

***Safety Management System and
Safety Culture Working Group (SMS
WG)***

**GUIDANCE ON
ORGANISATIONAL STRUCTURES**

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EXECUTIVE SUMMARY

This document has been prepared by the EASA ECAST SMS Working Group and provides practical guidance to organisations on appropriate organisational structures to comply with EASA rules on organisation and accountabilities within a Safety Management System.

The proposed draft rule and acceptable means of compliance (NPA 2008-22c) have been reviewed, commercial airline operators were surveyed, and relevant published literature on the subject was also identified and reviewed.

The operator survey produced a very small number of responses (nine in total). The small sample size doesn't give a high degree of confidence in the results, although the sample did cover a variety of types of operator. It was concluded that most organisations did have the ultimate accountability for safety resting with the Accountable Manager, which in some cases was the Chief Executive Officer or Chief Operating Officer. The safety departments were also generally organised separately from operational delivery. However, there appeared to be a general lack of formal arrangements for communications between the safety department and the Accountable Manager, and very few respondents appeared to have a fully functioning risk management programme.

A variety of relevant published literature sources were identified and a précis of each of the following sources is provided in the document:

- International Civil Aviation Organisation (ICAO)
- United Kingdom Civil Aviation Authority (UK CAA)
- International Air Transport Association (IATA)
- Civil Aviation Safety Authority (CASA) Australia
- Transport Canada.

Six guiding principles are proposed and these can be summarised as follows:

1. Full safety accountability should reside at the Top of the organisation, i.e. the Accountable Executive (e.g. Chief Executive Officer).
2. The Accountable Executive (AE) should be supported by an independent Safety Support Function which operates with the full authority of the AE.
3. Individuals within the Safety Support Function should have respect and influence.
4. There should be formal communications from the AE to the Safety Support Function.
5. Actions necessary to support the SMS should be managed throughout the organisation.
6. Safety accountabilities and responsibilities should be documented and understood by the incumbents.

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1 Introduction

This document has been produced by the EASA ECAST Safety Management Systems (SMS) Working Group to provide practical guidance to organisations on how to comply with the proposed EASA rules and associated Approved Means of Compliance (AMC) relating to SMS organisation and accountabilities.

A set of generic guiding principles have been developed. These guiding principles apply regardless of an organisations size or nature of their operations.

This guidance should be read and used in conjunction with the EASA Rule and AMC.

2 Approach

The approach taken to develop this guidance comprised four principle tasks:

1. Review of proposed AMC
2. Operators Questionnaire
3. Published Literature Review
4. Development of Practical Guidance

A high level review of the EASA rule and Approved Means of Compliance (AMC) contained in their notification of proposed amendment (NPA) No 2008-22c was undertaken to understand the basic requirements expected of organisations. This review is presented in Section 3 below.

As a parallel activity, a questionnaire on existing organisational structures was constructed and distributed to a wide range of different airline operators. The objective of this exercise was to gain an understanding of what types of organisational structures and approaches to managing accountabilities for safety are already used in the industry. The details of this task are reported in Section 4 below.

In addition, it was recognised that there are many existing published reference sources and guidance documents on organising for safety. A literature review of relevant information sources was therefore carried out. The results of this literature review are provided in Section 5 below.

Finally, the findings of all of the activities mentioned above have been condensed into some guiding principles for organising for safety. The guiding principles are given in Section 6.

3 Proposed Acceptable Means of Compliance (AMC)

In the opinion of the European Aviation Safety Agency (Ref. 1), an organisation shall have 'clearly defined lines of safety accountability throughout the organisation, including a direct accountability for safety on the part of senior management' (OR.GEN.200-3).

Further guidance is given in the associated acceptable means of compliance (AMC). In general, it is suggested that the management systems for organisations shall as a minimum include a safety manager, a safety review board and a safety action group (AMC 2).

3.1 Small Organisations

For Small¹ Organisations the Rule is interpreted separately (AMC 1) and accepts a simplified approach which puts a focus on safety accountabilities, co-ordination of emergency response

¹ Small organisations are those which employ 20 people or less.

planning and documentation. Within the safety accountabilities, the only responsibility mentioned is for hazard identification, risk assessment and mitigation.

3.2 Other Organisations

For Other Organisations (i.e. not Small Organisations), the AMC proposes that the safety manager acts as the focal point for the development and implementation of the safety management system. This involves a wide range of functions and would normally therefore be expected to be a full time role.

