Management System Assessment Tool

EASA
European Union Aviation Safety Agency

together 4 safety

Edition 2.0
1 September 2023

Table of contents

Contents

Revision record

Issue	Date of issue	Summary of changes
01	September 2017	Initial issue
02	September 2023	Considering the upgrade of documents on which the initial version of the document was built, a group of EU experts developed a new version. The latest available versions of the ICAO Annex 19[1], ICAO Safety Management Manual (doc 9859)[2], ICAO SSPIA AREA PQs[3], SMICG SMS evaluation tool[4]; and Regulation (EU) 2018/1139[5], have been considered. The tool was also extended to Part-CAMO, Part-145 and Part 21. Feedback and suggested improvement from the EU competent authorities and Industry have been taken into consideration, as required by MST.026 in EPAS[6].

Note: Feedback can be sent at safety.management@easa.europa.eu

---

[1] ICAO Annex-19, Second Edition, July 2016, incorporating amendment 1. Amendment 2 under progress at ANC session 2023 also considered [see AN.2022.WP.9611].

[2] ICAO Doc-9859 Safety Management Manual, Fourth Edition, 2018. Fifth Edition under progress to match Amendment 2 of ICAO Annex 19 also considered.

[3] As published by ICAO in February 2022, notably for SSPIA.AREA.04/05/06/07/08.

[4] https://www.skybrary.aero/index.php/SM_ICG_SMS_Evaluation_Tool (version 2)

[5] https://www.easa.europa.eu/regulations#regulations-basic-regulation

[6] https://www.easa.europa.eu/en/domains/safety-management/european-plan-aviation-safety - Edition 2023-2025 is here considered

Introduction

This document provides an assessment methodology focusing on both the assessment and the continual improvement of the Management System within the European Union (EU) environment to commonly enhance the National Competent authority's oversight.

The tool focuses on two elements of a Management System (MS) within the EU context:
- the safety management system (SMS) elements, which refers to ICAO Annex 19 and follows its ICAO framework (see sections 1 to 4, as per the traditional four pillars of an SMS: safety policy and objectives; safety risk management; safety assurance; safety promotion); and
- the compliance monitoring system as described in the EU system (see section 5), which is a function to check compliance with the relevant EU requirements.

It is complemented by the evaluation of the interface management as this is an essential element for the safety of operations.

Note 1: The reference to the ICAO Annex 19 Standards and Recommended Practices (SARPs) as well as its wordings, have been kept untouched. Most of the time, reference to ''SMS'' has been kept, sticking to the language used for the four ICAO pillars of an SMS. The user should not be confused by the hybrid use[7] of ''SMS' and ''MS'', depending on the context.

Note 2: Reference and material related to Regulation (EU) 376/2014 is made, where appropriate. The language has been also adapted to the EU context, when relevant. For instance, whereas ICAO uses the term ''Service Provider'', this tool prefers to use ''Organisation''.

A common approach to assessing Management System effectiveness supports competent authorities to evolve from traditional compliance-based oversight to performance-based oversight; provides a common baseline for Management System effectiveness assessment; and creates a basis for mutual acceptance of:
- SMS under international agreements;
- Multiple approvals (e.g. Part-CAMO management system integrated into the Management System of the licenced air carrier; or for integrated Management System of an organisation holding several certificates when different authorities are involved); or
- Harmonisation of the Part-CAMO Management System with the operator(s) management system, when the CAMO is contracted by licenced air carrier(s) forming part of an air carrier business grouping, when different authorities are involved [see Regulation (EU) 2022/410].

The MS 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 MS, for the purpose of continuous improvement or for the completion of a gap analysis when initiating the MS implementation. The resulting assessment could be discussed with the Competent Authorities, to obtain a common understanding of MS effectiveness. Organisations could also use the tool to address the MS interfaces with subcontracted organisations, should these subcontracted organisations be required to have their own Management Systems in place.

---

[7] Further information on 'what a Management System is about' is proposed in Annex 1 of this document. It further helps to understand the relationship between an SMS and a Management system (MS).

How and when the tool is used

This MS assessment tool may be used for both initial evaluation of the Management System's organisation (such as before the initial certification of the organisation) and its continuing oversight.

Note: This document uses the term ''initial certification'' for approved organisations for which a Management System (MS) is required; however, the same principles may apply to applicable elements of a management system for ''declared organisations'' when they start their operations.

Initial certification/initial implementation

Before the initial certification of the organisation, the competent authority should make sure that all processes are ''Present'' and ''Suitable[8]'', so that all the required enablers for a functioning MS are in place when the operations start. In this initial certification phase, a large part of the MS assessment could be carried out by a desktop review of relevant MS documentation. It is understood that, before starting operations, not all the elements can be addressed such as the identification of safety issues and resulting safety objectives to monitor. However, conducting such an evaluation, at the organisation premises, provides an opportunity for the assessor to advise and guide the organisation on its MS implementation and support standardised implementation; it also allows the competent authority to interview:

- Some key managers (including the Accountable Manager) about the role and functioning of the MS; and
- Some working staff about key safety management enablers such as knowledge and adherence to the procedures, safety policy, "positive safety culture", "just culture and reporting culture" (where, how, why…), role of the safety office…

Continuing oversight

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

---

[8] Further information on "scalability and suitability" is proposed in Annex 2 of this document.

As an organisation's MS processes mature, and as 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 reconsidering the suitability of the MS processes. 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 MS effectiveness can be gained from other oversight activities. This may include such activities as routine compliance audits and inspections (see section 5), occurrence investigations and meetings with the organisation. This should be taken into consideration by the assessor through liaison with other inspectors involved in the oversight of the organisation. The Competent Authority 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)[9]) 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[10] that it has full control over the changes to the MS;

(3) no level 1 findings have been issued; and

(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 oversight cycle could all be captured based on the Management System 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".

Note 3: The organisation shall have control over all the changes and be able to demonstrate that each change having a significant safety impact is appropriately managed.

---

[9] https://www.easa.europa.eu/en/regulations/air-operations - Regulation (EU) No 965/2012 is here taken as "regulatory reference", but the same approach applies to any other domain(s).

[10] See ORO.GEN.130 - https://www.easa.europa.eu/en/regulations/air-operations

Dealing with one or multiple certificates – integrated Management System

The Management System (MS) in each domain may require the implementation of specific elements such as the performance scheme for ANS providers[11], the EOFDM[12] for the operators of certain aircraft types, integration of Part-CAMO within the OPS rules for CAT operations, the flight test for an aircraft design and/or production organisation [e.g. 21.A.143(a)13[13]], the independent verification function for the design of products [see 21.A.239(d)2[14]], etc. The peculiarities and their levels of details in each domain cannot be systematically and comprehensively addressed by the tool: it might be necessary to further "customise"[15] the tool to the attributes in each domain and to the latest amendments of the Domain Rules.

When an organisation holds multiple approval certificates and where the MS is integrated across several domains [e.g. Part-CAMO and Part-145 such as CAMO.A.200(d) & (c) or 145.A.200(c)[16]], the use of the MS assessment tool should follow the rule "one Management System = one assessment". Therefore, if one organisation wishes to integrate several MS into a single one, the assessment should consider that integrated MS globally.

By covering all the domains and by pointing to the EU regulations as well as the MS requirements in each domain and for each topic, the tool allows the reconciliation of the overall assessment in the case of several approvals.

It may also be the case that different teams of assessors oversee the same Management System considering different certificates; a single assessment may be impracticable due to significant peculiarities in each domain. In such case, the different assessments should be shared with the various teams of assessors and a common message coming from the Competent Authorities should be provided. If needed, when different authorities are involved, agreement and coordination may be needed to assure a cohesive approach. Further guidance on a "management System" and "an integrated Management System" is proposed in Annex 1 of this document.

---

[11] See SKPIs as per Commission Implementing Regulation (EU) 2019/317 as amended - https://www.easa.europa.eu/en/regulations/skpi-safety-key-performance-indicators

[12] See https://www.easa.europa.eu/en/domains/safety-management/safety-promotion/european-operators-flight-data-monitoring-eofdm-forum

[13] See Commission Regulation (EU) No 748/2012 at https://www.easa.europa.eu/en/regulations/initial-airworthiness

[14] See Commission Regulation (EU) No 748/2012 at https://www.easa.europa.eu/en/regulations/initial-airworthiness

[15] Certain EU Competent authorities have further detailed the EASA MS assessment tool to consider the peculiarities in their domains of interest or to the risk profiles of their Industry within their territories. Sometime these customised versions are available on their public websites.

[16] See Regulation (EU) No 1321/2014 at https://www.easa.europa.eu/en/regulations/continuing-airworthiness

Tool guidance

The tool assesses the compliance and effectiveness of the Management System through a series of features based on ICAO Annex 19 and EASA Management System requirements for organisations. It is set out using the 12 elements of the ICAO SMS Framework (see Appendix 2 of ICAO Annex 19), some additional EASA Management System requirements within the EU environment, including the need to comply with Regulation (EU) 376/2014 on "occurrence reporting" and some key enablers to foster a "just culture environment". Each feature should be reviewed to determine whether the feature is "Present", "Suitable", "Operating" and "Effective", using the definitions and guidance set out below. Although the tool does not comprehensively address the evaluation of "a positive safety culture", the reader of this document can use the SMICG Industry Safety Culture Evaluation tool[17] for further support.

The tool is used by the competent authority inspector to evaluate and can be used to record the assessment. Alternatively, it can be 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 MS is "Suitable"; further information on "scalability and suitability" are provided in Annex 2 of this document. Assessors should refer to any existing EASA regulations that define what the management system may look like for non-complex organisations (when defined so in the domain regulatory framework) 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 assessment.

The tool has been designed to capture the generic MS requirements. As currently there are no common EASA MS requirements across all the domains, there may be some additional sector specific requirements that may need to be considered as part of the assessment. The tool is thus valid for all domains and its customisation to specific sectors is "recommended", as previously explained in the tool as regards to the need to deal with several certificates or with the integration of the management system.

---

[17]https://www.skybrary.aero/articles/industry-safety-culture-evaluation-tool-and-guidance

Definitions used in the tool – maturity levels

Present	There is evidence that the relevant item is documented within the organisation's Management System Documentation.
Suitable[18]	The relevant item is suitable based on the size, nature, complexity of the organisation and the inherent risk in the activity.
Operating	There is evidence that the relevant item is in use and an output is being produced.
Effective	There is evidence that the relevant item is achieving the desired outcome and has a positive safety impact.

What to look for

This column in the matrix guides the inspector when looking at each individual item 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. 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 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.

---

[18] Further information on "scalability" and "suitability" is proposed in Annex 2 of this document.

For the initial certification or as part of a transition to new Management System 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 a Management System 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', unless this situation is the result of the organisation repeatedly and structurally ignoring indicators which shows that the Management System is not effective or no action are taken to increase such effectiveness.

Findings will be raised in case of incomplete MS, serious risk that is not properly addressed, deficiency or non-compliance, serious safety concern that requires organisation's action, organisation below or far from expected standard; whereas observations will address identified areas of improvement, thus fostering and supporting the gradual implementation of the MS. Findings can only be issued against the rules whereas observations can address the section "what to look for" when not addressed by the rules.

Examples of observations[19] may include any of the following cases not requiring level 1 or level 2 findings, but not limited to:
  (1) for any item whose performance has been assessed to be ineffective;
  (2) when it has been identified that an item has the potential to cause a non-compliance;
  (3) when suggestions or improvements are of interest for the overall safety performance of the organisation.

Scoring the Management System assessment

The main objective of the assessment tool is to help the competent authority assess the Management System 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 assessment.

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

- Scoring should not be linear but exponential so that a much 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 criterion but to help assess the maturity of the Management System as a benchmark against other organisations and to aid in continuous improvement.

---

[19] Further guidance can be provided in the domain-specific rules, such as in point GM to 145.B.355 to Regulation (EU) No 1321/2014.

- Scoring may also create the wrong behaviours in organisations that could undermine a positive safety culture, so it should be very carefully applied and monitored for such events.
- Reaching "effective" or a high score is not the end of the journey as past performance does not guarantee future performance. The environment, by nature, is dynamic: occurrences, disruptive events, crisis, emerging risks, changes in the management system etc.; former risk assessments may not be longer valid over time and need to be continuously reviewed.

Assessment summary

By identifying the levels of maturity of the different processes and by providing the organisation with detailed comments of the assessment, the organisation will be assisted in continuous improvement of its Management System.

The assessor, when using the tool, should assess how the organisation globally performs and manages safety. The assessment summary thereof shall be performance orientated. Any MS-related surveillance activity report should particularly address the dimension of:

- Proactive safety risk management;
- Safety performance of the organisation;
- Data intelligence and its use;
- Resilience and agility to react to disruptive events or to an ever-changing, competitive environment; and
- Overall maturity of the organisation to manage safety and other activities having an impact on safety.

The report should document the most effective MS processes and the areas needing further improvement such as ineffective risk controls, new or emerging risks to consider, unsuitable processes, opportunities for improvement. This evaluation should also cover the organisation's safety objectives and their degree of achievement as well as their relationship to the States objectives through the relevant SSP/SPAS, where appropriate.

At least, a summary of the Management System assessment should be provided to the organisation along with a report that captures any findings and observations with timelines. Findings and observations shall reflect the degree of urgency to attain the safety objectives or push the individual organisation towards a quicker, better achievement or continuous improvement.

The summary can also highlight how receptive the organisation is about the implementation of an effective MS and about the journey of proactively developing safety risk management capabilities and assurance of safety performance over time. Most organisations like to know how they are performing in comparison to others.

IMPORTANT: how to use this guidance tool

The tool serves both for compliance and performance. It is the responsibility of the organisation and the assessor(s) to ensure that:

- The relevant MS elements are present and suitable for the proper functioning of an MS (compliance-orientated);
- The MS operates and delivers as expected (performance-orientated).

The assessment of an MS requires understanding of **performance-based expectations**, in addition to the more traditional prescriptive-based requirements. These understanding spans both the organisation and the overseeing authority.

Beyond 'traditional compliance' and factoring the size of the organisation as well as the complexity/nature of its operations, the evaluation of an MS should consider the overall capability of the organisation to effectively manage safety, set-up safety objectives; monitor them and achieving the intended targets.

Consequently, the grading system '*Present, Suitable, Operating, or Effective*' (PSOE) shall be rather used as a maturity model, so that the assessment thereof shall be performance orientated, evaluating how the organisation globally performs, manage safety, and ensure safe operations.

The assessment should particularly focus on the levels of maturity, as to whether:

- The MS, globally or for each element, is documented and defined – to a certain extent, it refers to 'Present'; or
- The design of the MS looks good and appropriate to the activities, nature and complexity, interfaces etc. – in other words, the MS looks ''Suitable''; or
- The MS is "scalable", "operating" and delivers - there is evidence that the MS operates as designed; however, the desired output is not yet attained and/or more should be achieved as the MS has not yet reached the expected level of maturity; or
- There is evidence that the MS is globally agile and working in an ''effective' way, having a positive safety impact and is striving for continuous improvement; the desired effect is attained through the achievement of the safety objectives.

In no case, the tool shall be used as a compliance checklist to verify that all the individual elements of an MS are in place. Assessing a MS is not a ticking box exercise where each and every line of the "What to look for" for each section of the tool are complied with. It is the responsibility of the assessor to appropriately use the tool **ONLY as a guide** to get prepared before the assessment; select, as necessary, what is relevant (based on the size, complexity and the nature of the operations); and provides an overall evaluation of the MS in terms of "maturity" and "performance".

"Being compliant" does not necessarily mean "being safe". Zooming into each element of this tool and notably verifying each process 'step by step' or 'word by word' runs the risk to be too narrow; mislead the assessor back to "compliance"; push the structure of the organisation to an inappropriate set-up or overly complicated MS; and finally miss out on the ultimate objective: evaluate how safe the operations are and ensure that no major risk has been overlooked.

Evaluation of "Suitability" and "scalability"

MS "suitability" is specific to each individual organisation and impossible to define for all types of activities and sizes of organisations. Some organisations may be small in size but carry out safety critical operations with many interfaces. Sometimes the regulatory framework in the domain proposes some guidance criteria per topic, such as 'complex organisation' versus 'non-complex organisation' to address the human resources; sometimes it does not.

It is therefore recommended:

- Before the assessment to analyse what is appropriate to the organisational set-up;

- At the end of a comprehensive MS evaluation to re-consider whether the overall MS and its associated processes are commensurate with the size of the organisation and the complexity/nature of its aviation products or services.

Neither "suitability", nor "Scalability" is about applying specific elements of a MS; or going for a light/complex MS: it is about adapting a MS with all its elements to the specific operational context of the organisation. It is the responsibility of the organisation to determine the suitability and/or scalability of its MS and demonstrate to the overseeing Authority that the MS is **appropriately designed and suitable** to effectively deliver as expected, as explained in the previous box.

Annex 2 at the end of this document proposes further guidance on 'suitability' and 'scalability'.

