outcomes and the development of a positive safety culture.
- Assess how safety objectives are communicated throughout the organisation.
- Safety objectives are reviewed/adjusted whenever needed (new safety information available); organisation weakness identified, compliance monitoring oversight outcome (internally and externally), organisation’s activity information, etc.

### Safety accountability and responsibilities

145.A.200(a)(1) 145.A.30(a)(b)(ca) (cb) AMC1 145.A.30(a)

The organisation shall identify the accountable manager who, irrespective of other functions, is accountable on behalf of the organisation, for the implementation and maintenance of an effective SMS.

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<td>An accountable manager has been appointed with full responsibility and ultimate accountability for the SMS.</td>
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<td>The accountable manager ensures that the SMS is properly resourced, implemented and maintained and has the authority to stop the operation if there is an unacceptable level of safety risk.</td>
<td>The accountable manager ensures that the performance of the SMS is being monitored, reviewed and improved.</td>
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<td>145.A.200(a)(1) AMC1 GM 145.A.200(a)(1) 145.A.30(b) AMC1 GM1 145.A.30(c) AMC1 GM1 145.A.30(c) AMC1 GM1 145.A.30(cb)</td>
<td>The organisation shall:</td>
<td>• Discuss with the accountable manager about his/her safety accountability and collect evidence: &lt;ul&gt;&lt;li&gt;that the accountable manager has the authority to provide sufficient resources for relevant safety improvements.&lt;/li&gt;&lt;li&gt;of the accountable manager understanding of the areas of major risks.&lt;/li&gt;&lt;li&gt;of accountable manager decision making on risk acceptability.&lt;/li&gt;&lt;li&gt;of activities being stopped due to unacceptable level of safety risk.&lt;/li&gt;&lt;li&gt;Review SMS activities are being carried out in a timely manner and the SMS is sufficiently resourced.&lt;/li&gt;&lt;/ul&gt;</td>
<td>P S O E</td>
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### Appointment of key personnel

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<td>145.A.200 (a)(1) AMC1 145.A.200(a)(1) 145.A.30(b);(cb) AMC1 145.A.30(c);(ca) GM1 145.A.30(ca) GM4 145.A.30(e)</td>
<td>Appointment of key personnel</td>
<td>• Acceptance of risk is aligned with authorisations.</td>
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The organisation shall appoint a safety manager who is responsible for the implementation and maintenance of the SMS.

A competent safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line with the accountable manager.

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<td>The safety manager qualification is acceptable.</td>
<td>The safety manager has implemented and is maintaining the SMS.</td>
<td>The safety manager is in regular communication with the accountable manager and escalates safety issues when appropriate.</td>
<td>The safety manager is competent to manage the SMS and to identify improvements in a timely manner.</td>
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- Safety Manager qualification in line with WI.CAO.00115. Evidence of maintained competency.
- Review safety manager role including credibility and status. Assess his/her understanding of the SMS.
- Review how the safety manager communicates and engages with operational staff and senior management.
- Interviews with accountable manager and safety manager.

### Verification of Safety Review Board/SAG meetings and documentation.

The safety committees monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources, actions are being monitored and appropriate safety objectives and SPIs have been established.

The organisation has established appropriate safety committees(s) (SRB, SAG, FSAG, as applicable) that discuss and address safety risks and compliance issues and includes the accountable manager and nominated persons.

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<td>There is evidence of meetings taking place in accordance with the terms of reference detailing the attendance and frequency of meetings.</td>
<td>Safety committees include key stakeholders. The outcomes of the meetings are documented and communicated and any actions are agreed, taken and followed up in a timely manner.</td>
<td>Safety performance and safety objectives are reviewed and actioned as appropriate.</td>
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- The safety committees monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources, actions are being monitored and appropriate safety objectives and SPIs have been established.

