Initial audit – what to look for:

Safety risk management and compliance monitoring

European Union Aviation Safety Agency
EU-ASEAN Sustainable Connectivity Package Aviation Partnership Project
(EU-ASEAN SCOPE APP)
This project is funded by the European Union and implemented by
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European Union Aviation Safety Agency

Safety risk management and compliance monitoring

guidance

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Management System (ORA.GEN.200 Management system)

→ The organization shall establish, implement and maintain a management system that includes:

- clearly defined lines of responsibility and accountability throughout the organization,
- a description of the overall philosophies and principles of the organization with regard to safety, referred to as the safety policy;
- the identification of aviation safety hazards entailed by the activities of the organization, their evaluation and the management of associated risks.

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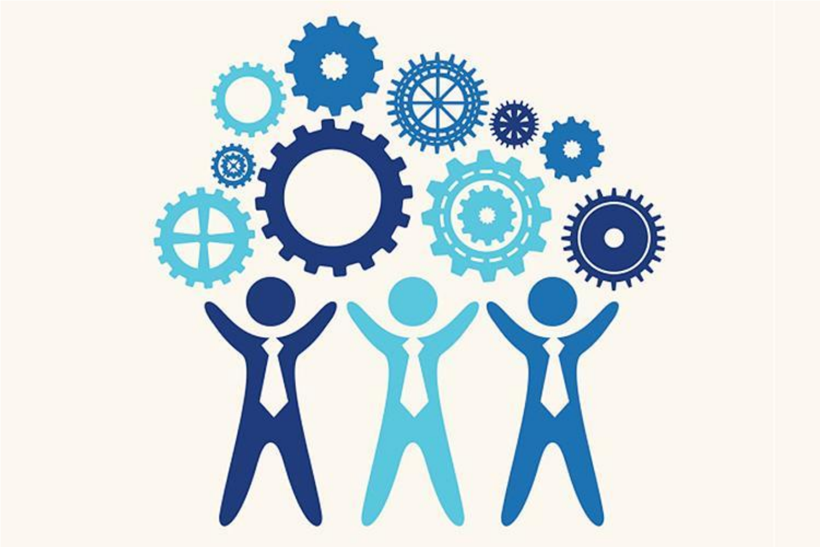
Management System

- Maintaining personnel trained and competent to perform their tasks;
- documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
- a function to monitor compliance of the organization with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
- any additional relevant requirements prescribed in National Regulation.

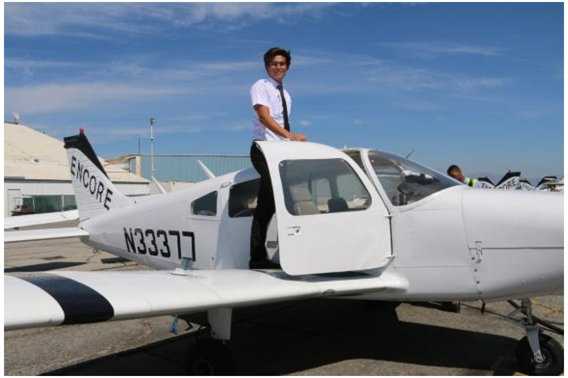
Size

→ The management system shall correspond to the size of the organization and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.



No complex organization

- In an organization providing training only for non commercial license and the associated ratings or certificates, safety risk management and compliance monitoring may be accomplished by an organizational review.
- The competent authority shall be notified about the results of this review by the organization without undue delay.

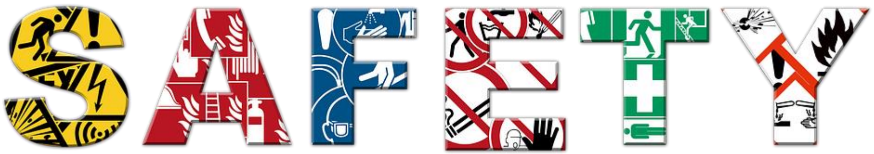


Complex organization

→ The management system of an organization should encompass safety by including a safety manager and a safety review board in the organizational structure.

Safety Manager

- The safety manager should act as the focal point and be responsible for the development, administration and maintenance of an effective safety management system
- Depending on the size of the organization and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel but he7she remain always the focal point for the organization and the CAA

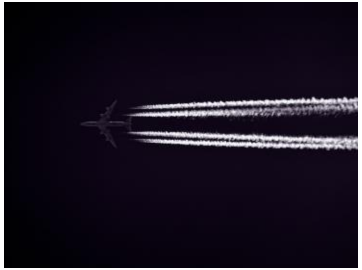


Function of SM

- → facilitate hazard identification, risk analysis and management;
- → monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;
- → provide periodic reports on safety performance;
- → ensure maintenance of safety management documentation;

Just colture

- A “just culture” reporting environment within aviation organizations it is an objective for all CAA, regulators and investigation authorities.
- This effective reporting culture depends on how those organizations handle blame and punishment.
- Under “Just Culture” conditions, individuals are not blamed for ‘honest errors’, but are held accountable for willful violations and gross negligence.