The Safety Review Board (SRB) is a high level committee comprising the heads of functional areas and chaired by the Accountable Manager. This committee provides strategic safety direction and should ensure that sufficient and appropriate resources are allocated to achieve the safety performance required. It should also monitor the actual safety performance against the safety policy and objectives.

The Safety Action Group (SAG) takes direction from the SRB and comprises Managers, Supervisors and Staff from across the organisation.

4 Operators Questionnaire

As part of this Work Package a questionnaire was sent out to airlines in Europe requesting responses to four questions concerning the airlines safety organisation.

Questionnaires were sent out to the IATA/AEA safety group and task force, and other airline sectors (i.e. charter, low fare, regional, business) through their respective associations (IACA, ELFAA, ERAA, EBAA). 9 replies were received.

The respondents were as follows.

Respondent Ident.	Description
A	A medium sized low cost operator operating as part of a large airline group conducting scheduled and charter services to holiday destinations using a single aircraft type.
B	A medium sized low cost operator mainly conducting scheduled services worldwide with some charter operations using a small number of aircraft types.
C	A large national flag carrier operating world wide utilising a wide range of different aircraft types.
D	A small charter airline operating short haul cargo flights using a single aircraft.
E	The charter arm of a major European Carrier conducting scheduled and charter operations worldwide.
F	A medium sized worldwide executive jet charter operator.
G	A small business aviation charter operating a single aircraft.
H	A medium sized leisure charter operator operating to tourist destinations mainly in Europe.
I	A medium sized leisure charter operator operating to tourist destinations worldwide.

4.1 The Questions

Four questions were set as follows:

Question 1

Is there a single senior manager identified as ultimately accountable for safety in your organisation?

If Yes - what post does this manager hold?

Question 2

- a) How is the post holder, mentioned in Question 1, made aware of the safety accountabilities associated with the post?
- b) How are safety accountabilities cascaded down through your organisation?

Question 3

Does your organisation have safety department?

If yes - Is the safety department independent from Operations delivery?

Does this department report directly to the highest level in the organisation?

What is the interface between the safety department and the post-holder identified in Question 1? See below.

Question 4

Has your organisation established a Risk Management programme?

If yes, please highlight the principal steps your organisation takes with regard to hazard identification, risk assessment and risk control.

4.2 Analysis

The responses are given in detail in Annex 7.3 and an analysis of these responses is given below.

4.2.1 Q1 - Management Accountability.

Seven out of nine respondents had a single senior manager identified as ultimately accountable for safety, and of those seven, six had the Accountable Manager as that person, with a single respondent having the Quality Manager nominated.

4.2.2 Q2 – Statement of Responsibilities

All respondents had formal statements of responsibilities, with eight utilising the Operations Manual or Corporate Safety Manual, whilst one relied upon the use of a Job Description alone. Seven of the respondents relied upon the published policies in the Ops Manual and Corporate Safety Manual to ensure safety accountabilities are cascaded through their organisation. Two respondents said it was promoted throughout the organisation but did not specify the means. The company intranet was mentioned by one respondent as a means for ensuring information was available to all.

4.2.3 Q3 – Safety Department

Eight of the nine respondents have a Safety Department.

Seven Safety Departments were independent of operational delivery. Two respondents did not answer the question.

Seven respondents have the Safety Department reporting directly to the Accountable Manager. Two respondents did not answer the question.

Only two respondents mentioned formal meetings as the means by which the Safety Dept interfaced with the Accountable Manager. One had meetings every three months, whilst a second had monthly meetings. Other respondents appeared to rely on the daily conduct of business to effect communications but did not specify any formal arrangement.

4.2.4 Q4 – Risk Management Programme

Three respondents stated they have a risk management programme, with the remainder stating they have no such programme.

Of the three with a programme one was used in one aspect of the Training Organisation only, a second did not describe its function, and a third described a system of analysis of Flight Data Monitoring, Air Safety Reports and Safety audits.

Two respondents stated a formal Risk Assessment Programme was under development.

4.3 Conclusions from Questionnaire

Given the small sample it is difficult to come to any reliable conclusion that could be applied across the industry at large. However a few indicators are of interest:

- a. The role of the Accountable Manager as the person ultimately responsible for safety appears to be the norm. In some cases the Accountable Manager is also the Chief Operating Officer or Chief Executive Officer.
- b. The Safety Departments, where they exist, all appear to be organised to be separate from operational delivery.
- c. There appeared to be a general lack of any formal arrangements for communications between the Safety Department and the Accountable Manager, with a number relying on the day to day interface to achieve the aim.
- d. No respondent appeared to have a fully functional Risk Management Programme, with a number of respondents citing a reactive analysis of events as fulfilling this need rather than a proactive system.

