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| **AUDIT INFORMATION** |
| **Audit Title:** | **SMS Assessment- Evaluation** | **Date:** |  |
| **Organisation:** |  | **Certificate Number (if available)** |  |
| **Post Holder / Nominated Personnel Name: Assigned to****the Audit** |  | **Title:** |  | **Present ☐** | **Absent ☐** |
| **Delegated / Representative:** |  | **Title:** |  |
| **Interviewees and position:** |  |  |
| **CAA Lead Inspector – Name:** |  | **Compliance** ☐ | **Oversight** ☐ |
| **CAA Inspectors – Name:** |  |
| **AUDIT CRITERIA** |
| **Applicable Regulations:** | CAR 100CAR ORA GENICAO ANNEX 19 APPENDIX 2ICAO Doc 9859 | **Other Applicable Regulations****(Safety Alert, Safety Decision, Safety Notices)** | CAD 02-04 |
| **Applicable Manual - Ref.** |  | **Version / Revision Number:** |  |

**INTRODUCTION**

This checklist/tool evaluates the overall effectiveness of the SMS; as a function of both compliance and performance assessment / evaluation, through a series of indicators[1](#_bookmark0) based on CAR 100, CAR OPS and ICAO Annex 19 and ICAO Safety Management Manual (doc 9859)[2](#_bookmark1) and is organised by the ICAO SMS Framework. Each indicator should be reviewed to determine whether it is *Present*, *Suitable*, *Operating,* or *Effective*, using the definitions and guidance set out below.

This concept of evaluating SMS effectiveness supports the move from traditional, compliance-based oversight to performance-based oversight that focuses on how the SMS is performing. It provides a common baseline for SMS effectiveness evaluation that creates a sound basis for mutual acceptance of SMS.

1 The use of the term *indicator* in this tool should not be confused with the term “Safety Performance Indicator” used in Annex 19.

2 ICAO Doc-9859 Safety Management Manual

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

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

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

**HOW AND WHEN THE TOOL IS USED**

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

# Initial certification/implementation

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

# Continuing oversight

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

As an organisation’s Safety Management System/SMS processes mature and it evolve into ‘Operating’ and ‘Effective’ this may also require subsequent review of the ‘suitability’ criteria. Changes to an organisation’s approval may also require a reconsideration of the suitability of the SMS processes. If when significant changes take place the CAA may determine the need to review the existing assessment to ensure it is still in compliance.

# Applicability

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

This tool has been modified to capture the CAR 100 Safety Management System/SMS requirements.

# Definitions

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

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

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

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

For Present, Operating and Effective a ‘word picture’ is included to help the inspector determine the correct level. The word picture for ‘Suitable’ may not apply to all organizations, as this is specific to the individual organisation and impossible to define for all types and sizes of organisations. It is the responsibility of the organisation to determine the suitability and to justify to the CAA Inspectors who will then assess it.

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

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

# Credit for other oversight activities

Valuable information about Safety Management System/SMS effectiveness can be gained from other oversight activities. This may include such activities as routine compliance audits and inspections, occurrence investigations and meetings with the organisation. This should be taken into consideration by the inspector through liaison with other inspectors involved in the oversight of the organisation.

# Reduction of oversight frequency

In the context of performance-based oversight, the CAA will reduce the oversight frequency to 24 months for some organisations on the following basis:

1. the organisation has demonstrated an effective Safety Management System/SMS;
2. the organisation has continuously demonstrated under CAR 100, that it has full control over all changes;
3. no level 1 findings have been issued; and
4. all corrective actions have been implemented within the time period accepted or extended by the CAA.

# Organizations with multiple certificates

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

**TOOL GUIDANCE**

This tool assesses the compliance and effectiveness of the Management System/SMS through a series of features based on ICAO Annex 19 Second Edition and CAR 100

- Safety Management System requirements for organisations with relevant cross reference to CAR-ORA SMS requirements. It is set out using the 12 elements of the ICAO SMS Framework and some additional Management System requirements. Each feature should be reviewed to determine whether the feature is present, suitable and operating and effective, using the definitions and guidance set out below.

The tool is partially completed by the organisation (Present, Suitable and Operating) to assess itself and by the CAA Inspector to verify and validate the organisation’s assessment.



***Definitions used in the tool***

**Present (P): ** There is evidence that the relevant indicator is documented within the organisation’s SMS documentation.

**4**

**Suitable (S):** The relevant indicator is suitable based on the size, nature, and complexity of the organisation and the inherent risk in its activity.

**7c**

**4**

**Operating (O):** There is evidence that the relevant indicator is in use and an output is being produced.

**4**

**7d**

**Eﬀective (E):** There is evidence that the relevant indicator is achieving the desired outcome and has a positive safety impact.

