	Ref # Document in 6. Status update on SMS implementation

Introduction

This file serves as a guide to perform DOA SMS assessments and is based on the SMS 4 pillars and 12 elements and the way of working proposed in the MSAT. The expected level of maturity for initial approval of a DOA, approval of the SMS significant change and/or closure of related level 2 findings is provided in yellow highlight.
This additional guidance is valid till 7 March 2025!
The file format is such that it can be used directly in an audit report (ARF).
Organisations can always be assessed against a higher maturity level when the organization is ready for that.

Contents

	Ref # Document in 6. Status update on SMS implementation

1. Safety Policy

Part 21 requirements	*Company referential*
239(c)1	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
1. *Does the safety policy* *(1) reflect organisational commitments regarding safety, and its proactive and systematic management, including the promotion of a positive safety culture;* *(2) include internal reporting principles by fostering the reporting of organisational threats as well as events, as defined in AMC3 21.A.3A(a);* *include the commitment:* *(3) to comply with all the applicable legislation, meet all the applicable requirements, and adopt practices to improve safety standards;* *(4) to provide the necessary resources for the implementation of the safety policy;* *(5) to apply human factors (HF) principles;* *(6) to enforce safety as a primary responsibility of all managers* 2. *Is it endorsed by the head of the design organisation (HDO)* 3. *Is it periodically reviewed to ensure that it remains relevant and appropriate to the organisation.*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a safety policy, signed by the Accountable Manager, which includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices.

☐ **Suitable** - The safety policy is easy to read. The content is customised to the organisation.

☐ **Operating** - The safety policy is reviewed periodically to ensure it remains relevant to the organisation.

☐ **Effective** - The Accountable Manager has a clear understanding of the safety policy and is fully engaged in implementing it.

Maturity assessment guidance

Review event specified in the procedures and scheduled (not necessarily performed yet)

	Ref # Document in 6. Status update on SMS implementation

2. Safety Policy - communication

Part 21 requirements	*Company referential*
239(c)1	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
4. What evidence is there that the safety policy is being communicated, with visible endorsement, throughout the organisation		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a means in place for the communication of the safety policy and its associated objectives. The management commitment to safety is documented within the safety policy.

☐ **Suitable** - The safety policy and its associated objectives is clearly visible (or reachable) to all staff (e.g. consider multiple sites, countries). The safety policy is understandable (consider multiple languages).

☐ **Operating** - The safety policy and its associated objectives is communicated to all personnel (including relevant contracted staff and organisations). The Accountable Executive and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.

☐ **Effective** - People across the organisation are familiar with the safety policy and its associated objectives and can describe their obligations in respect of the safety policy and the internal safety reporting scheme.

Maturity assessment guidance

Communication to staff can be shown including all levels of DO staff. It is acceptable if small portion of staff has not yet received the information.

Initial commitment by relevant subcontractors

3. Just Culture

Part 21 requirements	*Company referential*
239(c)1	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
5. *Does the organisation commit to apply 'just culture' principles and, in particular, not to make available or use the information on occurrences: (i) to attribute blame or liability to personnel for actions, omissions, or decisions that are commensurate with their experience and training; or (ii) for any purpose other than the improvement of aviation safety.* 6. *Where has the organisation defined internal rules that describe how 'just culture' principles are guaranteed and implemented.*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - A just culture policy and principles have been defined.

☐ **Suitable** - The just culture policy (or in any other related document) clearly identifies acceptable and unacceptable behaviors. The principles ensure that the policy can be applied consistently across the whole organisation. The just culture policy and principles are understandable and clearly visible (or reachable). Decision-making process related to the implementation of the just culture is designed according to the size of the organisation (e.g. involvement of staff representatives, staff Committee, Unions etc.)

☐ **Operating** - There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff.

☐ **Effective** - The Just Culture policy is applied in a fair and consistent manner and people trust the policy. There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff representatives.

Maturity assessment guidance

Making staff aware of 'just culture' elements giving them protection when reporting safety matters must have started (but not necessarily completed)

	Ref # Document in 6. Status update on SMS implementation

4. Safety Objectives

Part 21 requirements	*Company referential*
239(c)1	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
7. Where have the safety objectives been defined and by whom? *8. Do they* *(1) form the basis for safety performance monitoring and measurement;* *(2) reflect the organisation's commitment to maintaining and continuously improving the overall effectiveness of safety management;* *Are they* *(3) communicated throughout the organisation; and* *(4) periodically reviewed to ensure that they remain relevant and appropriate to the organisation.*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - Safety objectives have been established that are consistent with the safety policy and communicated throughout the organisation.

☐ **Suitable** - Safety objectives are relevant to the organisation and its activities. They are monitored by the right level of (senior) managers Safety objectives are understandable and clearly visible. Safety objectives are aligned with the SSP and/or SPAS, when appropriate.

