This information is intended for CAA and use only

UK Civil Aviation Authority

Safety Management System Evaluation Tool

Edition 1.1

15 Oct 26

Contents

Preliminaries 6
Amendment Record 6
01 Oct 25 6
Guidance 7
Introduction 7
When the tool is used 7
Assessment Criteria 8
Performance vs Compliance 8
Applicability 8
Signatures 9
Submitted By: 9
CAA Use Only - Assessed by: 9
0 Foundations of SMS 10
0.1 Safety Culture 10
0.1.1 Leadership Commitment 10
0.1.2 Just Culture 12
0.1.3 Reporting Culture 14

0.1.4 Learning Culture 16
0.1.5 Assessing the Safety Culture 18
0.2 Human Performance 20
0.2.1 Organisational and Human Factors in Risk Management 20
0.2.2 Human Factors in Change 22
0.2.3 Wellbeing of, and support available to, staff. 24
0.2.4 Training is provided on Human and Organisational Factors. 26
1 Safety Policy 28
1.1 Management Commitment and Suitability 28
1.1.1 Endorsed Safety Policy 28
1.1.2 Safety Policy and Resource 30
1.1.3 Supporting Policies 32
1.2 Safety Roles are Defined and Understood 34
1.2.1 Accountable Manager 34
1.2.2 Accountable Manager Suitability 36
1.2.3 Documented Authority for SMS 38
1.3 SMS Personnel and Resources 40
1.3.1 Safety Manager 40
1.3.2 SMS Resourcing 42
1.3.3 Safety Committee(s) 44

1.4 Emergency Response 46
1.4.1 Emergency Response Plan 46
1.4.2 Emergency Response Plan Testing 48
1.5 The SMS and documentation are appropriate to the size and scope of the organisation 50
1.5.1 Scope and Availability of Documentation and Records 50
1.5.2 Documentation and Records Control 52
2 Risk Management 54
2.1 Reporting 54
2.1.1 Reporting System(s) 54
2.1.2 Reporting Management 56
2.2 Safety Investigation 58
2.2.1 Safety Investigations 58
2.3 Hazard Identification 60
2.3.1 Hazard Identification and Safety Data Sourcing 60
2.3.2 Safety Data Analysis 62
2.4 Safety Risk Assessment 64
2.4.1 Management of Risk 64
2.4.2 Acceptable Levels of Safety 66
2.4.3 Effective Risk Controls 68
2.4.4 NASP Alignment 70

This information is intended for CAA and use only

3 Assurance 72

3.1 Safety Performance 72

3.1.1 Safety Objectives 72

3.1.2 Safety Performance Indicators 74

3.1.3 Risk Control Assurance 76

3.2 Change Management 78

3.2.1 Management of Change 78

3.3 Continuous Improvement 80

3.3.1 SMS Continuous Improvement 80

4 Promotion 82

4.1 Safety Training 82

4.1.1 Training – Initial and Recurrent 82

4.1.2 Training Effectiveness 84

4.1.3 Competence Evaluation 86

4.2 Safety Communication 88

4.2.1 Safety Policy Promotion 88

4.2.2 Safety Critical Information 90

4.2.3 Promoting Feedback 92

5 Interface Management 94

5.1 Interfacing SMS 94
5.1.1 Critical Internal and External Interfaces 94
5.1.2 Interface Collaboration 96
6 Compliance 98
6.1 Compliance Monitoring 98
6.1.1 Compliance Responsibilities and Accountabilities 98
6.1.2 Compliance Focal Point(s) 100
6.1.3 Monitoring Programme 102
6.1.4 Compliance Monitoring Performance and Outcomes 104

Preliminaries

Amendment Record

Version:	Date:	Released by:	Notes:
First Issue	01 Jul 26	SMS Prog Lead Marc Smith	First Issue of the SET – Initial Oversight
1.1	09 Oct 26	SMS Prog Lead Marc Smith	Change of title from SMS Evaluation Tool Initial to SMS Evaluation Tool

Guidance

Note: Please ensure that the name of the entity being assessed is added in the header, to ensure the document's sensitivity caveats are correctly annotated, and appropriate controls applied.

Introduction

The Safety Management System Evaluation Tool (SET) sets out a framework for assessment of an organisation's Safety Management System and elements of their wider Management System. Its use is mandated by the UK CAA for an initial approval. It is founded upon SMS elements contained within Appendix 2 of Annex 19, 2nd Edition, with the additional focus on Safety Culture, Human Factors, Compliance Monitoring and the Management of Interfaced SMS.

The tool provides a means and method by which the UK CAA promotes and delivers a standardised assessment across the differing types of entities and ensures:

- Pursuit of enhanced safety performance through the promotion of key safety enablers that, whilst not a regulatory requirement, are critical to delivering effective safety management eg Safety Culture.
- Annex 19 Standards and Recommended Practices are met.
- **As a minimum, the UK regulatory requirements are met.**

When the tool is used

The tool is to be used for:

- An initial approval of a new entity.
- Should a Business Area introduce SMS as a requirement, for the initial SMS assessment of an existing certificated organisations.
- It is not mandated for ongoing oversight but can be used as a guide to support Performance Based Oversight, particularly when analysing and rectifying any perceived drop in safety performance.

Assessment Criteria

Each of the elements contains a 'what to look for' section, with a series of example markers to aid in making an assessment against the 4 criteria:

Present	There is evidence that the relevant item is documented within the organisation's Management System Documentation.
Suitable	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.

The organisation should make an initial self-assessment, with supporting evidence, in the 'Organisation Assessment' Box. Note, the use of references to evidence is perfectly acceptable provided the CAA is granted access to the source and that the reference is specific eg any reference to a document such as an SMS Manual or Exposition, should contain the respective page and paragraph numbers.

The document should be returned to the CAA who will conduct an initial desktop assessment, followed by an onsite visit to verify each marker.

For initial approval, a minimum assessment of Present and Suitable is expected, with signs of the transition towards Operating. Ongoing, a minimum assessment of Operating is expected. Once a minimum of Operating is achieved across all elements, use of this SET is no longer mandated. However, its re-employment in analysing causal and contributory factors to any perceived drop in performance is recommended.

Performance vs Compliance

The SET-I is primarily a performance-based tool however it recognises the requirement of regulatory compliance. Any drop in performance will be notified, with objective evidence, through one of 3 mechanisms:

- **Findings:** Any non-compliance with a Regulation identified will be addressed using Findings.
- **Observation**: To ensure Annex 19 SARPs and SMS critical enablers are in place, and to promote performance to achieve a minimum of **Operating**, SMS assessors will employ Observations.

In addition to the 2 formal methods, the use of **Conversation** should not be underestimated. Conversation encourages the establishment of a mutual culture of trust between entity and regulator, fostering Continuous Improvement towards **Effective**.

Applicability

This SET can be used for any size or complexity of organisation. Due consideration should be given to scope and scale of the organisation and its activities, when being assessed, by both organisation and CAA SMS Assessors.

Signatures

Submitted By:

Organisation:	
Approval Reference(s):	
Position:	
SMS Manual Revision:	
Name:	
Date:	
Signed:	

CAA Use Only - Assessed by:

Business Area:	
Name:	
Date:	
Signed:	

0 Foundations of SMS

0.1 Safety Culture

The Organisation has established, and promotes actively, a fully engaged safety culture.

0.1.1 Leadership Commitment and Culture

The Accountable Manager and the senior management team promote a positive safety culture (Ref para 4.2.1) and demonstrate their commitment to the Safety Policy through active and visible participation in the Safety Management System

Annex 19 Reference

Appendix 2

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

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

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.

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2), , 21.A.139(c)(1), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2), UK Reg (EU) No 376/2014 Article 16.11

What to Look For?

- Managers are familiar with safety policy and understand safety culture.
- Regular management participation in safety meetings.
- There is evidence of routine and triggered safety culture surveys; and analysis of results.
- Mutually constructive and positive relationship with Regulator and other stakeholders (interface management).

Example Markers	Present	Suitable	Operating	Effective
	The safety policy is documented including the promotion of a positive safety culture. 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 and responsibilities of all relevant staff involved in 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's implementation and commitment are reviewed with the AM and senior management on a regular basis. The Safety Culture is known, understood, and has the confidence of employees across the Organisation.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.1.2 Just Culture

A Just Culture Policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours with evidence of application through Leadership and Management

Annex 19 Reference

Appendix 2

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

e) 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.

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2) , 21.A.139(c)(1), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2), UK Reg (EU) No 376/2014 Article 16.11

What to Look For?

- Just Culture is mentioned in the Safety Policy.
- Just Culture principles are understood by leadership and staff (Is it included in SMS training?)
- Evidence of Just Culture principles applied after an occurrence.
- Evidence of interventions from safety investigations addressing the Organisation's issues rather than focusing **only** on the individual.
- Shared perception of Just Culture between staff and leadership.

Example Markers	Present	Suitable	Operating	Effective
	The safety policy is documented including the promotion of a positive safety culture. 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.	An explanation of the Just Culture is available for all to read, understandable, and promoted through training and safety communication methods. Application of the Just Culture is appropriate to the size and scope of the Organisation.	Evidence of application of the Just Culture.	Consistent application of the Just Culture. People believe in the Just Culture. Feedback on reporting reinforces confidence in the Just Culture.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.1.3 Reporting Culture

A strong Reporting Culture exists evidenced through active promotion of reporting, and staff feel safe and confident to report.

Annex 19 Reference

Ch 5

5.3.1 Note 1. A reporting environment where employees and operational personnel may trust that their actions or omissions that are commensurate with their training and experience will not be punished is fundamental to safety reporting.

Appendix 2

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

f) include safety reporting procedures.

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2), 21.A.139(c)(1), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2), UK Reg (EU) No 376/2014 Article 16.11

What to Look For?

- Staff are reporting their own errors and mistakes, including events where no one was watching.
- Staff know what events to report and how to report them.
- Staff are aware of how safety reports are managed (Transparency).
- The importance of reporting is promoted.
- The importance of feedback on reporting is understood (Ref 4.2.3).
- Changes in reporting rates are analysed for causal and contributory factors. A drop in reporting could be linked to poor feedback rather than evidence of reduction in risk.
- Learned helplessness is mitigated through high quality feedback to reporters and the rest of the Organisation.
- Feedback from safety surveys.
- Compare reporting rates with previous results e.g. year on year. Raw data must be normalised against an appropriate rate of output eg rate of flying, maintenance activity. This analysis will often be done by safety manager as part of SMS performance monitoring. (Ref: 0.1.3)

Note: Question a variety of personnel from different areas eg Ops, Flight Crew, engineering; and levels of responsibility eg ops assistant, supervisory, management levels.