**4**

**7e**

Generally, *Present* and *Suitable* are used for initial approval or certiﬁcation. *Operating* and *Eﬀective* are expected to be found in a functioning SMS.

Due to the continuously changing and dynamic nature of aviation, during ongoing or subsequent evaluations the *Suitable* designation should be re-evaluated considering any changes to the organisation and its activities.

An item cannot be considered *Operating* or *Eﬀective* if it is not *Present* and it cannot be considered as *Present* if it is not documented—documentation ensures consistent repeatable and systematic outcomes.

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

**7a**

This column guides the inspector when looking at each individual feature and is not meant to be a checklist. The items listed are not specific to an individual PSOE level but remind the inspector of areas they may want to consider to look at.

# Level of detail to be recorded

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

# Findings and observations

For the initial certification, all the processes should be present and suitable. If any are not then the deficiencies should be raised as findings and approval should not be granted. After initial certification, during the assessment if a process is found not to be operating, a finding should be raised.

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

The completed assessment tool with the CAA detailed comments from the assessment should be provided to the organisation along with a report that captures any findings and observations to assist in continuous improvement of the SMS and support a positive safety culture at a State level.

# Scoring the Safety Management System/SMS assessment

The main objective of the assessment tool is to assist the CAA assess the Safety Management System/SMS for effectiveness in a consistent and quantifiable manner. Scoring is not intended to be used as a pass / fail criterion but to help assess the maturity of the SMS as a benchmark against other organisations and to aid in continuous improvement. Scoring is exponential so that a higher score is achieved for being Effective to encourage organisations to strive to achieve that level for their processes. A minimum score of 75% in each component of the Safety Management System/SMS must be achieved for the SMS to be declared effective.

# Assessment of Just Culture

When carrying out the SMS assessment the Inspector should be sensitive to the organisation’s just culture when sampling documents for evidence. This is especially important when looking at safety investigations and reporting systems. This may be achieved by asking the organisation to remove any sensitive information from documents or by the assessor applying just culture principles to any documents they review. This should also include avoiding detailing names of individuals interviewed during the SMS assessment and only recording the position of those individuals i.e. ‘Safety Manager’ or ‘a flight crew member’ etc.

# Recommended Audit Sequencing

Although the SMS assessment tool follows the ICAO Annex 19 SMS framework structure there are benefits from starting the assessment with Safety Risk Management followed by Safety Assurance as these are the core activities of an effective SMS. This will ensure an appropriate allocation of time is given to these 2 components and their elements. In sequencing the assessment in this way many of the aspects of Safety Policy and Objectives will be revealed during the first 2 components and can be credited.

# Instructions for completion:

Although the evaluation tool follows the SMS Framework in Annex 19, the order of the components has been changed to start with Safety Risk Management. This is considered the most important component of an organisation’s SMS and should therefore be given the most attention during the evaluation. In addition, a section dedicated to interface management has been added, to reﬂect Annex 19[3](#_bookmark2).

3ICAO Annex 19

However, users of the tool may choose to customise the order of the components to align it with the order of Annex 19. During the evaluation, the user may choose to start with any of the components due to the availability of personnel or resources, or to focus on a speciﬁc concern.

Users may decide to customise the evaluation tool to:

* Reﬂect organisational requirements;
* Reﬂect national SMS requirements or terminology; and/or
* Address a speciﬁc need that has been identiﬁed through the State Safety Programme (SSP).

The layout of this tool is shown below, with an accompanying legend deﬁning the purpose of each box.

1. **SAFETY POLICY AND OBJECTIVES**
	1. **MANAGEMENT COMMITMENT**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.1 (e)2.1.1 (g) | The service provider shall define its safety policy in accordance with CAR 100. The safety policy shall:e) be signed by the accountable executive of the organizationg) be periodically reviewed to ensure it remains relevant and appropriate to the service provider |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a safety policy, signed by the Accountable Manager, which includes a commitment to continuous improvement; observes all applicable legal requirements and standards; andconsiders best practices. | The safety policy is easy to read. The content is customised to the organisation. | The safety policy is reviewed periodically to ensure it remains relevant to the organisation. | The Accountable Manager has a clear understanding of the safety policy and is fully engaged in implementing it. The policy is periodically reviewed. |
| **Assessment results** |
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| **What to look for** |
| * Interview the Accountable Manager to assess his/her knowledge and understanding of the safety policy.
* Check evidence that the Accountable Manager takes informed decisions in accordance with the safety policy.
* Confirm the safety policy is relevant and meets applicable regulations.
* Check that ‘safety’ is key to the policy and remains a highest priority.
* Interview staff to determine to what extent the safety values and objectives from the safety policy are known, as well as how readable and understandable they are.
* Check evidences that all employees and key stakeholders contribute to the safe operations of the system in accordance with the safety policy.
* Check that the safety policy is reviewed periodically for content and currency.
* Check that the safety policy includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 1.1.1 (a) | ORA.GEN.200 (a) (2) - (a) (5) - (a) (6) |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.1 (b) | The safety policy shall:b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The safety policy includes a statement to provide appropriate resources. | There is a process for assessing resources and addressing any shortfalls; needs are discussed at the right level of management.Volume and significance of the contracted activities (to and from) are properly factored for the determination of the resources to deliver safe operations.Appropriate resources are allocated in the case of multiple approvals, factoring the complexity of the operations. | The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls. | The organisation is reviewing and taking action to address any forecasted shortfalls in resources. Needs are anticipated and forecasted, notably using the principles of the ‘management of changes’. |

