

Management System Assessment Tool



Management System assessment tool

v.01 – 06 September 2017

Present	There is evidence that the feature is documented within the organisation's Management system/SMS Documentation.
Suitable	The feature is suitable based on the size, nature, complexity of the organisation and the inherent risk in the activity.
Operating	There is evidence that the feature is in use and an output is being produced.
Effective	There is evidence that the feature is achieving the desired outcome and has a positive safety impact.

For Present, Operating and Effective a 'word picture' is included to help the inspector determine the correct level. The reason that there is no word picture for 'Suitable' is that it is specific to the individual organisation and impossible to define for all types and sizes of organisations. It is the responsibility of the organisation to determine the suitability and to justify to the competent authority who will then assess it.

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Introduction

ICAO Annex 19 promotes a common approach to safety management and safety oversight across aviation domains. This document provides a common assessment methodology focusing both on assessment and continual improvement of the Management System/SMS within the scope of authority oversight.

A common approach to assessing Management System/SMS effectiveness supports competent authorities to evolve from traditional, compliance based oversight to performance-based oversight, provides a common baseline for Management System/SMS effectiveness assessment and creates a sound basis for mutual acceptance of SMS under bilateral agreements.

The assessment tool is designed to be used by competent authorities but it could also be used by organisations, to assess the effectiveness of their own Management System/SMS, for the purpose of continuous improvement. The resulting assessment could be discussed with the competent authority, in order to obtain a common understanding of Management System/SMS effectiveness. Organisations could also use the tool to assess the Management System/SMS of subcontract organisations.



How and when the tool is used

This Management System assessment tool may be used for both initial certification (initial implementation of the Management System/SMS) and continuing oversight.

Initial certification/implementation

Before issuing the certificate, the competent authority should make sure that all processes are “Present” and “Suitable”, so that all the required enablers of a functioning SMS are implemented by the organisation. In this initial certification phase, a large part of the SMS assessment could be carried out by a desktop review of relevant Management System/SMS Documentation. However, carrying this out at the organisation provides an opportunity for the inspector to advise and guide the organisation on its Management System/SMS implementation and support standardised implementation.

Continuing oversight

After initial implementation, the organisation should start using the Management System/SMS as part of its operations. The competent authority should ensure that within the first oversight planning cycle the organisation’s Management System/SMS processes are “Present”, “Suitable” and “Operating”. An organisation may eventually have “Effective” processes, which is the evidence of an effective SMS. In order to check that SMS processes are indeed “Operating” and/or “Effective” the Management System/SMS should be re-evaluated on a regular basis to assess how well it is performing. The review should assess all of the items in the assessment tool which can be done by a combination of organisational visits, meetings and desk top reviews.

As an organisation’s Management System/SMS processes mature and it moves to ‘Operating’ and ‘Effective’ this may also require the ‘suitability’ criteria to be revisited. Changes to an organisation’s approval may also require a reconsideration of the suitability of the SMS processes. So when significant changes take place the competent authority may determine the need to review the existing assessment to ensure it is still appropriate.

Credit for other oversight activities

Valuable information about Management System/SMS effectiveness can be gained from other oversight activities. This may include such activities as routine compliance audits and inspections, occurrence investigations and meetings with the organisation. This should be taken into consideration by the inspector through liaison with other inspectors involved in the oversight of the organisation. Competent Authorities may also consider giving credit where an organisation has received accreditation for meeting an industry standard.

Extending the oversight planning cycle

In the context of performance based oversight, the competent authority may extend the oversight planning cycle for some organisations (see for example ARO.GEN.305 (c)¹) on the following basis:

1. the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks;
2. the organisation has continuously demonstrated under ORO.GEN.130 that it has full control over all changes;
3. no level 1 findings have been issued; and

1 Regulation (EU) No 965/2012



4. all corrective actions have been implemented within the time period accepted or extended by the competent authority as defined in ARO.GEN.350(d)(2).

These requirements for the extension of the audit cycle could all be captured based on the Management System/SMS assessment. For such an extension, the competent authority should at least ensure that all processes are “Operating” and that the processes of hazard identification, risk assessment and mitigation, management of change and compliance monitoring are “Effective”.

Dealing with multiple certificate holders

In the case of an organisation holding multiple approval certificates, the use of the Management System/SMS assessment tool should follow the rule “1 Management System/SMS = 1 assessment”. Therefore, if one organisation integrates all certificates within a single Management System/SMS, the assessment should consider the Management System/SMS as a whole.

Yet, it may be the case that different teams of inspectors oversee the same Management System/SMS with regard to different certificates, and a single assessment may be impracticable. In such case, the different assessments should be shared with the various teams of inspectors, and a common message coming from the competent authority(ies) should be provided.



Tool guidance

The tool assesses the compliance and effectiveness of the Management System/SMS through a series of features based on ICAO Annex 19 Second Edition and EASA Management System requirements for organisations. It is set out using the 12 elements of the ICAO SMS Framework and some additional EASA Management System requirements. Each feature should be reviewed to determine whether the feature is present, suitable and operating and effective, using the definitions and guidance set out below.

The tool is used by the competent authority inspector to evaluate and record the assessment. Alternatively it can be partially completed by the organisation to assess itself and by the competent authority to verify and validate the organisation's assessment.

Applicability

The assessment tool can be used to assess any size of organisation. However, due consideration should be given to the size, nature and complexity of an organisation to assess whether the individual feature of the SMS is 'Suitable'. Inspectors should refer to any existing EASA regulations that define what the management system/SMS may look like for non-complex organisations when considering if a feature is 'Suitable'. The competent authority should also consider any applicable Alternative Means of Compliance as part of the Management System/SMS assessment.

The tool has been designed to capture the generic Management System/SMS requirements. As currently there are no common EASA Management System/SMS requirements there may be some additional sector specific requirements that may need to be considered as part of the assessment.

Definitions used in the tool

Present: There is evidence that the feature is documented within the organisation's Management system/SMS Documentation.

Suitable: The feature is suitable based on the size, nature, complexity of the organisation and the inherent risk in the activity.