Example Markers	Present	Suitable	Operating	Effective
	The safety policy references the importance of reporting.	The safety policy promotes and links the need for a Just Culture to drive an effective Reporting Culture.	People understand the criticality of reporting to gather safety data. People understand what, when and how to report. People are reporting both occurrences and hazard observations (potential near misses). Feedback should include updates on the implementation (or rejection) of any recommendations or actions.	People are confident to submit reports about their own performance; knowing they will be treated justly.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

0.1.4 Learning Culture

A Learning Culture is established where organisations learn from reports and trend safety data to make improvements to policies, procedures, equipment and effectively mitigate their risks.

Annex 19 Reference

Appendix 2

2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services.

2.1.2 Hazard identification shall be based on a combination of reactive and proactive methods.

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2, 13.1, 13.2, 21.A.139(c)(3)

What to Look For?

- Evidence of safety data being used to inform and mitigate the risk picture.
- Safety investigations establish causal and contributory factors, generating appropriate actions to prevent reoccurrence.
- Evidence of investigations addressing the Organisation's issues rather than focussing on individuals.
- Safety actions or recommendations are attributed to an accountable owner and their management tracked actively. Any rejection of an action or recommendation should be justified and documented. Without action there is no learning, just identifying.
- Investigation actions and recommendations that are not managed appropriately or effectively could be evidence of a poor learning culture.
- Lessons learned are shared across the Organisation and with those that the company interfaces with.

Example Markers	Present	Suitable	Operating	Effective
	The safety policy recognises the requirement to learn from safety data.	Evidence of safety data being collected and analysed. Investigations are identifying preventative actions or recommendations.	Analysis of safety data is being applied to risk assessments. There is accountability for the implementation (or rejection) of actions or recommendations.	Safety data is used to assess effectiveness and criticality of individual barriers. Implemented actions are monitored to assess their effectiveness.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.1.5 Assessing the Safety Culture

The Organisation has an established methodology to assess the effectiveness of its safety culture.

Annex 19 Reference

Appendix 2

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

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

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.

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.

b) reflect the service provider's commitment to maintain or continuously improve the overall effectiveness of the SMS;

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 13.1, 13.2, 21.A.139(c)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2

What to Look For?

- The Organisation has developed appropriate safety culture related performance indicators eg reporting rates, types of report.
- The Organisation monitors its reporting rates and types (age) of report. (Data should be normalised eg against flying hours). Evidence of strategies to address any perceived issues.
- The organisation uses anonymous surveys to assess its culture.

Example Markers	Present	Suitable	Operating	Effective
	The safety policy recognises the criticality of maintaining an engaged safety culture.	Safety Culture Surveys are used routinely or triggered by events eg: Annually, Change of Leadership, Implementation of a significant change.	In addition to safety Surveys, the Organisation has identified Performance Indicators (PIs) to assess the culture eg: Reporting rates Types or report (Haz Obs vs Occurrences) Age of Reports	PIs are routinely analysed to ensure a dynamic assessment of the safety culture. Evidence of effective measures to address identified deficiencies.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.2 Human Performance

Human performance is considered throughout the SMS.

0.2.1 Organisational and Human Factors in Risk Management

Human Factors (HF) are considered in hazard identification and risk management.

Annex 19 Reference

Appendix 2

2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services.

2.1.2 Hazard identification shall be based on a combination of reactive and proactive methods.

(Note: Edition 3 of Annex 19 will include a greater focus on human performance in SMS)

Regulatory References

HAZARD IDENTIFICATION OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.3A, 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V

What to Look For?

- HF issues being identified and categorised.
- The effect of organisational factors on human factors and subsequent human performance is recognised.
- An absence of HF recognition could be evidence of an ineffective safety culture.
- Evidence of any mismatches between procedure and work conducted are identified, investigated and actions raised to correct.
- Deficiencies in, or recommendations to improve, procedures are identified, investigated and actions raised to correct.
- Evidence of activities to understand ‘work as done’ eg Operational Learning reviews (OLR’s).
- Evidence of critical tasks being identified and related hazards identified.
- HFs are being identified in occurrence investigations and appropriate actions to mitigate are applied, in a Just fashion.

Example Markers	Present	Suitable	Operating	Effective
	Human factors and their effect on human performance is recognised by the SMS.	There is evidence of human factors and human performance issues being considered within the hazard ID and risk management process.	The influence of organisational factors on human performance is recognised and documented in hazard id. Human factors and their effect on human performance is considered and documented within the Hazard ID process. Human and organisational factors are considered when developing effective risk controls.	Systemic factors and their impact on human performance are routinely considered; continuously reviewed; and applied to risk management activity, to ensure risk controls remain relevant and current. Hazard ID and risk management activities include relevant stakeholders and HF expertise.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.2.2 Human Factors in Change

Human Factors issues have been considered as part of the Management of Change (MoC) process. Where appropriate, the Organisation has applied design standards which consider the needs of the human operator as a priority for equipment and the physical environment (human centred design).

Annex 19 Reference

Appendix 2

3.2 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.

(Note: Edition 3 of Annex 19 will include a greater focus on human performance in SMS)

Regulatory References

THE MANAGEMENT OF CHANGE OR*GEN.200 (a) (3) ADR.OR.D.005 (b)(5), ATM/ANS.OR.B.005(a)(3), CAMO.A.200(a)(3), 21.A.139(c)(4)(ii), 21.A.239(c)(4)(ii), 145.A.200(a)(3)

What to Look For?

- MoC is communicated effectively.
- Evidence that Human factor considerations have been included as early in the MoC cycle and continually monitored.
- HF related hazards identified.
- Human performance limitations are considered for any risk mitigation action.
- MoC considers multiple changes and the impact on staff.
- MoC considers changes to equipment and the working environment.
- MoC considers any training requirements and associated competencies.

Example Markers	Present	Suitable	Operating	Effective
	The impact of change on human performance is recognised within the SMS.	The change is communicated to personnel. There is evidence of human factors and human performance issues being considered within the change management process. (Linked to human factors within the hazard ID process 0.2.1).	The reason for the change is communicated to, and understood by, staff. The influence of the Change on human performance is recognised and documented in hazard ID. Human Factors associated with the change should be considered and recorded during risk control development.	Stakeholder management is considered from the outset. (Ref Kubler-Ross Change Curve). All relevant stakeholders are considered during Hazard ID and risk management activity. Dynamic review of Hazard ID and risk controls throughout the change process to ensure the effectiveness of hazard ID and risk management activity.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.2.3 Wellbeing of, and support available to, staff.

Staff feel supported and are content.

Annex 19 Reference

Appendix 2

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

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

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

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

(Note: The intent here is to ensure that nominated posts are filled, sufficient qualified and experienced personnel are maintained to deliver safe operations, and that stresses associated with their respective roles do not adversely impact their performance.)

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2), UK Reg (EU) No 376/2014 Article 16.11, 21.A.139(c)(1)

APPOINTMENT OF KEY PERSONNEL OR*.GEN.210(b), OR*.GEN.200 (a)(1), ADR.OR.D.015 (c), ATS.OR.200 (1) (iii), ATCO.OR.C.010, CAMO.A.305(a)(5) and (6), CAMO.A.200(a)(4), 21.A.145(c)(2), 21.A.239(c)(2), 21.A.245(b)(3), 145.A.30(b)(3),(c) and (d), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 6.1, 21.A.139(c)(2)

What to Look For?

- Work demands including workload, work patterns and working environment.
- Roles and responsibilities are understood with double hatting or conflicting roles managed.
- Staff turnover, sickness, and overtime rates.
- A positive working environment is promoted; dealing with conflict and unacceptable behaviours.
- Industrial relationships
- Have Unions been involved in settling disagreements?
- Peer Support programmes are in place.
- Mental health first aiders.

Example Markers	Present	Suitable	Operating	Effective
	The Organisation (policy) recognises the importance of managing people's wellbeing to mitigate human factors (eg stress) that can impact upon performance and increase risk.	There is evidence of active stress and workload management to mitigate associated risks. HR policies and mechanisms support a safe and inclusive environment.	Staff feel confident to approach management with issues. Management provides feedback on any concerns or issues raised. Peer support mechanisms are in place and staff are aware of them. Industrial disputes are manged effectively, to mitigate stress and associated risks.	The effects of fatigue and stress on human performance is understood across all areas of the Organisation, not just within operational areas eg HR consider human performance when developing and managing policy. Managers are subject to HF Training. Staff contentment is routinely monitored eg surveys. With concerns addressed effectively.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

0.2.4 Training is provided on Human and Organisational Factors.

Annex 19 Reference

Appendix 2

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

(Note: Edition 3 of Annex 19 will include a greater focus on human performance in SMS)

Regulatory References

TRAINING AND EDUCATION OR*GEN.200 (a) (4), ADR.OR.D.005 (b) (8), ATM/ANS.OR.B.005(a)(6), ATS.OR.200(4)(i), ATCO.OR.C.001(d), CAMO.A.200(a)(4), 21.A.139(c)(5)(i), 21.A.239(c)(5)(i), 145.A.30(e), 145.A.35(a) and (d), 145.A.200(a)(4)

What to Look For?

- The relationship between HF, HP and System Performance is understood.
- Understanding of why errors and violations occur.
- Safety Culture training references HF reporting and the application of Just Culture.
- HF training is provided and recorded for all staff.
- HF training is appropriate and effective. (Look at course types eg CRMT, HF for maintenance, HF in Investigations, and review content, duration, delivery methods etc.)
- Training includes Fatigue Risk Management.

Example Markers	Present	Suitable	Operating	Effective
	The SMS recognises the impact of human factors on human performance.	HF/CRM training, appropriate to respective roles, is mandated for all front-line personnel and managers.	HF training is routinely evaluated for effectiveness, attendance tracked, with a suitable recurrent training programme. CRM training is routinely evaluated for effectiveness, attendance tracked, with a suitable recurrent training programme.	HF training is available to all personnel, not just operating staff/front-line staff. HF/CRM training is routinely updated and informed by the Organisation's occurrence reporting.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1 Safety Policy

1.1 Management Commitment and Suitability of SMS Policy

Leadership commitment to SMS is enshrined in the Safety Policy and understood.