- The organisation has established appropriate safety committees(s) (SRB, SAG, FSAG, as applicable) that discuss and address safety risks and compliance issues and includes the accountable manager and nominated persons.
### Immediate safety action and coordination with the operator’s Emergency Response Plan (ERP)

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| AMC1 145.A.200(a)(3) | Procedures should be implemented that enable the organisation to act promptly when it identifies safety concerns with the potential to have an immediate effect on flight safety. These provisions are without prejudice to the occurrence reporting required by point 145.A.60. | - Review safety committee and meeting structure and Terms of Reference for each committee / meeting. (SRB, SAG, FSAG, etc.)  
- Review meeting attendance levels (Accountable Manager and all NPs should be present at SRB).  
- Outcomes are communicated to the rest or the organisation.  
- Evidence of safety objectives, safety performance and compliance being reviewed and discussed at meetings.  
- Senior management are aware of the most significant risks faced by the organisation and the overall safety performance of the organisation. | □ P  
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<td>There is a procedure in place to contact the owner/operator/CAMO in case of safety concern with potential immediate effect on flight safety is identified.</td>
<td>Procedure allows the information to reach appropriate owner/operator/CAMO staff without undue delay.</td>
<td>There is evidence that procedure was used in the past, in case such scenario happened.</td>
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### AMC1 145.A.200(a)(3)

- Procedure clearly specifies who to contact/inform;  
  - within the Maintenance Organisation (manager, Nominated Postholder, etc.)  
  - within the operator/CAMO (Maintenance Control Center, operator/CAMO contact person, etc.).
- Procedure clearly specifies how to contact the operator/CAMO in order to make sure appropriate staff receive the information immediately in order to take action accordingly.
- An email without confirmation it has been received is not acceptable. A phone call may be necessary in case no confirmation is received by CAMO/operator after email sent.

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### Reference: 145.A.200(a)(3)

**Inspection topics:**

If applicable, procedures should be implemented to enable the organisation to react promptly if the Emergency Response Plan (ERP) is triggered by the operator and it requires the support of the Part-145 organisation.

**Specific requirements/expectations:**

An appropriate coordination procedure has been developed and distributed that defines the procedures, roles, responsibilities and actions of key personnel when the operator’s emergency response plan (ERP) is activated and support is required.

**PSOE:**

The coordination with operator ERP is defined, if applicable, with appropriate means.

**Description:**

Key personnel have easy access to the relevant parts of the ERP coordination procedure at all times. There is evidence of coordination with operator and other organisations as appropriate. The results of the ERP coordination procedure review and testing are assessed and actioned to improve its effectiveness.

- Review ERP coordination procedure.
- Review how co-ordination with other organisations is planned.
- Review how ERP coordination procedure is distributed and where copies are held.
- Talk to key personnel and check they have access to the relevant parts of ERP coordination procedure.

Review when ERP coordination procedure was last reviewed/tested and any actions taken as a result.

### SMS documentation

The organisation’s SMS procedures should be developed in the MOE following UG.CAO.00024 content.

The SMS documentation should include, at least, all of the following:

1. scope of the safety management system;
2. safety policy and objectives;
3. safety accountability of the accountable manager;
4. safety responsibilities of key safety personnel;
5. documentation control procedures;
6. hazard identification and risk management schemes;
7. safety action planning;
8. safety performance monitoring;
9. internal safety reporting and investigation;

**Specific requirements/expectations:**

The MOE includes the organisation’s SMS procedures.

**PSOE:**

SMS procedures are relevant to the size, nature, complexity of the organisation and its activities. SMS documentation is comprehensible.

**Description:**

Everyone has easy access to, is familiar with and follow the relevant parts of the SMS documentation. SMS Documentation is proactively reviewed for improvement.