Conducting and sequencing the MS assessment

There is no particular order on how to use the different sections of the tool: it is left to the assessor's discretion to decide on how to conduct an MS assessment.
- Sometimes, starting with section 2 (Safety risk management) then section 3 (Safety assurance) of the tool may be more appropriate, depending on the maturity of the organisation. For instance, the following questions can be relevant: "What are the main risks of the organisation? "How does the organisation know it?" "How does the organisation mitigate these risks? "How does the organisation know that the mitigation measures are effective? "Are the safety objectives monitored and ultimately achieved?" "How is it communicated to the senior management and the staff? Etc.
- Sometimes, in term of initial deployment or MS implementation, it can be beneficial to understand first-hand the progress made by the organisation, its challenges and then the next steps to complete, before reaching a higher level of maturity – in such a case, there is no particular

order to follow on how to use the tool.
- It is always possible to select a safety objective, an area of greater risk or a safety issue; then understand how the topic is globally managed by the organisation, using all the sections of the tool at the same time (objective-based, risk-based, and performance-based approach).
- Outcome of audits during the oversight cycle; analysis of events; performance reports (e.g. analysis of the FDMS, fuel management, HUMS, ATM performance scheme), management of changes; approval of changes to the exposition manual; Safety Review Board minutes or attendance to (high-level) safety committee(s) etc. allows a continuous flow of information that can be used to regularly inform on the performance of the MS by matching the different elements of this tool.

These ways of proceeding will impact on the number of evaluation and the duration of the assessment without being able to recommend any time and numbers of evaluators for an overall MS assessment over an oversight cycle: it depends on the "size", "complexity", "nature of the operations" and "number/significance of the risks".

In all cases, what ultimately matters, is the assessor at the end of an oversight cycle to be able to evaluate the overall level of maturity of the organisation and its capability to effectively manage safety beyond mere compliance.

Feedback on the use of the tool

According to MST.0026 in EPAS[20], the EU competent authorities using this tool, should it be customised or not, are required to provide feedback to EASA at safety.management@easa.europa.eu and suggest improvement, where necessary. Any other user is also invited to contribute so.

Training on how to use the MS assessment tool

It is important for the assessors to be competent on how to appropriately use the tool. An MS assessment differs from the traditional compliance-based approach. The assessors should be:
- Knowledgeable with the MS basics, including the risk-based and performance-based concept;
- Able to understand the principles about "suitability", "scalability" and "effectiveness" of a MS;
- Trained on the use of this MS assessment tool and the different technics to conduct an MS assessment;
- Behave according to the implementation of a positive safety culture;
- Competent on how to use this tool – consider the need for OJT before qualification;
- Regularly updated on the use of this tool and the good practices on how to assess an SMS – it is notably important the assessors to share their experience and foster a cohesive approach among assessors.

---

[20] https://www.easa.europa.eu/domains/safety-management/european-plan-aviation-safety

1 SAFETY POLICY AND OBJECTIVES

1.1 MANAGEMENT COMMITMENT

1.1.1 Safety policy, sign off and periodical review

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 organisation
Note: in the EU context, the Accountable Executive is designated as the Accountable Manager.
g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider

Present	**Suitable**	**Operating**	**Effective**
There is a safety policy, signed by the Accountable Manager, which includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices.	The safety policy is easy to read. The content is customised to the organisation.	The safety policy is reviewed periodically to ensure it remains relevant to the organisation.	The Accountable Manager has a clear understanding of the safety policy and is fully engaged in implementing it.
Assessment results			
What to look for			
- Interview the Accountable Manager to assess his/her knowledge and understanding of the safety policy. - Check evidence that the Accountable Manager takes informed decisions in accordance with the safety policy. - Confirm the safety policy is relevant and meets applicable EU Regulations. - Check that 'safety' is key to the policy and remains a highest priority.			

- Interview staff to determine to what extent the safety values and objectives from the safety policy are known, as well as how readable and understandable they are.
- Check evidences that all employees and key stakeholders contribute to the safe operations of the system in accordance with the safety policy.
- Check that the safety policy is reviewed periodically for content and currency.
- Check that the safety policy includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC 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) 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' -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'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(2) and (a)(6) AMC1 CAMO.A.200(a)(2) GM CAMO.A.200(a)(2) CAMO.A.300(a)(2) 'Continuing airworthiness management exposition (CAME)'	145.A.200 'Management system' points (a)(2) and (a)(6) 145.A.30 'Personnel requirements' point (a)(2) AMC1 145.A.200(a)(2) 'Safety policy and objectives' GM 145.A.200(a)(2) 'Safety policy' 145.A.70 'Maintenance organisation exposition (MOE)' point (a)(2) AMC1 145.A.70 'Maintenance organisation exposition (MOE)'	21.A.139 'Production management System' (c)(1) AMC1 21.A.139 (c)(1) 'Safety policy and objectives' GM1 21.A.139(c)(1) 'Safety policy'	21.A.239 'Design management System' (c)(1) AMC1 21.A.239 (c)(1) 'Safety policy and objectives' GM1 21.A.239(c)(1) 'Safety policy'	

1.1.2 Safety policy and resources

Annex 19 reference & text

1.1.1   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	Operating	Effective
The safety policy includes a statement to provide appropriate resources.	There is a process for assessing resources and addressing any shortfalls; needs are discussed at the right level of management. Volume and significance of the contracted activities (to and from) are properly factored for the determination of the resources to deliver safe operations. Appropriate resources are allocated in the case of multiple approvals, factoring the complexity of the operations.	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. Needs are anticipated and forecasted, notably using the principles of the 'management of changes'.
Assessment results			
What to look for			

Note 1: the focus here is on 'resources' to achieve the safety objectives and managing key safety risks correctly. Knowing that resources are not unlimited, this item should be reviewed within a safety-performance context, notably on the availability of resources on the most important safety activities. Safety risk management is decision making to balance safety enhancement, available resources to develop it, and optimised ways of working.

Note 2: 'resources' here is not limited to the "human resources" as it may also include financial resources, tools, documentation and processes etc.

Note 3: the safety policy should contain a clear statement about the provision of the necessary resources. Its detailed implementation can be found in another document.

- Review available, appropriate resources including staff, equipment, and finance.
- How does the organisation manage resources by anticipating and addressing any shortfalls?
- Are there sufficient and competent personnel? How does the organisation assess it?
- Review targeted resources vs actual resources.
- Check whether the resources are discussed with the Accountable Manager or during SRB meeting (or equivalent), as appropriate.

- Guarantee that strategy is not only defined according to the current resources but is also based on the needed resources and ways of working to appropriately mitigate the key safety risks.
- Check whether any fatigue issues, lack of resources, human performance weaknesses are reported, notably through the internal safety reporting scheme.
- Consider the organisation working time scheme and, if appropriate, implementation of Directive 2003/88/EC. Where applicable, check implementation of FRMS, FTL etc.
- Check whether the principles of 'management of changes' are applied to anticipate the resources in case of changes.
- Assess the situation when the organisation holds multiple approvals.
- Check the need for Safety Action Group(s) to assist or act on behalf of the safety Manager or the SRB
- If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review whether the resources allocated by the CAMO meet the needs of the different operators involved and are suitable for the continuing airworthiness management of all the aircraft they operate [see M.A.201(ea) as well as CAMO.A.200(e)].

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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] AMC1ORA.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
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
AMC1 CAMO.A.200(a)(1) 'Management system' point (c) AMC1 CAMO.A.200(a)(2) 'Management system' point (b)(2) CAMO.A.300(a)(4) 'Continuing airworthiness management exposition (CAME)' CAMO.A.305 (a)(5) 'Personnel requirements' GM1 CAMO.A.305 (a)(5) 'Safety manager' CAMO.A.305(d) and AMC1	145.A.200 'Management system' point (a)(2) 145.A.30 'Personnel requirements' points (a)(1); (b); (ca) 145.A.70 'Maintenance Organisation Exposition (MOE)' point (a)(2) AMC1 145.A.200(a)(2) 'Safety policy and objectives' GM 145.A.200(a)(2) 'Safety policy' AMC1 145.A.70 'Maintenance organisation exposition (MOE)'	21.A.139 'Production management System' points (c)(1) and (c)(2) AMC1 21.A.139 (c)(1) 'Safety policy and objectives' Point (b)2 21.A.145(a) 'Resources' all AMC and GM related to 21.A.145(a) 'Resources'	21.A.239 'Design management System' points (c)(1) and (c)(2) AMC1 21.A.239 (c)(1) 'Safety policy and objectives' Point (b)2 21.A.245 (a) and (e) 'Resources' AMC1 21.A.245(a) and AMC1 21.A.245(e) 'Resources'	

CAMO.A.305(d) 'Sufficient number of personnel' M.A.201(ea) and CAMO.A.200(e) 'Management System' point (e) – associated AMC and GM	AMC1 145.A.30(b) 'Management structure for maintenance' AMC1 145.A.30(d) 'Sufficient number of personnel' AMC1 145.A.30(c);(ca) 'Safety management and compliance monitoring function' – associated GM1 145.A.30(ca) AMC1 145.A.200(a)(1) 'Organisation and accountabilities' – associated GM1 145.A.200(a)(1)			

1.1.3 Communication of the safety policy

Annex 19 reference & text
1.1.1   The safety policy shall:
f) be communicated, with visible endorsement, throughout the organisation
See 2.1.2 for c) include safety reporting procedures

Present	Suitable	Operating	Effective
There is a means in place for the communication of the safety policy and its associated objectives. The management commitment to safety is documented within the safety policy.	The safety policy and its associated objectives are clearly visible (or reachable) to all staff (e.g. consider multiple sites, countries). The safety policy is understandable (consider multiple languages).	The safety policy and its associated objectives are communicated to all personnel (including relevant contracted staff and organisations). The Accountable Executive and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.	People across the organisation are familiar with the safety policy and its associated objectives and can describe their obligations in respect of the safety policy and the internal safety reporting scheme.
Assessment results			
What to look for			

Note: The safety policy shall give birth to safety objectives to be part of the assessment (see specific block on 'safety objectives)'.
- Review how the safety policy is communicated.
- Safety policy is clearly visible (or reachable, depending on the structure and size of the organisation) to all staff including relevant contracted staff and third-party organisations.
- Question managers and staff regarding knowledge of the safety policy and its associated objectives.
- All managers are familiar with the key elements of the safety policy and its associated objectives.
- Evidence that senior management involved in safety activities participate to safety meetings, training, conferences, etc.
- Check how a positive safety culture is encouraged and impacts the overall effectiveness, notably for the safety reporting system and the actions thereof.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org**
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) 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' -GENERAL [non-complex ATS providers]	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' point (d)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
AMC1 CAMO.A.200(a)(2) 'Management system' point (a)(5) CAMO.A.200(a)(5) and its GM1 CAMO.A.200(a)(5) CAMO.A.202 'Internal safety reporting scheme' and its AMC1 CAMO.A.202	145.A.200 'Management system' points (a)(2) & (a)(5) AMC 1 145.A.200(a)(2) 'Safety policy and objectives' points (c) and (d)	AMC1 21.A.139 (c)(1) 'Safety policy and objectives' Point (a)1	AMC1 21.A.239 (c)(1) 'Safety policy and objectives' Point (a)1	

1.1.4 Safety policy, commitment, and positive safety culture

Annex 19 reference & text

1.1.1   The safety policy shall:

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

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

Present	Suitable	Operating	Effective
The safety policy is documented including the promotion of a positive safety culture. The safety policy highlights the primary responsibility for safety of all employees to proactively manage risks. The safety policy contains the main attributes of a positive safety culture, including a commitment to safety leadership and to a Just Culture across the organisation.	The safety policy describes the commitment of all relevant staff involved in safety activities. A standard code of ethics or behaviour is documented and appropriate to the type of safety activities.	The safety policy and associated positive safety culture are operationally implemented and promoted at working level by the Accountable Manager and the key managers involved in safety activities.	The safety policy, its implementation and commitment are reviewed with the Accountable Manager and senior management on a regular basis. The organisational commitment to safety addresses interactions with key external stakeholders. The internal safety reporting scheme is known and used without fears of reprisal.
Assessment results			
What to look for			

- The managers involved in safety activities are familiar with the key elements of the safety policy and its associated objectives, including the positive safety culture.
- Senior management involved in safety activities are effectively involved in the (safety) management system and proactively managing safety policy, positive safety culture and objective processes set forth by the organisation to proactively manage risks.
- Evidence of senior management participation in safety meetings, training, conferences etc. where positive safety culture is promoted.
- Evidence of proactive behaviours by the managers involved in safety activities, demonstrating continuous leadership and continuous improvement.

- Relationship building with Competent Authorities and other key stakeholders (e.g. feedback, trust, exchange of information).
- Feedback from safety surveys that include specific just culture aspects. Confirmation that the internal safety reporting scheme is known and used without fears of reprisal.
- Review how a positive safety and just culture are promoted.
- Evidence that people do not fear to report in respect of the internal safety reporting scheme.

Note: SMICG proposes an Industry Safety Culture Evaluation tool[21].

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) 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)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
AMC1 CAMO.A.200(a)(2) 'Management system' point (a)(1) CAMO.A.202 'Internal safety reporting scheme' and its AMC/GM CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(10)	145.A.200 'Management system' points (a)(2) AMC 1 145.A.200(a)(2) 'Safety policy and objectives' point (b) – associated GM1 145.A.200(a)(2) points (b) and (c)145.A.202 'Internal safety reporting scheme' and its AMC/GM	21.A.139 'Production management System' (c)(1) AMC1 21.A.139 (c)(1) 'Safety policy and objectives' Points (a)(b)(c) GM1 21.A.139 (c)(1) 'Safety policy'	21.A.239 'Design management System' (c)(1) AMC1 21.A.239 (c)(1) 'Safety policy and objectives' Points (a)(b)(c) GM1 21.A.239 (c)(1) 'Safety policy'	

---

https://www.skybrary.aero/articles/industry-safety-culture-evaluation-tool-and-guidance

1.1.5 Safety policy and just culture

Annex 19 reference & text

1.1.1   The safety policy shall:

d) clearly indicate which types of behaviours 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	Operating	Effective
A just culture policy and principles have been defined.	The just culture policy (or in any other related document) clearly identifies acceptable and unacceptable behaviours. The principles ensure that the policy can be applied consistently across the whole organisation. The just culture policy and principles are understandable and clearly visible (or reachable). Decision-making process related to the implementation of the just culture is designed according to the size of the organisation (e.g. involvement of staff representatives, staff Committee, Unions etc.)	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 representatives.
Assessment results			
What to look for			

- Check that guidance and governance are developed on how to apply the just culture policy
- 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 voluntary reporting rates and review 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).
- Consider feedback on how the "just culture" policy is applied and perceived from staff.
- Interview staff representatives to confirm that they agree with just culture policy and principles.
- Check that staff are aware of the just culture policy and principles.
- Check against the non-legally binding European Corporate Just culture declaration and its implementation (see Annex 3 of this document).

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) AMC1 ORA.GEN.200(a)(2) 'Management system' point (a)(4) 'safety reporting principles' - [complex organisations]	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'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
Reg. 376/2014 Article 16(11) AMC1 CAMO.A.200(a)(2) 'Management system' point (b)(5) CAMO.A.202 'Internal safety reporting scheme' and its AMC/GM CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(10)	Reg. 376/2014 Article 16(11) 145.A.200 'Management system' points (a)(2) AMC 1 145.A.200(a)(2) 'Safety policy and objectives' point (b) – associated GM1 145.A.200(a)(2) points (b) and (c) 145.A.202 'Internal safety reporting scheme' and its AMC1 145.A.202	GM1 21.A.3A 'reporting system' to link with Reg. 376/2014 Article 16(11) AMC1 21.A.139 (c)(1) 'Safety policy and objectives' Points (b)(c) GM1 21.A.139 (c)(1) 'Safety policy' GM2 21.A.3A(a)(1) and (b)(1) 'Internal safety reporting scheme'	GM1 21.A.3A 'reporting system' to link with Reg. 376/2014 Article 16(11) AMC1 21.A.239 (c)(1) 'Safety policy and objectives' Points (b)(c) GM1 21.A.139 (c)(1) 'Safety policy' GM2 21.A.3A(a)(1) and (b)(1) 'Internal safety reporting scheme'	

1.1.6 Safety objectives

Annex 19 reference & text

1.1.2   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 organisation;

d) be periodically reviewed to ensure they remain relevant and appropriate to the service provider.