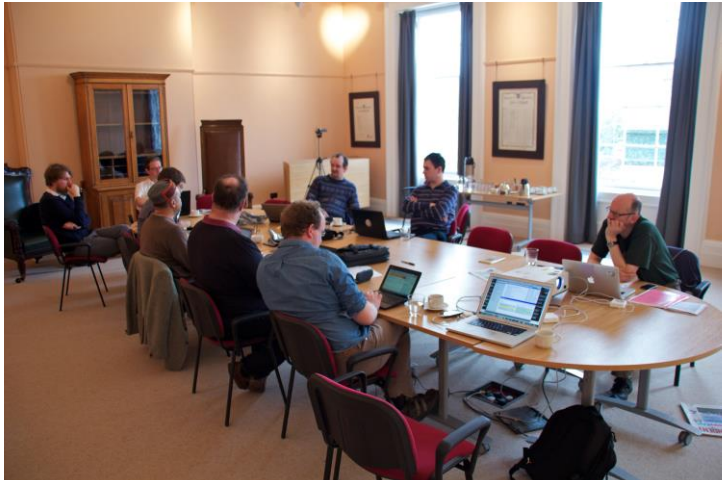


Safety review board

- The Safety review board should be a high level committee
- The board should be chaired by the accountable manager and be composed of heads of functional areas.

Safety review board

- The safety review board should monitor:
- safety performance against the safety policy and objectives;
- that any safety action is taken in a timely manner;
- the effectiveness of the organization's safety management processes.

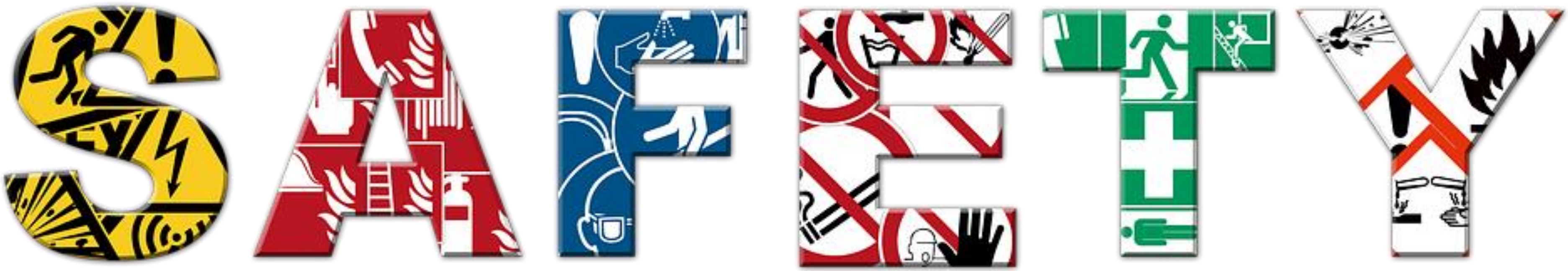


Safety Policy

- The safety policy is the means whereby the organization states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimize its contribution to the risk of an aircraft accident as far as is reasonably practicable.
- The safety policy should state that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.

Example of safety policy

→ Let’s see some example of safety policy in aviation



SAFETY RISK MANAGEMENT (AMC1 ORA.GEN.200(a)(3) Management system

→ Hazard identification processes

- Reactive and proactive schemes for hazard identification should be use.
- All reporting systems, including confidential reporting schemes, should include an effective feedback process.

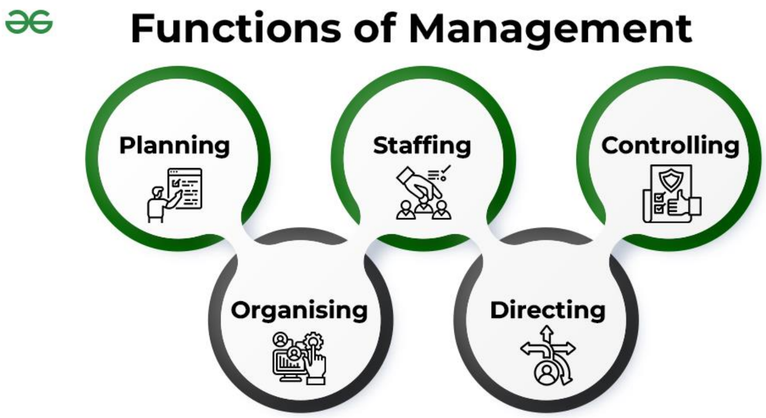
SAFETY RISK MANAGEMENT

→ Risk assessment and mitigation processes

- A formal risk management process should be developed and maintained
- The levels of management who have the authority to make decisions regarding the tolerability of safety risks, should be specified.