5 Published Literature Review

A variety of literature sources were identified and reviewed. The key sources are identified below:

1. ICAO
2. UK CAA
3. IATA
4. CASA
5. Transport Canada

Other sources were identified, however, they largely reflected the guidance material published by ICAO and are therefore covered under the ICAO review.

The following section provides an overview of the content of each of these sources in so far as it relates to organizations and organizational structures. Some of these sources also contained example organizational structures and these are given in Annex 7.4.

5.1 ICAO

The ICAO Safety Management Manual (SMM) provides example organizational structures. The first edition (Ref. 2) provides a sample organization structure as indicated in Figure 1. This is very similar to the IATA model (see Section 5.2). This has been developed further in the second edition by introducing the role and reporting lines of a Safety Review Board and Safety Action Group (Figure 2).

The second edition emphasizes the importance of the role of the Safety Manager. It recognizes that the actual job title of the incumbent may vary between organizations, but the key attribute is that this is the individual to whom the Accountable Executive has assigned day to

day management of the SMS. This individual must be the focal point for the application of the SMS and is responsible for coordinating and communication safety issues within the organization, as well as external agencies, contractors and stakeholders as appropriate. The special significance of the selection criteria for the Safety Manager is also noted in the ICAO SMM. In addition to operational management experience and technical competence, it is recommended that the Safety Manager also has good 'people' and communication skills.

However, the organizational structure proposed in the second edition does not necessarily demand direct reporting from the Safety Manager to the Accountable Executive. Instead it is proposed that the lines of communication should flow formally through the SAG and/or the SRB. A 'backdoor' line of communication directly to the Accountable Executive should be available but should be rarely used.

The SRB is a very high level committee, chaired by the Accountable Executive and composed of very senior managers, including the managers responsible for each functional area. The SRB is strategic and deals with policies, resource allocation and performance monitoring. The safety manager attends in an advisory capacity only.

The implementation of the strategies developed by the SRB is the responsibility of the SAG. The SAG is a tactical group dealing with specific actions and comprises managers and representatives of front-line personnel. ICAO suggests that the SAG chair alternates between senior managers but the Safety Manager acts as Secretary.

5.2 International Air Transport Association (IATA)

The IATA integrated airline management system (Ref. 4) provides guidance on safety organization and includes an example organizational structure (Figure 3).

In this structure, the Accountable Manager (being the Chief Executive Officer or Chief Operating Officer) has ultimate accountability for safety. However, it is also important to note that assignment of authority and responsibility is communicated and understood throughout the organization. As a minimum this should be via organization charts. However, management positions associated with critical operational safety or quality areas of the organization require enhanced job descriptions or terms of reference that reflect this responsibility.

SMS requires responsibility for safety and quality issues to rest with each Operational Business Unit. Each Business Unit / Department Head is responsible and accountable (through the delegation from the Accountable Executive) for safety and quality within their respective Business Unit. It is also important to note that the responsibility for safety and quality performance resides with the accountable individual / post-holder and NOT with the Safety and/or Quality Manager(s).

5.3 UK Civil Aviation Authority (CAA)

UK CAA Guidance to operators (Ref. 5) suggests that the Accountable Manager should have full responsibility for the SMS and should have:

- corporate authority for ensuring all activities can be financed and carried out to the required standard;
- full authority for ensuring adequate staffing levels;
- direct responsibility for the conduct of the organisation's affairs;
- final authority over operational matters; and
- final responsibility for all safety issues.

Other UK CAA guidance for Air Traffic Management (Ref. 6) suggests that the 'safety manager' must have a direct reporting line, on safety matters, to the CEO (the person who directs and controls the organization at the highest level – the Accountable Manager). It is also suggested that the person fulfilling the role of Safety Manager should have the respect of the staff from

the shop floor up to the senior management, yet is able to be objective in the fulfillment of his/her safety management task.

5.4 Civil Aviation Safety Authority (CASA)

In Australia, the Civil Aviation Safety Authority (CASA) provides guidance (Ref. 7) on organizational structures.

CASA identify the Chief Executive of an organization as being ultimately accountable for safety.