1.1.1 Endorsed Safety Policy

There is a clearly defined safety policy that includes a commitment to continuous improvement, observes all applicable legal requirements, standards, considers good practice, and is signed by the Accountable Manager.

Annex 19 Reference

Appendix 2

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

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

e) be signed by the accountable executive of the organization;

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

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

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2), 21.A.139(c)(1), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2), UK Reg (EU) No 376/2014 Article 16.11

What to Look For?

- The policy defines the Organisation's commitment to Just Culture and indicates clearly unacceptable behaviours (Ref: 0.1.2)
- The policy encourages proactive reporting (Ref: 0.1.3)
- The policy is committed to applying HF principles.
- Talk to accountable manager to assess their knowledge and understanding of the safety policy.
- Canvas staff to determine how readable and understandable the policy is.

Example Markers	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 readily available and understood. The Safety policy is tailored to the Organisation.	The safety policy is reviewed periodically to ensure it remains relevant to the Organisation. The safety policy is actively promoted. The safety policy includes a commitment to applying HF principles.	The Accountable Manager understands and the safety policy and is fully engaged in implementing it. Staff understand the safety policy and have confidence in it.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.1.2 Safety Policy and Resource

The safety policy includes a statement to provide appropriate resources and to monitor the workload for staff in key safety roles.

Annex 19 Reference

Appendix 2

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

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

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

Regulatory References

MANAGEMENT COMMITMENT OR*.GEN.200 (a) (2), ADR.OR.D. 005 (b)(2), ATS.OR.200 (1), ATCO.OR.C.001 (b), CAMO.A.200(a)(2), 21.A.139(c)(1), 21.A.143(a)(13)(iv), 21.A.239(c)(1), 21.A.243(a)(iv), 145.A.200(a)(2) UK Reg (EU) No 376/2014 Article 16.11

What to Look For?

- The policy acknowledges human factors and their impact on human performance.
- The policy includes a commitment to provide resources appropriate to the defined scope of the Organisation's products and services.
- The Accountable manger has appropriate authoritative and financial levers to effectively resource and manage the SMS.

Example Markers	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. 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.	Resource requirements are dynamically assessed to ensure continued safe operation with actions taken to address any shortfalls. Staff workload is monitored, alongside fatigue and occurrence reporting, to assess resource requirements.	Evidence of Human and Organisational Factors being applied to forecasting resource requirements. Management of change effectively forecasts any variation in resource requirements and the organisation proactively addresses this ahead of the change.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.1.3 Supporting Policies

There are policies in place for safety critical roles relating to Fitness for Duty (for example, Alcohol and Drugs Policy).

Annex 19 Reference

Appendix 2

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

Regulatory References

AMC1 CAT.GEN.MPA.100(c)(1);ARO.RAMP.106; GM3 ATS.OR.305(a); CAT.GEN.MPA.170;

What to Look For?

- Review policies surrounding alcohol and drugs.
- Review other occupational health policies related to fitness for duty.

Example Markers	Present	Suitable	Operating	Effective
	There is a clearly articulated and practiced zero tolerance policy with respect to the misuse of alcohol and psychoactive substances or operating whilst unfit for duty.			

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.2 Safety Roles are Defined and Understood

Safety accountabilities and responsibilities are defined and understood.

1.2.1 Accountable Manager

An appropriately experienced and qualified Accountable Manager has been appointed with full responsibility and ultimate accountability for the SMS to ensure it is properly implemented and performing.

Annex 19 Reference

Appendix 2

1.2 Safety accountability and responsibilities.

The service provider shall:

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

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; and

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

Regulatory References

SAFETY ACCOUNTABILITY AND RESPONSIBILITIES OR*.GEN.200 (a) (1), OR*.GEN.210 (a) and (b), ADR.OR.D.015 (a), ATS.OR.200 (1)(ii)(iii), ATCO.OR.C.001, CAMO.A.200(a)(1) and (b), CAMO.A.200(a)(5), 21.A.139(c)(2), 21.A.145(c)(1), 21.A.239(c)(2), 21.A.245(a), 145.A.30(a), (b) and (c), 145.A.200(a)(1) and (b), 145.A.200(a)(5)

What to Look For?

- The AM is suitably qualified and experienced. Form 4 interview, if applicable, is a useful source of evidence.
- Evidence that Accountable Manager has ability to access funding for relevant safety improvements and sufficient control of financial and human resources to manage risk effectively (Ref: 1.1.2).
- Evidence of decision making on risk acceptability.
- Review SMS activities are being conducted in a timely manner and SMS is sufficiently resourced (Safety Review Board can be a useful source of data).

Example Markers	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 multiple approvals, the designation of the 'Accountable Manager' will reflect the governance structure eg single corporate SMS or different SMS with managed interfaces.	The Accountable Manager ensures that the SMS is properly resourced, implemented, 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 drives continuous improvement. The AM leads and promotes a fully engaged safety culture.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.2.2 Accountable Manager Suitability

The Accountable Manager is fully aware of their SMS roles and responsibilities in respect of the safety policy, safety standards and safety culture of the Organisation.

Annex 19 Reference

Appendix 2

1.2 Safety accountability and responsibilities.

The service provider shall:

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;

4.1 Training and education

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

SAFETY ACCOUNTABILITY AND RESPONSIBILITIES OR*.GEN.200 (a) (1), OR*.GEN.210 (a) and (b), ADR.OR.D.015 (a), ATS.OR.200 (1)(ii)(iii), ATCO.OR.C.001, CAMO.A.200(a)(1) and (b), CAMO.A.200(a)(5), 21.A.139(c)(2), 21.A.145(c)(1), 21.A.239(c)(2), 21.A.245(a), 145.A.30(a), (b) and (c), 145.A.200(a)(1) and (b), 145.A.200(a)(5)

What to Look For?

- The AM understands the criticality of their role in leading the SMS and promoting a fully engaged safety culture.
- The AM understands how Organisational culture can impact upon human performance.
- The AM actively engages in the SMS through attendance at safety forums and uses SMS performance data to drive continuous improvement.
- The AM understands the Organisation's significant HF risks.

Example Markers	Present	Suitable	Operating	Effective
	The AM's role, responsibilities and accountabilities are clearly defined.	The scope of the AMs accountability – particularly when considering multi approval organisations – is appropriate to their experience and manageable.	The AM is suitably qualified and experienced; is proficient in SMS; and understands their role in it; demonstrable through AM interviews. The AM understands Human Factors, its impact on human performance, and how these affect any associated risks.	The AM is fully engaged in the SMS, leading and driving continuous improvements to the Organisation's SMS performance. The AM ensures their own qualifications and experience remains commensurate with the scope of their accountability through appropriate training.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.2.3 Documented Authority for SMS

Safety accountabilities, authorities and responsibilities are defined and documented throughout the Organisation and staff understand their own.

Annex 19 Reference

Appendix 2

1.2 Safety accountability and responsibilities.

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; and

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

1.5 SMS Documentation

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

d) accountability, responsibilities and authorities for SMS processes and procedures.

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.

Regulatory References

SAFETY ACCOUNTABILITY AND RESPONSIBILITIES OR*.GEN.200 (a) (1), OR*.GEN.210 (a) and (b), ADR.OR.D.015 (a), ATS.OR.200 (1)(ii)(iii), ATCO.OR.C.001, CAMO.A.200(a)(1) and (b), CAMO.A.200(a)(5), 21.A.139(c)(2), 21.A.145(c)(1), 21.A.239(c)(2), 21.A.245(a), 145.A.30(a), (b) and (c), 145.A.200(a)(1) and (b), 145.A.200(a)(5)

What to Look For?

- There are documented management Organisational diagrams and job descriptions for all personnel.
- Managers and supervisors understand the impact of their decisions and the local Organisational culture on human performance.
- Active participation of senior managers in the SMS.
- Evidence of appropriate risk mitigation, action, and ownership.
- Checks that managers and staff are familiar with their roles and responsibilities.

Example Markers	Present	Suitable	Operating	Effective
	The safety accountability, authorities, and responsibilities are clearly defined and documented.	Individuals have access to their safety accountability, authorities, and responsibilities (for example, through job descriptions or organisational charts).	Everyone in the Organisation is aware of, and fulfil their, safety responsibilities, authorities, and accountabilities. All are encouraged to contribute to the SMS.	Staff at all levels understand the risks faced by the Organisation and their role in the SMS to mitigate these. SMS is fully engaged within the Organisation to the extent that it is intrinsic to the day-to-day management of the Organisation.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.3 SMS Personnel and Resources

Key SMS personnel have been appointed to implement and manage an SMS that is appropriate to the scope of products and services delivered by the Organisation.

1.3.1 Safety Manager

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

Annex 19 Reference

Appendix 2

1.3 Appointment of key safety personnel

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

Note (from ICAO Annex 19, Appendix 2): 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.

Regulatory References

APPOINTMENT OF KEY PERSONNEL OR*.GEN.210(b), OR*.GEN.200 (a)(1), ADR.OR.D.015 (c), ATS.OR.200 (1) (iii), ATCO.OR.C.010, CAMO.A.305(a)(5) and (6), CAMO.A.200(a)(4), 21.A.139(c)(2), 21.A.145(c)(2), 21.A.239(c)(2), 21.A.245(b)(3), 145.A.30(b)(3),(c) and (d), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 6.1

What to Look For?

- Safety Manager interview. (Form 4 for initial approval or on personnel change) and Terms of Reference review.
- Safety Manager is suitably trained and qualified according to the scope of products and services (Consider any change to the Organisation's portfolio eg addition of new approvals).
- Evidence of maintained competency.
- The safety manager understands the criticality of their role in leading the SMS and promoting a fully engaged safety culture.
- The Safety Manager has an appropriate level of knowledge and understanding of HF.
- Review how the safety manager engages with operational staff and senior management.