☐ **Operating** - 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.

☐ **Effective** - Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met. Associated qualitative and quantitative measures are in place. Safety objectives are not only aligned with the SSP and/or SPAS, but they are also compared with those of the risk profile sector. They are updated based on the latest relevant safety information available. The organisation is sometimes involved in the elaboration of the SSP and/or SPAS. Continuous improvement of safety is effectively measured

Maturity assessment guidance

SPIs are determined and related input is being collected (or tools for collection are installed). Regular review needs to be specified in the procedures and should have been scheduled (not necessarily performed yet)

	Ref # Document in 6. Status update on SMS implementation

5. Key personnel

Part 21 requirements	*Company referential*
239(c)2	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
9. Has a Safety Manager been nominated that in addition to safety management related competences, including HF and HP, also provides the requiredoperational experience in design activities? *10. Has a Safety Review Board been implemented? Who are the participants and what are the tasks allocated to this board?* *11. When (how often) does the SRB meet?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - A 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. The organisation has established the SRB and SAG (as applicable).

☐ **Suitable** - The safety manager is competent. Sufficient time and resources are allocated to maintain the SMS, but not limited to, competent staff for safety investigation, analysis, auditing, and promotion. SRB's structure and frequency support the SMS functions across the organisation. The scope of the SRB includes safety risks and compliance issues. The attendance of the SRB includes at least the Accountable Manager and the heads of functional areas.

☐ **Operating** - The safety manager has implemented and is maintaining the SMS. The safety manager is in regular communication with the Accountable Manager and escalates safety issues when appropriate. The safety manager is accessible to staff in the organisation. There is evidence of SRB meetings taking place detailing the attendance, discussions, and actions. The SRB monitors the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources. Actions are being monitored. Qualitative/quantitative means have been established to measure and monitor the established safety objectives

☐ **Effective** - The safety manager is competent to manage the SMS and identifying improvements in a timely manner. There is an established reporting scheme between the Accountable Manager and the safety manager to timely and regularly report on the safety issues. SRB includes key stakeholders. The outcomes of the meetings are documented and communicated and any actions are agreed, taken and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate.

Maturity assessment guidance

Evidence of Safety Manager involvement in the (still) ongoing SMS implementation is sufficient. Safety Manager must be known (identifiable) by staff and ways to access him/her must be specified. Frequency of SRB meetings must be specified and plan and agenda for (initial) SRB meeting must be available

	Ref # Document in 6. Status update on SMS implementation

6. Safety Risk Management – Hazard Identification

Part 21 requirements	*Company referential*
239(c)3	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
12. What is the process to identify hazards? *13. Where are the identified hazards recorded?* *14. How are subcontracted activities covered?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a process that defines how hazards are identified though reactive and proactive methods, using multiples sources. The methodology to define criteria for safety investigations is documented. The process includes the management of organisational change when it impacts safety.

☐ **Suitable** - Multiple sources of hazards (internal and external) are considered and reviewed, as appropriate in the domain. The interfaces are properly addressed. The data analysis process enables gaining useable safety information. Hazards are documented in an easy-to-understand format. The level of sign-off for safety investigations is defined and adequate to the level of risk. The safety hazards at organisation's level are consistent with the ones identified at authority's level, where relevant,

☐ **Operating** - The hazards are identified and documented. Technical, human and organisational factors related hazards are being considered. The criteria for safety investigations are identified and applied. Safety investigations are carried out and recorded.

☐ **Effective** - The organisation has processes and means that capture hazards (technical, environmental, human and organisational factors related), are maintained and reviewed to ensure they remain up-to-date. The organisation is continuously and proactively identifying hazards (technical, environmental, human and organisational factors related) related to its activities and operational environment and involves all key personnel and appropriate stakeholders. Hazards are assessed in a systematic and timely manner. Personnel express confidence and trust in the organisation's reporting policy and processes. The criteria for safety investigations are continuously updated to include internal and external sources as appropriate

Maturity assessment guidance

Hazard identification will never be complete. Reasonable initial list of hazards must be visible and criteria for safety investigation must be specified

	Ref # Document in 6. Status update on SMS implementation

	Ref # Document in 6. Status update on SMS implementation

7. Safety Risk Management – assessment and mitigation

Part 21 requirements	*Company referential*
239(c)3	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
15. What is the process to analyze and assess safety risks? *16. Are there appropriate mitigations for the identified risks?* *17. Is there a recurrent review and update of the risk assessment?* *18. What are the identified main risks to the organization?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a process for the analysis and assessment of safety risks.