In the CASA guidance the focal point for the SMS implementation is referred to as the 'Safety Officer' rather than the Safety Manager. Two proposed structures are given (Figure 4). In one, the Safety Officer reports to the Chief Pilot, but retains a formal line of communication to the Chief Executive. In the other, the Safety Officer reports directly to the Chief Executive and retains a formal line of communication with the Chief Pilot. CASA recommends the latter structure, but recognizes that the role of the Safety Officer may be combined with the duties of the Operations Manager or Chief Pilot in smaller organizations. For larger organizations, it is considered likely that the Safety Officer will be a full time dedicated post. Very large organizations may decide to appoint a Safety Director having senior management responsibility.

Additionally, CASA suggests that large organizations may wish to establish a Safety Action Group. For smaller organizations, safety matters could alternatively be included as a standing agenda item on existing regular operational meetings.

Above all, within the organization, safety responsibilities must be clearly defined and documented. Moreover, the responsibilities and authority of the Safety Officer and Chief Pilot must be clear and understood so as to prevent potential conflict.

5.5 Transport Canada

Transport Canada provides a variety of reference material aimed at different types of organisations.

General introductory material (Ref. 8) is provided which highlights that regardless of the size, complexity, or type of operation, there is no doubt that senior management plays a major role in determining the company's safety culture. This material does not provide guidance on organisational structures but does emphasise the importance of safety management as a core value within the organisation. Transport Canada note that many organisations hold safety meetings from time to time, which TC consider to be a sound idea. However, if safety is a core value then safety implications should be raised and addressed as a normal part of doing business. They stress that safety should be a part of every management decision.

More specific guidance is provided for air operators and approved maintenance organisations (Ref. 9). This guidance emphasises the importance of the appointment of an Accountable Executive as a single identifiable person within the organisation. It is also vital that the Accountable Executive fully understands the safety accountabilities that come with the role.

Guidance to small operators is also provided (Ref. 10) This also recognises the importance of the Accountable Executive and notes that regardless of the size of the organisation this should be the person who 'calls the shots'. In a small organisation, this is likely to be the owner of the Company. The guidance recognises that there may be benefits from appointing a Safety Officer to implement the day to day operation of the SMS on behalf of the Accountable Executive if the size of the organisation permits, but it cautions that care should be taken that this person does not become seen by others as the sole person responsible for safety and the SMS – everyone has a role to play.

6 Guiding Principles

The requirements of the EASA AMC, existing practice by operators and good practice provided in published literature have been distilled by the WP2 working group into a number of 'Guiding Principles'. These principles are intended to be universally applicable to all types of organisation and independent of the size or complexity of the operation being undertaken. They are supplementary to, but not a replacement for, the EASA AMC.

The following 'Guiding Principles' have been derived by the WP2 working.

- 1 The individual having full accountability for the Safety Management System (SMS) should also have full corporate authority for ensuring necessary safety activities can be financed. This individual should be responsible for setting the safety policy and objectives for the organisation and for monitoring their delivery. They should be an Accountable Executive at the very top of the organisation (e.g. Chief Executive Officer or equivalent).
- 2 The individual having full accountability for the SMS should be supported by a safety support function from within the organisation which, wherever feasible, is independent of the operational delivery function of the operation but who operates with the full authority of the individual having full accountability for the SMS. The safety support function should be responsible for the day to day operation of the SMS. In a Small Organisation the safety support function may be carried out by a single individual and not necessarily as a full time role.
- 3 The individuals appointed to roles within the safety support function should have the respect of the operational staff and be influential within the organisation. In addition to technical skills, it is important that they also possess the necessary 'people' and 'communication' skills to ensure that they have the necessary impact required to drive the SMS implementation plans and activities forward.
- 4 Communications between the individual having full accountability for the SMS and the safety support function should be formal, regular and documented. This may involve communication channels which incorporate other senior managers within the organisation.
- 5 Actions necessary to support the functioning of the SMS, the delivery of the safety policy and objectives, or assurance of the ongoing safety of the operation, should be managed throughout the organisation. This should involve representatives from across the organisation (senior managers to front-line staff) and operate with the full authority of the individual having full accountability for the SMS.
- 6 Safety accountabilities and responsibilities should be documented and understood by the incumbents.