- Review the SMS documentation and amendment procedures.
- Check for cross references to other documents and procedures.
## Foreign Part-145: Safety management system assessment guidance

**Reference** | **Inspection topics** | **Specific requirements/expectations** | **PSOE** | **Description**
---|---|---|---|---
145.A.55(c) AMC1 145.A.55 | (10) emergency response planning; (11) management of change; (12) safety training and promotion. | - Check availability of SMS documentation to all staff.  
- Check staff know where to find safety related documentation including procedures appropriate to their role. | □ O  
□ E | <br>Present suitably, SMS documents are maintained and reviewed regularly for continuous improvement of the SMS.  
Suitable - all SMS documentation is made available to all staff.  
Operational - SMS documents are stored in accordance with the approved procedures.  
Effective - SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS.  
- Review SMS records (hazard logs, meeting minutes, safety performance reports, risk assessments etc).  
- Check how safety records are stored and version controlled.  
- Data protection and confidentiality rules have been defined and are consistently applied.  
- Check appropriate staff are aware of the records control processes and procedures.  
- The SMS documentation defines the SMS outputs and which records of SMS activities will be stored (including storage period and location).  
- There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).  
- The data analysis process enables gaining useable safety information.  
- Safety data sources are relevant to the activities and operational environment and involves all key personnel and appropriate.

### Safety risk management

#### Hazard identification

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| 145.A.200(a)(3) AMC1 145.A.200(a)(3) GM1 145.A.200(a)(3) 145.A.60 145.A.202 AMC1/GM1 | The organisation shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactive and proactive methods. | There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external). | □ P  
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□ E | The organisation has a register of the hazards that is maintained and reviewed to ensure it remains up to date. It is continuously and proactively identifying hazards related to its activities and operational environment and involves all key personnel and appropriate.
### Internal safety reporting scheme 145.A.202

The organisation has established an internal safety reporting system in line with MOE User Guide 3.2.

Through this scheme, the organisation shall:

1. identify the causes of and contributing factors to any errors, near misses, and hazards reported and address them as part of safety risk management process.
2. ensure evaluation of all known, relevant information relating to errors, the inability to follow procedures, near misses, and hazards, and a method to circulate the information as necessary.
3. collect details of occurrences that may not be captured by the mandatory reporting system.
4. identify other safety-related information which is perceived by the reporter as an actual or potential hazard to aviation safety.
5. identify those reports which require further investigation and/or mandatory reporting according MOE User Guide 2.18.

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<td>The internal reporting system is described in the organisation’s procedures.</td>
<td>The reporting system is simple to use and accessible to all personnel. People are aware of the existence of the voluntary reporting system. Confidentiality of personal details is ensured, except when absolutely necessary.</td>
<td>The reporting system is available for third parties to report (partners, suppliers, contractors). There is a healthy reporting system based on the volume of reporting and the quality of reports received. Personnel express confidence and trust in the organisation’s reporting policy and process.</td>
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<td>Responsibilities for natural persons and organisation for reporting are defined and described in the organisation’s procedures.</td>
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<td>Review the internal reporting system for access and ease of use.</td>
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<td>Check that staff are familiar with the internal reporting system and know what can be reported.</td>
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| PSOE      | The internal safety reporting scheme should be confidential and enable and encourage free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and hazards identified. This will be facilitated by the establishment of a just culture. | • Review how data protection and confidentiality is achieved.  
• Check that staff trust the reporting system.  
• Check availability to contracted/subcontracted organisations and customers to make reports. |      | Mandatory occurrence Reporting 145.A.60 and AMC 20-8A                                                                                                                                               |