Present	Suitable	Operating	Effective
Safety objectives have been established that are consistent with the safety policy and communicated throughout the organisation.	Safety objectives are relevant to the organisation and its activities. They are monitored by the right level of (senior) managers. Safety objectives are understandable and clearly visible. Safety objectives are aligned with the SSP and/or SPAS, when appropriate.	Safety objectives are being measured and regularly reviewed, are relevant and are communicated throughout the organisation. They are monitored through the Safety Review Board (or equivalent) and adjusted, when needed.	Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met. Associated qualitative and quantitative measures are in place. Safety objectives are not only aligned with the SSP and/or SPAS, but they are also compared with those of the risk profile sector. They are updated based on the latest relevant safety information available. The organisation is sometimes involved in the elaboration of the SSP and/or SPAS. Continuous improvement of safety is effectively measured.
Assessment results			

What to look for
- Assess whether the safety objectives are appropriate and relevant. - Through the safety performance measurement and monitoring, check whether the Safety objectives are being measured to monitor achievement through qualitative and quantitative means, such as SMART SPIs and SPTs. Check whether the safety objectives, as a minimum, target 'continuous improvement'. - Check the minutes of the Safety Review Board (or equivalent) how the safety objectives are monitored. - 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. Check how these safety objectives as well as their associated metrics are visible (or reachable) to all staff involved in safety activities. - Assess if the safety objectives have considered relevant documentation such as Industry sector risk profiles, State risk profiles, State safety objectives in the SSP and/or the SPAS and/or the EPAS Volume 2, section 4.2, and Volume III [see articles 7 or 8 of Regulation (EU) 2018/1139]. - Consider safety objectives identified as per article 76.6 of Regulation (EU) 2018/1139, if any. - Assess whether/how the outcome of the oversight internally and externally impacts the determination and monitoring of the safety objectives. -

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
AMC1 ORO.GEN.200(a)(2) 'Management system' point (c)(3) - [complex operators] AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators] AMC2 ORO.GEN.200(a)(5) 'Management system' point (a) - [complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' point (c)(3) - [complex organisations] AMC1 ORA.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations] AMC2 ORA.GEN.200(a)(5) 'Management system' point (a) - [complex organisations]	AMC1 ADR.OR.D.005(b)(2) 'Management system' point (c)(3)	ATM/ANS.OR.B.005(a)(3) 'Management system' AMC2 ATM/ANS.OR.B.005(a)(3) 'Management system' AMC1 ATS.OR.200(1)(i) 'Safety management system SAFETY POLICY' point (b)(3) - [complex ATS providers]	ATCO.OR.C.001 'Management system of training organisations' AMC1 ATCO.OR.C.001(b) 'Management system of training organisations SAFETY POLICY'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200(a)(2) AMC1 CAMO.A.200(a)(2) 'Management system' CAMO.A.200(a)(5) and it GM1 AMC1 CAMO.A.200(a)(3) 'Management system' points (d) and (f)	145.A.200 'Management system' points (a)(2) AMC1 145.A.200(a)(2) 'Safety policy and objectives' point (d) AMC1 145.A.200(a)(3) 'Safety Management Key Processes' point (d)	21.A.139 'Production management System' point (c)(1) AMC1 21.A.139 (c)(1) 'Safety policy and objectives' Point (d)	21.A.239 'Design management System' point (c)(1) AMC1 21.A.239 (c)(1) 'Safety policy and objectives' Point (d)	

	GM1 145.A.200(a)(4) 'Safety Promotion' point (b) GM1 145.A.200(a)(5) 'Management System Documentation' point (a) 145.A.70(a)(2)		

SUMMARY COMMENTS on 1.1. 'MANAGEMENT COMMITMENT'

1.2. SAFETY ACCOUNTABILITY AND RESPONSIBILITIES (Annex 19 element 1.2)

1.2.1 Identification of the Accountable manager

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 organisation, for the implementation and maintenance of an effective SMS
Note: in the EU context, the Accountable Executive is designated as the Accountable Manager or, for DOA, Head of Design Organisation.

Present	Suitable	Operating	Effective
An Accountable Manager has been appointed with full responsibility and ultimate accountability for the SMS.	The Accountable Manager has control of resources. In case of several approvals, the designation of the 'Accountable Manager' will reflect the governance structure, such as different SMS in each domain (with interfaces) or corporate 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 is fully aware of his/her SMS roles and responsibilities. The Accountable Manager is accessible to the staff in the organisation.	The Accountable Manager ensures that the performance of the SMS is being monitored, reviewed and improved. Beyond his/her SMS roles and responsibilities, the Accountable Manager continuously promotes the safety policy, safety standards, and safety culture of the organisation.
Assessment results			
What to look for			

- Evidence that the Accountable Manager has the authority to provide sufficient resources for relevant safety improvements.
- Evidence that the Accountable Manager is fully aware of their SMS roles and responsibilities.
- 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.
- Look for evidence that Accountable Manager actions are consistent with the active promotion of a positive safety culture within the organisation.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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'	ATCO.OR.C.001 'Management system of training organisations' point (a) ATCO.OR.C.010 'Personnel requirements' point (a)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200(a)(1) 'Management system' CAMO.A.305 'Personnel requirement' AMC1 CAMO.A.305 'Accountable Manager'	145.A.200 'Management system' points (a)(1) 145.A.30 'Personnel requirements' points (a)(b)(ca)(cb) AMC1 145.A.30(a) 'Accountable manager'	21.A.139 'Production management System' points (b)2 and (c)(2) 21.A.145 'Resources' point (c)(1) AMC1 21.A.145(c)(1) 'Accountable manager' GM1 21.A.145(c)(1) 'Accountable manager'	21.A.239 'Design management System' point (c)(2) 21.A.245 'Resources' points (b) and (d) AMC1 21.A.245(c)(1) 'Accountable manager' GM1 21.A.245(c)(1) 'Accountable manager'	

1.2.2 Accountabilities and responsibilities

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 organization,

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.

Note (from ICAO Annex 19, Appendix 2): In the context of this appendix as it relates to service providers, an 'accountability' refers to an 'obligation' that may not be delegated, and 'responsibilities' refers to functions and activities that may be delegated.

Present	Suitable	Operating	Effective
The safety accountability, authorities and responsibilities are clearly defined and documented.	Key safety roles have been identified for safety accountability, authorities, and responsibilities (for example, through job descriptions, job family descriptions, or organisational charts).	Individuals have been identified to fill key safety roles and are 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 substantive / significant risks faced by the organisation, and safety management system principles exist throughout the organisation so that. safety is part of the highest priority in the organisation.
Assessment results			
What to look for			

-    Question managers and staff regarding their roles and responsibilities.
-    Confirm senior managers are aware of the organisation's safety performance, its most significant risks and its safety objectives.
-    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.
- The levels of Management authorised to make decisions on risk acceptance are defined and applied.
- Acceptance of risk is aligned with authorisations.
- Check for any conflicts of interest and that they have been identified and managed.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.200 'Management system' point (a)(1)	ORA.GEN.200 'Management system' point (a)(1)	ADR.OR.D. 005 'Management system' point (b)(1)	ATM/ANS.OR.B.005(a)(1) and (b) ATS.OR.200 'Safety management system' (1)(ii)	ATCO.OR.C.001 'Management system of training organisations 'point (a)
ORA.GEN.200 'Management system' point (a)(1) ORO.GEN.210 'Personnel requirements' points (a) and (b)	ORA.GEN.200 'Management system' point (a)(1) ORA.GEN.210 'Personnel requirements' points (a) and (b)	ADR.OR.D. 005 'Management system' (b)(1) and ADR.OR.D.015 'Personnel requirements' (a);(b)	ATM/ANS.OR.B.005(a)(1) and ATS.OR.200(1)(ii)	ATCO.OR.C.001 'Management system of training organisations 'point (b) ATCO.OR.C.010 Personnel requirements, point (a) and (b)
ORO.GEN.200 'Management system' point (a)(5) AMC1 ORO.GEN.200(a)(5) AMC2 ORO.GEN.200(a)(5) [complex operators]	ORA.GEN.200 'Management system' point (a)(5) AMC1 ORA.GEN.200(a)(5) AMC1 ORA.GEN.200(a)(5) [complex organisations]	ADR.OR.D.005'Management system' point (c), AMC1 ADR.OR.D.005(c) 'Management system' AMC2 ADR.OR.D.005(c) 'Management system'	ATM/ANS.OR.B.005(a)(1) ATS.OR.200 'Safety management system' (1)(ii)	ATCO.OR.C.001 'Management system of training organisations', point (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 operators]	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]	AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATM/ANS.OR.B.005(a)(1) ATS.OR.200 'Safety management system' (1)(ii)	ATCO.OR.C.001 'Management system of training organisations' point (a)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**

CAMO.A.200 'Management system' points (a)(1) and (3) AMC1 CAMO.A.200 (a)(3)'Management system' point (b)(2) CAMO.A.300 and its AMC/GM CAMO.A.305 'Personnel requirement' point (a)(5) AMC1 CAMO.A.305 'Accountable Manager' AMC1 CAMO.A.305(a)(4); (a)(5)	145.A.200 'Management system' points (a)(1) AMC1 145.A.200(a)(1) 'Organisation and accountability' 145.A.30 'Personnel requirements' points (b) (c) (ca) (cb) AMC1 145.A.30(b) 'Management structure for maintenance' and its GM1 AMC1 145.A.30 (c) (ca) 'Safety Management and compliance monitoring function' GM1 145.A.30(ca) 'Safety manager' GM1 145.A.30 (cb) 'Responsibility of the nominated persons to the accountable manager' 145.A.70(a) points (3)(4) and (5)	21.A.139 'Production management System' point (c)(2) GM1 21.A.139(c) 'Safety management element' AMC1 21.A.139 (c)(2) 'Organisation and Accountability' Point GM1 21.A.139 (c)(2) 'Safety action group' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes' point (b) 21.A.145 'Resources' point (c) AMC1 21.A.145(c)(2) 'Nominated managers'	21.A.239 'Design management System' point (c)(2) GM1 21.A.239(c) 'Safety management element' AMC1 21.A.239 (c)(2) 'Organisation and Accountability' Point GM1 21.A.239 (c)(2) 'Safety action group' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes' point (b) 21.A.245 'Resources', points (b) and (d) AMC1 21.A.245(b) 'Nominated managers'	

SUMMARY COMMENTS on 1.2. 'SAFETY ACCOUNTABILITY AND RESPONSIBILITIES'

1.3.1 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.

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.

Present	Suitable	Operating	Effective
A safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line with the Accountable Manager.	The safety manager is competent. Sufficient time and resources are allocated to maintain the SMS, but not limited to, competent staff for safety investigation, analysis, auditing, and promotion. *See 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.* *For complex organisation, see next section.*	The safety manager has implemented and is maintaining the SMS. The safety manager is in regular communication with the Accountable Manager and escalates safety issues when appropriate. The safety manager is accessible to staff in the organisation.	The safety manager is competent to manage the SMS and identifying improvements in a timely manner. There is an established reporting scheme between the Accountable Manager and the safety manager to timely and regularly report on the safety issues.
Assessment results			
What to look for			

- Consider whether the responsibilities for the implementation and maintenance of the SMS should be given to a full-time person or to a safety manager supported by a team, enough empowered to advocate safety in case of conflict of interest (e.g. avoiding a person having functional activities both in production and surveillance);
- Check the availability of the safety manager (and supporting staff, if appropriate) to allocate sufficient time to the implementation and maintenance of the SMS
- Check for any conflicts of interest and that they have been identified and managed.

- Review safety manager role including credibility, competence, and status.
- Review the training that the safety manager has 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 in a timely manner such as safety investigation and surveys, analysis, assessing, safety meeting attendance, SMS implementation's coherence (notably for the assessment of risks and the mitigation measures), periodic reports on safety performance, communication processes including identification and dissemination of safety related information (internally and externally), and safety promotion.
- For organisations holding multiple certificates, the accountable manager may identify a unique focal point, i.e. the 'safety manager'.
- Review of safety report action and closure timescales.
- Interviews with the Accountable Manager and safety manager.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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] AMC1 ORO.AOC.130 'Flight data monitoring – aeroplanes' point (a)	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) AMC1 ADR.OR.D.015 'Personnel requirements'	ATS.OR.200(1)(iii)	ATCO.OR.C.010 'Personnel requirements'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
AMC1 CAMO.A.200(a)(1) 'Organisation and accountabilities' CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(5) CAMO.A.305 'Personnel requirement' point (a)(4) & (5)	145.A.2'0 'Management system' points (a)(1) AMC1 145.A.200(a)(1) 'Organisation and accountabilities' 145.A.'0 'Personnel requirements' points (b), (ca), (cb) and (cc)	21.A.139 'Production management System' point (c)(2) 21.A.145 'Resources' Point (c) AMC1 21.A.145 (c)(2) 'Nominated managers' points (j) and (k)	21.A.239 'Design management System' point (c)(2) 21.A.245 'Resources' AMC1 21.A.245 (b) 'Nominated managers' point (g) AMC1 21.A.245 (d) 'Management staff competencies' point (e)	

AMC1 CAMO.A.305 (a)(4); (a)(5) 'Safety management' and 'safety manager' point (a) GM1 CAMO.A.305 'Safety manager' and GM3 CAMO.A.305(g) 'Competency of the safety manager' AMC1 CAMO.A.200(a)(1) 'Organisation and accountabilities'	AMC1 145.A.30(c);(ca) 'Safety management and compliance monitoring function' GM1 145.A.30(ca)'Safety Manager' GM4 145.A.30(e) 'Competency of the Safety Manager'	AMC2 21.A.145 (c)(2) 'Management staff competencies' point (d)		

1.3.2 Appointment of key personnel for complex organisation(s)

Annex 19 reference & text
1.3.2   Management System for complex organisations (see regulatory reference below)

Present	Suitable	Operating	Effective
The organisation has established appropriate safety committees(s).	Safety committee(s)' structure and frequency support the SMS functions across the organisation. The scope of the safety committee(s) includes safety risks and compliance issues. The attendance of the highest-level safety committee includes at least the Accountable Manager and the heads of functional areas.	There is evidence of meetings taking place detailing the attendance, discussions, and actions. The safety committee(s) monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources. Actions are being monitored. Qualitative/quantitative means have been established to measure and monitor the established safety objectives	Safety committees include key stakeholders. The outcomes of the meetings are documented and communicated, and all actions are agreed, taken and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate.
Assessment results			
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.
- MS may be integrated for organisation holding multiple certificates

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
The concept of 'complex organisation' does not apply for Part-CAMO; but suitability is defined by: CAMO.A.200 (b) CAMO.A.200 'Management system' and its AMC/GM AMC1 CAMO.A.200(a)(1) applies as well as GM1 CAMO.A.200(a)(1)	The concept of 'complex organisation' does not apply for Part-145; See 145.A.200 'Management system' points (b) AMC1 145.A.200(a)(1) applies as well as GM1 145.A.200(a)(1)	The concept of 'complex organisation' does not apply for Part-21; See 21.A.139 'Production management system' point (b)1 GM1 21.A.139(c)(2) 'Safety action group'	The concept of 'complex organisation' does not apply for Part-21; See 21.A.239 'Design management system' point (b) GM1 21.A.239(c)(2) 'Safety action group'	

SUMMARY COMMENTS on 1.3. 'APPOINTMENT OF KEY PERSONNEL'

1.4 Co-ordination of emergency response planning (ERP)

Annex 19 reference & text

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

Present	Suitable	Operating	Effective
An appropriate, coordinated ERP has been developed and distributed that defines the procedures, roles, responsibilities and actions of the various organisations and key personnel.	Key personnel have easy access to the relevant parts of the ERP at all times. The ERP defines the procedures, roles, responsibilities, and actions of the various organisations and key personnel. The frequency and methods for testing the ERP are defined. The coordination with other organisations (including non-aviation organisations) is defined with appropriate means.	The ERP is reviewed and tested to make sure it remains up to date. Different scenarios with variations test the robustness of the ERP. Actions are taken to improve the ERP effectiveness.	There is evidence of coordination with other organisations through regular drills or crisis exercises, which are analysed for further improvement.
Assessment results			
What to look for			

Note: According to the EASA rules, an ERP is only needed for organisations complying with Air Operations, ANS/ATS and Aerodromes; however, coordination of that ERP with the organisations working at the interfaces should be appropriately considered.