7 Annexes

7.1 References

- 1: Notice of Proposed Amendment (NPA) No 2008-22c, 30/10/08
- 2: ICAO Doc9859 Safety Management Manual, First Edition, 2006
- 3: ICAO Doc9859 Safety Management Manual, Second Edition, 2008
- 4: IATA Integrated Airline Management System, SMS, 2007 Edition
- 5: CAA SRG SMS Guidance to Organisations, Version 2, October 08
- 6: CAA CAP 730 Safety Management Systems for ATM
- 7: Aviation Safety Management, Operators Guide, CASA
- 8: Introduction to SMS, Transport Canada
- 9: SMS Implementation Procedures Guide, Transport Canada
- 10: SMS for Small Aviation Operations, Transport Canada

7.2 Glossary of Abbreviations

AEA	Association of European Airlines
AMC	Acceptable Means of Compliance
ATM	Air Traffic Management
CAA	Civil Aviation Authority
CASA	Civil Aviation Safety Authority
CEO	Chief Executive Officer
COO	Chief Operating Officer
EASA	European Aviation Safety Agency
EBAA	European Business Aviation Association
ECAST	European Commercial Aviation Safety Team
EGAST	European General Aviation Safety Team
EHEST	European Helicopter Safety Team
ELFAA	European Low Fares Airline Association
ERAA	European Regions Airline Association
ESSI	European Strategic Safety Initiative
IACA	International Air Carriers Association
IATA	International Air Transport Association
ICAO	International Civil Aviation Organisation
MD	Managing Director
NPA	Notice of Proposed Amendment
SAG	Safety Action Group
SMM	Safety Management Manual
SMS	Safety Management System
SRB	Safety Review Board
TC	Transport Canada
WG	Working Group
WP	Work Package

7.3 Operator Questionnaire Responses

Question - v	1	1 cont'd	2a	2b	3	3a	3b	3c	4	4 cont'd
Respondent	Is there a single senior manager identified as ultimately accountable for safety in your organisation?	If Yes - what post does this manager hold?	How is the post holder, mentioned in Question 1, made aware of the safety accountabilities associated with the post?	How are safety accountabilities cascaded down through your organisation?	Does your organisation have safety department?	If yes - Is the safety department independent from Operations delivery?	Does this department report directly to the highest level in the organisation?	What is the interface between the safety department and the post-holder identified in Question 1?	Has your organisation established a Risk Management programme?	If yes, please highlight the principal steps your organisation takes with regard to hazard identification, risk assessment and risk control
A	Yes	Chief Operating Officer, also Accountable Manager	Through job description and through description of postholder responsibilities contained in Operations Manual Part A	Senior management: through job descriptions and description of postholder responsibilities contained in Operations Manual Part A For other management: through job descriptions For employees: through job descriptions	Yes	Yes, Safety & Quality Assurance dept is independent from operational departments	S&QA department reports directly to COO / Part-OPS accountable manager (is executive board level but not CEO)	VP S&QA reports directly to COO / Part-OPS accountable manager	No	Currently no risk management programme is in place. We are eagerly looking forward to the ECAST guidance document.
B	Yes	Accountable Manager as per EU-OPS 1.175(h)	He approved and signed the Corporate Safety Policy	Top – Accountable Manager Next layer: Postholders, responsible for four main areas (Flight Ops; Crew Training Maintenance; Ground Ops) -- Duties, responsibilities and authority are defined in the Operations Manual Other management staff – Duties, responsibilities and authority are defined in Operations Manual Other operations staff – Duties and responsibilities are defined in Operations Manual	Yes. 'B's safety department monitors 'Quality' (i.e. safety related quality, not customer related quality), Safety and Security. The safety dept. has no line management responsibilities except for setting of standards in the areas of security and Emergency Response management	Independent	Reports directly to Accountable Manager	Reports directly to Accountable Manager	No formal risk mgt progr. in place yet.	Elements of it are covered by the Occurrence Reporting Programme, in which safety reports are received, analysed and corrective action is proposed to responsible departments. In addition, in cases of change (organizational, fleet, destinations, procedures, etc.), risk assessment and control methods are used, however on an ad hoc basis and non-structured.
C	Yes	The Accountable	We have a detailed matrix	The CSQM is published	Yes	Yes	Yes	Direct access through	No	This is one of the key