SAFETY RISK MANAGEMENT

- Internal safety investigation
- Safety performance monitoring and measurement



The management of change

- The organization should manage safety risks related to a change.
- The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety.

SAFETY RISK MANAGEMENT

- Continuous improvement
- The emergency response plan (ERP)
- Internal Occurrence Reporting Scheme
- Approved Training Organizations - Risk Management of Flight Operations With Known or Forecast Volcanic Ash Contamination

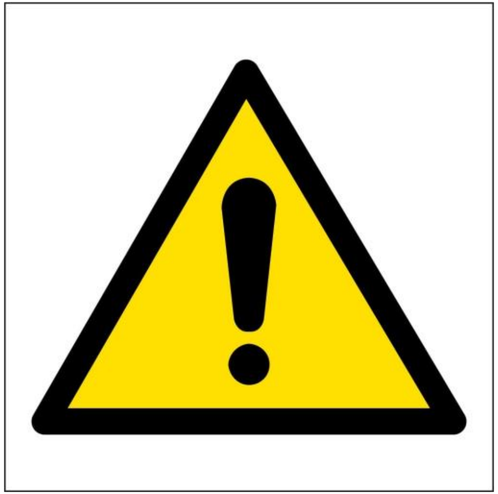
SMS Evaluation

- The SMS evaluation is designed to assess the compliance and performance of an organization's SMS.
- The organization must be able to demonstrate that the necessary structures, accountabilities, policies and procedures are in place and it is managing its risks effectively.
- The scope of the evaluation will take into account the size, nature and complexity of the approved organization.

SMS Evaluation

- When looking at an organisation's SMS, it is important to consider the risks faced by the organization that sit outside its direct control
- i.e. third party contracted organisations and how these risks are being managed and controlled by those external organisations.

Example of hazard list (ORA.GEN.200 Management system (3)



Occurrence reporting

ORA.GEN.160

→ As part of its management system, the organization shall establish and maintain an occurrence-reporting system, including mandatory and voluntary reporting.

COMPLIANCE MONITORING (ORA.GEN.200)

- The implementation and use of a compliance monitoring function should enable the organization to monitor compliance with the relevant requirements set in the regulation.
- The organisational set-up of the compliance monitoring function should reflect the size of the organization and the nature and complexity of its activities

COMPLIANCE MONITORING (ORA.GEN.200)

- The Accountable Manager should designate a Compliance Monitoring Manager to ensure that the activities of the organization are monitored for compliance with the applicable regulatory requirements, the requirements established by the organization, and that these activities are being carried out properly under supervision of the relevant personel.

COMPLIANCE MONITORING (ORA.GEN.200)

- Organizations should monitor compliance with the procedures they have designed to ensure safe activities. In doing so, they should as a minimum, and where appropriate, monitor:

- privileges of the organization;
- manuals, logs, and records;
- training standards;
- management system procedures and manuals

Changes to organizations ORA.GEN.130

→ Any change affecting:

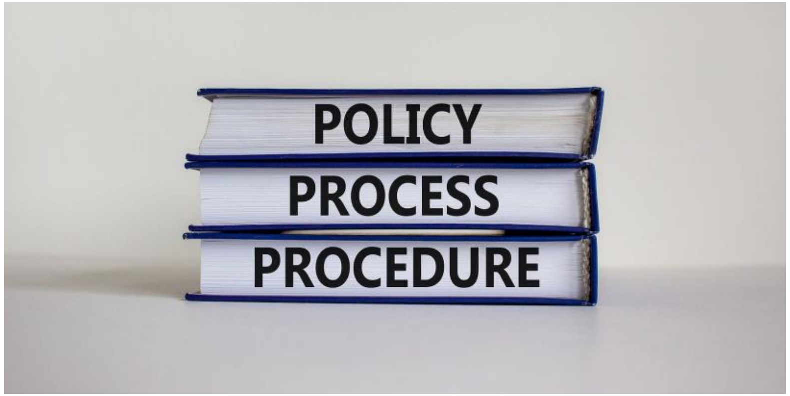
- the scope of the certificate or the terms of approval of an organization; or any of the elements of the organization's management system
- shall require prior approval by the competent authority.

Prior approval and acceptance

- For the continuous validity of the organization certifications, it is the responsibility of the Compliance Monitoring Manager to inform the Authority at least 30 days before the change implementation (or 10 days in case of an unplanned change of a nominated person) of any change which requires prior approval.
- Such changes can be implemented only after having received a formal Authority approval.

Prior approval procedure

- → The ATO CMM will issue a procedure to request a change requiring prior approval
- → The procedure must be approve by the authority and any change in the procedure itself require an approval.