**Mandatory occurrence Reporting 145.A.60 and AMC 20-8A**

| 145.A.60 | The organisation has established a mandatory reporting procedure in accordance to MOE User Guide 2.18.  
Mandatory occurrences are reported to the competent authority within the timeframe established by the regulation (72 hours).  
Occurrences are processed and analysed in order to identify the safety hazards associated with identified occurrences.  
Occurrence reports include a safety risk classification for the occurrence concerned.  
Based on the analysis of occurrences, the organisation determines any appropriate corrective and/or preventive action, required to improve aviation safety.  
It shall: (a) implement those actions in a timely manner; and (b) establish a process to monitor the implementation and effectiveness of the actions. | There is a mandatory occurrence reporting procedure that includes:  
• Responsibilities  
• Timescales  
• Safety risk classification for occurrences  
• analysis of occurrences (identification of potential safety deficiencies, the definition of preventive and corrective actions to address them)  
• the verification of their effectiveness.  
Procedure is relevant to the Organisation and activities.  
People are aware of their responsibilities in respect of the reporting system.  
Mandatory occurrences are reported within the defined timescales.  
Reports are processed and analysed.  
Occurrences are regularly analysed and potential safety issues identified and addressed. |      | The reporting system is available for third parties to report (contractors, subcontractors, customers, etc).  
Occurrence reports are effectively used as an input to the hazard identification process and to verify the effectiveness of mitigations.  
The reporting system is being used to make better management decision making and continuous improvement. |
| AMC 20-8A | | | | |
Investigations of safety occurrences establish causal/contributing factors (why it happened, not just what happened) and identify Human and organisational contributing factors. Hazards identified from occurrences are processed in compliance with 145.A.60 (and AMC 20-8A).

All occurrences are safety risk assessed (mandatory and voluntary).

Verify the adequacy of the analysis and mitigations to demonstrate the reduction of the risks to an acceptable level.

Verify that the mitigations are controlled (owner and follow-up of actions).

Verify that the mitigations are implemented and verified for effective implementation.

Assess how senior management deal with the outputs of the reporting system.

**Risk assessment and mitigation**

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<tr>
<td>145.A.200(a)(3) AMC1 145.A.200(a)(3)</td>
<td>The organisation shall develop and maintain a process that ensures analysis, assessment [and control] of the safety risks associated with identified hazards.</td>
<td>• There is a process for the analysis and assessment of safety risks. The level of risk the organisation is willing to accept is defined.</td>
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<td>The risk assessment methodology, including 'severity' and 'likelihood' usable criteria are clearly defined and fit the organisation’s actual environment.</td>
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<td>Risk analysis and assessments are carried out in a consistent manner based on the defined process. The defined risk acceptability is being applied.</td>
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<td>Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes. Risk assessments are regularly reviewed to ensure they remain current. Risk acceptability criteria is used routinely and applied in management decision making processes and is regularly reviewed.</td>
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• Review risk classification scheme and procedures. Check how the organisation is identifying possible hazard “clusters” that can be considered as safety issues.
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| 145.A.200(a)(3) GM1 145.A.200 AMC1 145.A.200(a)(3):(a) (b)(d) AMC1 145.A.70 | | • Severity and likelihood criteria defined and customized to reflect the type and number of activities. The used definitions are sufficiently explicit or detailed.  
• Check that the process defines who can accept what level of risk, and timelines for accepting it.  
• Sample some identified hazards and how they were processed and documented up to the development of the risk assessment:  
  ▪ Verify the risk assessment methodology used is the one described in the approved procedure.  
  ▪ Challenge assumptions made to develop the risk assessment.  
  ▪ Verify that the risk register has been updated following the result of the risk assessment.  
• Verify that all the departments have been involved in the development of the risk assessments.  
• Review what triggers a risk assessment.  
• Check any assumptions made and whether they are reviewed.  
• Verify whether the risk assessments are updated when new data from the safety reporting system is available.  
• Review layout of risk register e.g. initial assessment, residual risk, mitigation actions, ownership, associated safety performance and follow-up.  
• Risk register is being reviewed and monitored by the appropriate safety committee(s).  
• Evidence of risk acceptability being routinely applied in decision making processes. | □ E | |

The organisation shall develop and maintain a process that ensures [analysis, assessment and] control of the safety risks associated with identified hazards.