Example Markers	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 to the Accountable Manager.	The safety manager is competent. Sufficient time and resources are allocated to maintain the SMS.	The safety manager has implemented and maintains effective performance of the SMS. The safety manager and Accountable Manager communicate routinely with safety issues escalated when appropriate. The safety manager is open and accessible to all staff in the Organisation.	The safety manager is competent to manage the SMS and identifies improvements in a timely manner. There is a close working relationship with the Accountable Manager and the safety manager is considered a trusted advisor and given appropriate status in the Organisation.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

1.3.2 SMS Resourcing

The Organisation has allocated sufficient resources to manage the SMS including, but not limited to, competent staff for safety investigation, analysis, auditing, and promotion.

Annex 19 Reference

Appendix 2

1.2 Safety accountability and responsibilities.

The service provider shall:

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; and

1.5 SMS Documentation

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

d) accountability, responsibilities and authorities for SMS processes and procedures.

4.1 Training and education

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

APPOINTMENT OF KEY PERSONNEL OR*.GEN.210(b), OR*.GEN.200 (a)(1), ADR.OR.D.015 (c), ATS.OR.200 (1) (iii), ATCO.OR.C.010, CAMO.A.305(a)(5) and (6), CAMO.A.200(a)(4), 21.A.139(c)(2), 21.A.145(c)(2), 21.A.239(c)(2), 21.A.245(b)(3), 145.A.30(b)(3),(c) and (d), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 6.1,

What to Look For?

- Safety Manager has sufficient time to fulfil role effectively. (Consider Organisations where SM may hold multiple roles eg Safety and Compliance Manager).Evidence that Organisation is resourced to effectively deliver an appropriate and effective SMS.
- Review staffing and competence levels for those involved in SMS activities eg Deputy Safety Manager, Investigators, Analysts.
- SMS team have appropriate IT and software to deliver an effective SMS.
- Review of report action and closure timescales. This should include the allocation of accountability for management of actions to prevent reoccurrence (Ref: 0.1.4).

Example Markers	Present	Suitable	Operating	Effective
	Staff have been appointed to fulfil key roles within the SMS e.g. Investigators, Analysts. Note: These roles could be combined and conducted by existing staff provided they are suitably competent and have sufficient capacity.	Staff in key roles are suitably trained and competent to fulfil the role. Staff have sufficient time and resource to fulfil their role effectively.	Both Initial and recurrent training is provided for those filling key appointments. A training requirements matrix is established and maintained to track competency and currency.	SMS staff workload is routinely monitored to ensure resource allocated to SMS remains appropriate and effective eg the SMS matches any growth in the organisation (Considered as part of Change Management).

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.3.3 Safety Committee(s)

The Organisation has established appropriate safety committee(s) that discuss and address safety risks and compliance issues and includes the Accountable Manager and the heads of functional areas.

Annex 19 Reference

Appendix 2

1.3 Appointment of key safety personnel

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

1.5 SMS Documentation

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

d) accountability, responsibilities and authorities for SMS processes and procedures.

2.2 Safety risk assessment and mitigation

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

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

Note: The frequency and format of meetings should be appropriate to the size and scope of the Organisation.

Regulatory References

APPOINTMENT OF KEY PERSONNEL OR*.GEN.210(b), OR*.GEN.200 (a)(1), ADR.OR.D.015 (c), ATS.OR.200 (1) (iii), ATCO.OR.C.010, CAMO.A.305(a)(5) and (6), CAMO.A.200(a)(4), 21.A.139(c)(2), 21.A.145(c)(2), 21.A.239(c)(2), 21.A.245(b)(3), 145.A.30(b)(3),(c) and (d), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 6.1,

What to Look For?

- Reviews of safety meeting structure. Appropriate to size and scope of Organisation.
- Reviews of Terms of Reference for each group / committee.
- Review meeting attendance levels.
- Review meeting minutes, including how they are recorded and how actions are manged effectively.
- Safety committees consider HF related issues including fatigue risk management.
- People have come to the meeting prepared, ready to participate, and willing to challenge.

Example Markers	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 committee(s) monitor the compliance **and** performance of the SMS. Actions are managed. 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. Accountability and responsibility for actions are agreed, taken, and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.4 Emergency Response

Coordination of an appropriate Emergency Response Plan (ERP).

1.4.1 Emergency Response Plan

An appropriate emergency response plan (ERP) has been developed and distributed that defines the procedures, roles, responsibilities and actions of the various Organisations and key personnel.

Annex 19 Reference

Appendix 2

1.4 Coordination of emergency response planning.

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

Regulatory References

CO-ORDINATION OF EMERGENCY RESPONSE PLANNING OR*.GEN.200(a)(3), ADR.OR.D.005 (b) (10), ATS.OR.200 (1)(iv), AMC1 CAMO.A.200(a)(3)(g)(2), AMC1 145.A.200(a)(3)(g)(2)

What to Look For?

- Review emergency response plan is appropriate for scope of Organisation.
- Requirement for specialist industry support e.g. crisis management services.
- Does it reflect foreseeable accident scenarios.
- Review co-ordination with other Organisations, particularly emergency services.
- Review how ERP and changes are communicated.
- Check ease of access to ERP.

Example Markers	Present	Suitable	Operating	Effective
	An ERP appropriate to the size and scope of products and services provided has been developed and distributed. The ERP defines the procedures, roles, responsibilities and actions of the various Organisation's and key personnel.	Key personnel have easy access to the relevant parts of the ERP at all times. The coordination with other organisations (including non-aviation organisations) is defined with appropriate means. The ERP considers the requirement for external specialist support e.g. crisis management Organisations.	The ERP is easily understandable with checklists for key personnel to ensure initial emergency actions are completed.	The ERP is resilient and considers absence of key personnel. Ensuring nominated duty replacements are available.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.4.2 Emergency Response Plan Testing

The ERP is periodically evaluated for the adequacy of the plan and the results reviewed to improve its effectiveness.

Annex 19 Reference

Appendix 2

1.4 Coordination of emergency response planning.

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

Regulatory References

CO-ORDINATION OF EMERGENCY RESPONSE PLANNING OR*.GEN.200(a)(3), ADR.OR.D.005 (b) (10), ATS.OR.200 (1)(iv), AMC1 CAMO.A.200(a)(3)(g)(2), AMC1 145.A.200(a)(3)(g)(2)

What to Look For?

- Review when and how the plan was evaluated.
- Review how were lessons identified and recorded, including the allocation of accountability for the management of actions to improve its effectiveness.

Example Markers	Present	Suitable	Operating	Effective
	ERP is compliant with exercising requirements for both table-top and live events.	ERP exercise scenarios are representative.	ERP exercising considers interfacing Organisations that are included in scenarios. There is a Post Exercise Report with lessons identified and allocated actions.	ERP is reviewed and exercised ahead of any planned change in operations or extraordinary events.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

1.5 Safety Documentation

The SMS is documented appropriate to the scope of products and services delivered by the Organisation.

1.5.1 Scope and Availability of Documentation and Records

The SMS documentation includes the policies, processes and procedures that describe the Organisation's safety management system and is readily available to all relevant personnel.

Annex 19 Reference

Appendix 2

1.5 SMS documentation

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; and
d) accountability, responsibilities and authorities for SMS processes and procedures.

Note (from ICAO Annex 19, Appendix 2): 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.

Regulatory References

SMS DOCUMENTATION OR*GEN.200(a) (5), OR*GEN.220, ADR.OR.D.005(c), ADR.OR.D.035, ATM/ATS.OR.B.005(b), AMC1 ATCO.OR.C.001(e), CAMO.A.200(a)(5), CAMO.A.220(b), 21.A.139(c), 21.A.139(d)(2)(i), 21.A.239(c), 145.A.200(a)(5), UK Reg (EU) No 376/2014 Articles 6.1, 6.5, 7.1, 15.1, 15.2, 16.2, 16.11,

What to Look For?

- Review how safety policies, processes and procedures are documented and amended. (This could be within existing Organisational documentation or a separate Safety Management Manual with appropriate cross referencing).
- SMS documentation includes a System description including relationship with other interfacing SMSs.
- HF principles are considered in the development of policies, processes, and procedures.
- SMS records are recognised as a critical part of SMS documentation eg Investigations, Action Logs, MoC
- Documentation is readily accessible.

Example Markers	Present	Suitable	Operating	Effective
	The SMS documentation includes the policies, objectives, and processes that describe the Organisation's SMS. SMS documentation is comprehensible. The SMS documentation is appropriate to the organisation. SMS records are recognised as a critical part of SMS and documentation and managed appropriately.	The scope of the activities under the SMS is clearly defined. (Some multi approval organisations have separate SMSs). SMS documentation is representative of the actual processes in place. SMS documentation describes the interfaces with other management systems both externally and internally eg ISMS, SEMS The SMS documentation readily available to all relevant personnel.	Key personnel involved in implementation of the SMS are familiar with the SMS documentation, following and promoting the processes contained therein. All personnel should be familiar with their relevant parts of the documentation and role in its implementation.	SMS documentation is proactively reviewed for improvement.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

1.5.2 Documentation and Records Control

SMS documentation, including SMS related records, are regularly reviewed, and updated with appropriate version control in place.

Annex 19 Reference

Appendix 2

1.5 SMS documentation

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; and

d) accountability, responsibilities and authorities for SMS processes and procedures.

Regulatory References

SMS DOCUMENTATION OR*GEN.200(a) (5), OR*GEN.220, ADR.OR.D.005(c), ADR.OR.D.035, ATM/ATS.OR.B.005(b), AMC1 ATCO.OR.C.001(e), CAMO.A.200(a)(5), CAMO.A.220(b), 21.A.139(c), 21.A.139(d)(2)(i), 21.A.239(c), 145.A.200(a)(5), UK Reg (EU) No 376/2014 Articles 6.1, 6.5, 7.1, 15.1, 15.2, 16.2, 16.11,

What to Look For?

- Check how safety manuals are stored and version controlled.
- Check safety data is recorded and stored in accordance with regulatory requirements e.g. defined retention periods.
- Hazard logs and risk registers are managed effectively including evidence of appropriate periodic review and associated version control.
- Data protection and confidentiality rules have been defined and consistently applied, including controls on how the information derived from safety reporting can be used to meet regulatory requirements and Just Culture promotion.

Example Markers	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 and implemented.	Changes to SMS Documentation are managed. 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.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

2 Risk Management

2.1 Reporting

Effective safety reporting mechanisms are in place; that are compliant with regulations, appropriate to the scope of products and services delivered by the Organisation; and promoted under a banner of Just Culture.