-   Verify whether the service provider is required to have an ERP or to coordinate with the organisation's ERP, according to the domain.
-   Review the emergency response plan and how the procedures, roles, responsibilities, and actions of the various organisations are defined Review how co-ordination with other organisations (including non-aviation organisations) is planned.
-   Review how ERP is distributed and where copies are held.
-   Interview key personnel and check they have access to the relevant parts of the ERP.
-   Check that different types of foreseeable emergencies have been considered.
-   Check how defined are the frequency and methods for testing the ERP.
-   Review when the plan was last reviewed and tested, and actions taken.
-   Verify that variations of the different scenarios are regularly considered to test the robustness of the ERP.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) 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)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
AMC1 CAMO.A.200(a)(3) point (g) 'Immediate safety action and coordination with the operator's Emergency Response Plan (ERP)'	145.A.155 'Immediate reaction to a safety problem' AMC1 145.A.200(a)(3) 'Safety Management key Process' point (g)	The concept of 'ERP' does not apply for Part 21	The concept of 'ERP' does not apply for Part 21; 21.A.3 'Reporting system' point (d) AMC1 21.A.3A(a)(3), 21.A.3A(b)(3), 21.A.3A(d)	

SUMMARY COMMENTS on 1.4. 'COORDINATION OF EMERGENCY RESPONSE PLANNING'

1.5.1 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	Operating	Effective
The SMS documentation includes the policies and processes that describe the organisation's SMS and processes.	The scope of the activities under the SMS is clearly defined. SMS documentation is comprehensible. SMS documentation is consistent with other internal management systems and is representative of the actual processes in place. The manner and format of the SMS documentation is appropriate to the organisation and readily available to all relevant personnel. *See 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 organisational documents (or documentation) maintained by the service provider.*	Changes to the SMS documentation are managed. Key personnel involved in SMS implementation is familiar with and follows the relevant parts of the SMS documentation, whereas employees are familiar with the content of the SMS documentation relevant to their activities	SMS documentation is proactively reviewed for continuous improvement.
Assessment results			

What to look for				

- Review the SMS documentation and amendment procedures.
- Check the manner and format of the SMS documentation, depending on the size, structure of the organisation, its business model, such as volume and significance of the contracted activities (to and from).
- Check for cross references to other documents and procedures.
- Check availability of SMS documentation to all staff.
- Check if staff knows who to contact (when needed) or where to find safety related documentation including procedures appropriate to their role.
- Review the supporting SMS documentation (hazard logs, meeting minutes, safety performance reports, risk assessments, etc.).
- In case several operators form part of a single air carrier business grouping use the same CAMO for the continuing airworthiness of all aircraft they operate (AMC3 CAMO.A.300), check how potential specific requirements and procedures for the different operators are implemented.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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 ORA.GEN.200(a)(5) 'Management system' point (a) AMC1 ORA.GEN.200(a)(5) - [complex organisations]	ADR.OR.D.005 'Management system' point (c) 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)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200(a)(5) 'Management system' GM1 CAMO.A.200(a)(5) 'Management system documentation' CAMO.A.300 'CAME' and its AMC1 CAMO.A.300 CAMO.A.200(a)(5) and its GM1 CAMO.A.200(a)(5) 'Management system documentation'	145.A.200 'Management System' point (a)(5) GM1 145.A.200(a)(5) 'Management System Documentation' 145.A.70 'Maintenance organisation exposition (MOE)' AMC 1 145.A.70 'Maintenance organisation exposition (MOE)'	21.A.143 'Production organisation exposition (POE)' GM1 21.A.143 'POE' AMC1 21.A.143 (a)(1) 'Content of the POE'	21.A.243 'DO Handbook' AMC1 21.A.243(a) 'DO handbook' AMC2 21.A.243(a) 'Typical content of the handbook…/…'	

AMC3 CAMO.A.300 in the case several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness of all aircraft they operate.			

SUMMARY COMMENTS on 1.5. 'SMS DOCUMENTATION'

1.5.2 SMS records

Annex 19 reference & text
1.5.2   The service provider shall develop and maintain SMS operational records as part of its SMS documentation. *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.*

Present	Suitable	Operating	Effective
The SMS documentation defines the SMS outputs and which records of SMS activities will be stored. Records to be stored, storage period, and location are identified.	Data protection and confidentiality rules have been defined.	SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and confidentiality control rules.	SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS. SMS documentation, including SMS related records, are regularly reviewed and updated with appropriate version control in place.

Assessment results

What to look for
- Check how safety records are stored and version controlled. - Data protection and confidentiality rules have been defined and are consistently applied. - Check if appropriate staff is aware of the records control processes and procedures. - Check that the SMS records include the decisions taken during the Safety Review Board (or any other high-level safety committee) are supported by evidence.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.220 'Record-keeping' AMC1 ORO.GEN.220(b) 'Record-keeping' AMC1 ORO.AOC.130 'Flight data monitoring – aeroplanes' point (k)	ORA.GEN.220 'Record-keeping' AMC1 ORA.GEN.220(b) 'Record-keeping'	ADR.OR.D.035 'Record keeping' AMC1 ADR.OR.D.035 'Record keeping' AMC2 ADR.OR.D.035 'Record keeping'	ATM/ANS.OR.B.030 Record keeping ATS.OR.200(1)(v) AMC2 ATS.OR.200(1)(v) 'Safety management system'	ATCO.OR.C.020 'Record keeping' AMC1 ATCO.OR.C.020(a);(b) 'Record keeping'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.220 'Record-keeping' point (b) AMC1 CAMO.A.220 'Record-keeping - general'	145.A.55 'Record-keeping' point (c) AMC1 145.A.55 Record-keeping – general'			

SUMMARY COMMENTS on 'SMS RECORDS'

2. SAFETY RISK ASSESSMENT

2.1.1 Hazard identification

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	Operating	Effective
There is a process that defines how hazards are identified through reactive and proactive methods, using multiples sources. The methodology to define the criteria for safety investigations is documented. The process includes the management of organisational change when it impacts safety (see 3.2).	Multiple sources of hazards (internal and external) are considered and reviewed, as appropriate in the domain. The interfaces are properly addressed. The data analysis process enables gaining useable safety information. Hazards are documented in an easy-to-understand format. The level of sign-off for safety investigations is defined and adequate to the level of risk. The safety hazards at organisation's level are consistent with the ones identified at authority's level, where relevant.	The hazards are identified and documented. Technical, human, and organisational factors related hazards are being considered. The criteria for safety investigations are identified and applied. Safety investigations are carried out and recorded.	The organisation has processes and means that capture hazards (technical, environmental, human, and organisational factors related), which are maintained and reviewed to ensure they remain up to date. The organisation is continuously and proactively identifying hazards (technical, environmental, human, and organisational factors related) related to its activities and operational environment and involves all key personnel and relevant stakeholders. Hazards are assessed in a systematic and timely manner. Personnel express confidence and trust in the organisation's reporting policy and processes. The criteria for safety investigations are continuously updated to include internal and external sources as required.
Assessment results			

What to look for

- Review how hazards are identified, analysed, addressed, and recorded.
- Review structure and layout of hazard log.
- Consider hazards related to:
    - Possible accident or serious incident scenarios,
    - Technical factors as well as Human and organisational factors (e.g. hazards linked to human performance and organisation's performance as part of the systemic risk management – please consider ICAO Doc.10151 'Manual on Human Performance for Regulators'),
    - Business decisions and processes,
    - Third party organisations.
- Review what internal and external sources of hazards are considered such as: safety reports / automatic data collection (such as flight data monitoring, ATS/ANS, health monitoring system), audits, safety surveys and/or studies, investigations, inspections, brainstorming, Management of Change activities, security, cybersecurity, sanitary crisis, environmental, commercial and other external influences, compliance monitoring analysis; sector risk profile, and etc.
- Check whether the identification of safety hazards considers the ones identified at authority's level (e.g. SSP/SMS interfaces and SPAS in accordance with Regulation (EU) 2018/1139, articles 7 and 8, State's safety risks or State risk profile (e.g. State's issues portfolio), EPAS, EASA and State's ASR, EASA annual safety recommendations reviews, or through recognized International Organisations (like IATA, CANSO) ASRs; safety objectives identified as per article 76.6 of Regulation (EU) 2018/1139), SIB;
- Investigations of safety occurrences establish causal/contributing factors (why it happened, not just what happened) and identify human and organisational contributing factors.
- Assess to which extent the process is not limited to the reactive part (i.e. occurrences) but also considers the proactive approach (as proposed above).
- Check how hazards identified from occurrences are processed in compliance with Reg. (EU) 376/2014 Article 4 and 5 (see next block).
- Is the staff encouraged to report errors, near misses through the reporting system ensuring adequate protection of the reporter?
- Is there a mechanism in place to document the hazard log in a way that enables its evolution over time? Is the hazard log periodically reviewed?

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (a)(1) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators] AMC1 ORO.AOC.130 'Flight data monitoring – aeroplanes' point (b)	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (a)(1) - [complex organisations] AMC1 ORA.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)(3) AMC1 ADR.OR.D.005(b)(3) 'Management system'	ATM/ANS.OR.B.005(a)(5) 'Management system' ATS.OR.200(2)(i) 'Safety management system' AMC1 ATS.OR.205(b)(1) 'Safety assessment and assurance of changes to the functional system COMPLETENESS OF HAZARD IDENTIFICATION' AMC2 ATS.OR.205(b)(1) 'Safety assessment and assurance of changes to the functional system HAZARDS TO BE IDENTIFIED'	ATM/ANS.OR.B.005(a)(5) 'Management system' ATS.OR.200(2)(i) 'Safety management system' AMC1 ATS.OR.205(b)(1) 'Safety assessment and assurance of changes to the functional system COMPLETENESS OF HAZARD IDENTIFICATION' AMC2 ATS.OR.205(b)(1) 'Safety assessment and assurance of changes to the functional system HAZARDS TO BE IDENTIFIED'

CAM Org.	Maintenance Org.	Production Org.	Design Org.	Reserved
CAMO.A.160 'Occurrence reporting' CAMO.A.200 'Management system' point (a)(3) GM1 CAMO.A.200 'Management system' AMC1 CAMO.A.200(a)(3) GM1 CAMO.A.200(a)(3) 'Management system – Safety risk management – interfaces between organisations' GM2 CAMO.A.200(a)(3) 'Management system' CAMO.A.202 'Internal safety reporting scheme' and its AMC/GM CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(10)	145.A.200 'Management System' point (a)(3) AMC1 145.A.200(a)(3) 'Safety Management Key Process' GM1 145.A.200(a)(3) 'Safety risk management – interfaces between organisations' 145.A.60 'Occurrence reporting' 145.A.202 'Internal safety reporting scheme' AMC1/GM1 145.A.202 145.A.205 'Contracting and subcontracting' GM1 145.A.205 'Responsibility when contracting or subcontracting maintenance'	21.A.139 'Production management System' point (c)(3) GM1 21.A.139(c) 'Safety management System' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes" 21.A.3A 'Reporting system' point (b) GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014' GM1 21.A.3A(a) and 21.A.3A(b) 'General – collecting system' GM1 21.A.3A(a)(1) and (b)(1) 'Events reported voluntarily to the organisation' GM2 21.A.3A(a)(1) and (b)(1) 'Internal safety reporting scheme'	21.A.239 'Design management System' point (c)(3) GM1 21.A.239(c) 'Safety management System' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes" 21.A.243 (a)(4) 'Flight test' 21.A.3A 'Reporting system' point (a) GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014' GM1 21.A.3A(a) and 21.A.3A(b) 'General – collecting system' GM1 21.A.3A(a)(1) and (b)(1) 'Events reported voluntarily to the organisation' GM2 21.A.3A(a)(1) and (b)(1) 'Internal safety reporting scheme'	

2.1.2 Occurrences reporting iaw. Regulation (EU) 376/2014

Annex 19 safety reporting procedures, which shall be part of the Safety Policy iaw 1.1.1 (c) Here also Regulation 376/2014			
Present	**Suitable**	**Operating**	**Effective**
There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database. Responsibilities have been defined as required by Reg. (EU) 376/2014. The process identifies how reports are actioned and timescales specified.	The reporting system is accessible and easy to use for the personnel involved in the safety activities of the organisation. There is an appropriate means to capture issues from third parties (partners, suppliers, contractors).	The reporting system is simple to use, being used and accessible to all personnel. There is feedback to the reporter of any actions taken (or not taken), where appropriate, and to the rest of the organisation. Reports are evaluated, processed, analysed, and stored. Safety investigations are carried out by appropriately trained personnel to identify root causes (why it happened, not just what happened). People are aware and fulfil their responsibilities in respect of the reporting system Reports are processed within the defined timescales. Coherence with the topics discussed during the SRB or safety committees' meetings is ensured.	Personnel express confidence and trust in the organisation's reporting policy and process. The reporting system is being used to influence management decisions and continuous improvement. There is a healthy reporting system based on the pertinence of reports received. Safety reports are acted on in a timely manner. The reporting system contributes to the continuous improvement of the organisation performance.
Assessment results			

What to look for
- Verify that the responsibilities as required by Regulation (EU) 376/2014 have been defined and described in the job descriptions - Review the reporting system for access and ease of use [appropriateness of the reporting systems]. Depending on the size and complexity, the appropriateness of the reporting system can range from simple secured boxes to a digital system, including Apps to instal on mobile devices. - Check if staff trusts the reporting system, are familiar with it and know what should be reported. - Evidence that people do not fear to report in respect of the internal safety reporting scheme. - Review how data protection and confidentiality is achieved. - Evidence of feedback to reporter (or a feedback loop addressing the aggregation of reports with their analysis, depending on the volume of occurrences) - Assess volume and quality of reports including self-reporting. - Review report closure rates. - Check availability to contracted organisations and customers to make reports. - Check the training of the staff carrying out the investigations. - Check whether a taxonomy is defined and used. - Safety investigations are carried out to identify root causes (why it happened, not just what happened). Check the quality of the analysis - The system supports analysis, follow-up, and report to the relevant Competent Authority as mandated by Article 13 of Reg. (EU) 376/2014. There is a process in place to analyse safety data and safety information to look for trends and gain useable management information. - Confirm responsibilities with regards to occurrence analysis, storage and follow-up are clearly defined. - Check relevant staff are aware of which occurrences should be mandatory. Verify how the Annexes to Regulation (EU) 2015/1018 are implemented and known by the staff. - Assess how the operational managers and the senior management engage with the outputs of the reporting system.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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'.				

CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.160 'Occurrence reporting' and its AMC/GM CAMO.A.202 'Internal safety reporting scheme' and its AMC/GM CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(10)	145.A.60 'Occurrence reporting' AMC2 145.A.60 AMC1 145.A.60 'General' GM1 145.A.60 'Mandatory reporting - general' 145.A.202 'Internal safety reporting scheme' and its AMC1 GM1 145.A.202 'General'	21.A.3A 'Reporting system' GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014' When appropriate, all AMC and GM developed for 21.A.3A AMC1 21.A.143 (a)(1) 'Content of the production organisation exposition'	21.A.3A 'Reporting system' GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014' When appropriate, all AMC and GM developed for 21.A.3A AMC1 21.A.243(a) 'Handbook'	

	145.A.70 'Maintenance organisation exposition (MOE)' AMC1 145.A.70(a) 'MOE' points 2.18 and 3.2			
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'.				

SUMMARY COMMENTS on 2.1. 'HAZARD IDENTIFICATION'

2.2 Safety 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.

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

Present	Suitable	Operating	Effective
There is a process for the analysis and assessment of safety risks.	The risk assessment methodology, including 'severity' and 'likelihood' usable criteria are defined and fit the service provider's actual environment, including consideration to the expert judgement when data are not available. The used definitions are sufficiently explicit or detailed. For the acceptance of the risk's level, the right level of organisation's authority within the organisation (responsibilities) in cooperation with the stakeholders is clearly defined.	Risk analysis and assessments are carried out in a consistent manner based on the defined process. Appropriate risks controls are being applied to reduce safety risks to an acceptable level, including timelines and allocation of responsibilities agreed with the stakeholders. Operational, technical, human and organisational factors are considered as part of the development of risks controls. Senior management is actively involved in medium and high risks and their mitigation and controls. Understanding of external inputs and outputs of safety risk management that should be addressed.	Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes. Risk assessments are regularly reviewed to ensure they remain current. Risk acceptability criteria are used routinely, consistently applied in management decision making processes, and are regularly reviewed.
Assessment results			

What to look for

- Review risk classification scheme and procedures.
- Check the methodology used to assess the risks; how this is documented, accurately defined, and used; check how the staff using that methodology is trained.
- Check any assumptions made and whether they are reviewed.
- Check that the process defines who can accept what level of risk.
- Check that the level of risk that the organisation is willing to accept is defined.
- Severity and likelihood definitions and criteria are sufficiently defined (or that an alternative methodology is described) and adapted to the activities. Severity 'of what' ('possible worst scenario' and consequence) is also described. Differentiation between 'likelihood' and 'frequency' is understood.
- Review whether risk assessments are carried out consistently and coherently across the organisation (e.g. consideration of various safety perspectives and views to make the relevant decision).
- Review how issues are classified when there is insufficient quantitative data available. When expert judgement is used, a collaborative risk assessment process is used (e.g. various expert judgement through cross-functional disciplines such as Flight operations, Design, Production, Human Performance experts), taking into account different safety perspectives and views to make the relevant decision, to ensure the reproducibility of the assessment.
- Consider how human performance is evaluated through the safety risk management and mitigation process (refer to ICAO Doc.10151)
- Check whether the outcome of the safety reporting system, including the mandatory and voluntary occurrence reporting systems, is used to test the robustness the risk assessment, including when the expert judgement was used (see section 3.1). Is the network of stakeholders involved in the collection of data and safety information informing the risk assessments, notably for the risk at the interfaces? (See also Section 5.1 of this tool).
- Verify whether the risk assessments are updated when new data from the safety reporting system are available. Review what triggers a risk assessment and its review over time. Check that the risk register is being reviewed and monitored by the appropriate safety committee(s), where appropriate. Verify how experience, feedback and monitoring of recently published safety information serves that regular update.
- Review layout of risk register e.g. initial assessment, residual risk, mitigation actions, ownership, associated safety performance and follow-up.
- Sample identified hazards and how these are processed and documented.
- Check which safety committee(s) or person(s) oversee the 'acceptability'. Check the availability of instructions about implementation of 'As Low As Reasonably Practical' (ALARP). Check the right level of authority for decision-making.
- Evidence of risk reduction, evaluation of residual risk and risk acceptability, when appropriate, being applied in the data-driven decision-making.
- Evidence that risks, including those that are not generated by the organisation itself, are analysed and mitigated, without further transfer of risks.
- Check how trends and emerging issues are identified and managed.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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)	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (b)(1) - [complex organisations] AMC1 ORA.GEN.200(a)	ADR.OR.D.005 'Management system' point (b)(4) AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATS.OR.200(2)(i) 'Safety management system'	ATCO.OR.C.001 'Management system of training organisations' point (c) AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'