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<td>The organisation has a process in place to decide and apply the appropriate risk controls.</td>
<td>Responsibilities and timelines for determining and accepting the risk controls are defined.</td>
<td>Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities.</td>
<td>Risk controls are practical and sustainable, applied in a timely manner and do not create additional risks. The effectiveness of the risks controls is monitored through safety performance,</td>
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### Inspection topics

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<td>Controls are defined (if SMART concept is used: Specific, Measurable, Agreed, Realistic and Time-bounded), followed-up (allocated to nominated persons with due dates) and implemented. Evidence of risk controls (mitigating measures) being actioned and followed up.</td>
<td>☐</td>
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<td>using qualitative and/or quantitative means.</td>
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<td>Check how the policy considers ‘As Low As Reasonably Practical’ (ALARP) – verify the implementation of it.</td>
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<td>Starting from the hazards or cluster of hazards analysed in the previous part, verify how the organisation identifies the mitigation and control and verify how the actions have been implemented in the organisation.</td>
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<td>Aggregate risk is being considered.</td>
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<td>Look at whether the risk controls (mitigation) have reduced the residual risk ONLY AFTER EFFECTIVE IMPLEMENTATION. Inspector has to verify the effective implementation of the mitigations.</td>
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<td>Quantitative and/or qualitative means are used to monitor the effectiveness of the risk controls, such as to SMART SPIs, SPTs, alert levels.</td>
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<td>Risk controls clearly identified.</td>
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<td>Accountability for the implementation clearly defined (allocated to nominated persons with due dates).</td>
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<td>Check how operator regularly informs employees and contracted personnel with information concerning the analysis of, and follow-up on occurrences for which preventive or corrective action is taken.</td>
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### Safety assurance

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<tr>
<td>AMC1 145.A.200(a)(3)(d)</td>
<td>The organisation shall develop and maintain the means to verify the safety performance of the organisation and to validate the effectiveness of safety risk controls. The organisation’s safety performance shall be verified in reference to the safety performance indicators (SPI) and safety performance targets (SPT) of the SMS in support of the organisation’s safety objectives.</td>
<td>There is a documented process in place to measure the safety performance of the organisation, including qualitative and quantitative means linked to the organisation’s safety objectives and to measure the effectiveness of safety risk controls. The interface between compliance-based audits and the safety risk management processes is described. Safety performance measurement targets the effectiveness of the mitigation measures addressing the key risks, and by extension, the safety objectives. The defined SPIs and targets are meaningful and appropriate to the organisation’s activities, risks and safety objectives.</td>
<td>□ P □ S □ O □ E</td>
<td>The safety performance of the organisation is being measured and the SPIs are being continuously monitored and analysed for trends. Risk controls are being verified to assess whether they are applied and effective. Risk controls are assessed and actions taken to ensure they are effective and delivering a safe service. The reasons for ineffectiveness of risk controls are investigated. SPIs are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data. SPIs are reviewed and regularly updated to ensure they remain relevant.</td>
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</tbody>
</table>

- There is a process in place to assess whether the risk controls are applied and effective; survey controls being assessed and monitored for effectiveness (e.g. audits, surveys, reviews, qualitative and/or quantitative means to measure and monitor safety performance such as SPIs, SPTs, alert levels, wherever needed, reporting systems).
- Responsibilities, methods, and timelines for assessing risk controls are appropriately defined.
- SPIs are focused on what is important rather than what is easy to measure.
- Evidence that SPIs, SPTs, alert levels are based on reliable sources of data. Realistic targets have been set, wherever appropriate.
- Monitoring the number of reportable occurrences (aircraft/component damaged during maintenance, non-airworthy condition overlooked, etc.) cannot be considered an effective way to measure Safety performance. Any precursor allowing to identify negative trend can be considered a good SPI.
- Evidence of when Safety performance indicators were last reviewed.
- Evidence of risk controls being assessed for effectiveness (e.g. audits, surveys, reviews). If the verification is not positive (SPI indicating a negative trend reflecting a not effective risk control or an inappropriate SPI), the organisation shall review the risk assessment consequently and identify
### Management of change