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| **Assessment results** |
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| **What to look for** |
| *Note 1: the focus here is on ‘resources’ to achieve the safety objectives and managing key safety risks correctly. Knowing that resources are not unlimited, this item should be reviewed within a safety-performance context, notably on the availability of resources on the most important safety activities. Safety risk management is decision making to balance safety enhancement, available resources to develop it, and optimised ways of working.**Note 2: ‘resources’ here is not limited to the “human resources” as it may also include financial resources, tools, documentation and processes etc.**Note 3: the safety policy should contain a clear statement about the provision of the necessary resources. Its detailed implementation can be found in another document.** Review available, appropriate resources including staff, equipment, and finance.
* How does the organisation manage resources by anticipating and addressing any shortfalls?
* Are there sufficient and competent personnel? How does the organisation assess it?
* Review targeted resources vs actual resources.
* Check whether the resources are discussed with the Accountable Manager or during SRB meeting (or equivalent), as appropriate.
* Guarantee that strategy is not only defined according to the current resources but is also based on the needed resources and ways of working to appropriately mitigate the key safety risks.
* Check whether any fatigue issues, lack of resources, human performance weaknesses are reported, notably through the internal safety reporting scheme.
* Where applicable, check implementation of FRMS, FTL etc.
* Check whether the principles of ‘management of changes’ are applied to anticipate the resources in case of changes.
* Assess the situation when the organisation holds multiple approvals.
* Check the need for Safety Action Group(s) to assist or act on behalf of the safety Manager or the SRB
* If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review whether the resources allocated by the CAMO meet the needs of the different operators involved and are suitable for the continuing

airworthiness management of all the aircraft they operate. |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 1.1.1 (b) | ORA.GEN.200 (a) (2) (b), (3) - provide appropriate resources ORA.GEN.210 (c) - sufficient qualified personnel for theplanned tasks |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.1 (f) | The safety policy shall:f) be communicated, with visible endorsement, throughout theorganization |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a means in place for the communication of the safety policy and its associated objectives.The management commitment to safety is documented within the safety policy. | The safety policy and its associated objectives are clearly visible (or reachable) to all staff (e.g. consider multiple sites, countries).The safety policy is understandable (consider multiple languages). | The safety policy and its associated objectives are communicated to all personnel (including relevant contracted staff and organisations). The Accountable Executive and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safetymanagement system. | People across the organisation are familiar with the safety policy and its associated objectives and can describe their obligations in respect of the safety policy and the internal safety reporting scheme. |
| **Assessment results** |
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| **What to look for** |
| *Note: The safety policy shall give birth to safety objectives to be part of the assessment (see specific block on ‘safety objectives)’.** Review how the safety policy is communicated.
* Safety policy is clearly visible (or reachable, depending on the structure and size of the organisation) to all staff including relevant contracted staff and third-party organisations.
* Question managers and staff regarding knowledge of the safety policy and its associated objectives.
* All managers are familiar with the key elements of the safety policy and its associated objectives.
* Evidence that senior management involved in safety activities participate to safety meetings, training, conferences, etc.
* Check how a positive safety culture is encouraged and impacts the overall effectiveness, notably for the safety reporting system and the actions thereof.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 1.1.1(f) | ORA.GEN.200. (a)(3) - be communicated, with visibleendorsement, throughout the organization |  |