(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators] AMC1 ORO.AOC.130 'Flight data monitoring – aeroplanes' point (b)	(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]			
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
GM1 CAMO.A.200 'Management system' CAMO.A.200 'Management system' point (a)(3) AMC1 CAMO.A.200(a)(3) point (b)(1) AMC1 CAMO.A.200 point (a)(1) 'Organisation and accountabilities' GM1 CAMO.A.200(a)(1) for the determination of the safety committees in charge of 'acceptability' CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(11)(i)	145.A.200 'Management System' point (a)(3) AMC1 145.A.200(a)(3) 'Safety Management Key Process' point (b) 145.A.48 'Performance of maintenance' AMC1/2/3 145.A.48(c)(2) 'Performance of Maintenance' AMC1 145.A.48(c)(3) 'Performance of Maintenance' and its GM1 145.A.70 'Maintenance organisation exposition (MOE)' AMC1 145.A.70(a) 'MOE' points 3.1 and 3.4	21.A.139 'Production management System' point (c)(3) GM1 21.A.139(c) 'Safety management System' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes" GM1 21.A.139(c) (2) 'Safety action group' 21.A.3A 'Reporting system' point (b) GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014'	21.A.239 'Design management System' point (c)(3) GM1 21.A.239(c) 'Safety management System' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes" GM1 21.A.239(c) (2) 'Safety action group' 21.A.3A 'Reporting system' point (a) GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014'	

Annex 19 reference & text

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	Operating	Effective
The organisation has a process in place to decide and apply the risk controls.	Responsibilities and timelines for determining and accepting the risk controls are defined. Appropriate risk mitigation strategies and perspectives are considered.	Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities. The organisation follows the process in place to make decisions and apply appropriate and effective risk controls. Human Performance are considered as part of the development of risk controls.	Risk controls are practical and sustainable, applied in a timely manner and do not create additional risks. The effectiveness of the risks controls is monitored through safety performance, using qualitative and/or quantitative means. Risk Controls take Human Performance into consideration.
Assessment results			

What to look for

- Risk controls clearly identified. Evidence of risk controls being actioned and follow up.
- Quantitative and/or qualitative means are used to monitor the effectiveness of the risk controls, such as to SMART SPIs, SPTs, alert levels.
- Check how trends are monitored and used.
- Aggregate risk is being considered.
- Check whether the risk controls have reduced the residual risk.
- Check that new risk controls do not create additional risks.
- Check how the policy considers ALARP – verify the implementation of it.
- Check how specific domain-related risks are appropriately controlled, such as Fatigue Risk Management, flight data monitoring, HUMS, subcontracting and interfaces, etc.
- Check whether the acceptability of the risks is made at the right management level.
- Operational managers and senior management have visibility of medium and high risk as well as their mitigation and controls.
- Review the use of risk controls that rely solely on human intervention.
- Risk controls consider human performance and organisational factors.

    Verify how the effectiveness of the safety barriers for the significant risks at the interfaces is assured (see also Section 5.1 of this tool).

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) 'Safety management system'	ATCO.AR.B.001 'Management system' point (a)(4); Furthermore, ATSP provisions apply.
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(3) GM1 CAMO.A.200 'Management system' AMC1 CAMO.A.200(a)(3) points (b) and (d) CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(11)(i)	145.A.200 'Management system' point (a)(3) GM1 145.A.200 'Management system' AMC1 145.A.200(a)(3) 'Safety Management Key processes points (a), (b) and (d) AMC1 145.A.70 'MOE' points 3.1 and 3.4	21.A.139 (c) (3)'Production management element" GM1 21.A.139(c) 'Safety management System' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes" GM1 21.A.139(c) (2) 'Safety action group'	21.A.239 (c) (3) 'Design management element' GM1 21.A.239(c) 'Safety management System' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes" GM1 21.A.239(c) (2) 'Safety action group'	

SUMMARY COMMENTS on 2.2. 'RISK ASSESSMENT AND MITIGATION'

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**[22] of the organization and to validate the **effectiveness of safety risk controls.** *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).*

Present	Suitable	Operating	Effective
The organisation has a documented internal audit programme with a link to a management review process. There is a documented process to assess whether the appropriate risk controls are applied and effective with respect to SMS key processes. A person or group of persons with responsibilities for the monitoring function have been identified and they have direct access to the Accountable Executive.	Responsibilities, methods, and timelines for assessing risk controls are appropriately defined. Safety performance measurement targets the effectiveness of the mitigation measures addressing the key risks, and by extension, the safety objectives. Safety performance measurement is focused on what is important rather than what is easy to measure. The contribution of contracted organisations should be considered in the safety performance process, considering the potential effect it may have on the safety performance of the organisation.	Information from the reporting system(s), safety assurance, compliance monitoring activities or any other relevant source feeds back into the safety risk management process. Appropriate risk controls are being verified to assess whether they are applied and effective. Follow-up of the corrective/preventive actions plan is evidenced and reviewed by the relevant SMS governance body (i.e. Adequate authority level based on the size of the organisation and the complexity of its operations). The interface between compliance-based audits and the safety risk management processes is described and operating.	Appropriate risk controls are assessed, and actions taken to ensure they are effective and delivering a safe service The reasons for ineffectiveness of risk controls are investigated. Human performance is taken into consideration. There is comprehensive integration of external and internal interfaces, as appropriate, into organisation's Safety Risk Management and Safety Assurance processes. The outcome of the organisation' safety performance considers and provides feedback to the SMS governance body, as relevant, for review and ultimately to the Competent Authority. The effectiveness of the SMS processes are reviewed on a regular basis.

---

[22] EASA note: Through the coming amendment of Annex 19, ICAO plans to review the definition of "safety performance", as follows: Safety performance. An organisation's measurable effect on safety assessed through SPIs, supported by qualitative means as needed. A new definition of SPIs is also provided: metric or quantitative means used to measure and monitor the progress made by the organisation towards achieving a safety objective. It is thus planned that revised ICAO Standard 3.1.2 will focus more on the progress made towards achieving the safety objectives through the measurement and monitoring of the organisation's performance. The applicability date should be November 2026 (TBC).

Assessment results

What to look for

Check if there is a mechanism in place to ensure that the organisation utilises all relevant data feeding sources, to get a true picture of their risks, evaluate its safety performance; and, in time take appropriate actions and check their effectiveness.

- Evidence of responsibilities, methods, and timelines to assess whether the risk controls are applied and effective: survey controls being assessed and monitored for effectiveness (e.g. audits, surveys, reviews, qualitative and/or quantitative means to measure and monitor safety performance such as SPIs, SPTs, alert levels, wherever appropriate, reporting systems).
- Evidence that the organisation's risk assessment processes, including residual risks, are evaluated regularly.
- Safety assurance takes into account activities carried out at the interfaces internally and externally (i.e. stakeholders): evidence of risk controls applied by contracted organisations / third parties, other departments being assessed and overseen (e.g. quality check, reviews, and regular meetings).
- Information from safety assurance and compliance monitoring activities (see section 5.2.4) feeds back into the safety risk management process (see section 2.2).
- Review where risk controls have been changed as a result of the assessment.

What type of information and sources may support the safety performance measurement?

Check to which extent the organisation pays attention to information stemming from internal and external occurrences, outcome of Regulation (EU) 376/2014 (notably Article 13), safety objectives identified as per article 76.6 of Regulation (EU) 2018/1139, investigation reports; automatic data collection (such as flight data monitoring for air operators); safety meetings, workshops, seminars, hazard reports, sector risk profile; audits and statistics from the compliance monitoring function, safety data analysis, SSP and/or SPAS, (industry and/or EASA) safety roadmaps, EPAS (notably Volume II, section 4 where SPIs are proposed for monitoring, and Volume III) , ICAO's or EASA's or State's Annual Safety Report / Review (ASR) or recognized International Organisations (like IATA, CANSO) ASRs; State safety promotion, surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation 3.3.2.2 etc.

Consider how human performance (ICAO doc.10151) is taken into consideration when contributing to the safety performance and assurance of safety.

Corresponding EU/EASA regulatory references

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATC Training Org.
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators] AMC1 ORO.AOC.130 'Flight data monitoring – aeroplanes' point (b)	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]	ADR.OR.D.005 'Management system' point (b)(5) AMC1 ADR.OR.D.005(b) (5) 'Management system'	ATS.OR.200 (3)(i) 'Safety management system' Commission Implementing Regulation (EU) 2019/317 or latest amendment	Not applicable, however Air Traffic Service Provider provisions apply.

CAM Org.	Maintenance Org.	Production Org.	Design Org.	Reserved
CAMO.A.200 'Management system' point (a)(3) GM1 CAMO.A.200 'Management system' AMC1 CAMO.A.200(a)(3) point (d) See also CAMO.A.160 CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(11)(i)	145.A.200 'Management System' point (a)(3) AMC1 145.A.200(a)(3) 'Safety Management Key processes point (d) 145.A.48 'Performance of maintenance' AMC1/2/3 145.A.48(c)(2) 'Performance of Maintenance' AMC1 145.A.48(c)(3) 'Performance of Maintenance' and its GM1 145.A.70 'Maintenance organisation exposition (MOE)' AMC1 145.A.70 'MOE' point 3.4	21.A.139 'Production management System' point (c)(4)(i) GM1 21.A.139(c) 'Safety management element' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes" GM1 21.A.139(c) (2) 'Safety action group' 21.A.139 'Production management System' point (e) AMC1 21.A.139(e) and 21.A.139(d)(2)(xiv) 'Independent monitoring function'	21.A.239 'Design management System' point (c)(4)(i) GM1 21.A.239(c) 'Safety management element' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes" GM1 21.A.239(c) (2) 'Safety action group' 21.A.239 'Design management System' point (e) AMC1 21.A.239(e) 'Independent monitoring function'	

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[23] of the SMS in support of the organization's **safety objectives**.

Present	Suitable	Operating	Effective
There is a documented process in place to measure the safety performance of the organisation, covering all the appropriate areas, including qualitative and quantitative means linked to the organisation's safety objectives and to measure the effectiveness of safety risk controls.	The quantitative means are focused on what is important rather than what is easy to measure. Reliability of data sources is considered in the design of qualitative means and/or quantitative means such as SPIs and SPTs. The qualitative and quantitative means are linked to the identified risks, the effectiveness of the safety barriers and the safety objectives. Frequency of and responsibility for the trend monitoring of qualitative means are defined. Realistic targets have been set, wherever appropriate Qualitative and quantitative means related to the State safety objectives from the SSP/SPAS are taken into consideration, as applicable. The qualitative and quantitative means consider key internal and external interfaces (or risks at the interfaces), when meaningful.	The safety performance of the organisation is being measured through qualitative and quantitative means, which are being continuously monitored and analysed for trends, wherever appropriate. The effectiveness of safety risk controls is being measured and supports actionable decisions. Frequency and responsibility for the trend monitoring of qualitative/quantitative means are appropriate and reliable.	The qualitative and quantitative means are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data. The qualitative and quantitative means are reviewed; regularly updated to ensure they remain relevant, then reviewed with the relevant SMS governance body and allow the maturation of the organisation's SMS. Where the qualitative and quantitative means indicate a risk control not being effective, appropriate action is taken. The State's safety objectives on the SSP/SPAS are appropriately considered, when relevant, and continuous discussion with the State drives the continuous improvement of the process.
Assessment results			

---

[23] EASA note: SPTs, alert level", "lagging and leading indicators" are not required by EASA AMC. However, they are currently mentioned in the ICAO AREA SSPIA PQs. Through the coming amendment of Annex 19, ICAO plans to review the definition of "safety performance", as follows: Safety performance. An organisation's measurable effect on safety assessed through SPIs, supported by qualitative means as needed. A new definition of SPIs is also provided: metric or quantitative means used to measure and monitor the progress made by the organisation towards achieving a safety objective. It is thus planned that revised ICAO Standard 3.1.2 will focus more on the progress made towards achieving the safety objectives through the measurement and monitoring of the organisation's performance. The use of SPTs and alert levels will be at the discretion of the organisation, when relevant. The applicability date should be November 2026 (TBC).

What to look for
- How is safety performance monitored and measured? Check that the defined SPIs, SPTs, alert levels and targets, when used and defined, are appropriate to the organisation's activities, risks, and safety objectives.
- Verify that the interfaces having an impact on the performance of the SMS are appropriately considered (see also Section 5.1 of this tool).
- How does the occurrence reporting scheme efficiently and timely enable the measurement and evaluation of the organisation's safety performance? Liaison with Regulation (EU) 376/2014. Hook with the continuous improvement of the SMS.
- How does 'compliance monitoring' feed the monitoring and measurement of the organisation's safety performance?
- Evidence that the qualitative means or quantitative means such as SPIs, SPTs, alert levels are based on any kind of reliable data-feeding sources to inform the performance of the organisation and the progress made on the achievement of the safety objectives [see also footnote No.23].
- Evidence of when the qualitative and quantitative means were last reviewed.
- The qualitative means such as the SPIs are focused on what is important rather than what is easy to measure. SPIs are focused on the safety objectives and the effectiveness of the safety barriers, notably on the preventive ones: check that they allow the maturation of the organisation's performance over time.
- Evidence that the organisation's qualitative and quantitative means are balanced (leading / lagging, State-level / self-generated / representative of safety objectives) and accurately represent the risk picture of individual organisations and can serve as a tool for the monitoring of their safety performance.
- Evidence that, when the alert levels have been reached, the organisation takes adequate actions and report at higher level, when appropriate (SRB, safety committees etc.)
- Consideration of any State's safety objectives (stemming from SSP and/or SPAS in accordance with Regulation (EU) 2018/1139, articles 7 and 8; or following State surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation 3.3.2.2)
- Consider whether the monitoring of the safety objectives, including relevant SPIs in the EPAS, notably Volume II, section 4.2 or Volume III, wherever appropriate, are being considered (see Regulation (EU) 2018/1139, article 6)
- Consider any relevant safety performance indicator or target stemming from Regulation (EU) 376/2014, articles 13 &14 or EASA ASR[24] or any other occurrence reporting system (internal, voluntary etc.), ICAO's or State's Annual Safety Report / Review (ASR) or recognized International Organisations (like IATA, CANSO) ASRs.
- Review whether any action has been taken when the monitoring of the performance indicates a negative trend (reflecting non-effective risk control(s) or inappropriate qualitative/quantitative means or negative impact on the organisation's performance).
- Verify whether any standard SPIs or targets used in a risk sector profile or safety roadmap or standard monitoring process (e.g. flight data monitoring programme for Air Ops; ANS performance scheme) or valuable Industry good practices / standards are being considered.
- Evidence that results of safety performance monitoring are discussed for its safety relevance at senior management level (or Safety Review Board or any Safety committees or any other appropriate level of Authority within the organisation, as appropriate). Hook with the continuous improvement of the SMS (see section 3.3).
- Evidence of feedback provided to the accountable manager.
- Evidence, where alert levels are relevant, that, when the alert levels associated to SPTs have been reached, the organisation takes adequate actions and reviews its safety objectives, wherever needed.