Operating: There is evidence that the feature is in use and an output is being produced.

Effective: There is evidence that the feature is achieving the desired outcome and has a positive safety impact.

For Present, Operating and Effective a 'word picture' is included to help the inspector determine the correct level. There is no word picture for 'Suitable' as this is specific to the individual organisation and impossible to define for all types and sizes of organisations. It is the responsibility of the organisation to determine the suitability and to justify to the competent authority who will then assess it.

The PSOE level should be considered as progressive; it must first be present, then confirmed as suitable, then it becomes operating and may then be effective. During ongoing assessments the suitability should be reassessed taking into account changes to the organisation and its activities.

An item cannot be considered Effective if it is not present because if it is not documented it cannot be carried out consistently and systematically.

What to look for: This column guides the inspector when looking at each individual feature and is not meant to be a checklist. The items listed are not specific to an individual PSOE level but remind the inspector of areas they may want to consider to look at. Some items in this column may not be relevant depending on the type or nature of the organisation.



Level of detail to be recorded

It is important that the inspector using the assessment tool records evidence of the assessment. Evidence includes documentation, reports, records of interviews and discussions. For example, for an item to be present the evidence is likely to be documented only, whereas for assessing whether it is operating it may involve assessing records as well as face to face discussions with personnel within an organisation.

Addressing findings and observations

The current findings definitions used in EU regulations are not consistent across domains and do not necessarily fit the Management System/SMS assessment which requires more focus on the effectiveness of the processes. Observations should be used to identify areas for continuous improvement and encourage a positive safety culture.

For the initial certification or as part of a transition to new Management System/SMS requirements for existing certificate holders all the processes should be present and suitable. If any are not then the approval should not be granted or transition accepted. Once an Management System/SMS is operating and transition periods expired, during the assessment if a process is found not to be operating, a finding should be raised.

Where a feature is found not to be effective the inspectors may consider issuing an observation to give rise to suggested improvements. However, findings should not be issued if the process is 'Operating' but not 'Effective'.

The completed assessment tool with the competent authority remarks from the assessment or at least a summary of the Management System/SMS assessment should be provided to the organisation along with a report that captures any findings and observations. Providing the organisation with detailed comments of the assessment will assist in continuous improvement of the Management System/SMS and supports a positive safety culture at a State level.

Scoring the Management System/SMS assessment

The main objective of the assessment tool is to help the competent authority assess the Management System/SMS for effectiveness in a consistent way rather than to deliver a 'score'. It is also recognised that the ANS Performance scheme may foresee some sort of scoring of the Management System/SMS assessment.

Should a competent authority decide to score the Management System/SMS assessment across its industry the following important considerations are needed:

- Scoring should not be linear but exponential so that a higher score is achieved for being Effective to encourage organisations to strive to achieve that level for their processes.
- Scoring should not be used as a pass / fail criteria but to help assess the maturity of the Management System/SMS as a benchmark against other organisations and to aid in continuous improvement.
- Scoring may also create the wrong behaviours in organisations that could undermine a positive safety culture.

1 SAFETY POLICY AND OBJECTIVES

1.1 MANAGEMENT COMMITMENT

Annex 19 reference & text

1.1.1 The service provider shall define its safety policy in accordance with international and national requirements.

The safety policy shall:

e) be signed by the accountable executive of the organization

g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a safety policy that includes a commitment to continuous improvement, observe all applicable legal requirements, standards and considers best practice signed by the accountable manager.		It is reviewed periodically to ensure it remains relevant to the organisation.	The accountable manager is familiar with the contents of the safety policy.

What to look for

- Talk to accountable manager to assess their knowledge and understanding of the safety policy.
- Confirm it meets EU Regulations.
- Interview staff to determine how readable and understandable it is.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Org.
ORO.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1) AMC1 ATS.OR.200(1)(i) Safety management system SAFETY POLICY — COMPLEX ATS PROVIDERS AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	ATCO.OR.C.001 'Management system of training organisations' point (b) AMC1 ATCO.OR.C.001(b) Management system of training organisations SAFETY POLICY



1 SAFETY POLICY AND OBJECTIVES

Annex 19 reference & text

1.1.2 The safety policy shall

b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The safety policy includes a statement to provide appropriate resources.		The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls.	The organisation is reviewing and taking action to address any forecasted shortfalls in resources.	
What to look for				
<ul style="list-style-type: none"> Review available resources including personnel, equipment and financial. There are sufficient and competent personnel. Review planned manpower vs actual manpower. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]	AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1) and related AMCs/GM	ATCO.OR.C.001 'Management system of training organisations' point (b) and related AMCs/GM

Annex 19 reference & text

1.1.3 The safety policy shall

f) be communicated, with visible endorsement, throughout the organization

See 2.1.2 for c) include safety reporting procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a means in place for the communication of the safety policy.		The safety policy is communicated to all personnel (including relevant contract staff and organisations).	People across the organisation are familiar with the policy and can describe their obligations in respect of the safety policy	
What to look for				
<ul style="list-style-type: none"> Review how safety policy is communicated. Safety policy is clearly visible. Question managers and staff regarding knowledge of the safety policy. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex operators	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex organisations	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005(b)(2) 'Management system' point (a)(4)	ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200(1)(i) 'Safety management system' SAFETY POLICY — [complex ATS providers] AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' point (d)

1 SAFETY POLICY AND OBJECTIVES

Annex 19 reference & text

1.1.4 The safety policy shall

a) reflect organizational commitment regarding safety, including the promotion of a positive safety culture

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The management commitment to safety is documented within the safety policy.		The accountable manager and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.	Decision making, actions and behaviours reflect a positive safety culture and there is good safety leadership that demonstrates commitment to the safety policy.