2.1.1 Reporting System(s)

There is a reporting system, managed confidentially, that is compliant with UK Reg (EU) No 376/2014 Article 4.2 & 5.1. Capturing errors, hazards and near misses, that is simple to use and accessible to all staff.

Annex 19 Reference

Chapter 5

5.1.2 *States shall establish a mandatory safety reporting system that includes the reporting of incidents.*

5.1.3 *States shall establish a voluntary safety reporting system to collect safety data and safety information not captured by mandatory safety reporting systems.*

Appendix 2

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

c) include safety reporting procedures;

Regulatory References

HAZARD ID OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.3A, 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V,

What to Look For?

- A reporting system (in addition to MORs) is promoted and readily available for all personnel.
- Staff are familiar with it, trust it, and know what to report. – including Cyber and Security concerns.
- The default for the reporting system should be confidentiality of reporting.
- An option to waive confidentiality is encouraged and can be used as a measure of safety culture.
- Assess volume, content, and quality of reports (report volumes must be normalised against rate of flying).
- Quality of reporting (Including meeting ECCAIRS 2 format requirements).
- Ability for customers and contractors to submit reports.
- Review voluntary and mandatory reporting.

Example Markers	Present	Suitable	Operating	Effective
	There is a reporting system, treated confidentially, 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).	People are aware and fulfil their reporting responsibilities.	The reporting system is being used to influence management decisions and continuous improvement.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

2.1.2 Reporting Management

Reports are manged in a timely fashion, with appropriate updates provided to the regulator, reporter and where appropriate, to the rest of the Organisation.

Annex 19 Reference

Chapter 5

5.1.2 *States shall establish a mandatory safety reporting system that includes the reporting of incidents.*

5.1.3 *States shall establish a voluntary safety reporting system to collect safety data and safety information not captured by mandatory safety reporting systems.*

Appendix 2

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

c) include safety reporting procedures;

Regulatory References

HAZARD ID OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.3A, 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V,

What to Look For?

- Safety reports are acted on in a timely manner.
- Reporting timelines are met for MORs (72 hours initial report; 30 days preliminary findings; 3 months for final report.)
- Evidence of feedback to reporter, the Organisation, and third parties. This should include positive promotion of high quality and/or self-reporting to foster the safety culture.

Example Markers	Present	Suitable	Operating	Effective
	Responsibilities have been defined as required by Reg. (EU) 376/2014.	Data protection and confidentiality is ensured. Safety Investigations are triggered (Ref 2.2). The data analysis process enables gaining useable safety information.	Reporting timelines for MORs are met. Voluntary reporting time frames are defined and adhered to. There is feedback to reporters on the quality of reporting (Ref 0.1.3 & 4.2.3).	The reporting system is being used to influence management decisions and continuous improvement.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

2.2 Safety Investigation

Safety occurrences are investigated effectively and timely.

2.2.1 Safety Investigations

Safety investigations are conducted - as soon as practicable, by appropriately trained personnel - that identify causal and contributory factors; with associated actions and recommendations to prevent reoccurrence.

Annex 19 Reference

Appendix 2

2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services.

2.1.2 Hazard identification shall be based on a combination of reactive and proactive methods.

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

HAZARD ID OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V, 21.A.3A,

What to Look For?

- Review investigation methodology.
- Review investigation closure times (Ref: 2.1.2).
- Investigators have appropriate training, including HF elements.
- Investigations seek to identify all causal and contributory factors, not just focus on the root cause.
- Investigations consider HFs (Ref: 0.2.1)
- Investigations do not focus on the individuals but consider systemic factors – including organisational factors - as causal and contributory factors to any human performance elements identified.
- Organisations should strive, wherever practicable, to ensure the investigator maintains a degree of separation and independence from the occurrence.
- Investigations should strive to identify actions and/or recommendations that address all causal and contributory factors identified.
- Evidence of resultant actions/recommendations being recorded, assigned to an accountable individual, and proactively managed (Ref: 0.1.4).

Example Markers	Present	Suitable	Operating	Effective
	The triggers for safety investigations are identified.	The level of sign-off for safety investigations is defined and adequate to the level of risk. Appropriately trained personnel conduct investigations.	Investigations use a systems lens ensuring the consideration technical, environmental, organisational, and human factors. Investigations identify causal and contributory factors, with associated actions and recommendations to mitigate reoccurrence.	Any actions or recommendations generated by investigations are assigned to an accountable individual, proactively managed, tracked, with appropriate feedback to the reporter and Organisation. Including justification of any rejected action or recommendation. Safety recommendations are assigned success criteria and performance measured. Safety investigation criteria are continuously updated to include internal and external sources as required.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

2.3 Hazard Identification

Effective processes for hazard identification are developed and maintained.

2.3.1 Hazard Identification and Safety Data Sourcing

There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external). Information gathered and stored complies with UK Reg (EU) No 376/2014 Articles 4.1, 6.5, 7.1.

Annex 19 Reference

Appendix 2

2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services.

2.1.2 Hazard identification shall be based on a combination of reactive and proactive methods.

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

HAZARD IDENTIFICATION OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.3A, 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V,

What to Look For?

- Review how hazards are identified, analysed, and recorded.
- Review internal and external sources of hazards such as Safety reports, audits, safety surveys, Management of Change, brainstorming, commercial or business changes and other external influences.
- Physical and cyber security hazards are considered.
- Hazards related to third party organisations.
- Any hazard logs are well structured and regularly reviewed.
- Human Factors are considered in the identification and analysis of all hazards (Ref: 0.2.1).

Example Markers	Present	Suitable	Operating	Effective
	There is a process that defines how hazards are identified though reactive and proactive methods. The process includes the management of organisational change when it impacts safety (see 3.2). There are trained personnel in Hazard ID and Risk Management.	Multiple sources of hazards (internal and external) are considered and reviewed, and interfaces are properly addressed. Hazards are documented in an easy-to-understand format. The safety hazards at Organisation level are consistent with the ones identified at State level, where relevant.	Technical, environmental, organisational, and human factors related hazards are all considered. Hazards are identified and assessed in a systematic and timely manner, involving key personnel; and relevant, subject matter experts and stakeholders.	The organisation has processes and means that capture hazards (technical, environmental, human, and organisational factors related), and ensures hazards are manged to ensure they remain up to date. Hazards are continuously and proactively identified with processes to support predictive hazard ID during Change Management.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

2.3.2 Safety Data Analysis

There is a process in place to analyse safety data and safety information to look for trends and gain useable safety and risk management information.

Annex 19 Reference

Appendix 2

2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services.

2.1.2 Hazard identification shall be based on a combination of reactive and proactive methods.

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

HAZARD IDENTIFICATION OR*.GEN.200 (a) (3), OR*GEN.160, ADR.OR.D.005, ATM/ANS.OR.B.005(a) (5), ATS.OR.200 (2) (i), ATCO.OR.C.001, CAMO.A.155, CAMO.A.160, CAMO.A.202, CAMO.A.200(a)(3), 21.A.3A, 21.A.129(e), 21.A.139(c)(6), 21.A.165(e), 21.A.239(c)(6), 145.A.47(b) and (d), 145.A.48(c), 145.A.61, 145.A.200(a)(3), 145.A.202, UK Reg (EU) No 376/2014 Articles 4.1, 4.2, 4.7, 4.8, 5.1, 5.6, 6.1, 6.5, 7.1, 13.1, 13.4, UK Reg (EU) IR No 2015/1018 Annex I to V,

What to Look For?

- Data is being analysed and results shared with Safety Committees.
- Review what internal and external sources of safety data 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, etc.
- Check whether the identification of safety hazards considers the ones identified at authority's level (e.g. SSP/SMS interfaces.
- Assess to which extent the process is not limited to the reactive part (i.e. occurrences) but also considers the proactive approach.
- Evidence of management decisions based on data analysis and reporting system outputs which determines any appropriate, corrective, or preventive action required to improve aviation safety.

Example Markers	Present	Suitable	Operating	Effective
	There is a process for the capture and analysis of safety data.	Both proactive and reactive sources of safety data are used in hazard ID and risk management eg FDM, aircraft health monitoring systems. Reporting systems use an appropriate taxonomy to aid in trend analysis.	Safety data is actively used to inform discussion at SRB. Relevant personnel are trained in statistical analysis. Occurrence data is considered by the Organisation when determining their top risks. The Organisation considers state level and similar organisation reporting as a comparison against its own hazard ID and risk management processes.	Safety data analysis feeds continuous improvement activities. Safety data is proactively used to drive dynamic hazard ID and risk management. Personnel are provided with suitable statistical analysis software. This could include the use of appropriate AI.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

2.4 Safety Risk Assessment

The Organisation has developed and maintains a formal process that ensures analysis, assessment, and control of safety risks in operations are mitigated to an acceptable level.

2.4.1 Management of Risk

There is a process for the management of risk that includes the analysis, assessment of risk associated with identified hazards, expressed in terms of likelihood and severity.

Annex 19 Reference

Appendix 2

2.2 Safety risk assessment and mitigation

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

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 21.A.139(c)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2, 13.1, 13.2,

What to Look For?

- Sample identified hazards and how associated risks were assessed.
- Qualitative vs quantitative assessment dependent depending on availability of data.
- Risk register layout/system is clear.
- Process defines who can accept what level of risk.
- Risk register being reviewed and updated.
- Risk assessment considers physical and cyber security threats.

Example Markers	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 to provide qualitative rather than quantitative assessment, when data is insufficient. Hazard ID and risk management is intrinsic to any management of change.	Risk analysis and assessments are conducted in a consistent, systematic, and timely manner, based on the defined process involving key personnel; and relevant, subject matter experts and stakeholders. Risk assessments are recorded and managed using a Risk Register (This could be a commercial software solution e.g. Centrik) appropriate to the size and scope of the Organisation.	Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes. Risks are regularly reviewed with reference to safety data to ensure they remain relevant and presented at appropriate safety committees.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

2.4.2 Acceptable Levels of Safety

There are criteria for evaluating the level of risk the Organisation is willing to accept; risk assessments and ratings are appropriately justified; managed, owned and signed of accordingly by an appropriate level of management.

Annex 19 Reference

Appendix 2

1.2 Safety accountability and responsibilities.

The service provider shall:

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

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

2.2 Safety risk assessment and mitigation

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

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 21.A.139(c)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2, 13.1, 13.2,

What to Look For?