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Example

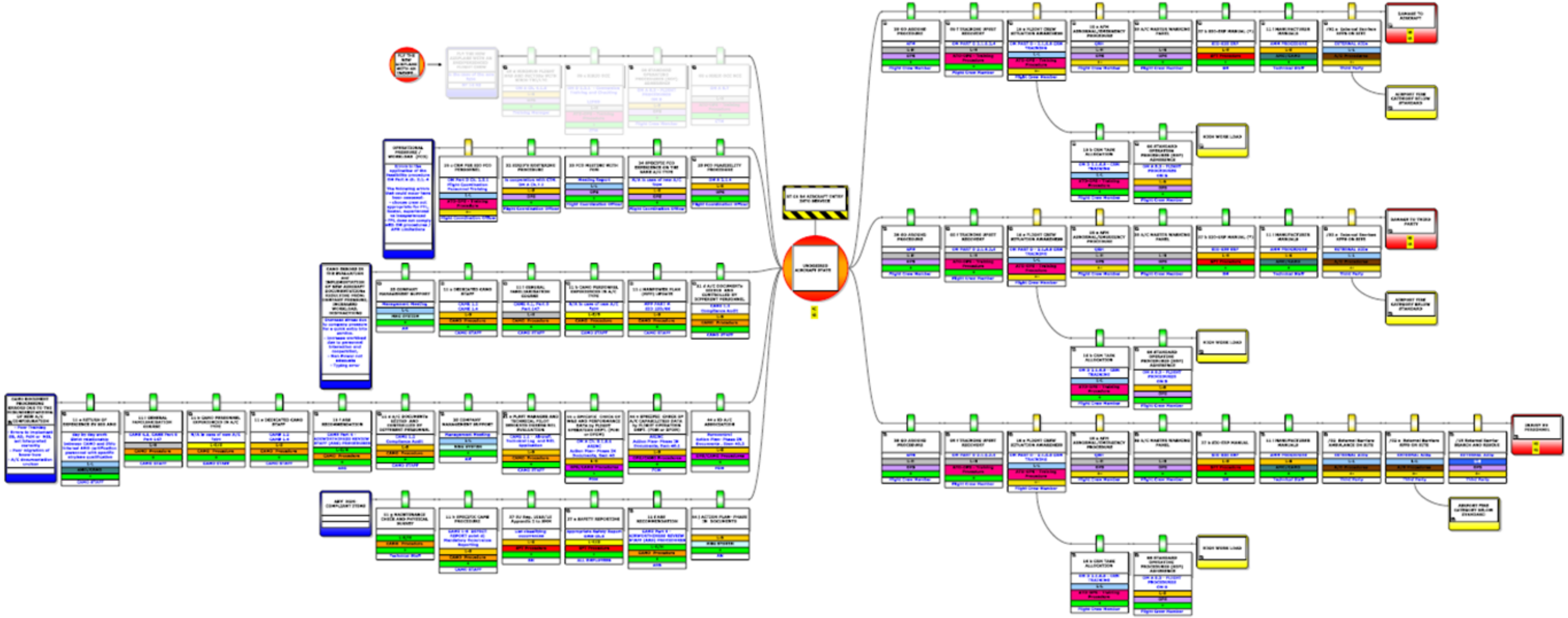
- Process Description:
- Amendments are to be processed and verified for compliance and risk assessment before new changes are submitted to the CAA for approval.
- The owner of the document affected by the amendment will start the process.
- The amendment draft is then transmitted to the Safety Manager and the CMM.

Example

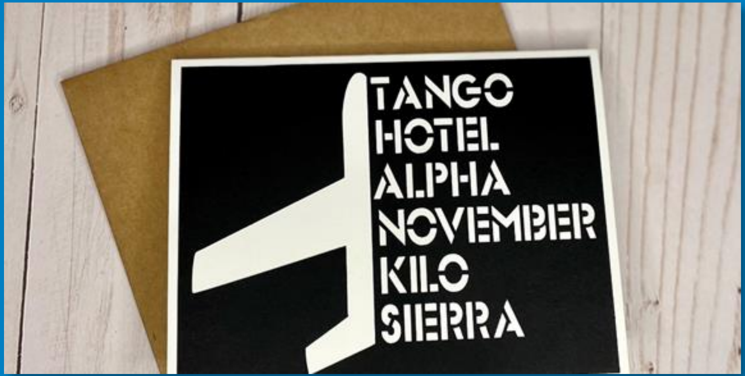
- The SM will produce a Management of Change and the CMM a compliance verification. Once these steps are completed, the Compliance Manager will apply to the Authority the approval request.
- When the approval is given, the CMM will update the affected manuals repository including the valid latest manual revisions and proceed with internal distribution of the affected document.

Manual of approval ATO

- Example of prior approval procedure…



Global Gateway



Thank you very much for your attention and patience

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