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|  | ORA.GEN.200. (a)(4)- include safety reporting principles ORA.GEN.200.(a)(5) - documentation of all management system key processes, including a process for making personnel awareORA.GEN.160.(a) -Safety Reporting program including theATO |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.1 (a)2.1.1 (c) | The safety policy shalla) reflect organizational commitment regarding safety, including the promotion of a positive safety culture. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The safety policy is documented including the promotion of a positive safety culture.The safety policy highlights the primary responsibility for safety of all employees to proactively manage risks.The safety policy contains the main attributes of a positive safety culture, including a commitment to safety leadership and to a Just Cultureacross the organisation. | The safety policy describes the commitment of all relevant staff involved in safety activities.A standard code of ethics or behaviour is documented and appropriate to the type of safety activities. | The safety policy and associated positive safety culture are operationally implemented and promoted at working level by the Accountable Manager and the key managers involved in safety activities. | The safety policy, its implementation and commitment are reviewed with the Accountable Manager and senior management on a regular basis.The organisational commitment to safety addresses interactions with key external stakeholders.The internal safety reporting scheme is known and used without fears of reprisal. |
| **Assessment results** |
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| **What to look for** |
| * The managers involved in safety activities are familiar with the key elements of the safety policy and its associated objectives, including the positive safety culture.
* Senior management involved in safety activities are effectively involved in the (safety) management system and proactively managing safety policy, positive safety culture and objective processes set forth by the organisation to proactively manage risks.
* Evidence of senior management participation in safety meetings, training, conferences etc. where positive safety culture is promoted.
* Evidence of proactive behaviours by the managers involved in safety activities, demonstrating continuous leadership and continuous improvement.
* Relationship building with Competent Authorities and other key stakeholders (e.g. feedback, trust, exchange of information).
* Feedback from safety surveys that include specific just culture aspects. Confirmation that the internal safety reporting scheme is known and used without fears of reprisal.
* Review how a positive safety and just culture are promoted.
* Evidence that people do not fear to report in respect of the internal safety reporting scheme.
* Note: SMICG proposes an Industry Safety Culture Evaluation tool.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.1.1 (a)** | ORA.GEN.200 (a) (2) (b) (5) - not to blame someone for reporting something which would not have been otherwisedetected |  |

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| **CAR 100****Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.1 (c)2.1.1 (d)AMC1 to 2.1.2(a)(d) | The safety policy shall:d) Clearly indicate which types of behaviors are unacceptable related to the service provider’s aviation activities and include the circumstances under which disciplinary action would not apply. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| A just culture policy and principles have been defined. | The just culture policy (or in any other related document) clearly identifies acceptable and unacceptable behaviours. The principles ensure that the policy can be applied consistently across the wholeorganisation. | There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff. | The Just Culture policy is applied in a fair and consistent manner and people trust the policy.There is evidence that the line between acceptable and unacceptable behaviour |

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|  | The just culture policy and principles are understandable and clearly visible (or reachable).Decision-making process related to the implementation of the just culture is designed according to the size of the organisation (e.g. involvement of staff representatives, staff Committee, Unionsetc.) |  | has been determined in consultation with staff and staff representatives. |
| **Assessment results** |
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| **What to look for** |
| * Check that guidance and governance are developed on how to apply the just culture policy
* Evidence of when the just culture principles have been applied following an event.
* Evidence of interventions from safety investigations addressing organisational issues rather than focusing only on the individual.
* Review how the organisation is monitoring reporting rates.
* The number of aviation safety reports appropriate to the activities.
* Safety Reports include the reporter’s own errors and events they are involved in (events where no one was watching).
* Feedback on just culture from staff safety culture surveys.
* Interview staff representatives to confirm that they agree with just culture policy and principles.
* Talk to staff to check they are aware of the just culture policy and principles.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.1.1 (d)** | GM1 ORA.GEN.200 (a) (2) - not to apportion blame toindividuals |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| GM to 2.1.1 (b),2.1.1 (g)AMC1 to 2.1.2 (a)(b) | Taking due account of its safety policy, the service provider shall define safety objectives.The safety objectives shall:1. form the basis for safety performance monitoring and measurement as required by 2.3.1.
2. reflect the service provider’s commitment to maintain or continuously improve the overall effectiveness of the SMS.
3. be communicated throughout the organization.
4. be periodically reviewed to ensure they remain relevant and appropriate to the service provider.
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| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the organisation. | Safety objectives are relevant to the organisation and its activities. They are monitored by the right level of (senior) managersSafety objectives are understandable and clearly visible.Safety objectives are aligned with the SSP and/or NASP, when appropriate. | Safety objectives are being regularly reviewed and are communicated throughout the organisation. They are monitored through the Safety Review Board (or equivalent) and adjusted, when needed. | Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met. Associated qualitative and quantitative measures are in place.Safety objectives are not only aligned with the SSP and/or NASP, but they are also compared with those of the risk profile sector. They are updated based on the latest relevant safety information available. The organisation is sometimes involved in the elaboration of the SSP and/or NASP. Continuous improvement of safety is effectively measured. |