- Risk tolerability criteria defined.
- Risk classifications are clearly defined and applied consistently.
- Management acceptability and sign-off is in line with their defined authorities e.g. AM for High Risks, Safety Manger for Med Risks.

Example Markers	Present	Suitable	Operating	Effective
	The level of risk the organisation is willing to accept is defined.	The risk matrix and acceptability criteria are clearly defined and usable.	Senior management is actively involved in medium and high risks and their mitigation and controls.	Risk acceptability criteria are used routinely, consistently applied in management decision making processes, and are regularly reviewed.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

2.4.3 Effective Risk Controls

The Organisation has a process in place to decide and apply appropriate and effective risk controls to reduce the risk to an acceptable level of safety.

Annex 19 Reference

Appendix 2

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;

1.2 Safety accountability and responsibilities.

The service provider shall:

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

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

2.2 Safety risk assessment and mitigation

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

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 21.A.139(c)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2, 13.1, 13.2,

What to Look For?

- Risk mitigations are practical and robust and manage risks to as low as reasonably practicable.
- Risk mitigations consider human performance limitations.
- Risk mitigations consider organisational causal and contributory factors.
- Risk mitigations consider threats from physical and cyber security.
- Mitigations are implemented in an appropriate time scale.
- Do not create additional risks; evidence of corrective actions and follow up.
- Review risk controls that rely solely on human action or intervention.
- Policies to prevent distractions during safety critical tasks.
- Evidence of mitigation implementation including ownership and timeline (Ref 0.1.4).

Example Markers	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. Risk mitigations consider technical, environmental, organisational, and human factors.	A responsible person is allocated to the implementation and management of risk controls. Risk controls are practical and sustainable, applied in a timely manner, and do not create additional risks. The effectiveness of risk controls that could impact across SMS interfaces is considered. The effectiveness of the risk controls is monitored through safety performance, using qualitative and/or quantitative means.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

2.4.4 NASP Alignment

The UK National Aviation Safety Plan and UK National Aviation Safety Roadmap are being considered and addressed as appropriate.

Annex 19 Reference

Appendix 2

1.1 Management commitment

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

Regulatory References

RISK ASSESSMENT AND MITIGATION OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(4), ATS.OR.200(2)(i), ATCO.OR.C.001 (c), CAMO.A.155, CAMO.A.200(a)(3), 21.A.139(c)(3), 21.A.143(a)(13)(iv), 21.A.239(c)(3), 21.A.243(a)(iv), 145.A.47(b) and (d), 145.A.48(c), 145.A.155, 145.A.200(a)(3), UK Reg (EU) No 376/2014 Articles 7.2, 13.1, 13.2,

What to Look For?

- Evidence of the Organisation considering the Key Risk Areas (Some may still be using the legacy Significant 7)

Example Markers	Present	Suitable	Operating	Effective
	The SMS references alignment with the State Safety Plan.	The SMS considers the Key Risk Areas (Legacy significant 7) in its risk management	The Organisation compares its identified risk profile with that of the State's recognised industry wide risk profile. The Organisation recognises how its risk profile can impact upon the State's recognised risk picture.	The Organisation recognises innovation, both implemented by itself and others, and how this could impact on the States recognised risk picture.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

3 Assurance

3.1 Safety Performance

The Organisation has developed and maintained the means to monitor their safety performance and validate the effectiveness of safety risks controls, through the application of appropriate safety performance indicators and, where required, targets.

3.1.1 Safety Objectives

Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the Organisation.

Annex 19 Reference

Appendix 2

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

Note (from ICAO Annex 19) Guidance on setting safety objectives is provided in the Safety Management Manual (SMM) *(Doc 9859).*

Regulatory References

SAFETY PERFORMANCE MONITORING AND MEASUREMENT OR*GEN.200 (a) (3), ADR.OR.D.005 (b)(5), ATS.OR.200 (3)(i), CAMO.A.200(a)(3), 21.A.139(c)(1), 21.A.239(c)(1), 145.A.200(a)(2) and (3), UK (EU) Reg No 376/2014 Article 13.2,

What to Look For?

- How safety objectives have been promulgated.
- Are they appropriate and relevant?
- Safety Objectives include how human performance should be addressed.

Example Markers	Present	Suitable	Operating	Effective
	Appropriate Safety Objectives have been generated.	The safety objectives have been endorsed by the Accountable Manager and effectively communicated.	Personnel are aware of the safety objectives and understand their role in meeting them.	The objectives are routinely reviewed to ensure they remain effective. Safety data is used to inform the safety objectives.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

3.1.2 Safety Performance Indicators

Safety performance indicators (SPIs) linked to the Organisation's safety objectives have been defined, promulgated, and are being monitored and analysed for trends.

Annex 19 Reference

Appendix 2

3.1 Safety performance monitoring and measurement

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

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

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

Regulatory References

SAFETY PERFORMANCE MONITORING AND MEASUREMENT OR*GEN.200 (a) (3), ADR.OR.D.005 (b)(5), ATS.OR.200 (3)(i), CAMO.A.200(a)(3), 21.A.139(c)(1), 21.A.239(c)(1), 145.A.200(a)(2) and (3), UK (EU) Reg No 376/2014 Article 13.2,

What to Look For?

- Evidence of SPIs based on diverse sources of data.
- Are they appropriate and relevant?
- Use of several types of indicators.
- There are HF related SPIs.
- SPIs being used to identify safety issues and management actions.
- Evidence that they are being periodically reviewed – effective Safety Review Boards.
- Safety targets are defined where appropriate. (Note that inappropriate safety targets can generate negative behaviours e.g. chasing quantity of reports rather than the quality of reporting.

Example Markers	Present	Suitable	Operating	Effective
	There is a process in place to measure the safety performance of the organisation including SPIs and targets linked to the organisation's safety objective.	SPIs are focused on what is important rather than what is easy to measure. Reliability of data sources is considered in the design of SPIs. Frequency and responsibility for the trend monitoring of SPIs are appropriate. State SPIs are considered, as applicable.	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. SPIs on how human factors and human performance are considered. Safety targets are realistic, understood and are not driving negative behaviours.	Both qualitative and quantitative SPIs and SPTs are reviewed; regularly updated to ensure they remain relevant, then reviewed with the relevant SMS governance body. SPIs and SPTs promote continuous improvement and maturation of the SMS.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

3.1.3 Risk Control Assurance

Risk mitigations and controls are being verified/audited to confirm they are working and effective (Ref 2.4.3).

Annex 19 Reference

Appendix 2

3.1 Safety performance monitoring and measurement

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

Note (From ICAO Annex 19) 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).

Regulatory References

SAFETY PERFORMANCE MONITORING AND MEASUREMENT OR*GEN.200 (a) (3), ADR.OR.D.005 (b)(5), ATS.OR.200 (3)(i), CAMO.A.200(a)(3), 21.A.139(c)(1), 21.A.239(c)(1), 145.A.200(a)(2) and (3), UK (EU) Reg No 376/2014 Article 13.2,

What to Look For?

- Evidence of risk controls being assessed for effectiveness (e.g., audits, surveys, reviews).
- Review the Interfaces between Compliance Monitoring and Safety personnel.
- Review where risk controls have failed and subsequently changed.
- Audits activities feed back into the SMS.

Example Markers	Present	Suitable	Operating	Effective
	There is a process in place to measure the safety performance of the organisation including SPIs and targets to measure the effectiveness of safety risk controls.	Both qualitative methods and quantitative SPIs and Targets are considered and linked to the measurement of effectiveness of risk controls.	The effectiveness of safety risk controls is being measured routinely alongside continual analysis to support timely risk assessment and decision making. Risk control effectiveness is communicated to the Accountable Manager so that resource can be targeted accordingly.	Safety data is being applied to inform the measurement of effectiveness of safety controls. Where a risk control is identified as reducing in performance or ineffective, responsibility is allocated to an empowered individual to implement control strengthening activity.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

3.2 Change Management

The Organisation has developed and maintains a formal management of change process to assure safety performance before implementing changes; ensuring the regulator is informed where required and/or appropriate.

3.2.1 Management of Change

The Organisation has a process to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.

Annex 19 Reference

Appendix 2

3.3 The management of change

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.

Regulatory References

THE MANAGEMENT OF CHANGE OR*GEN.200 (a) (3) ADR.OR.D.005 (b)(5), ATM/ANS.OR.B.005(a)(3), CAMO.A.200(a)(3), 21.A.139(c)(4)(ii), 21.A.239(c)(4)(ii), 145.A.200(a)(3)

What to Look For?

- Review recent changes to see a formal process was used.
- Review what triggers the process?
- Key stakeholders are identified and involved in the change management process.
- Safety accountabilities, authorities and responsibilities are reviewed as part of the change.
- Hazards and risks associated with the change are identified.
- Risk mitigations are identified, including the generation, modification, or elimination of risk controls.
- Transitional risk considered.
- Human performance is considered in the MoC process (Ref 0.2.2).
- Evidence of existing risks being reviewed related to the change.

Example Markers	Present	Suitable	Operating	Effective
	The organisation has established a management of change process that identifies risks in accordance with its existing hazard ID and risk management processes (Refer 2.3.1 & 2.4.1)	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 reason for the Change is communicated to all relevant stakeholders, including internal and external interfaces. The Change Management process identifies hazards and applies appropriate risk controls, to manage the associated risk ahead of a decision to implement the change. Haz ID and risk management processes include Technical, Environmental, Human and Organisational factors. (Refer 2.3.1 and 2.4.1)	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. The process considers the mental stress associated with Change is as a factor that could impact on human performance and risk. Risk controls are appropriately performance measured throughout the Change.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

3.3 Continuous Improvement

The Organisation responds effectively to findings or observations and seeks proactively opportunities to continuously improve the SMS.

3.3.1 SMS Continuous Improvement

The Organisation is continuously monitoring and assessing its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.

Annex 19 Reference

Appendix 2

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

Regulatory References

CONTINUOUS IMPROVEMENT OF THE SMS OR*.GEN.200 (a) (3), ADR.OR.D.005 (b)(7), ATS.OR.200(3)(iii), AMC1 ATCO.OR.C.001(e), CAMO.A.200(a)(3), UK Reg (EU) No 376/2014 Article 7.3 & 7.4, 21.A.139(c)(4)(iii), 21.A.239(c)(4)(iii), 145.A.200(a)(3)

What to Look For?