Question ->	1	1 cont'd	2a	2b	3	3a	3b	3c	4	4 cont'd
		Manager is the CEO. This role is ultimately accountable for safety, though we have both a Head of Safety & Security and, reporting to him, a General Manager Corporate & Air Safety who have specific responsibilities for overseeing safety in support of the CEO/AM role.	of responsibilities for the EU-OPS and EASA Part M responsibilities and our Corporate Safety & Quality manual (CS&QM) describes the key responsibilities for all senior roles in the company.	on the intranet as is the matrix of responsibilities.				being physically located a short distance from the CEO's office. The Head of Safety & Security maintains (almost) daily contact with the CEO.		activities under planning to meet the ICAO SMS requirements. 'C' conducts a large number of risk based activities and the intention is to enhance the coordination between these so that they can be run as a coordinated Risk Management programme.
D	Yes	Quality Manager	All information and procedures are clearly stated in the company manuals and he is one of the persons who receives them as well as any amendments	Accountable Manager → Quality Manager → Flight Safety Manager and Maintenance Manager and Ground Operations Safety Supervisor	Yes	Indeed but only for Flight and Ground Ops	Yes, to the Accountable Manager	They work together in establishing new procedures and guidelines and correct previous ones and sometimes they present common initiatives and propositions to the Accountable Mgr. for acceptance. However, the Quality Manager is always checking that the Safety Manager is conducting the prescribed regular and irregular safety audits and checks.	No	
E	Yes	The Accountable Manager	By the procedures in the Operations Manual.	It is promoted throughout the organisation that in the end everyone is responsible for a safe operation.	Yes	Yes	Yes	A regular meeting and every 3 months a safety committee meeting with all postholders.	No	
F	Yes	Accountable Manager	Written statement about safety policy and personal responsibility undersigned by accountable manager	Everybody is responsible for safe operations, management is accountable for overall performance of safety system	Yes	Yes	Yes	Direct communication by all means	No	Development of the Risk Management Programme is in progress
G	No		Through post holder flight operations	Regular briefing (monthly)	No				Yes	Using for crew recurrent training only approved TRTO
H	No		Part of each managers Jobdescription	Corporate Policy Manual defines the accountabilities	Yes			A flight safety department is installed, reporting to the management.	Yes	This is part of the Flight Safety manual
I	Yes	Accountable manager (COO) as per JAR-OPS 1	For the accountable manager, postholders, crew and other employees their safety accountabilities and	By use of the organisational diagram as per JAR-OPS	Yes	Yes	Yes	By formal monthly, quarterly and yearly meetings. Input for the meetings are Safety management reports	Yes	Every Air Safety report and Flight Data Monitoring event is assessed on their severity and

Question ->	1	1 cont'd	2a	2b	3	3a	3b	3c	4	4 cont'd
			responsibilities are clearly written in the Operations and Flight Safety manual					including, risk analysis data and examples of high risk Incidents.		likelihood of reoccurrence. The level of risk determines the action to be taken, ranging from just enter into the data base or a full investigation. Safety audits are part of the Quality audits which are conducted both within the organization and during line operations