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| **Assessment results** |
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| **What to look for** |
| * Assess whether the safety objectives are appropriate and relevant.
* Through the safety performance measurement and monitoring, check whether the Safety objectives are being measured to monitor achievement through qualitative and quantitative means, such as SMART SPIs and SPTs. Check whether the safety objectives, as a minimum, target ‘continuous improvement’.
* Check the minutes of the Safety Review Board (or equivalent) how the safety objectives are monitored.
* Objectives are defined that will lead to an improvement in processes, outcomes, and the development of a positive safety culture.
* Assess how safety objectives are communicated throughout the organisation. Check how these safety objectives as well as their associated metrics are visible (or reachable) to all staff involved in safety activities.
* Assess if the safety objectives have considered relevant documentation such as Industry sector risk profiles, State risk profiles, State safety objectives in the SSP and/or the NASP (National Aviation Safety Plan) and/or RPAS (Regional Plan for Aviation Safety).
* Assess whether/how the outcome of the oversight internally and externally impacts the determination and monitoring of the safety objectives.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 1.1.2 | ORA.GEN.200 (a) (2) (c) (3) - and establish safety objectives and performance standardsORA.GEN.200 (a) (3) (d) - Safety performance monitoring and measurement |  |
| **SUMMARY COMMENTS BY CAA:****1.1 MANAGEMENT COMMITMENT** |
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* 1. **SAFETY ACCOUNTABILITY AND RESPONSIBILITIES**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.2 (a)AMC1 to 2.1.2 (a) - (b), (c), (d) | The service provider shall:a) identify the accountable executive who, irrespective of other functions, is accountable on behalf of the organization, for theimplementation and maintenance of an effective SMS. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| An accountable manager has been appointed with full responsibility and ultimate accountability for the SMS. | The Accountable Manager has control of resources.In case of several approvals, the designation of the ‘Accountable Manager’ will reflect the governance structure, such as different SMS in each domain (with interfaces) or corporate SMS. | The Accountable Manager ensures that the SMS is properly resourced, implemented and maintained and has the authority to stop the operation if there is an unacceptable level of safety risk.The Accountable Manager is fully aware of his/her SMS roles and responsibilities.The Accountable Manager is accessibleto the staff in the organisation. | The Accountable Manager ensures that the performance of the SMS is being monitored, reviewed and improved.Beyond his/her SMS roles and responsibilities, the Accountable Manager continuously promotes the safety policy, safety standards, and safety culture of the organisation. |
| **Assessment results** |
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| **What to look for** |
| * Evidence that the Accountable Manager has the authority to provide sufficient resources for relevant safety improvements.
* Evidence that the Accountable Manager is fully aware of their SMS roles and responsibilities.
* Evidence of decision making on risk acceptability.
* Review SMS activities are being carried out in a timely manner and the SMS is sufficiently resourced.
* Evidence of activities being stopped due to unacceptable level of safety risk.
* Look for evidence that Accountable Manager actions are consistent with the active promotion of a positive safety culture within the organisation.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.2 (a)** | ORA.GEN.200(a)(1) - safety accountability of the accountable managerAMC2 ORA.GEN.200(a)(5) (b) (3) - Safety accountability of the accountable managerORA.GEN.210 - maintaining an effective management system |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.2 (b)2.1.2 (c)2.1.2 (d2.1.2 (e) | The service provider shall:1. clearly define lines of safety accountability throughout the organization, including a direct accountability for safety on the part of senior management,
2. identify the responsibilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the organisation,
3. document and communicate safety accountability, responsibilities, and authorities throughout the organization,
4. define the levels of management with authority to make decisions

regarding safety risk tolerability. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The safety accountability, authorities and responsibilities are clearly defined and documented. | Key safety roles have been identified for safety accountability, authorities, and responsibilities (for example, through job descriptions, job family descriptions, or organisational charts). | Individuals have been identified to fill key safety roles and are aware of and fulfil their safety responsibilities, authorities and accountabilities and encouraged to contribute to the SMS. | The accountable manager and the senior management team are aware of the substantive / significant risks faced by the organisation, and safety management system principles exist throughout the organisation so that. safety is part of thehighest priority in the organisation. |
| **Assessment results** |
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| **What to look for** |
| * Question managers and staff regarding their roles and responsibilities.
* Confirm senior managers are aware of the organisation’s safety performance, its most significant risks and its safety objectives.
* Evidence of managers having safety related performance targets.
* Look for active participation of the management team in the SMS.
* Evidence of appropriate risk mitigation, action, and ownership.
* The levels of Management authorised to make decisions on risk acceptance are defined and applied.
* Acceptance of risk is aligned with authorisations.
* Check for any conflicts of interest and that they have been identified and managed.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.2** | ORA.GEN.200 (1) -AMC1 ORA.GEN.200(a)(1) –AMC1 ORA.GEN.200(a)(3)(b)(2) - tolerability |  |
| **SUMMARY COMMENTS BY CAA:****1.2 SAFETY ACCOUNTABILITY AND RESPONSIBILITIES** |
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* 1. **APPOINTMENT OF KEY PERSONNEL**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| * + 1. , 2.1.3.1 ,AMC to
			1. (a)
 | The service provider shall appoint a safety manager who is responsiblefor the implementation and maintenance of the SMS. |  |