What to look for

- All Managers are familiar with the key elements of the safety policy.
- Evidence of senior management participation in safety meetings, training, conferences etc.
- Feedback from safety culture surveys.
- Relationship with regulator and other stakeholders.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' point (a)(2) - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' point (a)(2) - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (a)(3)	ATM/ANS.OR.B.015(a)(2) GM3 ATM/ANS.OR.B.005(a)(2) Management system SAFETY CULTURE and ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200 (1)(i) 'Safety management system'	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' points (c), (e) and (f)



1 SAFETY POLICY AND OBJECTIVES

Annex 19 reference & text

1.1.5 The safety policy shall

d) clearly indicate which types of behaviors are unacceptable related to the service provider’s aviation activities and include the circumstances under which disciplinary action would not apply.

See also Reg. (EU) 376/2014 Article 16.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
A Just Culture Policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours to promote a Just Culture.		There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff.	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 and staff representatives.

What to look for

- Evidence of when the just culture principles have been applied following an event.
- Evidence of interventions from safety investigations addressing organisational issues rather than focusing only on the individual.
- Review how the organisation is monitoring reporting rates.
- The number of aviation safety reports appropriate to the activities.
- Safety Reports include the reporter’s own errors and events they are involved in (events where no one was watching).
- Feedback on just culture from staff safety culture surveys.
- Interview staff representatives to confirm that they agree with just culture policy and principles.
- Talk to staff to check they are aware of the just culture policy and principles.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 376/2014 Article 16(11) AMC1 ORO.GEN.200(a) (2) ‘Management system’ point (a)4 ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) AMC1 ORA.GEN.200(a) (2) ‘Management system’ point (a)4 ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11) ADR.OR.D. 005 ‘Management system’ AMC1 ADR.OR. D.005(b)(2) ‘Management system’ point (b)(3)	Reg. 376/2014 Article 16(11) ATS.OR.200 ‘Safety management system’ (1)(i) AMC1 ATS.OR.200(1) (i) ‘Safety management system’ SAFETY POLICY – [complex ATS providers] ATM/ANS.OR.A.065	Reg. 376/2014 Article 16(11) AMC1 ATCO.OR.C.001(b) ‘Management system of training organisations’

1 SAFETY POLICY AND OBJECTIVES

Annex 19 reference & text

(New Std. 1.1.2)

1.1.6 Taking due account of its safety policy, the service provider shall define safety objectives.

The safety objectives shall:

- a) form the basis for safety performance monitoring and measurement as required by 3.1.2
- b) reflect the service provider’s commitment to maintain or continuously improve the overall effectiveness of the SMS
- c) be communicated throughout the organization
- d) be periodically reviewed to ensure they remain relevant and appropriate to the service provider.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the organisation.		Safety objectives are relevant to the organisation and are being regularly reviewed and are communicated throughout the organisation.	Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met.

What to look for

- Assess whether the safety objectives are appropriate and relevant?
- 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 being measured to monitor achievement through SPLs.-

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ORA.GEN.200(a)(2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ADR.OR.D.005(b)(2) Management system point (c)(3)	ATM/ANS.OR.B.005(a)(3) ‘Management system’	ATCO.OR.C.001 Management system of training organisations
AMC1 ORO.GEN.200(a)(3) Management system point (d)(1) - [complex organisations]	AMC1 ORA.GEN.200(a)(3) Management system point (d)(1) - [complex organisations]		AMC2 ATM/ANS.OR.B.005(a)(3) Management system	AMC1 ATCO.OR.C.001(b) Management system of training organisations
AMC2 ORO.GEN.200(a)(5) Management system point (a) - [complex organisations]	AMC2 ORA.GEN.200(a)(5) Management system point (a) - [complex organisations]		AMC1 ATS.OR.200(1)(i) Safety management system SAFETY POLICY — COMPLEX ATS PROVIDERS point (b)(3)	SAFETY POLICY



1.2 SAFETY ACCOUNTABILITY AND RESPONSIBILITIES

Annex 19 reference & text

1.2.1 The service provider shall

a) identify the accountable executive who, irrespective of other functions, is accountable on behalf of the organization, for the implementation and maintenance of an effective SMS

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
An accountable manager has been appointed with full responsibility and ultimate accountability for the SMS.		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.	The accountable manager ensures that the performance of the SMS is being monitored, reviewed and improved.

What to look for

- Evidence that the accountable manager has the authority to provide sufficient resources for relevant safety improvements.
- Evidence of decision making on risk acceptability.
- Review SMS activities are being carried out in a timely manner and the SMS is sufficiently resourced.
- Evidence of activities being stopped due to unacceptable level of safety risk.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(1) ORO.GEN.210 'Personnel requirements' point (a)	ORA.GEN.200 'Management system' point (a)(1) ORA.GEN.210 'Personnel requirements' point (a)	ADR.OR.D.015 'Personnel requirements' point (a)	ATS.OR.200 'Safety management system' point (1)(ii)(iii) AMC1 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES AMC2 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]	ATCO.OR.C.001 Management system of training organisations, (a) ATCO.OR.C.010 'Personnel requirements' point (a)

1 SAFETY POLICY AND OBJECTIVES

Annex 19 reference & text

1.2.2 The service provider shall

b) clearly define lines of safety accountability throughout the organization, including a direct accountability for safety on the part of senior management,

c) identify the responsibilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the organisation

d) document and communicate safety accountability, responsibilities, and authorities throughout the organization,

e) define the levels of management with authority to make decisions regarding safety risk tolerability.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety accountability, authorities and responsibilities are clearly defined and documented.		Everyone in the organisation is aware of and fulfil their safety responsibilities, authorities and accountabilities and encouraged to contribute to the SMS.	The accountable manager and the senior management team are aware of the risks faced by the organisation and safety management system principles exist throughout the organisation so that safety is part of the everyday language.