- Organisational response to findings – measures taken to close and avoid repeat findings.
- Lessons learnt being incorporated into SMS and operational processes (Ref 0.1.4).
- Best practice being sought and embraced.
- Surveys and assessments of organisational culture being conducted and acted upon.
- Data being analysed and results shared with Safety Committees.
- Evidence of follow up actions.
- Data quality checking is established where appropriate to improve the accuracy and reliability of data collected.
- Information from external occurrences, investigation reports, safety meetings, hazard reports, audits, and safety data analysis all contribute towards continuous improvement of the SMS.

Example Markers	Present	Suitable	Operating	Effective
	There are processes in place to monitor and review the effectiveness of the SMS (Ref 3.1.2).	The SMS, including safety assurance activities, produces reliable data that is periodically reviewed and analysed to reveal opportunities to improve the SMS. External, as well as internal, data is considered. Management is informed, at the appropriate level, to ensure sufficient levers and resource to manage any required improvement activity.	There is evidence of the SMS performance being periodically reviewed and any improvement activities being triggered accordingly. CI activity is included in Senior Management briefings and/or safety committees to ensure awareness; and resource is managed appropriately. CI activity includes the assessment of the effectiveness of any Safety Performance Indicators, to deliver reliable and exploitable data.	The assessment of SMS effectiveness uses multiple sources of information that supports decisions for CI (Ref 2.3.1and 3.1.2). CI activity is managed proactively, using predictive data analysis, to ensure the SMS Objectives and SPIs are updated to perpetually support and deliver further CI. Data is exploited from external organisations, including interfacing organisations, similar industrial organisations, and State level. The Organisation proactively shares SMS improvements to support global SMS advancement.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

4 Promotion

4.1 Safety Training

All personnel are trained and competent to perform their SMS related duties and the training programme is monitored for its effectiveness and updated accordingly.

4.1.1 Training – Initial and Recurrent

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 SMS operates.

Annex 19 Reference

Appendix 2

4.1 Training and education

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

TRAINING AND EDUCATION OR*GEN.200 (a) (4), ADR.OR.D.005 (b) (8), ATM/ANS.OR.B.005(a)(6), ATS.OR.200(4)(i), ATCO.OR.C.001(d), CAMO.A.200(a)(4), 21.A.139(c)(5)(i), 21.A.239(c)(5)(i), 145.A.30(e), 145.A.35(a) and (d), 145.A.200(a)(4)

What to Look For?

- Review the SMS initial and recurrent training programme including course content and delivery methods.
- Training records are updated.
- Training considers feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis, training, course evaluations etc.
- Ask staff when they last received SMS training and what they remember from it.
- Consider specific training elements for individual roles within the SMS eg Safety Manager, Safety Investigator etc.
- Training requirements for a change of role is considered (Ref 3.2.1).
- HF training appropriate to a person's role is delivered (Ref 0.2.4)

Example Markers	Present	Suitable	Operating	Effective
	There is an SMS training programme 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 factors (Ref 0.2.4) All staff requiring training are identified.	The SMS training programme is delivering appropriate training to the different staff in the organisation (Ref 4.1.2) and is being delivered by competent personnel (Ref 4.1.3).	SMS training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests, etc.) and is linked to the competency framework. Training is promoted as a positive reinforcement of continuous improvement of both the SMS and personal development. An identified deficiency in training, or a requirement for retraining, is promoted positively as an opportunity to refresh and improve.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

4.1.2 Training Effectiveness

There is a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training.

Annex 19 Reference

Appendix 2

4.1 Training and education

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

TRAINING AND EDUCATION OR*GEN.200 (a) (4), ADR.OR.D.005 (b) (8), ATM/ANS.OR.B.005(a)(6), ATS.OR.200(4)(i), ATCO.OR.C.001(d), CAMO.A.200(a)(4), 21.A.139(c)(5)(i), 21.A.239(c)(5)(i), 145.A.30(e), 145.A.35(a) and (d), 145.A.200(a)(4)

What to Look For?

- Review any training evaluation e.g. feedback questionnaires.
- Ask staff about their own understanding of their role in the Organisation's SMS and their safety duties and responsibilities.

Example Markers	Present	Suitable	Operating	Effective
	There is a process to review training to ensure it remains current with the latest compliance and performance requirements of the SMS, and best practices.	Feedback on the effectiveness of training is gathered and reviewed.	There is evidence of training being modified in response to feedback from delegates. There is evidence of training being modified in response to amendments to Regulation, standards, and recommended practices. Staff understand the SMS fundamentals of Culture, Policy, Risk Management, Assurance and Promotion.	There is evidence of training being generated or modified in response to lessons identified from the Organisation's safety data analysis. *(Note: Any case studies used should be suitably disidentified to preserve the safety culture).*

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

4.1.3 Competence Evaluation

There is a process that evaluates the individual's competence, including SMS trainers, and takes appropriate remedial action when necessary.

Annex 19 Reference

Appendix 2

4.1 Training and education

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.

4.1.2 The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

Regulatory References

TRAINING AND EDUCATION OR*GEN.200 (a) (4), ADR.OR.D.005 (b) (8), ATM/ANS.OR.B.005(a)(6), ATS.OR.200(4)(i), ATCO.OR.C.001(d), CAMO.A.200(a)(4), 21.A.139(c)(5)(i), 21.A.239(c)(5)(i), 145.A.30(e), 145.A.35(a) and (d), 145.A.200(a)(4)

What to Look For?

- Review how SMS competence and experience assessment is conducted on initial recruitment and recurrently.
- Consider requirements for specific roles e.g. Safety Manager, Safety Investigator etc
- Skill levels including experience and language proficiency criteria are set for job roles and assessed.
- Review trainer competencies, both professional knowledge and 'train the trainer' qualifications.
- The competence of the instructors is being assessed e.g. feedback from training sessions.

Example Markers	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 review personnel competency against the framework e.g. requirement for recurrent training. Specific competency frameworks have been created for key SMS roles e.g. Safety Manager, Investigator.	SMS trainers should have a suitable training qualification in addition to any SMS competencies required. There is evidence of the staff competencies being actively managed. Competence assessments should only be conducted by qualified personnel who are suitable qualified, experienced, and competent to do so.	Change Management recognises the requirement for competency frameworks to be amended, with suitable training provided accordingly. The competency framework is routinely reviewed, fed by safety data, and amended as required. The competency framework is driven by the pursuit of good practice and enhanced performance, over a need for minimum, necessary training.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

4.2 Safety Communication

The criticality of safety communication is understood, and the Organisation promotes the SMS proactively, to deliver a fully engaged safety culture and effective safety and risk management.

4.2.1 Safety Policy Promotion

The safety policy is promoted, understood by personnel, and establishes the foundations of a fully engaged safety culture.

Annex 19 Reference

Appendix 2

1.1.1 The safety policy shall:

f) be communicated, with visible endorsement, throughout the Organisation.

4.2. 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.

Regulatory References

SAFETY COMMUNICATION OR*.GEN.200 (a) (4) OR*GEN.200 (a) 4,ADR .OR.D.005 (b) (9), ATM/ANS.OR.B.005 (a) (7), ATS.OR.200 4(ii), CAMO.A.200(a)(4), 21.A.139(c)(5)(ii), 21.A.239(c)(5) (ii), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 13.3,

What to Look For?

- The policy is introduced to all personnel during initial training.
- The policy is proactively promoted to all personnel and not just a page in the SMS manual.
- Personnel understand the policy and have confidence in its application and effectiveness (Ref 0.1).
- Promotion includes feedback from Safety Culture surveys.
- The SMS team are familiar to, and readily contactable by, all staff.

Example Markers	Present	Suitable	Operating	Effective
	The safety policy and commitment to an engaged safety culture is actively promoted.	SMS Team allocate sufficient time and resource to delivering effective promotion e.g. ensuring time to routinely visit front line staff. Staff know the safety team and how to contact them. Multiple methods are used to promote the SMS e.g. newsletter, website, audio, video appropriate to the size and complexity of the Organisation.	The SMS is promoted across the entire Organisation, including HR and supporting staff, so that every person in the Organisation understands their contribution to its success. The promotion of the safety policy and its positive safety culture is visible.	The effectiveness of the promotion methodology and media is assessed using suitable performance indicators eg. feedback, website hits, changes in reporting rates or quality. The Organisation analyses its safety data and uses this to dynamically drive relevant, real, timely, promotion activity.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

4.2.2 Safety Critical Information

There is a process to determine what safety critical information needs to be communicated and how this is best promulgated throughout the Organisation. This includes contracted organisations and personnel where appropriate.

Annex 19 Reference

Appendix 2

4.2. 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.

Regulatory References

SAFETY COMMUNICATION OR*.GEN.200 (a) (4) OR*GEN.200 (a) 4,ADR .OR.D.005 (b) (9), ATM/ANS.OR.B.005 (a) (7), ATS.OR.200 4(ii), CAMO.A.200(a)(4), 21.A.139(c)(5)(ii), 21.A.239(c)(5) (ii), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 13.3,

What to Look For?

- Review the sources of information used (internal and external).
- Review the methods to communicate.
- The effectiveness of safety communication is being reviewed.
- Safety communication is easy to read and understand.
- Ask staff about any recent communications.

Example Markers	Present	Suitable	Operating	Effective
	There are processes to communicate safety critical information.	The process determines what, when, and how safety information needs to be communicated. The process includes contracted organisations and their 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 e.g. are signatures required?	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.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

4.2.3 Promoting Feedback

Safety promotion activity includes feedback on reporting.

Annex 19 Reference

Appendix 2

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

c) include safety reporting procedures;

4.2. 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.

Regulatory References

SAFETY COMMUNICATION OR*.GEN.200 (a) (4) OR*GEN.200 (a) 4,ADR .OR.D.005 (b) (9), ATM/ANS.OR.B.005 (a) (7), ATS.OR.200 4(ii), CAMO.A.200(a)(4), 21.A.139(c)(5)(ii), 21.A.239(c)(5) (ii), 145.A.200(a)(4), UK Reg (EU) No 376/2014 Article 13.3,

What to Look For?

- Feedback contains appropriate details concerning the investigation, analysis and follow up actions of occurrences.
- Preventive and corrective actions taken because of reporting are fed back.
- Feedback actively promotes the application of Just Culture.
- Feedback should not just concentrate on errors but include positive promotion of good practice.
- Safety awards are used to appropriately encourage the engaged safety culture.