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| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| A safety manager who is | The safety manager is competent. | The safety manager has implemented | The safety manager is competent to |
| responsible for the | Sufficient time and resources are allocated | and is maintaining the SMS. | manage the SMS and identifying |
| implementation and | to maintain the SMS, but not limited to, | The safety manager is in regular | improvements in a timely manner. |
| maintenance of the SMS |  | communication with the Accountable |  |

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| has been appointed with a direct reporting line with the Accountable Manager. | competent staff for safety investigation, analysis, auditing, and promotion.*See Annex 19 note: Depending on the size of the service provider and the complexity of its aviation products or services, the responsibilities for the implementation and maintenance of the SMS may be assigned to one or more persons, fulfilling the role of safety manager, as their sole function or combined with other duties, provided these do not result in any conflicts of interest.**For complex organisation, see next section.* | Manager and escalates safety issues when appropriate.The safety manager is accessible to staff in the organisation. . | There is an established reporting scheme between the Accountable Manager and the safety manager to timely and regularly report on the safety issues. |
| **Assessment results** |
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| **What to look for** |
| Consider whether the responsibilities for the implementation and maintenance of the SMS should be given to a full-time person or to a safety manager supported by a team, enough empowered to advocate safety in case of conflict of interest (e.g. avoiding a person having functional activities both in production and surveillance);* Check the availability of the safety manager (and supporting staff, if appropriate) to allocate sufficient time to the implementation and maintenance of the SMS
* Check for any conflicts of interest and that they have been identified and managed
	+ Review safety manager role including credibility, competence, and status.
	+ Review the training that the safety manager has received.
	+ Evidence of maintained competency.
	+ Review how the safety manager gets access to internal and external safety information.
	+ Review how the safety manager communicates and engages with operational staff and senior management.
	+ Review safety manager workload / allocated time to fulfil role.
	+ Check there are sufficient resources for SMS activities in a timely manner such as safety investigation and surveys, analysis, assessing, safety meeting attendance, SMS implementation’s coherence (notably for the assessment of risks and the mitigation measures), periodic reports on safety performance, communication processes including identification and dissemination of safety related information (internally and externally), and safety promotion.
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| * For organisations holding multiple certificates, the accountable manager may identify a unique focal point, i.e. the ‘safety manager’.
* Review of safety report action and closure timescales.
* Interviews with the Accountable Manager and safety manager.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.3.** Note: *Depending on the size of the service provider and the complexity of its aviation products* | AMC |  |
| *or services, the responsibilities for the implementation and maintenance of the SMS may be* | ORA.GEN.200(a)(1);(2);(3);(5) |
| *assigned to one or more persons, fulfilling the role of safety manager, as their sole function or* | (c) – for non-complex org |
| *combined with other duties, provided these do not result in any conflicts of interest.* | AMC1 ORA.GEN.200(a)(1) (a) |
|  | – Safety Manager for |
|  | complex org GM1 |
|  | ORA.GEN.200(a)(1) |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| GM to AMC to 2.1.3.1 (j) | Management System AMCs for complex organisations. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The organisation has established appropriate safety committees(s). | Safety committee(s)’ structure and frequency support the SMS functions across the organisation. The scope of the safety committee(s) includes safety risks and compliance issues.The attendance of the highest-level safety committee includes at least the Accountable Manager and the heads of functional areas. | There is evidence of meetings taking place detailing the attendance, discussions, and actions.The safety committee(s) monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources.Actions are being monitored. Qualitative/quantitative means have beenestablished to measure and monitor the established safety objectives | Safety committees include key stakeholders. The outcomes of the meetings are documented and communicated and any actions are agreed, taken and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate. |
| **Assessment results** |
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| **What to look for** |
| * Review safety committee and meeting structure and Terms of Reference for each committee / meeting.
* Review meeting attendance levels.
* Review meeting records and actions.
* outcomes are communicated to the rest or the organisation
* Evidence of safety objectives, safety performance and compliance being reviewed and discussed at meetings.
* Participants challenging what is being presented when there is limited evidence.
* Senior management are aware of the most significant risks faced by the organisation and the overall safety performance of the organisation.
* MS may be integrated for organisation holding multiple certificates
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 1.3 | AMC1 ORA.GEN.200(a)(1)(b) – Safety review BoardGM2 ORA.GEN.200(a)(1)– Safety Action Group |  |
| **SUMMARY COMMENTS BY CAA:****1.3 APPOINTMENT OF KEY PERSONNEL** |
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* 1. **CO-ORDINATION OF EMERGENCY RESPONSE PLANNING**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.4AMC to 2.1.4 (f) | 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 interfacewith during the provision of its products and services. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| An appropriate emergency response plan (ERP) has been developed and distributed that defines the procedures, roles, responsibilities and actions of the various organisations and keypersonnel. | Key personnel have easy access to the relevant parts of the ERP at all times. The ERP defines the procedures, roles,responsibilities, and actions of the various organisations and key personnel.The frequency and methods for testing the ERP are defined. | The ERP is reviewed and tested to make sure it remains up to date. Different scenarios with variations test the robustness of the ERP.Actions are taken to improve the ERP effectiveness | There is evidence of coordination with other organisations through regular drills or crisis exercises, which are analysed for further improvement. |