What to look for

- Question managers and staff regarding their roles and responsibilities.
- Confirm senior managers are aware of the organisation’s safety performance and its most significant risks.
- Evidence of managers having safety related performance targets.
- Look for active participation of the management team in the SMS.
- Evidence of appropriate risk mitigation, action and ownership.
- Levels of Management authorised to make decisions on risk acceptance are defined.
- Acceptance of risk is aligned with authorisations.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
b) ORO.GEN.200 ‘Management system’ point (a)(1)	b) ORA.GEN.200 ‘Management system’ point (a)(1)	b) ADR.OR.D. 005 ‘Management system’ point (b)(1)	b) ATM/ANS.OR.B.005(a)(1) and (b), ATS.OR.200 ‘Safety management system’ (1)(ii)	b) ATCO.OR.C.001 ‘Management system of training organisations’ ‘point (a)
c) ORA.GEN.200 ‘Management system’ point (a)(1) ORO.GEN.210 ‘Personnel requirements’ points (a) and (b)	c) ORA.GEN.200 ‘Management system’ point (a)(1) ORA.GEN.210 ‘Personnel requirements’ points (a) and (b)	c) ADR.OR.D. 005 ‘Management system’ (b)(1) and ADR. OR.D.015 ‘Personnel requirements’ (a);(b)	c) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200(1)(ii)	c) ATCO.OR.C.001 ‘Management system of training organisations’ ‘point (b) ATCO.OR.C.010 Personnel requirements, point (a) and (b)
d) ORO.GEN.200 ‘Management system’ point (a)(5) AMC1 ORO.GEN.200(a)(5) AMC2 ORO.GEN.200(a)(5) [complex operators]	d) ORA.GEN.200 ‘Management system’ point (a)(5) AMC1 ORO.GEN.200(a)(5) AMC1 ORO.GEN.200(a)(5) [complex organisations]	d) ADR.OR.D.005‘Management system’ point (c),AMC1 ADR. OR.D.005(c) ‘Management system’ and AMC2 ADR. OR.D.005(c) ‘Management system’	d) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 ‘Safety management system’ (1)(ii)	d) ATCO.OR.C.001 ‘Management system of training organisations’, point (e)
e) AMC1 ORO.GEN.200(a) (3) ‘Management system’ point (b)(2) - [complex operators] AMC1 ORO.GEN.200(a) (1)(2)(3)(5) ‘Management system’ point (d) - [non- complex organisations]	e) AMC1 ORO.GEN.200(a) (3) ‘Management system’ point (b)(2) - [complex operators] AMC1 ORO.GEN.200(a) (1)(2)(3)(5) ‘Management system’ point (d) - [non- complex organisations]	e) AMC1 ADR.OR.D.005(b)(4) ‘Management system’	e) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 ‘Safety management system’ 1)(ii)	e) ATCO.OR.C.001 ‘Management system of training organisations’



1 SAFETY POLICY AND OBJECTIVES

1.3 APPOINTMENT OF KEY PERSONNEL

Annex 19 reference & text

1.3.1 The service provider shall appoint a safety manager who is responsible for the implementation and maintenance of the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
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.	<i>See Annex 19 Note:</i>	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 competent to manage the SMS and identifying improvements in a timely manner. There is a close working relationship with the accountable manager and the safety manager is considered a trusted advisor and given appropriate status in the organisation.

What to look for

- Review safety manager role including credibility and status.
- Appropriate safety training received.
- Evidence of maintained competency.
- Review how the safety manager gets access to internal and external safety information.
- Review how the safety manager communicates and engages with operational staff and senior management.
- Review safety manager workload / allocated time to fulfil role.
- Check there are sufficient resources for SMS activities such as safety investigation, analysis, auditing, safety meeting attendance and promotion.
- Review of safety report action and closure timescales.
- Interviews with accountable manager and safety manager.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.210 'Personnel requirements' point (b) AMC1 ORO.GEN.200(a)(1) 'Management system' point (a)(1)- [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex operators]	ORA.GEN.210 'Personnel requirements' point (b) AMC1-ORA.GEN.200(a)(1) 'Management system' point (a)(1)- [complex organisations] AMC1-ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex organisations]	ADR.OR.D.015 'Personnel requirements' point (c) and AMC1 ADR.OR.D.015(c) 'Personnel requirements'	ATS.OR.200(1)(iii)	ATCO.OR.C.010 Personnel requirements

Annex 19 Note: *Depending on the size of the service provider and the complexity of its aviation products or services, the responsibilities for the implementation and maintenance of the SMS may be assigned to one or more persons, fulfilling the role of safety manager, as their sole function or combined with other duties, provided these do not result in any conflicts of interest.*

1 SAFETY POLICY AND OBJECTIVES

1.3.2 EASA reference:

Management System AMCs for complex organisations

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established appropriate safety committees(s) that discuss and address safety risks and compliance issues and includes the accountable manager and the heads of functional areas.		There is evidence of meetings taking place in accordance with the terms of reference detailing the attendance and frequency of meetings. 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.	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. The safety performance and safety objectives are reviewed and actioned as appropriate.

What to look for

- Review safety committee and meeting structure and Terms of Reference for each committee / meeting.
- Review meeting attendance levels.
- Review meeting records and actions.
- outcomes are communicated to the rest or the organisation
- Evidence of safety objectives, safety performance and compliance being reviewed and discussed at meetings.
- Participants challenging what is being presented when there is limited evidence.
- Senior management are aware of the most significant risks faced by the organisation and the overall safety performance of the organisation.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ORA.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ADR.OR.D.005(b)(1) 'Management system'	Note; An air traffic services provider should be considered as complex unless it is eligible to apply for a limited certificate and fulfils the criteria set out in ATM/ANS.OR.A.010(a). AMC1 ATS.OR.200(1)(i) Safety management system AMC1 ATS.OR.200(1)(ii) Safety management system ACCOUNTABILITIES [complex ATS providers] AMC2 ATS.OR.200(1) (ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]	Not applicable



1.4 CO-ORDINATION OF EMERGENCY RESPONSE PLANNING

Annex 19 reference & text

1.4.1 The service provider required to establish and maintain an emergency response plan for accidents and incidents in aircraft operations and other aviation emergencies shall ensure that the emergency response plan is properly coordinated with the emergency response plans of those organizations it must interface with during the provision of its products and services.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
An appropriate emergency response plan (ERP) has been developed and distributed that defines the procedures, roles, responsibilities and actions of the various organisations and key personnel.		The ERP is reviewed and tested to make sure it remains up to date. Key personnel have easy access to the relevant parts of the ERP at all times. There is evidence of coordination with other organisations as appropriate.	The results of the ERP review and testing are assessed and actioned to improve its effectiveness.