☐ **Suitable** - The risk assessment methodology, including 'severity' and 'likelihood' usable criteria are defined and fit the service provider's actual environment, including consideration to the expert judgement when data are not available. The used definitions are sufficiently explicit or detailed. For the acceptance of the risk's level, the right level of organisation's authority within the organisation (responsibilities) in cooperation with the stakeholders is clearly defined.

☐ **Operating** - Risk analysis and assessments are carried out in a consistent manner based on the defined process. Appropriate risks controls are being applied to reduce safety risks to an acceptable level, including timelines and allocation of responsibilities agreed with the stakeholders. Operational, technical, human and organisational factors are considered as part of the development of risks controls. Senior management is actively involved in medium and high risks hazards and their mitigation and controls. Understanding of external inputs and outputs of safety risk management that should be addressed.

☐ **Effective** - 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 are used routinely, consistently applied in management decision making processes, and are regularly reviewed.

Maturity assessment guidance

Risk analysis results for the identified hazards must be available

	Ref # Document in 6. Status update on SMS implementation

8. Safety Reporting

Part 21 requirements	*Company referential*
239(c)3	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
19. By what means are errors, near misses etc. investigated, that are not subject to 21.A.3A? *20. How do results from such investigations feed back into the improvement of the design management system?* *21. What is the ratio between anonymous and open reports?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database. Responsibilities have been defined as required by Reg. (EU) 376/2014. The process identifies how reports are actioned and timescales specified.

☐ **Suitable** - The reporting system is accessible and easy to use for the personnel involved in the safety activities of the organisation. There is an appropriate means to capture issues from third parties (partners, suppliers, contractors).

☐ **Operating** - The reporting system is simple to use, being used and accessible to all personnel. There is feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organisation. Reports are evaluated, processed, analysed and stored. Safety investigations are carried out by appropriately trained personnel to identify root causes (why it happened, not just what happened). People are aware and fulfil their responsibilities in respect of the reporting system Reports are processed within the defined timescales. Coherence with the topics discussed during the SRB meetings is ensured.

☐ **Effective** - Personnel express confidence and trust in the organisation's reporting policy and process. The reporting system is being used to influence management decisions and continuous improvement. There is a healthy reporting system based on the pertinence of reports received. Safety reports are acted on in a timely manner. The reporting system contributes to the continuous improvement of the organisation performance.

Maturity assessment guidance

Reporting system must be available to and known by staff. Provisions to include external reports must be available. Procedure for processing reports must be in place and processing staff has to be identified, trained and authorized

9. Safety Performance

Part 21 requirements	*Company referential*
239(c)4	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
22. *What are the organisation's means to monitor its level of compliance with its safety policy and safety objectives? Have any safety performance indicators been defined? If so, what are these?* 23. *How would feedback from that monitoring be further processed (i.e. feeding into risk assessment process, continuous improvement process etc.)*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - The organisation has a documented internal audit programme with a link to a management review process. There is a documented process to assess whether the appropriate risk controls are applied and effective with respect to SMS key processes. A person or group of persons with responsibilities for the monitoring function have been identified and they have direct access to the Accountable Executive.

☐ **Suitable** - Responsibilities, methods, and timelines for assessing risk controls are appropriately defined. Safety performance measurement targets the effectiveness of the mitigation measures addressing the key risks, and by extension, the safety objectives. Safety performance measurement is focused on what is important rather than what is easy to measure. The contribution of contracted organisations should be considered in the safety performance process, considering the potential effect it may have on the safety performance of the organisation.

☐ **Operating** - Information from the reporting system(s), safety assurance, compliance monitoring activities or any other relevant source feeds back into the safety risk management process. Appropriate risk controls are being verified to assess whether they are applied and effective. Follow-up of the corrective/preventive actions plan is evidenced and reviewed by the relevant SMS governance body (i.e. Adequate authority level based on the size of the organisation and the complexity of its operations). The interface between compliance-based audits and the safety risk management processes is described and operating

☐ **Effective** - Appropriate 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. Human performance is taken into consideration. There is comprehensive integration of external and internal interfaces, as appropriate, into organisation's SRM and Safety Assurance processes. The outcome of the organisation' safety performance considers and provides feedback to the SMS governance body, as relevant, for review and ultimately to the Competent Authority. The effectiveness of the SMS processes are reviewed on a regular basis.

Maturity assessment guidance

	Ref # Document in 6. Status update on SMS implementation

Means to merge information from different sources have to be established. No sample case required

10. Change management

Part 21 requirements	*Company referential*
239(c)4	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
24. How are changes to the design management system taken into account for the risk assessment?		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - The organisation has established a change management process to identify whether changes have an impact on safety activities and to manage significant, identified risks in accordance with existing safety risk management processes. Methods, responsibilities, and timelines are defined in the process.

☐ **Suitable** - Triggers for the change management process are defined. The process also considers business related changes and interfaces with other organisations/departments, having an impact on safety.