7.4 Organisational Structures Proposed by Reference Sources

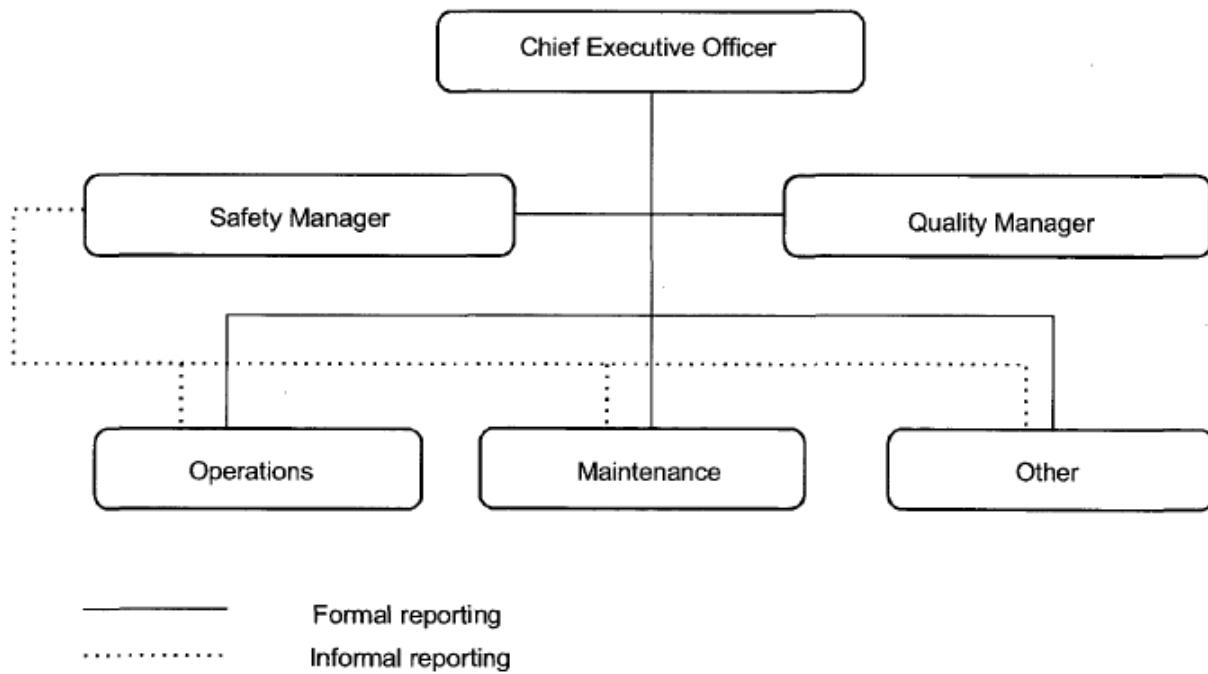


Figure 1: International Civil Aviation Organisation (ICAO) – SMM First Edition 2006