What to look for

- Review emergency response plan.
- Review how co-ordination with other organisations is planned.
- Review how ERP is distributed and where copies are held.
- Talk to key personnel and check they have access to the ERP
- Different types of foreseeable emergencies have been considered.
- Review when plan was last reviewed and tested and any actions taken as a result

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (g) - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (f) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (g) - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (f) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(10) and AMC1 ADR.OR.D.005(b)(10) 'Management system'	ATS.OR.200(1)(iv) AMC1 ATS.OR.200(1)(iv) Safety management system AMC1 ATS.OR.200(1)(iv) Safety management system COORDINATION OF EMERGENCY RESPONSE PLANNING FOR ATS PROVIDERS [complex ATS providers]	Not applicable (ANSP ERP provisions apply)

1 SAFETY POLICY AND OBJECTIVES

1.5 SMS DOCUMENTATION

Annex 19 reference & text

1.5.1 The service provider shall develop and maintain an SMS manual that describes its:

- a) safety policy and objectives
- b) SMS requirements
- c) SMS processes and procedures
- d) accountability, responsibilities and authorities for SMS processes and procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The SMS documentation includes the policies and processes that describe the organisation's safety management system and processes.	See Annex 19 note	SMS documentation is consistent with other internal management systems and is representative of the actual processes in place. Changes to the SMS documentation are managed Everyone has easy access to, familiar with and follow the relevant parts of the SMS documentation.	SMS Documentation is proactively reviewed for improvement

What to look for

- Review the SMS Documentation and amendment procedures
- Check for cross references to other documents and procedures.
- Check availability of SMS documentation to all staff
- Check staff know where to find safety related documentation including procedures appropriate to their role.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(5) 'Management system' point (a) AMC2 ORO.GEN.200(a)(5) - [complex operators]	ORA.GEN.200 'Management system' point (a)(5) AMC1 ORO.GEN.200(a)(5) 'Management system' point (a) AMC1 ORO.GEN.200(a)(5)- [complex organisations]	ADR.OR.D.005 'Management system' point (c) and AMC1 ADR.OR.D.005(c) 'Management system', AMC2 ADR.OR.D.005(c) 'Management system'	ATM/ANS.OR.B.005(b) AMC1 ATM/ANS. OR.B.005(b) 'Management system' and Annex IV ATS. OR.200(1)(v) AMC1 ATS.OR.200(1)(v) Safety management system	AMC1 ATCO.OR.C.001(e) Management system of training organisations Point (e)(8)

Annex 19 Note: Depending on the size of the service provider and the complexity of its aviation products or services, the SMS manual and SMS operational records may be in the form of stand-alone documents or may be integrated with other organizational documents (or documentation) maintained by the service provider..



Annex 19 reference & text

1.5.2 The service provider shall develop and maintain SMS operational records as part of its SMS documentation.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The SMS documentation defines the SMS outputs and which records of SMS activities will be stored.		SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and control.	SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS

What to look for

- Review the supporting SMS documentation (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.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.220 'Record-keeping'	ORA.GEN.220 'Record-keeping'	ADR.OR.D.035 'Record keeping'	ATM/ANS.OR.B.030 Record keeping	ATCO.OR.C.020 Record keeping
AMC1 ORO.GEN.220(b) 'Record-keeping'	AMC1 ORA.GEN.220(b) 'Record-keeping'	AMC1 ADR.OR.D.035 'Record keeping' AMC2 ADR.OR.D.035 'Record keeping'	ATS.OR.200(1)(v) AMC2 ATS.OR.200(1) (v) Safety management system	AMC1 ATCO.OR.C.020(a);(b) Record keeping

2 SAFETY RISK MANAGEMENT

2.1 HAZARD IDENTIFICATION

Annex 19 reference & text

2.1.1 The service provider 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.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).		The hazards are identified and documented. Human and organisational Factors related hazards are being identified.	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 stakeholders. Hazards are assessed in a systematic and timely manner	
What to look for				
<ul style="list-style-type: none"> Review how hazards are identified, analysed and recorded. Consider hazards related to; <ul style="list-style-type: none"> possible accident scenarios. Human and organisational factors business decisions and processes Third party organisations Review what internal and external sources of hazards are considered such as: Safety reports / audits / safety surveys / investigations / inspections / brainstorming / Management of Change activities / Commercial and other external influences etc. 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 Reg. (EU) 376/2014 Article 4 and 5. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(3)	ATM/ANS.OR.B.005(a)(5) ATS.OR.200(2)(i)	ATCO.OR.C.001 Management system of training organisations point (c)
AMC1 ORO.GEN.200(a)(3) 'Management system' point (a)(1) - [complex operators]	AMC1 ORA.GEN.200(a)(3) 'Management system' point (a)(1) - [complex organisations]	AMC1 ADR.OR.D.005(b)(3) 'Management system'	AMC1 ATS.OR.205(b)(1) AMC2 ATS.OR.205(b)(1)	AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]			



2 SAFETY RISK MANAGEMENT

2.1.2 Regulation (EU) 376/2014 and Annex 19 Appendix 2 Std. 1.1.1.c) safety reporting procedures				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database.</p> <p>Responsibilities have been defined as required by Reg. (EU) 376/2014.</p> <p>The process identifies how reports are actioned and timescales specified.</p>		<p>The reporting system is simple to use, being used and accessible to all personnel.</p> <p>There is feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organisation.</p> <p>Reports are evaluated, processed, analysed and stored.</p> <p>People are aware and fulfil their responsibilities in respect of the reporting system</p> <p>Reports are processed within the defined timescales.</p>	<p>There is a healthy reporting system based on the volume of reporting and the quality of reports received.</p> <p>Safety reports are acted on in a timely manner</p> <p>Personnel express confidence and trust in the organisations reporting policy and process.</p> <p>The reporting system is being used to make better management decision making and continuous improvement</p> <p>The reporting system is available for third parties to report (partners, suppliers, contractors).</p>	
What to look for				
<ul style="list-style-type: none"> • Review the reporting system for access and ease of use. • Check staff trust the reporting system, are familiar with it and know what should be reported. • Review how data protection and confidentiality is achieved. • Evidence of feedback to reporter, the organisation and third parties. • Assess volume and quality of reports including self reporting.; • Review report closure rates. • Check availability to contracted organisations and customers to make reports. • The system supports analysis and follow-up. • Confirm responsibilities with regards to occurrence analysis, storage and follow-up clearly defined. • Check relevant staff are aware of which occurrences should be mandatory. • Assess how senior management engage with the outputs of the reporting system. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>Regulation (EU) 376/2014 Article 4 ‘Mandatory reporting’, Article 5 ‘Voluntary reporting’, Article 13 ‘Occurrence analysis and follow-up at national level’, Article 16 ‘Protection of the information source’.</p>				