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|  | The coordination with other organisations (including non-aviation organisations) isdefined with appropriate means. |  |  |
| **Assessment results** |
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| **What to look for** |
| * Review emergency response plan.
* Review how co-ordination with other organisations is planned.
* Review how ERP is distributed and where copies are held.
* Talk to key personnel and check they have access to the ERP
* Different types of foreseeable emergencies have been considered.
* Review when plan was last reviewed and tested and any actions taken as a result.
* Verify that variations of the different scenarios are regularly considered to test the robustness of the ERP.
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.4** | AMC1 ORA.GEN.200(a)(3) (g) – Complex orgAMC ORA.GEN.200(a)(1);(2);(3);(5)(f) – Non-complex org |  |
| **SUMMARY COMMENTS BY CAA:****1.4 CO-ORDINATION OF EMERGENCY RESPONSE PLANNING** |
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* 1. **SMS DOCUMENTATION**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| GM to AMC2.1.5(a) Appendix 8,1 | The service provider shall develop and maintain an SMS manual that describes it; (*Endorsed by the Accountable Manager)*:1. safety policy and objectives
2. SMS requirements
3. SMS processes and procedures
4. accountability, responsibilities and authorities for SMS processes and procedures
 |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The SMS documentation includes the policies and processes that describe the organisation’s safety management system and processes. | The scope of the activities under the SMS is clearly defined.SMS documentation is comprehensible.SMS documentation is consistent with other internal management systems and is representative of the actual processes in place.The manner and format of the SMS documentation is appropriate to the organisation and readily available to all relevant personnel.*See Annex 19 Note: Depending on the size of the service provider and the complexity of its aviation products or services, the SMS manual and SMS operational records may be in the form of stand-alone documents or may be integrated with other organisational documents (or documentation) maintained by the**service provider.* | Changes to the SMS documentation are managed.Key personnel involved in SMS implementation is familiar with and follows the relevant parts of the SMS documentation, whereas employees are familiar with the content of the SMS documentation relevant to their activities | SMS documentation is proactively reviewed for continuous improvement. |

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| **Assessment results** |
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| **What to look for** |
| * Review the SMS documentation and amendment procedures.
* Check the manner and format of the SMS documentation, depending on the size, structure of the organisation, its business model, such as volume and significance of the contracted activities (to and from).
* Check for cross references to other documents and procedures.
* Check availability of SMS documentation to all staff.
* Check if staff knows who to contact (when needed) or where to find safety related documentation including procedures appropriate to their role.
* Review the supporting SMS documentation (hazard logs, meeting minutes, safety performance reports, risk assessments, etc.).
* In case several operators form part of a single air carrier business grouping use the same CAMO for the continuing airworthiness of all aircraft they operate (AMC3 CAMO.A.300), check how potential specific requirements and procedures for the different operators are implemented.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.5.1** | AMC2 ORA.GEN.200(a)(5) (2) – Safety policy and objectives - COMPLEX ORGANISATIONS – ORGANISATION’S SAFETY MANAGEMENT MANUALAMC2 ORA.GEN.200(a)(5) (2) – Safety policy and objectivesAMC2 ORA.GEN.200(a)(5) (3) & (4) – accountabilities |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.1.5 (b)AMC to 2.1.5 (b) | The service provider shall develop and maintain SMS operational records aspart of its SMS documentation. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The SMS documentation defines the SMS outputs and which records of SMS activities will be stored. | Data protection and confidentiality rules have been defined. | SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and confidentiality control rules. | SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS. SMS documentation, including SMSrelated records, are regularly reviewed |