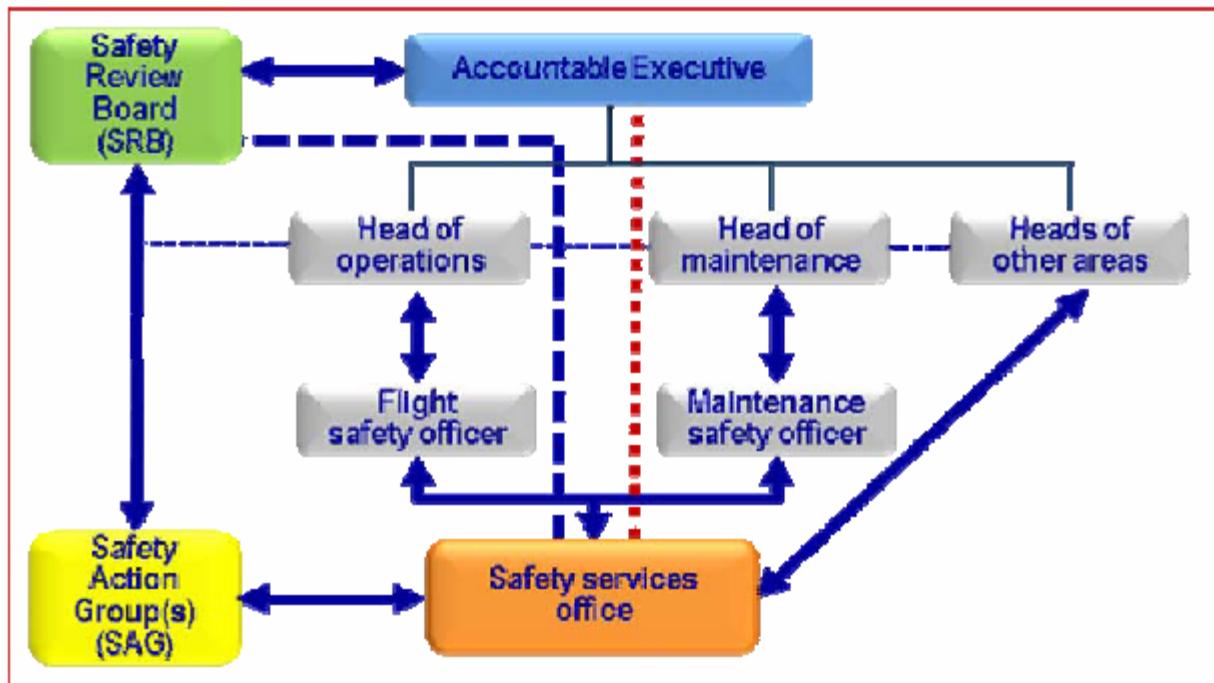


Figure 2: ICAO SMM – Second Edition 2008

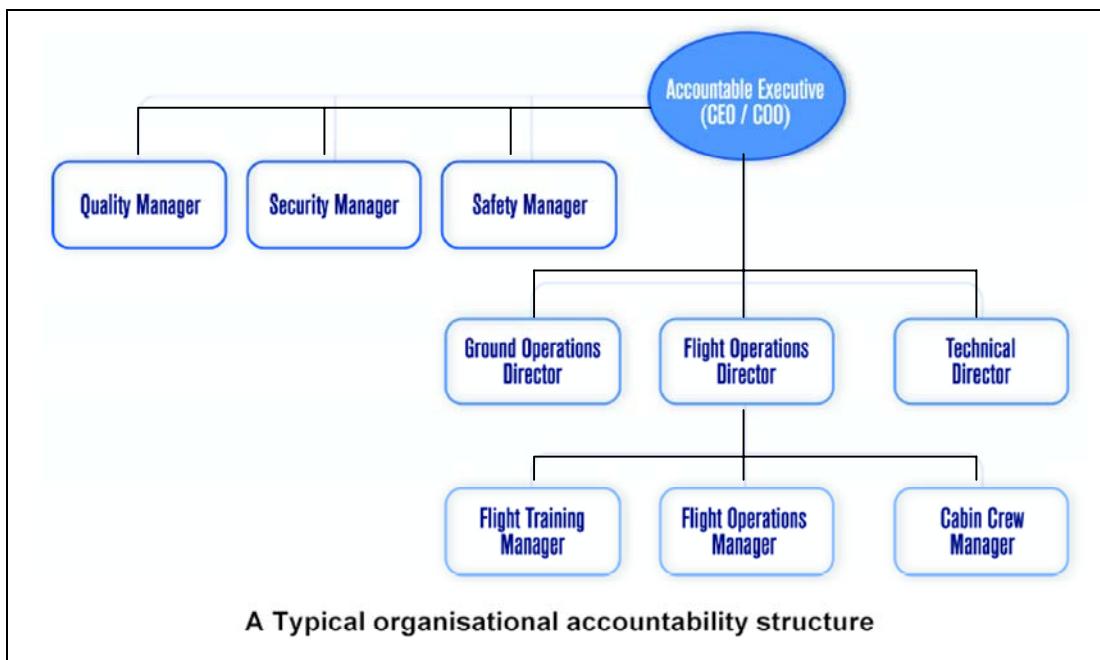


Figure 3: IATA Integrated Airline Management System

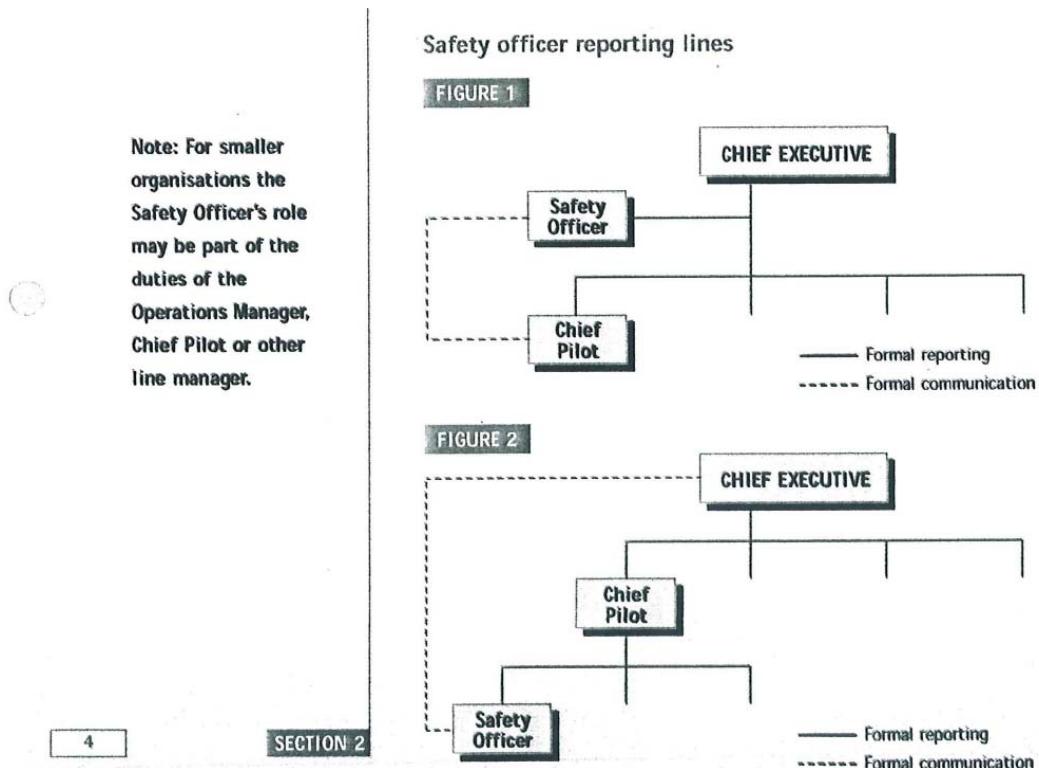


Figure 4: Civil Aviation Safety Authority (CASA)