2.2 RISK ASSESSMENT AND MITIGATION

Annex 19 reference & text

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

See Annex 19 note.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process for the analysis and assessment of safety risks. The level of risk the organisation is willing to accept is defined.		Risk analysis and assessments are carried out in a consistent manner based on the defined process. The defined risk acceptability is being applied.	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 and applied in management decision making processes and are regularly reviewed.

What to look for

- Review risk classification scheme and procedures.
- Severity and likelihood criteria defined (or alternative methodology described).
- Review layout of risk register.
- Sample an identified hazard and how it is processed and documented.
- Review what triggers a risk assessment.
- Check any assumptions made and whether they are reviewed.
- Review how issues are classified when there is insufficient quantitative data available.
- Process defines who can accept what level of risk.
- Risk register is being reviewed and monitored by the appropriate safety committee(s).
- Evidence of risk acceptability being routinely applied in decision making processes.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (b)(1) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (b)(1) - [complex organisations] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(4) and AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATS.OR.200(2)(i)	ATCO.OR.C.001 'Management system of training organisations' point (c) AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'

Annex 19 Note: *The process may include predictive methods of safety data analysis.*



Annex 19 reference & text

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has a process in place to decide and apply the appropriate risk controls.		Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities. Human Factors are considered as part of the development of risk controls	Risk controls are practical and sustainable and applied in a timely manner and do not create additional risks. Risk Controls take into consideration Human Factors.

What to look for

- Risk controls consider human and organisational factors.
- Evidence of risk controls being actioned and follow up.
- Aggregate risk is being considered.
- Look at whether the risk controls have reduced the residual risk.
- Risk controls clearly identified.
- Review the use of risk controls that rely solely on human intervention.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO. GEN.200(a)(3) 'Management system' point (b)	AMC1 ORA.GEN.200(a) (3) 'Management system' point (b)	AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATS.OR.200(2)(i)	ATCO.AR.B.001 Management system, (a)(4); Furthermore, ATSP provisions apply.

3 SAFETY ASSURANCE

3.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT

Annex 19 reference & text

3.1.1 The service provider shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risk controls.

See Annex 19 Note.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a process in place to assess whether the risk controls are applied and effective.		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.	
What to look for				
<ul style="list-style-type: none"> Evidence of risk controls being assessed for effectiveness (eg. audits, surveys, reviews). Evidence of risk controls applied by contracted organisations / third parties being assessed. Information from safety assurance and compliance monitoring activities feeds back into the safety risk management process. Review where risk controls have been changed as a result of the assessment. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]	ADR.OR.D.005 'Management system' point (b)(5) and AMC1 ADR.OR.D.005(b)(5) 'Management system'	ATS.OR.200 (3)(i)	Not applicable, however Air Traffic Service Provider provisions apply.

Annex 19 Note: An internal audit process is one means to monitor compliance with safety regulations, the foundation upon which SMS is built, and assess the effectiveness of these safety risk controls and the SMS. Guidance on the scope of the internal audit process is contained in the Safety Management Manual (SMM) (Doc 9859).



3 SAFETY ASSURANCE

Annex 19 reference & text

3.1.2 The service provider’s safety performance shall be verified in reference to the safety performance indicators and safety performance targets of the SMS in support of the organization’s safety objectives.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place on how the safety performance of the organisation will be measured including safety performance indicators and targets linked to the organisation’s safety objectives.		The safety performance of the organisation is being measured and the SPIs are being continuously monitored and analysed for trends.	<p>SPIs are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data.</p> <p>SPIs are reviewed and regularly updated to ensure they remain relevant.</p> <p>Where the SPIs indicate a risk control not being effective appropriate action is taken.</p>

What to look for

- Evidence that SPIs are based on reliable sources of data.
- Evidence of when Safety performance indicators were last reviewed.
- The defined SPIs and targets are appropriate to the organisation’s activities, risks and safety objectives.
- SPIs are focused on what is important rather than what is easy to measure.
- Consideration of any State SPIs.
- Review whether any action has been taken when an SPI is indicating a negative trend (reflecting a risk control or an inappropriate SPI).
- Evidence that results of safety performance monitoring are discussed at senior management level.
- Evidence of feedback provided to the accountable manager.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>ORO.GEN.200 ‘Management system’ point (a)(3)</p> <p>AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex operators]</p>	<p>ORA.GEN.200 ‘Management system’ point (a)(3)</p> <p>AMC1 ORA.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex organisations]</p>	<p>ADR.OR.D.005 ‘Management system’ point (b)(5) and AMC1 ADR.OR.D.005(b)(5) ‘Management system’</p>	<p>ATM/ANS.OR.B.005(a)(3)</p> <p>AMC2 ATM/ANS.OR.B.005(a)(3) Management system</p> <p>AMC1 ATS.OR.200(1)(v) Safety management system</p>	<p>Not applicable, however Air Traffic Service Provider provisions apply.</p>

3 SAFETY ASSURANCE

3.2 THE MANAGEMENT OF CHANGE

Annex 19 reference & text

3.2.1 The service provider shall develop and maintain a process to identify changes which may affect the level of safety risk associated with its aviation products or services and to identify and manage the safety risks that may arise from those changes.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established a management of change process to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.		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 management of change process is used for all safety related changes including Human Factors issues and considers the accumulation of multiple changes. It is initiated in a planned, timely and consistent manner and includes follow up action that the change was implemented safely.