<table>
<thead>
<tr>
<th>Reference</th>
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</tr>
</thead>
<tbody>
<tr>
<td>145.A.85</td>
<td></td>
<td>possible new mitigations. Review where risk controls have been changed as a result of the assessment.</td>
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<tr>
<td>AMC2 145.A.85</td>
<td></td>
<td>• Evidence of risk controls applied by subcontracted organisations / third parties being assessed.</td>
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<tr>
<td>GM1 145.A.200(a)</td>
<td></td>
<td>• Information from the reporting system(s), compliance monitoring activities, safety assurance or any other relevant source feeds back into the safety risk management process.</td>
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<tr>
<td>AMC1 145.A.200(a)(3)(e)</td>
<td></td>
<td>• Evidence that results of safety performance monitoring are discussed at senior management level and during SRBs.</td>
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</table>

The organisation has established a management of change procedure to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.

Management of change procedure is appropriate to the organisation’s size, nature, complexity, activities and procedures.

The management of change process is being used. It includes hazard identification and risk assessments with appropriate risk controls being put in place before the decision to make the change is taken.

Human Factors issues have been considered and being addressed as part of the change management process.

The change is anticipated and communicated to those affected, (i.e. internal and external key interfaces) and managed safely.

Risk control and mitigation strategies associated with changes are achieving the planned effect.

The organisation keeps on monitoring residual risks after the implementation of these changes.

- Check the procedure describing the management of change process. Triggers for the change management process are defined. Methods, responsibilities and timelines are defined in the process. Key stakeholders are involved in the process.
<table>
<thead>
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<tbody>
<tr>
<td></td>
<td></td>
<td>• The process is integrated with the risk management (hazard identification – risk assessment/control).</td>
<td>☐ E</td>
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<tr>
<td>145.A.200(a)(3)</td>
<td></td>
<td>• Review recent changes that have been through the change management process, including the risk assessment process (e.g. change of NP, scope of approval, maintenance facilities, etc).</td>
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<tr>
<td>145.A.200(a)(6)</td>
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<td>• Change is signed off by an appropriately authorised person.</td>
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<tr>
<td>AMC1 145.A.200(a)(3)(f)</td>
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<td>• Transitional risks are being identified and managed.</td>
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<td>• Review follow up actions such as whether any assumptions made have been validated.</td>
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<td>• Review whether there is an impact on previous risk assessments and existing hazards.</td>
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<td>• Review impact of change on training and competencies.</td>
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<td>• Review previous changes to confirm they remain under control.</td>
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<td>• Review whether consideration is given to the cumulative effect of multiple changes.</td>
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<td></td>
<td>• Evidence of Human Performance (HP) issues being addressed during changes.</td>
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### Continuous improvement of the SMS

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<tr>
<td>The organisation shall monitor and assess its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.</td>
<td>There is a process in place to monitor and review the effectiveness of the SMS using the available data and information.</td>
<td>There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken. The organization is using SMS and safety data to develop and assess effectiveness of the SPIs to enhance safety and continuous improvement of SMS processes.</td>
<td>The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements. The contribution of SMS and safety data from key external interface organizations is taken into consideration. The organisation shares best practices and lessons learned as a global leader in SMS.</td>
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</table>
### Foreign Part-145: Safety management system assessment guidance

**Rev 0, date: 2/12/2022**

<table>
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</table>
| 145.A.200(a)(4) AMC1 145.A.200(a)(4) GM1 145.A.200(a)(4) | • What information and safety data is used for management decision making for continuous improvement?  
• Evidence of:  
  o Lessons learnt being incorporated into SMS and operational processes;  
  o Best practice being sought and embraced;  
  o Surveys and assessments of organisational culture being carried out and acted upon;  
  o Data being analysed and results shared with Safety Committees.  
  o Evidence of follow up actions. | ☐ P  
☐ S  
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☐ E | | |
| | • Assess the willingness and leadership of the senior management at continuously improving the SMS. |  |  | |