---

[24]Starting from EASA ASR 2021, EASA plans to issue some SPIs in 2023 – for further information, please monitor the EASA website

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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 ORA.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]	ADR.OR.D.005 'Management system' point (b)(5) AMC1 ADR.OR.D.005(b)(5) 'Management system'	ATM/ANS.OR.B.005(a)(3) AMC2 ATM/ANS.OR.B.005(a)(3) 'Management system' AMC1 ATS.OR.200(1)(v) 'Safety management system' Commission Implementing Regulation (EU) 2019/317 (and its Annex i or latest amendment)	Not applicable, however Air Traffic Service Provider provisions apply.
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
GM1 CAMO.A.200 'Management system' AMC1 CAMO.A.200(a)(1) 'Management system' point (b)(3)(i) CAMO.A.200 'Management system' point (a)(3) AMC1 CAMO.A.200(a)(3) 'Management system' point points (d) and (f)(5)	145.A.200 'Management System' point (a)(3) AMC1 145.A.200(a)(3) 'Safety Management Key processes point (d) and (f)(5) 145.A.48 'Performance of maintenance' AMC1/2/3 145.A.48(c)(2) 'Performance of Maintenance' AMC1 145.A.48(c)(3) 'Performance of Maintenance' and its GM1 145.A.70 'Maintenance organisation exposition (MOE)' AMC1 145.A.70 'MOE' point 3.4	21.A.139 (c)(4)(i) 'Production assurance system' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes' point (e)	21.A.239 (c)(4)(i) 'Design assurance system' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes' point (e)	

SUMMARY COMMENTS on 3.1. 'SAFETY PERFORMANCE MONITORING AND MEASUREMENT'

3.2. 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	Operating	Effective
The organisation has established a change management process to identify whether changes have an impact on safety activities and to manage significant, identified risks in accordance with existing safety risk management processes (see 2.2). Methods, responsibilities, and timelines are defined in the process.	Triggers for the change management process are defined. The process also considers business related changes and interfaces with other organisations/departments, having an impact on safety.	The organisation is using a defined change management process to identify whether substantive changes have an impact on safety. Any identified risks are managed in accordance with existing safety risk management processes and are monitored through safety assurance. Internal and external factors such as Technical, Environmental, Human and Organisational related hazards are being considered, as appropriate.	The Management of change process considers the accumulation or impact of multiple changes, and the change and impact to safety-related functions are communicated with other organisations, including internal and external stakeholders. There is a means to share information with respect to management of change impact with external stakeholders (partners, suppliers, contractors, etc.). Safety risks are being managed consistent with the scope and time scale associated with the change. Risk mitigation actions resulting from management of change are part of the SMS performance monitoring.
Assessment results			
What to look for			

- Key stakeholders are involved in the process. This may include individuals from other departments of the organisation and/or external organisations.
- Review what triggers the 'management of changes' process. Consider organisational, financial, commercial factors etc. as well as any other change that may affect safety (e.g. security, cybersecurity, environment, sanitary crisis, sickness, or staff retirement & transfer of knowledge).
- Review recent changes that have been through the risk assessment process.
- Check that 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 cumulative effect of multiple changes.
- Review that business-related changes have considered safety risks (organisational restructuring, upsizing, or downsizing, IT projects, etc.).
- Evidence of Human Performance (HP) issues being addressed during changes.
- Assess whether the risk mitigation actions resulting from these changes are evident and consistent with positive performance monitoring trends.
- Review impact of change on training and competencies.
- Review previous changes to confirm they remain under control.
- Consider how the reasons for these changes are communicated and how the changes are planned and communicated to those people affected by the change externally and internally. Consider how stakeholders (other departments, partners, suppliers, contractors, Authorities) affected by the changes are involved in the process.
- Review whether the standard contractual arrangements address 'management of changes' on both contractual sides. Check evidence of implementation.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) 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)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.130 'Changes' AMC2 CAMO.A.130 GM1 CAMO.A.200(a)(1) 'Management system' point (d)(3)	145.A.85 'Changes to the organisation' AMC2 145.A.85 'Management of changes' GM1 145.A.200 'Management system – General'	21.A.139 'Production management System' point (c)(4)(ii) AMC1 21.A.139(c)(3) and (4) 'Safety management key processes' point (f)	21.A.239 'Design management System' point (c)(4)(ii) AMC1 21.A.239(c)(3) and (4) 'Safety management key processes' point (f)	

CAMO.A.200 'Management system' point (a)(3) AMC1 CAMO.A.200 (a)(3) 'Management of change' point (e) GM2 CAMO.A.200 (a)(3) 'Management of change' CAMO.A.300(a)(11) and (c)	AMC1 145.A.200(a) (3) 'Safety management key processes' point (e) 145.A.70 'Maintenance organisation exposition (MOE)' point (a)(10) and (c) AMC1 145.A.70 'MOE' point 3.5	21.A.147 'Changes to the Production management system' AMC1 21.A.147 'Application for approval of significant changes or variations in the scope or terms of a POA' GM1 21.A.147 'Significant changes' 21.A.143 'Production organisation exposition' point (c) GM1 21.A.143 'Production organisation exposition' AMC1 21.A.143 (a)(1) 'content of the production organisation exposition'	21.A.247 'Changes to the Design management system' AMC1 21.A.247 'Application for approval of significant changes or variations in the scope or terms of a DOA' GM1 21.A.247 'Significant changes to the design management system'' 21.A.243 'Handbook' point (c) 21.A.265 'Obligations of the holder' point (a) AMC1 21.A.265(a) 'Administration of the handbook'	

SUMMARY COMMENTS on 3.2. 'THE MANAGEMENT OF CHANGE'

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	Operating	Effective
There is a documented process in place to monitor and review the effectiveness of the SMS using the available data and information.	The overall system, including the Safety assurance activities, is producing SMS data / information that is being periodically reviewed by the safety management organisation to improve SMS implementation. External information is considered in addition to internal information. Appropriate senior managers are notably involved when it affects different departments. The decision making is data informed.	There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken. The SMS is being periodically reviewed by the senior management team to support the assessment of its effectiveness and that appropriate actions are being taken. The organisation is using SMS and safety data to develop and assess effectiveness of the SPIs to enhance safety and continuous improvement of SMS processes	The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements. The measurement of the organisation's safety performance addresses the continuous improvement of the SMS in a proactive manner, as well as the safety objectives, which are regularly updated. The contribution of SMS and safety data from key external interface organisations is taken into consideration. A robust and comprehensive set of SMS and safety data is developed [SMS Database with data governance] that supports the use of predictive data analysis. The organisation shares best practices and lessons learned as a global leader in SMS.
Assessment results			
What to look for			

- What type of information and sources support the continuous improvement of the SMS? Check to which extent the organisation pays attention to information stemming from internal and external sources, outcome of Regulation (EU) 376/2014 (notably Article 13), investigation reports; automatic data collection (such as flight data monitoring for air operators); safety meetings, workshops, seminars, hazard reports, sector risk profile; audits and statistics from the compliance monitoring function, safety data analysis, SSP and/or SPAS, industry and EASA safety roadmaps such as for rotorcraft, EPAS (notably section 4 where SPIs are proposed for monitoring), ICAO or EASA Annual Safety Review (ASR) or State ASR or recognized International Organisations (like IATA, CANSO) ASRs; State safety promotion, surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation 3.3.2.2 etc.
- Review the information and safety data used for management decision making for continuous improvement.
- Evidence of:
  o Lessons learnt being incorporated into SMS and operational processes.
  o Best practices being sought and embraced.
  o Surveys and assessments of organisational culture being carried out and acted upon.
  o Data being analysed and results shared with Safety Committees.
  o Evidence of follow up actions.
- How does the measurement of the service provider's safety performance liaise with the safety objectives? How are such processes updated? Check whether a methodology is used to so that safety objectives are expressed and matured; ~~and so that associated SPIs are being SMART, improved and balanced (leading / lagging, State-level / self-generated), accurately representing the risk picture and serving for the monitoring and continuous improvement of its safety performance~~. Check that the Safety SPTs) linked to the organisation's safety objectives are being monitored for continuous improvement over time (as a minimum) as expressed in Regulation (EU) 1139/2018.
  Assess the willingness and leadership of the senior management at continuously improving the SMS, taking into consideration the induced cost and return of investment.'"""SSPIA

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org..**
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) AMC1 ADR.OR.D.005(b)(7) 'Management system'	ATS.OR.200(2)(iii) 'Safety management system' Commission Implementing Regulation (EU) 2019/317 or latest amendment	AMC1 ATCO.OR.C.001(e) 'Management system of training organisations' point (b)

CAM Org.	Maintenance Org.	Production Org.	Design Org.	Reserved
CAMO.A.200 'Management system' point (a)(3) and (a)(6) AMC1 CAMO.A.200(a)(3) 'Continuous improvement' points (d) and (f) AMC and GM to CAMO.A.200(a)(6) 'Compliance monitoring'	145.A.200 'Management System' points (a)(3) and (a)(6) AMC1 145.A.200(a)(3) 'Safety management key processes' point (f) AMC and GM to 145.A.200(a)(6) 'Compliance monitoring' 145.A.48 'Performance of maintenance' AMC1 145.A.70 'MOE' point 2.23	21.A.139 'Production management System' points (c)(4)(iii) and (c)(6) GM1 21.A.139(c) 'Safety management system' AMC1 21.A.139(c)(3) and (4) 'Safety management key processes' point (g) 21.A.3A 'Reporting system' GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014'	21.A.239 Design management System' points (c)(4)(iii) and (c)(6) GM1 21.A.239(c) 'Safety management system' AMC1 21.A.239(c)(3) and (4) 'Safety management key processes' point (g) 21.A.3A 'Reporting system' GM1 21.A.3A 'Link between point 21.A.3A and Regulation (EU) No 376/2014'	

SUMMARY COMMENTS on 3.3. 'CONTINUOUS IMPROVEMENT OF THE SMS'

4. SAFETY PROMOTION

4.1.1 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	Operating	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. Training material and methodology are adapted to the audience and include Human Performance when relevant. All staff requiring training are identified.	The SMS training programme is delivering appropriate training to the different staff in the organisation and is 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.
Assessment results			
What to look for			

- Review the SMS training programme including course content and delivery method.
- Check that the training covers individual safety duties (including roles, responsibilities, and accountabilities) and how the organisation's SMS operates.
- Does the training consider feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis, training, course evaluations etc.?
- Check that the training includes human and organisational factors, just culture and non-technical skills with the intent of reducing organisational risks that may lead to human errors.
- Check training records against the training programme.
- Review how the competence of the trainers is being assessed and maintained.
- Check whether there is a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training. How the effectiveness of the training is rated?
- Review how training is assessed for new staff and changes in position.

- Review any training evaluation.
- Ask staff about their own understanding of their safety duties in the organisation's SMS.
- Check all staff are reminded of compliance on top of SMS.
- How are the continuous improvement of the SMS as well as the monitoring and measurement of the service provider's safety performance, including the update of the safety objectives, taken into consideration the recurrent safety training?
- If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review whether the training delivered by the CAMO meet the needs of the different operators involved, covering their different policies and (operating) procedures, responsibilities and communication, duties and areas of interfaces, lines of communication [see M.A.201(ea) as well as CAMO.A.200(e)].

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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) AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 'Safety management system' point (4)(i)	ATCO.OR.C.001 'Management system for training organisation' point (d)
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
GM1 CAMO.A.200 'Management system' point (f) CAMO.A.200 'Management system' point (a)(4) and its GM1 AMC1 CAMO.A.200(a)(4) 'Management system' point (a) 'Communication on safety' CAMO.A.305 'Personnel requirements' point (g) and its AMC/GM, notably AMC3 CAMO.A.305 (g) 'Safety training including HF',	145.A.30(e) and its AMC3, AMC4, GM1. GM1 145.A.200 point (f) 145.A.200 'Management System' points (a)(4) AMC1 145.A.200(a)(4) 'Communication on safety' GM1 145.A.200(a)(4) 'Safety promotion' 145.A.48 'Performance of maintenance' AMC2 145.A.48(c)(2) point (b) (8)	21.A.139 'Production management System' point (c)(5)(i) AMC1 21.A.139(c)(5)(i) 'Safety training' GM1 21.A.139(c)(5)(i) 'Safety training' AMC2 21.A.145(a) 'Staff number and competency' Points (g) and (h)	21.A.239 'Design management System' point (c)(5)(i) AMC1 21.A.239(c)(5)(i) 'Safety training' GM1 21.A.139(c)(5)(i) 'Safety training' AMC1 21.A.245(e) 'Staff, facilities, and coordination' point e)	

AMC 3 CAMO.A.305 (g), GM1&2 CAMO A.305(g) AMC1 CAMO.A.202 'Internal safety reporting scheme' points (b)(5) and (c)(3) M.A.201(ea) as well as CAMO.A.200 (e) – associated AMC and GM AMC M.A.306(b) point (c)	145.A.70 'Maintenance organisation exposition (MOE)' AMC1 145.A.70 'MOE' point 3.6 145.A.60 'Occurrence reporting' 145.A.202 'Internal safety reporting scheme' AMC1 145.A.202 'Internal safety reporting scheme' point (b)(5)			

4.1.2 Competence (EASA requirement)

Requirements for maintaining personnel trained and competent to perform their safety and compliance tasks:
- There is a process that evaluates the individual's competence and takes appropriate remedial action when necessary.
- The competence of trainers is defined and assessed; and appropriate remedial actions are taken when necessary.

Present	Suitable	Operating	Effective
A competency framework is defined for the staff having an impact on Safety, including trainers.	There is a process in place to periodically assess the actual safety competency of personnel against the framework.	There is evidence of the competency assessment process being used and being recorded.	The competence assessment programme and process are routinely reviewed and improved. The competence assessment takes appropriate remedial action when necessary and feeds into the training programme.

Assessment results

What to look for

- Review how is competence assessment carried out on initial recruitment and recurrently.
- Is there a process that evaluates the individual's competence and takes appropriate remedial action when necessary? Does it consider 'human performance'?
- Check whether the competence assessment includes competence assessment safety duties and responsibilities, as well as compliance management.
- Is the competence of trainers defined and assessed?
- Are appropriate remedial actions taken when necessary?
- In the case of international contracts, check that all relevant personnel have sufficient skills in the common language, such as English and in the use of the documentation.

Corresponding EU/EASA regulatory references

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

CAM Org.	Maintenance Org.	Production Org.	Design Org.	Reserved
CAMO.A.200 'Management system' point (a)(4) CAMO.A.305(g) 'Personnel requirements' and its AMC on 'Competency' GM1 CAMO.A.200 'Management system' point (f) AMC1 CAMO.A.202 'Internal safety reporting scheme' point (b)(5) GM1 CAMO.A.305(b) 'personnel requirement' AMC CAMO.A.305(g) point 8 'personnel requirement'	145.A.200 'Management System' point (a)(4) 145.A.30 'Personnel requirements' AMC1 145.A.30(cc) 'Knowledge, background and experience of nominated person(s)' AMC1 145.A.30(e) 'Competency assessment objectives' AMC2 145.A.30(e) 'Competency assessment procedure' and its GM2 145.A.30(e) AMC4 145.A.30(e) 'Safety training (including human factors)' GM4 145.A.30(e) 'Competency of the safety manager' 145.A.35 'Certifying staff and support staff' and its AMC	21.A.139 'Production management System' point (d)(2)(xi) 21.A.145 'Resources' points (c)2 and (d) AMC2 21.A.145(a) 'Staff number and competency' point (g) AMC2 21.A.145(c)(2) 'Management staff competences'	21.A.245 'Resources' point (e) AMC1 21.A.245(e) 'Staff, facilities, and coordination' points b) and e) AMC1 21.A.245(d) 'management reporting lines and competencies' point b)	

SUMMARY COMMENTS on 4.1 'TRAINING AND EDUCATION' as well as 'COMPETENCE'

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:

a) ensures personnel are aware of the SMS to a degree commensurate with their positions;

b) conveys safety-critical information;

c) explains why particular actions are taken to improve safety; and

d) explains why safety procedures are introduced or changed.

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

Present	Suitable	Operating	Effective
There is a process to communicate safety critical information.	The process determined what, when, and how safety information needs to be communicated. The process includes contracted organisations and personnel, where appropriate. The means of communication are adapted to: - The size and complexity of the organisation; - the audience and the significance of what is being communicated.	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 blended methods, as appropriate, to maximise it being understood. Safety communication is assessed to determine how it is being used and understood, and to improve it where appropriate. The promotion of the safety policy and its positive safety culture is visible. Decision making, actions, and communication reflect a positive safety culture and safety leadership demonstrating commitment to the safety policy.
Assessment results			

What to look for

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

- Review the sources of information used for safety communication.
- Review the methods used to communicate safety information e.g., meetings, presentations, briefings, videos, emails, websites, newsletters, leaflets, bulletins, posters etc.
- Assess whether the means of communication is appropriate, based on the organisation's structure and the audience. The communication should be simple and concise so that it is easily understood.
- Is the means for safety communication being reviewed for effectiveness and material used to update relevant training?
- Check that lessons learned, significant events, changes and investigation outcomes are being communicated.
- Check that a positive safety culture is regularly promoted, enhancing 'reporting culture' (where, how, when etc.) and the principles of 'just culture'.
- Check accessibility to safety information.
- Ask staff about any recent safety communication.
- Review whether information from occurrences is timely communicated to key stakeholders (internal and external) and whether it has been appropriately dis-identified.
- Does the organisation extend safety communication, as appropriate, to external key stakeholders (e.g., customers, suppliers)?
- Check whether the staff know where to find the safety objectives and associated safety performance monitoring? Check whether the staff know the safety objectives in their domain of competence? Does the organisation communicate the status of safety objectives' achievement or monitoring?

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.200 'Management system' point (a)(4) ORO.GEN.200 'Management system' point (a)(5) AMC1 ORO.GEN.200(a)(4) 'Management system' point (b)	ORA.GEN.200 'Management system' point (a)(4) ORA.GEN.200 'Management system' point (a)(5) AMC1 ORA.GEN.200(a)(4) 'Management system' point (b)	ADR.OR.D.005 'Management system' point (b)(9) AMC1 ADR.OR.D.005(b)(9) 'Management system'	ATM/ANS.OR.B.005(a)(7) ATS.OR.200(4)(ii) AMC1 ATM/ANS.OR.B.005(a) (7) 'Management system'	Not applicable, however Air Traffic Service Provider provisions apply.
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(4) AMC1 CAMO.A.200(a)(4) 'Communication on safety' GM1 CAMO.A.200 (a)(4) 'Safety promotion' CAMO.GEN.200 'Management system' point (a)(5) and its GM1	145.A.200 'Management System' point (a)(4) AMC1 145.A.200(a)(4) 'Communication on safety' GM1 145.A.200(a)(4) 'Safety promotion'	21.A.139 'Production management System' points (c)(5)(ii) AMC1 21.A.139(c)(5) 'Safety communication' GM1 21.A.139(c)(5) 'Safety promotion'	21.A.239 'Design management System' point (c)(5)(ii) AMC1 21.A.239(c)(5) 'Safety communication' GM1 21.A.239(c)(5) 'Safety promotion'	

SUMMARY COMMENTS on 4.2. 'SAFETY COMMUNICATION'

5. ADDITIONAL ITEMS TO BE CONSIDERED

5.1 Interface management

Annex 19 reference & text

5.1.1   Appendix 2 Note 2 — The service provider's interfaces with other organisations can have a significant contribution to the safety of its products or services.