What to look for

- Key stakeholders are involved in the process.
- Review what triggers the process.
- Review recent changes that have been through the risk assessment process.
- Change is signed off by an appropriately authorised person.
- Transitional risks are being identified and managed.
- Review follow up actions such as whether any assumptions made have been validated.
- Review whether there is an impact on previous risk assessments and existing hazards.
- Review whether consideration is given to the accumulative effect of multiple changes.
- Review that business related changes have considered safety risks (organisational restructuring, downsizing, IT projects etc.)
- Evidence of Human Factors issues being addressed during changes.
- Review impact of change on training and competencies.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (e) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (b) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (e) - [complex organisations] AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (b) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(6) and AMC1 ADR.OR.D.005(b)(6) 'Management system' ADR.OR.B.040 'Changes' in particular point (f)	ATM/ANS.OR.A.040 Changes — general ATM/ANS.OR.A.045 Changes to a functional system ATM/ANS.OR.B.005(a)(4) ATM/ANS.OR.B.010 Changes - General ATS.OR.205 Safety assessment and assurance of changes to the functional system ATS. OR.210 Safety criteria	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (c)



3.3 CONTINUOUS IMPROVEMENT OF THE SMS

Annex 19 reference & text

3.3.1 The service provider shall monitor and assess its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place to monitor and review the effectiveness of the SMS using the available data and information.		There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken.	The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements.

What to look for

- What information and safety data is used for management decision making for continuous improvement?
- Evidence of:
 - › Lessons learnt being incorporated into SMS and operational processes;
 - › Best practice being sought and embraced
 - › Surveys and assessments of organisational culture being carried out and acted upon.
 - › Data being analysed and results shared with Safety Committees.
- Evidence of follow up actions.
- Feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis all contribute towards continuous improvement of the SMS.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 216/2008 Essential requirements for air operations point 8.a.4 ORO.GEN.200 'Management system' point (a)(3) and (a)(6) AMC1 ORO.GEN.200(a)(3) 'Management system' point (f) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (e) - [non-complex operators]	Reg. 216/2008 Essential requirements for pilot licensing point 3.a.1(ii) for ATOs and 4.c.1(ii) for AeMCs ORA.GEN.200 'Management system' point (a)(3) and (a)(6) AMC1 ORA.GEN.200(a)(3) 'Management system' point (f) - [complex organisations] AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(7) and AMC1 ADR.OR.D.005(b)(7) 'Management system'	ATS.OR.200(2)(iii)	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (b)

4 SAFETY PROMOTION

4.1 TRAINING AND EDUCATION

Annex 19 reference & text

4.1.1 The service provider 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.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
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 being delivered by competent personnel.	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.

What to look for

- Review the SMS training programme including course content and delivery method.
- Check training records against the training programme.
- Review how the competence of the instructors is being assessed.
- 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.
- Does the training include human and organisational factors?
- Ask staff about their own understanding of their role in the organisation’s SMS and their safety duties.
- Check all staff are briefed on compliance.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(4) AMC1 ORO.GEN.200(a) (4) ‘Management system’ point (a)	ORA.GEN.200 ‘Management system’ point (a)(4) AMC1 ORO.GEN.200(a) (4) ‘Management system’ point (a)	ADR.OR.D.005 ‘Management system’ (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 ‘Safety management system’ (4)(i)	ATCO.OR.C.001 ‘Management system for training organisation’, point (d)



4.1.2 EASA reference

EASA ORX.GEN.200(a)(4) requirements for maintaining personnel trained and competent to perform their safety and compliance tasks

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place to ensure that the organisation has trained and competent personnel.		There is evidence of the process being used and being recorded.	The competency assessment programme takes appropriate remedial action when necessary and feeds into the training programme.

What to look for

- Review how competence assessment is carried out on initial recruitment and recurrently.
- Check it includes safety duties and responsibilities and compliance management

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ORA.GEN.200 'Management system' point (a)(4) AMC1 ORA.GEN.200(a)(4) 'Management system' point (a)	ADR.OR.D.005 'Management system' (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 'Safety management system' (4)(i))	AMC1 ATCO.OR.C.001(d) Management system of training organisations PERSONNEL

4 SAFETY PROMOTION

4.2 SAFETY COMMUNICATION

Annex 19 reference & text

4.2.1 The service provider shall develop and maintain 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

See also Reg. (EU) 376/2014 (Article 13(3))

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
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. This includes contracted organisations and personnel where appropriate.		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 it being understood. Safety communication is assessed to determine how it is being used and understood and to improve it where appropriate.

What to look for

- 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.
- Is the means for safety communication being reviewed for effectiveness and material used to update relevant training.
- Significant events, changes and investigation outcomes are being communicated.
- Check accessibility to safety information.
- Ask staff about any recent safety communication.
- Review whether information from occurrences are communicated to all relevant personnel (internal and external) and it has been appropriately dis-identified.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(4)	ORA.GEN.200 'Management system' point (a)(4)	ADR.OR.D.005 'Management system' point (b)(9) and AMC1	ATM/ANS.OR.B.005(a)(7) ATS.OR.200(4)(ii)	Not applicable, however Air Traffic Service Provider provisions apply.
ORO.GEN.200 'Management system' point (a)(5)	ORA.GEN.200 'Management system' point (a)(5)	ADR.OR.D.005(b)(9) 'Management system'	AMC1 ATM/ ANS.OR.B.005(a) (7) Management system	
AMC1 ORO.GEN.200(a) (4) 'Management system' point (b)	AMC1 ORA.GEN.200(a) (4) 'Management system' point (b)			



5 ADDITIONAL ITEMS TO BE CONSIDERED

These additional items included for the assessment relate to EASA Management System requirements or new notes in Annex 19 Edition 2. They are considered important parts of an effective SMS.

5.1 INTERFACE MANAGEMENT

Annex 19 reference & text

5.1.1 Appendix 2 Note 2.—

The service provider's interfaces with other organizations can have a significant contribution to the safety of its products or services.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.		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.