### Safety promotion

### Safety training and education

<table>
<thead>
<tr>
<th>145.A.200(a)(4) AMC1 145.A.200(a)(4) GM1 145.A.200(a)(4)</th>
<th>Present</th>
<th>Suitable</th>
<th>Operational</th>
<th>Effective</th>
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</table>
| The organisation shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform their SMS duties. The scope of the safety training programme shall be appropriate to each individual’s involvement in the SMS. | There is a training programme for SMS in place that includes initial and recurrent training. The training covers individual safety duties (including roles, responsibilities and accountabilities) and how the organisation’s SMS operates. | The SMS training programme is delivering appropriate training to the different staff in the organisation and is being delivered by competent personnel. | The SMS training programme is evaluating for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment. | SMS Training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment. | ☐ P  
☐ S  
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☐ E | |
| | • Review the SMS training programme to verify including course content (customisation to organisation’s methodology) and delivery method.  
• Verify that the training delivered to personnel (including nominated persons) involved in SMS is relevant to the duties and is reflecting the adopted SMS procedures.  
• Check training records against the training programme.  
• Review how the competence of the instructors is being assessed. |  |  | |

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### Safety communication

<table>
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<th>Description</th>
</tr>
</thead>
</table>
| 145.A.200(a)(4) AMC1 145.A.200(a)(4) GM1 145.A.200(a)(4) | | • Training considers feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis, training, course evaluations etc.  
• Review how training is assessed for new staff and changes in position.  
• Review any training evaluation. | | |

The organisation shall have a formal means for safety communication that:
• ensures personnel are aware of the SMS to a degree commensurate with their positions;  
• conveys safety-critical information;  
• explains why particular actions are taken to improve safety; and  
• explains why safety procedures are introduced or changed.

Note: communication is essential to build a positive safety culture through hazard reporting or sharing of safety information.

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<th>Operational</th>
<th>Effective</th>
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</table>
| There is a process to determine what safety critical information needs to be communicated and how it is communicated throughout the organisation to all personnel as relevant. | The means of communication are adapted to:  
- The size and complexity of the organisation;  
- The audience and the significance of what is being communicated. | Safety critical information is being identified and communicated throughout the organisation to all personnel as relevant including contracted organisations and personnel where appropriate. | The organisation analyses and communicates safety critical information effectively through a variety of methods as appropriate to maximise its understanding. Safety communication is assessed to determine how it is being used and understood and to improve it where appropriate. |

- Review the sources of information used for safety communication.  
- Review the methods used to communicate safety information e.g., meetings, presentations, emails, website access, newsletters, bulletins, posters etc.  
- Assess whether the means of communication is appropriate, based on the organisation’s structure and the audience. The communication should be simple and concise so that it is easily understood.  
- Is the means for safety communication being reviewed for effectiveness and material used to update relevant training?  
- Check that lessons learned, significant events, changes and investigation outcomes are being communicated.  
- Check accessibility to safety information. | ☐ P  
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## Interface management

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### Additional items to be considered

- The organisation’s **interfaces** with other organisations can have a significant contribution to the safety of its products or services.
- The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.
- The way the interfaces are managed is appropriate to the criticality in terms of safety.
- The organisation is managing the interfaces through hazard identification and risk management. There is assurance activity to assess risk mitigations being delivered by external organisations.
- The organisation has a good understanding of interface management and there is evidence that interface risks are being identified and acted upon.
- Interfacing organisations are sharing safety information and take actions when needed.

- Review how interfaces have been documented. Check MOE 2.1 provider procedure, MOE 5.2 and 5.4 to identify subcontracted/contracted org.
- Evidence that:
  - Safety critical issues, areas and associated hazards are identified;
  - Safety occurrences are being reported and addressed;
  - Risk controls actions are applied and regularly reviewed;
  - Interfaces are reviewed periodically.
- The organisation’s SMS covers hazard identification for the external services and activities (incl. subcontracted activities) and internal interfaces.
- Training and safety promotion sessions are organised with relevant external organisations.
- External organisations participate in SMS activities and share safety information.
- The organisation’s occurrences reporting system needs to extend to the external organisations, wherever appropriate.
- Management of changes impacting safety are appropriately addressed through the contracts.
### Inspection topics

<table>
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