Note: 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.

Present	Suitable	Operating	Effective
The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.	The way the interfaces are managed is appropriate to the criticality in terms of safety. The means for communicating safety information is defined. The contracts adequately addressed the safety critical nature of the interfaces and the need to appropriately feed the Hazard Identification and Risk Assessment (HIRA), including the risk mitigations.	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 the safety critical nature of the interface risks is being identified and acted upon. Interfacing organisations are sharing safety information, management of changes and take actions when needed. Evidence shows that a positive safety culture is promoted with interfacing organisations.
Assessment results			
What to look for			

- Review how interfaces internally (with other departments) and externally (e.g. contractors, customers, State) have been identified and documented. Review the system description of the interfaces, should it be documented in the SMS manual or any other equivalent document.
- If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review how the interfaces between that group CAMO and all the different operators involved are properly addressed [see M.A.201(ea) as well as CAMO.A.200(e)]. In particular, the continuing airworthiness management contracts shall describe how the individual management systems of the operators and of the CAMO are harmonised between each other.
- Evidence that:

	o Safety critical issues, areas and associated hazards are identified;
	o Safety occurrences are being reported and addressed;
	o Risk controls actions are applied and regularly reviewed;
	o Interfaces are reviewed periodically.
-	The organisation's SMS covers hazard identification for the external services, 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.
-	Review how positive safety culture is promoted at the interfaces.
-	The organisation's occurrences reporting system needs to extend to the external organisations, wherever appropriate.
-	Management of changes impacting safety are appropriately addressed through the contracts.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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' ADR.OR.D.025 'Coordination with other organisation's' See associated AMC/GM	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
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200(a)(3) and (c) GM1 CAMO.A.200(a)(3) 'Safety risk management – interfaces between organisations' CAMO.A.200 (c) and (d) 'Management system' AMC1 CAMO.A.202 'Internal safety reporting scheme' point (b)(6) CAMO.A.205 'Contracting and subcontracting' M.A.201(ea)as well as CAMO.A.200(e) 'Management System' point (e) – associated AMC and GM.	145.A.200 'Management System' points (a)(3) and (c) GM1 145.A.200(a)(3) 'Safety risk management – Interfaces between organisations' 145.A.205 'Contracting and subcontracting' GM1 145.A.205 'Responsibility when contracting or subcontracting maintenance' 145.A.60 'Occurrence reporting' 145.A.202 'Internal safety reporting scheme'	21.A.139 'Production management System' point (d)(2)(ii) GM1 21.A.139(d)(1) 'Conformity of supplied parts and appliances' GM2 21.A.139(d)(1) 'Quality system element – Partner and subcontractor arrangements' AMC1 21.A.139 (d)(2)(ii) (b)(1)(ii) 'Vendor and subcontractor assessment, audit and control – POA holder that uses documented arrangements with other parties	21.A.239 'Design management System' point d) 3) AMC2 21.A.239(d) 'Design assurance element for minor changes to type design or minor repair to products' GM1 21.A.239 (d)(3) 'Design assurance element – Partner and subcontractor GM2 21.A.239 (d)(3) 'Design assurance element – Partner and subcontractor arrangements' GM2 21.A.239 (d)(3) 'Design assurance element – Partner and subcontractor	

| | 145.A.70 'Maintenance Organisation Exposition (MOE)' AMC1 145.A.70(a) 'MOE' point 4.2 | for the assessment and surveillance of a supplier'

AMC2 21.A.139 (d)(2)(ii) 'Vendor and subcontractor assessment, audit and control – POA holder that uses other parties supplier certification'

21.A.143 'Production organisation exposition' point 12 | arrangements' points b), c) and d) for communication | |

SUMMARY COMMENTS on 5.1. 'INTERFACE MANAGEMENT'

5.2 Responsibilities for compliance and compliance monitoring function

5.2.1 Responsibilities and accountability for ensuring compliance

5.2.1 Responsibilities and accountability for **ensuring** compliance are defined			
Present	**Suitable**	**Operating**	**Effective**
Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures. Responsibilities and accountabilities for compliance are defined for all staff involved in Safety activities.	The contracts with (or requirements cascaded to) the external organisation(s), having a significant contribution to safety, also addresses the need for ensuring compliance to Safety requirements; responsibilities and accountability are defined.	Organisation manuals and procedures are regularly reviewed in light of changes in applicable requirements. All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures.	Enhancements to processes and procedures are suggested from the workforce and management. Individuals are proactively identifying and reporting potential non-compliances.
Assessment results			
What to look for			
- Review how senior management ensure the organisation remains in compliance. - Review that job descriptions clearly include responsibilities for compliance. - Check that the contracts with the external organisation(S), having a significant contribution to safety, properly address the needs for 'compliance'. - Evidence that senior management act on internal and external audit results. Check that, when deficiencies are detected and linked to significant risks to control, the root causes are identified and feed the Hazard Identification and Risk Assessment (HIRA) process (i.e. section 2 of this tool). - Review how independence of the internal audit function is achieved.			
Corresponding EU/EASA regulatory references			
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.210 'Personnel requirements' point (b) See associated AMC/GM	ORO.GEN.210 'Personnel requirements' point (b) See associated AMC/GM	ADR.OR.D.005 'Management system' point (b)(11) See associated AMC/GM	ATM/ANS.OR.B.020 'Personnel requirements' See associated AMC/GM	ATCO.OR.C.010 'Personnel requirements' point (b) See associated AMC/GM

CAM Org.	Maintenance Org.	Production Org.	Design Org.	Reserved
CAMO.A.200 'Management system' points (a)(1) and (a)(6) CAMO.A.300 'Continuing airworthiness management exposition (CAME)' points (a)(6) and (7) CAMO.A.305 'Personnel requirement' point (a)(4) AMC1 CAMO.A.305 (a)(4) 'Safety management and compliance monitoring function' points (b) and (c)	145.A.200 'Management System' points (a)(1) and (a)(6) and its AMC1. 145.A.30 'Personnel requirements' GM1 145.A.30(b) 'Responsibility for ensuring compliance' AMC1 145.A.30©;(ca) 'Safety management and compliance monitoring function' point (b) GM1 145.A.30(cb) 'Responsibility of the nominated persons to the Accountable Manager' 145.A.70 'Maintenance Organisation Exposition (MOE)' AMC1 145.A.70(a) 'MOE' point 1.4	21.A.139 'Production management System' point (e) AMC1 21.A.139(c)(2) 'Organisation and accountability' point b)4 AMC1 21.A.139(e) and 21.A.139(d)(2)(xiv) 'Independent Monitoring function' 21.A.145 'Resources' points (c)(1) and (c)(2) AMC1 21.A.145(c)(2) 'Nominated manager' points b), c),(f),(g),(h),(i) AMC2 21.A.145(c)(2) 'Management staff competencies' point c)	21.A.239 'Design management system' points (d)(1) and (d)(2) as well as its GM 21.A.239 'Design management System' point (e) AMC1 21.A.239(c)(2) 'Organisation and accountability' point b)4 AMC1 21.A.239(e) 'Independent Monitoring function' AMC1 21.A.243(d) 'Statement of qualifications and experience' GM1 21.A.243(d) 'Statement of qualifications and experience' 21.A.245 'Resources' points (a) and (b)(2) AMC1 21.A.245 (b) 'Nominated managers' points d) f) AMC1 21.A.245 (d) 'Management reporting lines and competencies	

5.2.2 Responsibilities and accountability for compliance monitoring

5.2.2 Responsibilities and accountabilities for compliance **monitoring** are defined			
Present	**Suitable**	**Operating**	**Effective**
It has been documented that there is a person or group of persons with the responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager. The accountable manager's accountability and responsibilities for compliance monitoring is documented.	Independence of the compliance monitoring audit function is achieved.	The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme. The accountable manager is ensuring that there are sufficient compliance monitoring resources and independence of the audit function is being maintained.	The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager. The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities.
Assessment results			
What to look for			

- How does the compliance monitoring manager interact with:
  - o senior management,
  - o line managers,
  - o the safety management staff,
  - o the staff of external organisations, having a significant contribution to the safety?
- Evidence that senior management act 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 regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
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'
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(1) and (a)(6) CAMO.A.305 'Personnel requirement' points (a)(4) AMC1 CAMO.A.305 (a)(4) 'Safety management and compliance monitoring function' points (b) and (c)	145.A.200 'Management System' points (a)(1) and (a)(6) and GM1 145.A.30 'Personnel requirements' GM1 145.A.30(b) 'Responsibility for ensuring compliance' AMC1 145.A.30(c);(ca) 'Safety management and compliance monitoring function' point (b) GM1 145.A.30(cb) 'Responsibility of the nominated persons to the Accountable Manager' 145.A.70 'Maintenance Organisation Exposition (MOE)' AMC1 145.A.70(a) 'MOE' point 3.12	21.A.139 'Production management System' point (e) AMC1 21.A.139(e) and 21.A.139(d)(2)(xiv) 'Independent Monitoring function' 21.A.145 'Resources' points (c)(1) and (c)(2) AMC1 21.A.145(c)(2) 'Nominated manager' points b), c),(h),(i)	21.A.239 'Design management System' point (e) AMC1 21.A.239(c)(2) 'Organisation and accountability' point b)4 AMC1 21.A.239(e) 'Independent Monitoring function' AMC1 21.A.243(d) 'Statement of qualifications and experience' GM1 21.A.243(d) 'Statement of qualifications and experience' 21.A.245 'Resources' points (a) and (b)(2) AMC1 21.A.245 (b) 'Nominated managers' points d) f) AMC1 21.A.245 (d) 'Management reporting lines and competencies	

5.2.3 Compliance monitoring programme

5.2.3	Compliance monitoring **programme**

Present	Suitable	Operating	Effective
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. The way independence of compliance monitoring is achieved is documented.	The compliance monitoring audit programme covers all applicable regulations and includes details of the schedule of audits. The compliance monitoring programme adequately covers the external organisations supporting the delivery of services, having a significant contribution to the safety.	The compliance monitoring programme is being followed and regularly reviewed. This includes the modification of the programme to address identified risks or organisational and operational changes. Compliance monitoring is independent from operational activities and includes contracted activities	The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective. The effectiveness of the SMS processes is reviewed on a regular basis.

Assessment results

What to look for
- 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 regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
AMC1 ORO.GEN.200(a)(6) 'Management system' point (d)(2)(vi) GM2 ORO.GEN.200(a)(6) 'Management system' - [complex operators]	AMC1 ORA.GEN.200(a)(6) 'Management system' point (d)(2)(vi)	ADR.OR.D.005 'Management system' Point (b)11 [compliance monitoring] and its AMC, notably AMC1 to ADR.OR.D.005 (b) (11) section e)	AMC1 ATM/ANS.OR.B.005(c) 'Management system Compliance monitoring'	GM1 ATCO.OR.C.001(f) 'Management system of training organisations' point (c)(2)(vi)

GM3 ORO.GEN.200(a)(6) 'Management system' - [non-complex operators]				
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(6) and its AMC/GM CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(11)(i)	145.A.200 'Management System' point (a)(6) AMC1 145.A.200(a)(6) 'Compliance monitoring – general' AMC2 145.A.200(a)(6) 'Compliance monitoring – Independent audit AMC3 145.A.200(a)(6) 'Compliance monitoring – Contracting of the independent audit' GM2 145.A.200(a)(6) 'Compliance monitoring – audit plan' 145.A.70 'Maintenance Organisation Exposition (MOE)' AMC1 145.A.70(a) 'MOE' point 3.8	21.A.139 'Production management System' point (e) AMC1 21.A.139(e) and 21.A.139(d)(2)(xiv) 'Independent Monitoring function' AMC1 21.A.145(c)(2) 'Nominated manager' point (i)	21.A.239 'Design management System' point (e) AMC1 21.A.239(c)(2) 'Organisation and accountability' point b)4 AMC1 21.A.239(e) 'Independent Monitoring function' AMC1 21.A.245(b) 'Nominated managers' point (f)	

5.2.4 Compliance monitoring outcomes

5.2.4	Compliance monitoring outcomes e.g. audit results including corrective and preventive actions follow-up.		
Present	**Suitable**	**Operating**	**Effective**
The organisation has documented procedures for the identification and follow-up of corrective actions and preventive actions. There is a process for how audit results are communicated to the accountable manager and senior management. The interface between compliance monitoring and the safety risk management processes is described.	Responsibilities and timelines for determining, accepting, and following-up the corrective/preventive action are defined. Compliance monitoring includes contracted activities. The tools for the follow-up of corrective and preventive actions are adapted to the compliance monitoring outcomes and appropriately liaise with the SMS tools, when necessary. The methods used for causal analysis are appropriate to the size of the organisation and the complexity of its aviation products and services.	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. The status of corrective and preventive actions is regularly communicated to relevant senior management and staff.	The organisation regularly reviews the status of corrective and preventive actions, as well as its effectiveness. The organisation investigates the systemic causes and contributing factors of findings, which further liaise with the hazard identification and risk assessment (HIRA) as well as the safety objectives. Significant findings are used in internal safety training & safety promotion sessions. The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures. There is regular communication between compliance monitoring staff and staff involved in other SMS activities.
Assessment results			
What to look for			
- Review the methods used for causal analysis. - Is the method used consistently, and adapted to the size of the organisation and its complexity of activities? - 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.
- Check how the identification of the systemic causes and contributing factors of findings liaise with the hazard identification and risk assessment (HIRA), including the safety objectives and its associated safety performance measurement & monitoring, when appropriate.
- Check what type of information should be reported to the Accountable manager (or Safety Review Board or any safety committees, as appropriate) to support the HIRA and the establishment of safety objectives.

Corresponding EU/EASA regulatory references				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATC Training Org.**
ORO.GEN.200 'Management system' point (a)(6) See associated AMC/GM	ORA.GEN.200 'Management system' point (a)(6) See associated AMC/GM	AMC1 ADR.OR.D.005(b)(11) 'Management system' points (a)(1)(b) and (e)	AMC1 ATM/ANS.OR.B.005(c) 'Management system COMPLIANCE MONITORING'	ATCO.OR.C.001 'Management system of training organisations' point (f) See associated AMC/GM
CAM Org.	**Maintenance Org.**	**Production Org.**	**Design Org.**	**Reserved**
CAMO.A.200 'Management system' point (a)(6) and its AMC/GM, notably: AMC2 CAMO.A.200 (a)(6) AMC4 CAMO.A.200 (a)(6) CAMO.A.300 'Continuing airworthiness management exposition (CAME)' point (a)(11)(i)	145.A.200 'Management System' point (a)(6) AMC4 145.A.200(a)(6) 'Compliance monitoring – Feedback system' 145.A.70 'Maintenance Organisation Exposition (MOE)' AMC1 145.A.70(a) 'MOE' point 3.8	21.A.139 'Production management System' point (e) AMC1 21.A.139(e) and 21.A.139(d)(2)(xiv) 'Independent Monitoring function' AMC1 21.A.145(c)(2) 'Nominated manager' point (i)	21.A.239 'Design management System' point (e) AMC1 21.A.239(c)(2) 'Organisation and accountability' point b)4 AMC1 21.A.239(e) 'Independent Monitoring function' AMC1 21.A.245(b) 'Nominated managers' point (f)	

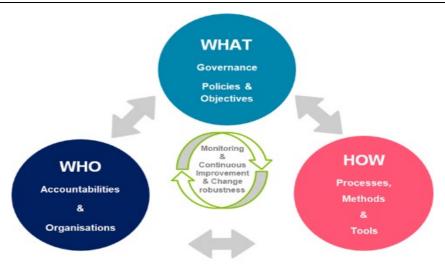| SUMMARY COMMENTS on 5.2. 'RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION' |
|---|
| |

Annex 1: What is a Management System?

This Annex tries to clarify the relationship between an SMS and a Management System.

Most organisations have a layered management system that is composed of multiple subsystems given direction through some type of governance system.
ISO 9000:2005 defines a management system as a 'set of interrelated or interacting elements to establish policies and objectives and to achieve those objectives'

A management system is a set of 4 key components, which enable an organisation to develop:

1. the '**What**': The Rules and Governance:
    o   to be flowed down into processes and organisation's accountabilities, (linked with components 'Who' and 'How')
    o   to be well understood by all people within the organisation (linked with component 'Who')

2. the '**How**': The Means and Processes to be used by the organisation:
    o   to ensure that the way the organisation operates is consistent with Rules and objectives, (linked with component 'What')
    o   to ensure that the way the organisation operates is described and followed by people in the organisation (linked with component 'Who')

3. the '**Who**': The accountabilities, responsibilities, and definitions of associated missions:
    o   to ensure that people act according to rules and policies (linked with component 'What')
    o   to ensure that people stick to processes and ways of working described in the organisation/or company (linked with component 'How')

4. the **Assurance**: The monitoring and control to ensure the good operations of the 3 components 'What' 'How' 'Who' according to the rules and objectives set by the organisation (performance approach)

Note: "MS" stands for "Management System" whereas "SMS" does for "Safety Management System".