What to look for

- Review how interfaces have been documented. It may be included in a system description.
- 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 and internal interfaces.
- Training and safety promotion sessions are organised with relevant external organisations.
- External organisations participate in SMS activities and share safety information.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Not explicitly addressed See ORO.GEN.205 'Contracted activities' and related GM1 & 2	Not explicitly addressed See ORA.GEN.205 'Contracted activities' and related GM1 & 2	ADR.OR.D.010 'Contracted activities' and ADR.OR.D.025 'Coordination with other organisations'	ATM/ANS.OR.B.005 'Management system' point (f) GM1 ADR.OR.B.040(f) 'Changes' points (b)(2) and (b)(3)	Not explicitly addressed

5.2 RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION

5.2.1 Responsibilities and accountability for ensuring compliance are defined

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures. Responsibilities and accountabilities for compliance are defined for all staff.		<p>Organisation manuals and procedures are regularly reviewed in light of changes in applicable requirements.</p> <p>All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures.</p>	Enhancements to processes and procedures are suggested from the workforce and management. Individuals are proactively identifying and reporting potential non-compliances.	
What to look for				
<ul style="list-style-type: none"> Review how senior management ensure the organisation remains in compliance. Review that job descriptions include responsibilities for compliance. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.205 'Personnel requirements' point (b)	ORA.GEN.205 'Personnel requirements' point (b)	ADR.OR.D.005 'Management system' point (b)(11)	ATM/ANS.OR.B.020 Personnel requirements	ATCO.OR.C.010 Personnel requirements, point (b)

5.2.2 Responsibilities and accountabilities for compliance monitoring are defined

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>It has been documented that there is a person or group of persons with responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager.</p> <p>The accountable manager's accountability and responsibilities for compliance monitoring is documented.</p>		<p>The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme</p> <p>The accountable manager is ensuring there are sufficient compliance monitoring resources and independence of the audit function is being maintained.</p>	<p>The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager.</p> <p>The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities.</p>	
What to look for				
<ul style="list-style-type: none"> How does the compliance monitoring manager interact with: <ul style="list-style-type: none"> senior management, line managers the safety management staff? Evidence that senior management take action on compliance monitoring results. Check that the number of staff involved in compliance monitoring is appropriate Check for evidence of direct reporting lines to the accountable manager. Review how independence of the audit function is achieved 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(6) 'Management system' point (c)	AMC1 ORA.GEN.200(a)(6) 'Management system' point (c)	AMC1 ADR.OR.D.005(b)(11) Management system point (b) and AMC2 ADR.OR.D.005(b)(11) Management system	AMC1 ATM/ANS.OR.B.005(c)Management system COMPLIANCE MONITORING	AMC2 ATCO.OR.C.001(f) Management system of training organisations COMPLIANCE MONITORING



5 ADDITIONAL ITEMS TO BE CONSIDERED

5.2.3 Compliance monitoring programme				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
<p>The organisation has a compliance monitoring programme including details of the schedule of monitoring activities and procedures for audits and inspections, reporting, follow up and records.</p> <p>The way independence of compliance monitoring is achieved is documented.</p>		<p>The compliance monitoring programme is being followed and regularly reviewed.</p> <p>This includes the modification of the programme to address identified risks or organisational and operational changes.</p> <p>Compliance monitoring is independent from operational activities and includes contracted activities</p>	<p>The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.</p>	
What to look for				
<ul style="list-style-type: none"> Assess the contents of the programme against any regulatory requirements. Review how risk and performance is used to determine the depth and frequency of monitoring activities. Review how independence is achieved. Assess what triggers a change in the programme. Review whether there are any potential conflicts of interest. 				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p> <p>GM2 ORO.GEN.200(a)(6) 'Management system' [complex organisations]</p> <p>GM3 ORO.GEN.200(a) (6) 'Management system' [non-complex organisations]</p>	<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p>	<p>AMC1 ADR.OR.D.005(b) (11) Management system point (c)(2)(vi)</p>	<p>AMC1 ATM/ANS.OR.B.005 (c) Management system</p> <p>COMPLIANCE MONITORING</p>	<p>GM1 ATCO.OR.C.001(f) 'Management system of training organisations' point (c)(2)(vi)</p>

5 ADDITIONAL ITEMS TO BE CONSIDERED

5.2.4 Compliance monitoring outcomes e.g. audit results including corrective and preventive actions follow-up.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
<p>The organisation has documented procedures for the identification and follow-up of corrective actions and preventive actions.</p> <p>There is a process for how audit results are communicated to the accountable manager and senior management.</p> <p>The interface between compliance monitoring and the safety risk management processes is described.</p>		<p>The identifying and follow-up of corrective and preventive actions is carried out in accordance with the procedures including causal analysis to address root causes.</p> <p>The status of corrective and preventive actions is regularly communicated to relevant senior management and staff.</p>	<p>The organisation regularly reviews the status of corrective and preventive actions.</p> <p>The organisation investigates the systemic causes and contributing factors of findings.</p> <p>Significant findings are used in internal safety training & safety promotion sessions.</p> <p>The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures.</p> <p>There is regular communication between compliance monitoring staff and staff involved in other SMS activities.</p>

What to look for

- Review the methods used for causal analysis
- Is the method used consistently?
- Review any repeat findings or where actions have not been implemented or overdue.
- Check for timely implementation of actions.
- Awareness of senior management of the status of significant findings and related CA/PAs.
- Appropriate personnel participate in the determination of causes and contributing factors.
- Look for consistency between internal audit results and external audit results.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>ORO.GEN.200 'Management system' point (a)(6)</p>	<p>ORA.GEN.200 'Management system' point (a)(6)</p>	<p>AMC1 ADR.OR.D.005(b) (11) 'Management system' point (a)(1) points (b) and (e)</p>	<p>AMC1 ATM/ANS.OR.B.005(c) Management system COMPLIANCE MONITORING</p>	<p>ATCO.OR.C.001 'Management system of training organisations' point (f)</p>

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