Example Markers	Present	Suitable	Operating	Effective
	There is a process to ensure feedback to safety reporting.	The SMS Team understands the critical role in maintaining an effective engaged safety culture. There is evidence of feedback on reporting being effectively provided. Feedback should include details of any investigation and any actions taken as a result.	Feedback should be shared as widely as possible across the Organisation, with suitable disidentification to preserve the safety culture. Occurrence management progress should be sent/available to reporters. (Note: Some reporting systems allow reporters to access their report and track its management.) Safety awards are used as a positive promotional tool to encourage safe practices.	Feedback promotes positive actions and sound safety decision making, reinforcing the engaged safety culture. Feedback is provided to every reporter. Feedback includes the identification and subsequent actions to mitigate, technical, environmental, organisational, and human factors. Ensuring effective, balanced, safety culture promoting, feedback. (Ref: 2.2.1)

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

5 Interface Management

5.1 Interfacing SMS

The Organisation has identified and understands the criticality of interfacing SMSs, both internally and externally.

5.1.1 Critical Internal and External Interfaces

The Organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.

Annex 19 Reference

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.

Regulatory References

INTERFACE MANAGEMENT OR*.GEN.205, ADR.OR.D.010, ATM/ANS.OR.B.005 (f), CAMO.A.205(a)(2), 21.A.139(b)(1), 21.A.139(d)(2)(ii), 21.A.239(b)(1), 21.A.239(d)(3), 145.A.205(a)(2)

What to Look For?

- The SMS manual includes a system description of internal and external interfaces.
- Interfaces with physical and cyber security management systems are addressed.
- Safety critical issues and associated hazards are identified.
- Safety occurrences that bridge the interface are reported to both parties and addressed.
- The Organisation understands how the actions/risks of an interfacing Organisation can induce hazards, threats, and causal or contributory factors, that impact risks owned and managed by themselves e.g. quality management and training of personnel in a contracted MRO.
- Risk control actions are applied and reviewed appropriately.

Example Markers	Present	Suitable	Operating	Effective
	The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.	All relevant interfaces are addressed. The way the interfaces are managed is appropriate to the criticality in terms of safety. Any contracts associated with interfaces define the safety critical nature of the interfaces; the requirements to share information and the need to appropriately feed the Hazard Identification and Risk Assessment (HIRA), including any subsequent mitigations.	The organisation is managing the interfaces through hazard identification and risk management. There is an assurance activity to assess risk mitigations being delivered by external organisations.	Risk controls that impact across interfaces are being performance monitored and shared with the interfacing organisation. Change that may impact across any interface is communicated. Organisations take actions when required to ensure effective risk management across the interface.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

5.1.2 Interface Collaboration

There is proactive collaboration across interfaces.

Annex 19 Reference

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.

Regulatory References

INTERFACE MANAGEMENT OR*.GEN.205, ADR.OR.D.010, ATM/ANS.OR.B.005 (f), CAMO.A.205(a)(2), 21.A.139(b)(1), 21.A.139(d)(2)(ii), 21.A.239(b)(1), 21.A.239(d)(3), 145.A.205(a)(2)

What to Look For?

- Evidence of interfacing SMS meetings.
- There is evidence of collaboration across safety and security – physical and cyber – domains.
- SRBs within a multi-approval Organisation have representation from all approvals and consider the interfacing of risks.
- External organisations participate in SMS activities and share safety information.
- Evidence of collaboration across external interfaces e.g. meetings at an Aerodrome involving interfacing agencies such as Aerodrome management, ATC, Operators, Gnd Handlers etc.
- Interfacing organisations proactively support each other's occurrence investigations.

Example Markers	Present	Suitable	Operating	Effective
	Collaboration across the interfaces is defined and documented.	Any contracts associated with interfaces define the safety critical nature of the interfaces; the requirements to share information and the need to appropriately feed the Hazard Identification and Risk Assessment (HIRA), including any subsequent mitigations. Meetings to discuss risk management involving stakeholders from all interfacing organisations are planned.	There is evidence of routine cross interface collaboration, through meetings, with the sharing of safety information and actions accordingly. Interfacing organisations contribute openly to each other's investigations when required.	Interfacing organisations share relevant safety information openly, promoting mutual advancement of the interfacing safety culture.

Organisation Assessment	P	S	O	E
	☐	☐	☐	☐

CAA Assessment	P	S	O	E
	☐	☐	☐	☐

6 Compliance

6.1 Compliance Monitoring

A function to monitor compliance of the Organisation with the relevant requirements and the adequacy of procedures, has been established. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions, as necessary.

6.1.1 Compliance Responsibilities and Accountabilities

Responsibilities and accountability for ensuring compliance are defined for all staff and applicable requirements are clearly identified in the Organisation's manuals and procedures.

Annex 19 Reference

Appendix 2

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

d) accountability, responsibilities and authorities for SMS processes and procedures.

Regulatory References

RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION OR*.GEN.205 and OR*.GEN.200 (a) (6), ADR.OR.D.005 (b) (11), ATM/ANS.OR.B.020 and ATM/ANS OR.B.007 (c), ATCO.OR.C.010 (b) and ATCO.OR.C.001 (f), CAMO.A.150, CAMO.A.200(a)(6), CAMO.A.305(a)(4), 21.A.139(e), 21.A.239(e), 145.A.30(b)(2), 145.A.95, 145.A.200(a)(6),

What to Look For?

- Review how senior management ensure the Organisation remains in compliance.
- Review that job descriptions include responsibilities for compliance.

Example Markers	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.	Interfaces and contracts with (or requirements cascaded to) any external organisation(s), having a significant contribution to safety addresses the need for ensuring compliance to Safety requirements; responsibilities and accountability are also 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.	Individuals are proactively identifying and reporting potential non-compliances, under the protection of an engaged (Just) culture. Data is analysed and used to drive enhancements to processes and procedures.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

6.1.2 Compliance Focal Point(s)

Responsibilities and accountabilities for compliance monitoring are defined and there is a person or group of persons with responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the Accountable Manager.

Annex 19 Reference

Appendix 2

1.2 The service provider shall:

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;

Regulatory References

RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION OR*.GEN.205 and OR*.GEN.200 (a) (6), ADR.OR.D.005 (b) (11), ATM/ANS.OR.B.020 and ATM/ANS OR.B.007 (c), ATCO.OR.C.010 (b) and ATCO.OR.C.001 (f), CAMO.A.150, CAMO.A.200(a)(6), CAMO.A.305(a)(4), 21.A.139(e), 21.A.239(e), 145.A.30(b)(2), 145.A.95, 145.A.200(a)(6),

What to Look For?

- Review how the compliance monitoring manager interacts with senior management; line managers; the safety management staff.
- 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.

Example Markers	Present	Suitable	Operating	Effective
	The Compliance Monitoring Team and its role is defined and documented. There is a nominated Compliance Manager with direct access to the Accountable Manager. The Accountable Manager's accountability and responsibility for compliance is defined and understood.	Independence of the compliance monitoring audit function is achieved.	The Compliance Monitoring Manager has implemented and is maintaining a compliance monitoring programme appropriate to the size and scope of the Organisation. The accountable manager is ensuring that there are sufficient compliance monitoring resources; and independence of the audit function is being maintained.	Feedback on performance is provided to the Accountable Manager and other senior Managers (Ref: 6.1.4) There is evidence of Compliance Monitoring performance data being used to drive resource management appropriately.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

6.1.3 Monitoring Programme

There is a compliance monitoring programme including details of the schedule of monitoring activities and procedures for audits and inspections, reporting, follow up and records.

Annex 19 Reference

Appendix 2

2.2 The service provider shall develop and maintain a process that ensures analysis, assessment, and control of the safety risks associated with identified hazards. (Safety Data)

Regulatory References

RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION OR*.GEN.205 and OR*.GEN.200 (a) (6), ADR.OR.D.005 (b) (11), ATM/ANS.OR.B.020 and ATM/ANS OR.B.007 (c), ATCO.OR.C.010 (b) and ATCO.OR.C.001 (f), CAMO.A.150, CAMO.A.200(a)(6), CAMO.A.305(a)(4), 21.A.139(e), 21.A.239(e), 145.A.30(b)(2), 145.A.95, 145.A.200(a)(6),

What to Look For?

- Review the programme and whether it is being achieved.
- Review how risk/performance is used to determine the depth and frequency of CM activity.
- Review how independence is achieved.
- Assess what triggers a change in the programme.
- Review whether there are any potential conflicts of interest.

Example Markers	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. SMS compliance and effectiveness of its processes is reviewed on a regular basis with evidence of the data/findings driving improvement (Ref: 6.1.4)

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐

6.1.4 Compliance Monitoring Performance and Outcomes

Compliance Monitoring ensures that there is appropriate analysis of causal factors, and that corrective actions and preventive actions are taken.

Annex 19 Reference

Appendix 2

2.2 The service provider shall develop and maintain a process that ensures analysis, assessment, and control of the safety risks associated with identified hazards. (Safety Data)

Regulatory References

RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION OR*.GEN.205 and OR*.GEN.200 (a) (6), ADR.OR.D.005 (b) (11), ATM/ANS.OR.B.020 and ATM/ANS OR.B.007 (c), ATCO.OR.C.010 (b) and ATCO.OR.C.001 (f), CAMO.A.150, CAMO.A.200(a)(6), CAMO.A.305(a)(4), 21.A.139(e), 21.A.239(e), 145.A.30(b)(2), 145.A.95, 145.A.200(a)(6),

What to Look For?

- Review how causal analysis is conducted.
- 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.
- Evidence that the outputs from compliance monitoring are fed into the SMS.

Example Markers	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.	Preventative or corrective actions generated through Compliance Monitoring are assigned to an accountable individual and proactively managed to conclusion. There are processes in place to ensure links between Compliance Monitoring and Risk Management outcomes. Compliance monitoring includes contracted activities and interfacing organisation.	The identifying and follow-up of corrective and preventive actions is conducted 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. There is regular communication between compliance monitoring staff and staff involved in other SMS activities.	The organisation investigates the systemic causes and contributing factors of findings, associating them with the hazard identification and risk management. 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.

Organisation Assessment	P	S	O	E	CAA Assessment	P	S	O	E
	☐	☐	☐	☐		☐	☐	☐	☐