Typical management systems within an aviation organisation may be applied to the integration of:
a)   **Quality** – with a quality management system (QMS);
b)   **Flight Safety** – with a safety management system (SMS);
c)   **Security** – with a security management system (SeMS);
d)   **Environment** – with an environmental management system (EMS);
e)   **Health and Safety** – with an occupational health and safety management system (OHSMS);
f)   **Finance** – with a financial management system (FMS); and
g)   **Information services** – with an [Information Security Management System](25) (ISMS), including cybersecurity aspects.

In the European Union system, according to the rules in each sector, a MS covers the SMS and the compliance monitoring function (similar to QMS); it may also cover sub-elements relevant in the sector such as a Fatigue Risk Management System for Air OPS. More explanations can be found in [GM1 to CAMO.A.200](26).
The MS is planned to host further needed systems in the future, such as the ISMS. Such an overall approach allows to streamline the processes; make the relationships between the different systems more effective; allows the synergies for resources required by different certificates or approvals; and foster an integrated risk management.

---

[25] https://www.easa.europa.eu/en/document-library/opinions/opinion-032021 Management of information security risks – Opinion adopted
[26] https://www.easa.europa.eu/en/regulations/continuing-airworthiness

Annex 2: Guidance on 'scalability' and 'suitability'

This Annex aims at clarifying the meaning of the following requirement: '**The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities'.**

Note: "MS" stands for "Management System" whereas "SMS" does for "Safety Management System".

1. Whereas the rules address the main, systemic risks, they cannot address all the risks. Especially given the variety of different organisations, their services, and products as well as the wide range of operating environments.
   o Organisations should seek to move beyond mere compliance to the requirements. The Management System (MS) should thus provide ways to look for safety issues that are not appropriately captured by the rules, to maintain or improve safety.
   o **"Being compliant" does not mean "being safe".** The MS of any type of organisation should notably remain resilient, agile, and vigilant in a continuously moving context (such as new business models or technologies or change of methods, emerging risks, competition, crisis). Finally, good safety performance and resilience with the absence of negative safety events in the past does not guarantee safe operations in the future.
2. All organisations, regardless of the size of their organisations, are exposed to risks, some of them being potentially significant, even for a limited business. This means that:
   o All elements of a MS should thus apply;
   o The effectiveness of the MS will depend on how appropriately its elements are designed, implemented, and operated.
3. However, an operating MS does not need to be complicated and expensive to be effective. The MS could be made scalable if it keeps on delivering as expected and provides an effective way to manage all key operational risks. A system description of the MS should help to identify the different attributes and interfaces to be factored in the MS design and implementation.
   o Scalability is not about applying specific elements of a MS or SMS light: it is about adapting a MS with all its elements to the specific operational context of the organisation.
   o The following aspects are vital for any organisation to understand the context in which its Management System operates, what the purpose of the Management System should be and the key risks that it must manage effectively:
      1) for the size of the organisation:
         - Number of employees; number of sites, including permanent and temporary locations; internal and external interfaces; organisational structure;
         - Type and variety of operations (e.g. leasing agreements, organisation with more than one approval, ACMI);
         - Aircraft types and number of aircraft;
         - Number of passengers carried per flight and annually; volume of traffic; number of aircraft movements or runways (ADR and ANSP), as relevant;
      2) for the complexity of the risks to manage:
         - Risks associated with the operating environment (e.g. mountainous, freezing conditions, offshore, remote operations without close support, Polar / Arctic, active volcanos areas, operations near conflicts zones); specialized operations requiring a specific approval (e.g. SPOs); safety consequence(s) in

case of failure of the products or services; potential downtime, etc.;

- Risks associated with the business model (e.g. extent of the contracted activities internally and externally, services based on a short turnaround or operations with commercial pressures, nature of the approval's privileges, single CAMO for several AOCs as per M.A.201(ea)[27] and CAMO.A.200(e); '0 hour contract' for pilot's employment)

- Changes requiring approval prior to operations;

- Exemptions and AltMoC granted by the competent Authority.

3) for the external and internal dimension:

- Societal and public expectations;

- Economical, commercial, and financial environment; competition; stability in the business versus needs for changes;

- Experience in the business; adequacy and robustness of the existing procedures, etc.;

- Safety culture, open reporting culture, prevention culture, just culture;

- State's overall performance.

4. This multi-dimensional complexity should be consequently weighted. A number of topics are proposed here, for consideration:

   o The safety policy may be a brief-high level statement of management's commitment, supported by safety objectives that address significant risks; it would be more detailed in a challenging environment; regular update of the safety objectives would be necessary where the business / operations are continually evolving (e.g. changing operational activities, numerous deficiencies, crisis etc.); the communication of these safety objectives should be commensurate with the resources of the organisation

   o The reporting policy, just culture policy and safety objectives could be combined with the safety policy for small organisations;

   o For the implementation of a "just-culture" principles, any disciplinary action (e.g. illegal activity, negligence, wilful misconduct) would be submitted to an independent committee representative of the staff in a large organisation (e.g. Staff committee, Unions could be invited) to avoid any excessive decision detrimental to safety reporting culture; for smaller organisation, staff representatives should have enough power to counterbalance any unilateral decision from the senior management;

   o The significance of the areas of greater risks (severity, likelihood, robustness of the mitigation measures) will greatly impact the robustness of the processes and the monitoring of the safety barriers;

   o For organisations with a lower risk level, the risk assessment model that is used may be very simple in cases in which the identified hazards are easy to mitigate; in addition the organisation will strive classifying risks in a consistent manner; expert judgement might be sufficient to measure the efficiency of the safety barriers, especially when the volume of data or safety information does not allow to precisely support the evaluation of the likelihood and the severity of the consequences of the hazards;

   o The safety data that an organisation should collect, should depend on the type of operations it performs, its degree of digitalization (e.g. automated data-capturing systems). Filtered information will support the assessment of risks for data-rich organisations whereas organisations lacking data will rely more on

---

[27] https://www.easa.europa.eu/en/regulations/continuing-airworthiness

expert judgement, risks known in the same profiling sector, or data pools (e.g., collaborative approach, risk sector profile); Data-rich organisations will be inclined to buy software supported by a robust risk assessment methodology to classify the risks in a more analytical, coherent approach.

o The volume of occurrence reports (voluntary and mandatory) as well as means and resources to manage them will depend on the safety culture; open-reporting culture, just culture; the magnitude of the operations and its criticality; The EASA domain safety risk portfolios, EPAS[28] volume III, Annual Safety Reviews[29] as per article 13 of Regulation (EU) 376/2014[30] or any other sector risk profiles (held by Authorities or Industry) could be used to identify specific risks in different activities in the absence of large numbers of occurrence reports for small entities; additionally, small organisations should listen as much as possible to workshops, conferences, events or read literature (e.g. risk profiling) in their domains of expertise to capture risks that may have not been properly identified by their SMS.

o Volume of collected data; databases and their managements will also vary from one organisation to another; datamining and tools, dedicated resources and competencies will thus do, to a point data scientists or data-mining analysts might be needed when the volume of data is high and/or complex to manage.

o The mechanism and the type of safety information to report to the relevant bodies will depend on the organisation's size and structure and the process for the decision-making (e.g. which level of authority). In the same vein, appropriate resources will be allocated to the needs of the effective MS (such as justification for a full-time safety manager, safety committees; frequency of Safety Review Board meetings, staff dedicated to real-time monitoring);

o Flow, nature and volume of information to circulate up and down the organisation will shape the means of communication, training and safety promotion. For instance:

　　a) the safety reporting form could range from paper systems for organisations having limited IT resources to online systems for those having the means to implement them (e.g. Apps installed on the mobiles);

　　b) Recommendations and actions stemming from reports of safety issues could be posted online or simply displayed on noticeboards;

　　c) Records of safety discussions and outcomes could be reduced to the minimum in very small entities where verbal communication with the staff is preferred;

　　d) Frequency, content, and duration of recurrent training will be adapted to the safety culture, the volume/significance of the identified safety issues, the evolution of the safety objectives over time, the outcome of the monitoring for the effectiveness of the safety mitigation actions, the audience to update, the changes of regulatory requirements and the ever-changing operational context (such as new procedures).

o Timely handling of data will rely on its relevance for real-time monitoring and safety management decision supported by Artificial Intelligence (e.g. air navigation traffic management; runways in use; HUMS and predictive maintenance inspection; real-time safety management);

o Focus on the risks at the interfaces will significantly depend on the criticality of the subcontracted tasks and the magnitude of the supply chain. Communication of changes and communication at the interfaces will certainly be more demanding in a large organisation or for an organisation contracting many activities.

---

[28] https://www.easa.europa.eu/en/domains/safety-management/european-plan-aviation-safety

[29] https://www.easa.europa.eu/en/document-library/general-publications?publication_type%5B%5D=144 for EASA – for each European Union Member States, please consult their websites

[30] https://www.easa.europa.eu/en/regulations/occurrence-reporting

- o MS documentation; hazard log; records of risk assessments; decisions, actions, ownership and monitoring etc. should be clear, concise but sufficiently detailed to ensure adequate management of risks. They should be consistent, complete, in context and in control. However, in small entities, they should not generate "red-tape".
- o 'Human performance' and 'human resources' may be critical for organisations of all size, although the related issues may depend on the context and the size: small organisations will be more impacted by retirement, transfer of knowledge, sickness, stressful environment, whereas large organisations experiencing major changes or significant growth would face major challenges;
- o The degree of urgency to reach a certain level of safety based on deficiencies, feedback from the compliance monitoring system, cultural aspects, changes to timely manage or any immediate / pressing safety issue, may impact the resources to timely achieve the safety objectives.

5. The implementation of Industry Standards or International Standards directly relevant to the organisation's activities, shall be also considered in the design and functioning of the Management System such as Quality Management System (e.g. ISO 91xx), SMS (ICAO Annex 19), Risk Management System (e.g. ISO 31000) , ISMS (Information Security Management System – see EASA Opinion 03/2021[31]), Environment Management system (e.g. ISO14001), Occupational and Health Management System, Financial Management System. Fully fledged Management System can allow streamlined processes and substantial gain when commonalities between different elements of a Management System exist (such as deficiencies' investigation, reporting system, risks having an impact of each other, coherent and integrated risk assessment methodology, governance, responsibilities, resources, and competencies).

6. All of the above illustrates how 'one system does not fit all'. The variety of organisations, operations, and risks to manage, justify why:
   - o there is no MS 'on the shelves', ready for use; and
   - o a management system applies to all organisations, should they be small or large; and
   - o it does not imply that a MS should be necessarily complex or simple for a 'small organisation'.

7. It is the ultimate responsibility of the organisation to demonstrate to its overseeing authority that its Management System is **appropriately designed and suitable** to effectively deliver as expected, as specified in the two first paragraphs. **An operating SMS does not necessarily need to be complicated, time consuming and expensive to be effective and demonstrate that the significant risks are under control and that the organisation is safety data-rich so to take the right managerial decisions.** Instead of focusing on 'size' and 'complexity', the organisation and the overseeing authority should concentrate on the **scalability, suitability, and effectiveness** of that Management System.

8. When using this EASA MS assessment tool, it is the responsibility of the assessor to select the right elements and criteria of this guidance tool so that the questions raised during the conduct of the assessment are relevant to the attributes of the organisation and do not encourage to an overly complicated MS.

Available literature about 'SMS and small organisations':
→ Australia CASA SMS resource kits, including book 7 – *SMS for small, non-complex organisations;*

→ Civil Aviation Authority (CAA) of New Zealand, *Implementing Safety Management Systems – Guidelines For Small Aviation Organisations;*

---

[31] https://www.easa.europa.eu/en/document-library/opinions/opinion-032021 Management of information security risks – Opinion adopted

→ United Kingdom CAA, *CAP1059: Safety Management Systems: Guidance for small, non-complex organisations;*

→ SMICG SMS for small organisations;

→ SM.0001 Issue B and its Appendix 7 on "SMS implementation strategies".

Annex 3: European corporate just culture declaration

EUROPEAN CORPORATE JUST CULTURE DECLARATION[32]

Safety is of paramount importance to the public but also to the aviation industry.

Safety is not only a legal requirement but also a key contributor to sustainable business. Any entity in aviation has therefore a responsibility to maintain and improve safety. Staff working in the aviation industry, at all levels, have a safety responsibility and are key to a safe system.

A safe aviation system requires events that affect or could affect aviation safety to be reported fully, freely and in a timely manner as needed to facilitate their investigation and the implementation of lessons learnt.

Just Culture lies at the heart of an effective reporting system and such a system is needed in all aviation organisations to maintain and improve aviation safety.

This Declaration supports existing legislation, in particular Regulation (EU) No 376/2014 on the reporting, analysis, and follow-up of occurrences in civil aviation, and is fully consistent with applicable rules.

---

[32] This non-legally binding Declaration only considers Just Culture within the context of an organisation and does not address or overrule the judicial rules or proceedings applicable in individual Member States.

Each organisation should, after consultation with their staff representatives, implement internal rules that are best suited to its internal and external specificities. These internal rules[33] should be supported by documented processes and applied consistently throughout the organisation.

This Declaration constitutes a set of key principles that each organisation is encouraged to implement in the context of its Just Culture internal rules.

We, the signatories to this Declaration, will encourage our respective members to implement a Just Culture based on the following key principles referred to in this Declaration. The signatories agree to continue to work together to develop guidance and industry best practices material to assist Just Culture implementation by organisations in the various aviation sectors.

KEY PRINCIPLES OF A JUST CULTURE

1. Acting safely is a top priority.
2. Staff, at all levels, should be, as a starting point, considered to act in the interest of safety, in a manner commensurate with the training, experience and professional standards that fit their position or function. To achieve this, organisations are responsible for providing their staff with the appropriate environment, tools, training and procedures.
3. It is acknowledged that, in an operational aviation industry environment, individuals, despite their training, expertise, experience, abilities and good will, may be faced with situations where the limits of human performance combined with unwanted and unpredictable systemic influences may lead to an undesirable outcome.
4. Analysis of reported occurrences by organisations should focus on system performance and contributing factors first and not on apportioning blame and/or focus on individual responsibilities, except in the cases foreseen under Regulation (EU) No 376/2014 and other applicable legislation.
5. When assessing individual responsibility, organisations should focus on determining if actions, omissions, or decisions taken were commensurate with experience and training, and not on the outcome of an event.
6. Reporters of safety information, and any other person mentioned in the report, are protected from adverse consequences, in accordance with Regulation (EU) No 376/2014.
7. Whilst acknowledging that adverse events can frequently be the driver for analysis, positive behaviour and actions should be captured and encouraged.
8. Organisations should promote effective implementation of Just Culture principles within the organisation at all levels and with all parties, including their representatives. All should actively foster mutual trust and respect and promote support and cooperation to build the necessary trust across the organisation. Staff should be educated in Just Culture principles and all relevant documentation should be made available.
9. Just Culture internal rules should include, amongst others, the definition of a process, including the actors involved, to determine an unacceptable behaviour, in accordance with its description in Regulation No 376/2014.
10. Just Culture internal rules should document how safety data is managed, stored, protected, and disclosed. It should also document to what extent the organisation intends to share de-identified data for safety learning purposes.
11. Support provided by organisations, in cases where staff are subject to external procedures based on an occurrence they have reported or been involved in, reinforces the mutual trust that is necessary to ensure an effective Just Culture.

---

[33] Article 16 (11) of Regulation (EU) No 376/2014 prescribes the presence of 'Just Culture internal rules', supported by internal processes that need to be adopted after consulting the organisation's staff representatives, and implemented in European aviation organisations.

12. A consistent and effective Just Culture environment requires going beyond publication of Just Culture internal rules.
13. To effectively implement a Just Culture staff at all levels, as well as top management, should understand and accept their responsibility with regards to Just Culture principles and internal rules and their promotion.
14. Organisations, in cooperation with involved parties, including their competent authority, should define how they intend to continuously promote and stimulate the implementation of Just Culture principles and practices throughout the organisation.
15. Organisations should regularly review and assess the maturity of their Just Culture internal rules and compare it to the Just Culture perception within the organisation. Benchmarking may also be of benefit and may be considered.

European Union Aviation Safety Agency
Flight Standards Directorate

Postal address
Postfach 10 12 53
50452 Cologne
Germany

Visiting address
European Aviation Safety Agency
Konrad-Adenauer-Ufer 3, D-50668
Köln
Germany

Tel.	+49 221 89990 - 000
Fax	+49 221 89990 - 999
Mail	info@easa.europa.eu
Web	www.easa.europa.eu