☐ **Operating** - The organisation is using a defined change management process to identify whether substantive changes have an impact on safety. Any identified risks are managed in accordance with existing safety risk management processes and are monitored through safety assurance. Internal and external factors such as Technical, Environmental, Human and Organisational related hazards are being considered, as appropriate.

☐ **Effective** - The Management of change process considers the accumulation or impact of multiple changes and the change and impact to safety-related functions are communicated with other organisations, including internal and external stakeholders. There is a means to share information with respect to management of change impact with external stakeholders (partners, suppliers, contractors, etc.). Safety risks are being managed consistent with the scope and time scale associated with the change. Risk mitigation actions resulting from management of change are part of SMS performance monitoring,

Maturity assessment guidance

Extension of already existing change process to take into account safety impact analysis. Sample should be provided (e.g. SMS implementation itself)

	Ref # Document in 6. Status update on SMS implementation

11. Continuous improvement

Part 21 requirements	*Company referential*
239(c)4	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
25. What input data (from which sources) is used to continuously improve the design management system? *26. What is the process to trigger such improvements form the collected data?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a documented process in place to monitor and review the effectiveness of the SMS using the available data and information

☐ **Suitable** - The overall system, including the Safety assurance activities, is producing SMS data / information that is being periodically reviewed by the safety management organisation to improve SMS implementation. External information is considered in addition to internal information. Appropriate senior managers, notably when it affects different departments, are involved. The decision making is data informed.

☐ **Operating** - There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken. The SMS is being periodically reviewed by the senior management team to support the assessment of its effectiveness and that appropriate actions are being taken. The organisation is using SMS and safety data to develop and assess effectiveness of the SPIs to enhance safety and continuous improvement of SMS processes

☐ **Effective** - The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements. The measurement of the organisation's safety performance addresses the continuous improvement of the SMS in a proactive manner, as well as the safety objectives, which are regularly updated. The contribution of SMS and safety data from key external interface organisations is taken into consideration. A robust and comprehensive set of SMS and safety data is developed [SMS Database with data governance] that supports the use of predictive data analysis. The organisation shares best practices and lessons learned as a global leader in SMS.

Maturity assessment guidance

Periodical review needs to be determined and scheduled (not necessarily performed yet)

	Ref # Document in 6. Status update on SMS implementation

	Ref # Document in 6. Status update on SMS implementation

12. Training and education

Part 21 requirements	*Company referential*
239(c)5	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
27. Has the organisation established a programme covering all staff to provide relevant SMS related trainings? *28. Does the training include both, initial and recuurent trainings?* *29. Are training syllabi established for the key trainings?* *30. Have trainers providing this training been properly qualified (technically and as trainers) or selected?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a training programme for SMS in place that includes initial and recurrent training.

☐ **Suitable** - The training covers individual safety duties (including roles, responsibilities, and accountabilities) and how the organisation's SMS operates. Training material and methodology are adapted to the audience and include Human Performance when relevant. All staff requiring training are identified.

☐ **Operating** - The SMS training programme is delivering appropriate training to the different staff in the organisation and is being delivered by competent personnel.

☐ **Effective** - SMS Training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment. Training is routinely reviewed to take into consideration feedback from different sources.

Maturity assessment guidance

Proof of staff training. Acceptable that initial training programme is still ongoing (not necessarily fully completed yet)

	Ref # Document in 6. Status update on SMS implementation

13. Safety communication

Part 21 requirements	*Company referential*
239(c)5	[Handbook chapter, procedure reference]

EASA	*Discussion*	*Company*
31. What means does the organisation use to provide safety communication and information. *32. How does the organisation assess the status of its 'safety culture' and whether it is commonly shared by staff independently from their actual function?*		

Evidences

[List of evidences reviewed to support the discussion]

DOATL notes

Conclusion

☐ **Present** - There is a process to communicate safety critical information.

☐ **Suitable** - The process determined what, when, and how safety information needs to be communicated. The process includes contracted organisations and personnel, where appropriate. The means of communication are adapted to: - The size and complexity of the organisation; - the audience and the significance of what is being communicated.

☐ **Operating** - Safety critical information is being identified and communicated throughout the organisation to all personnel, as relevant, including contracted organisations and personnel where appropriate.

☐ **Effective** - The organisation analyses and communicates safety critical information effectively through a variety of blended methods, as appropriate, to maximise it being understood. Safety communication is assessed to determine how it is being used and understood and to improve it where appropriate. The promotion of the safety policy and its positive safety culture is visible. Decision making, actions, and communication reflect a positive safety culture and safety leadership demonstrating commitment to the safety policy.

Maturity assessment guidance

Tools identified to provide safety critical information have to be implemented and populated with initial information