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| Records to be stored, storage period, and location areidentified. |  |  | and updated with appropriate version control in place. |
| **Assessment results** |
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| **What to look for** |
| * Check how safety records are stored and version controlled.
* Data protection and confidentiality rules have been defined and are consistently applied.
* Check if appropriate staff is aware of the records control processes and procedures.
* Check that the SMS records include the decisions taken during the Safety Review Board (or any other high-level safety committee) are supported by evidence.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **1.5.2** | AMC1 ORA.GEN.220(b) Record-keeping |  |
| **SUMMARY COMMENTS BY CAA:****1.5 SMS DOCUMENTATION** |
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| **SAFETY POLICY AND OBJECTIVES SUMMARY** |
| Number of Markers assessed as being effective: | (out of 13) |  |
| Percentage of Markers assessed as being effective: | (100/13 x number of effective markers) |  |
| **Effectiveness Achieved for Component:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

1. **SAFETY RISK MANAGEMENT**
	1. **HAZARD IDENTIFICATION**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.2.1AMC 1 to 2.2.1 | The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactiveand proactive methods. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a process that defines how hazards are identified through reactive and proactive methods, using multiples sources.The methodology to define the criteria for safety investigations is documented.The process includes the management of organisational change when it impacts safety (see 3.2). | Multiple sources of hazards (internal and external) are considered and reviewed, as appropriate in the domain.The interfaces are properly addressed.The data analysis process enables gaining useable safety information.Hazards are documented in an easy-to- understand format.The level of sign-off for safety investigations is defined and adequate to the level of risk.The safety hazards at organisation’s level are consistent with the ones identified at authority’s level, where relevant. | The hazards are identified and documented. Technical, human, and organisational factors related hazards are being considered.The criteria for safety investigations are identified and applied.Safety investigations are carried out and recorded. | The organisation has processes and means that capture hazards (technical, environmental, human, and organisational factors related), which are maintained and reviewed to ensure they remain up to date.The organisation is continuously and proactively identifying hazards (technical, environmental, human, and organisational factors related) related to its activities and operational environment and involves all key personnel and relevant stakeholders.Hazards are assessed in a systematic and timely manner.Personnel express confidence and trust in the organisation's reporting policy and processes.The criteria for safety investigations are continuously updated to include internal and external sources as required. |

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| **Assessment results** |
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| **What to look for** |
| Review how hazards are identified, analysed, addressed, and recorded.* Review structure and layout of hazard log.
* Consider hazards related to:
* Possible accident or serious incident scenarios,
* Technical factors as well as Human and organisational factors (e.g. hazards linked to human performance and organisation’s performance as part of the systemic risk management – please consider ICAO Doc.10151 ‘Manual on Human Performance for Regulators’),
* Business decisions and processes,
* Third party organisations.
* Review what internal and external sources of hazards are considered such as: safety reports / automatic data collection (such as flight data monitoring, ATS/ANS, health monitoring system), audits, safety surveys and/or studies, investigations, inspections, brainstorming, Management of Change activities, security, cybersecurity, sanitary crisis, environmental, commercial and other external influences, compliance monitoring analysis; sector risk profile, and etc.
* Check whether the identification of safety hazards considers the ones identified at authority’s level (e.g. SSP/SMS interfaces and NASP or through recognized International Organisations (like IATA, CANSO) ASRs; safety objectives identified as per SIB (Safety Investigation Board);
* Investigations of safety occurrences establish causal/contributing factors (why it happened, not just what happened) and identify human and organisational contributing factors.
* Assess to which extent the process is not limited to the reactive part (i.e. occurrences) but also considers the proactive approach (as proposed above).
* Check how hazards identified from occurrences are processed in compliance with CAR 100.
* Is the staff encouraged to report errors, near misses through the reporting system ensuring adequate protection of the reporter?
* Is there a mechanism in place to document the hazard log in a way that enables its evolution over time? Is the hazard log periodically reviewed?
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **2.1.1** | ORA.GEN.200 (a) (3) - identification of aviation safety hazardsAMC ORA.GEN.200(a)(1);(2);(3);(5) |  |
| **2.1 Hazard Identification** |
| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| AMC2 to 2.2.1 | Safety reporting procedures |  |

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| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database.Responsibilities have been defined.The process identifies how reports are actioned and timescales specified. | The reporting system is accessible and easy to use for the personnel involved in the safety activities of the organisation. There is an appropriate means to capture issues from third parties (partners, suppliers, contractors). | The reporting system is simple to use, being used and accessible to all personnel.There is feedback to the reporter of any actions taken (or not taken), where appropriate, and to the rest of the organisation.Reports are evaluated, processed, analysed, and stored.Safety investigations are carried out by appropriately trained personnel to identify root causes (why it happened, not just what happened).People are aware and fulfil their responsibilities in respect of the reporting systemReports are processed within the defined timescales.Coherence with the topics discussed during the SRB or safety committees’ meetings is ensured. | Personnel express confidence and trust in the organisation's reporting policy and process. The reporting system is being used to influence management decisions and continuous improvement.There is a healthy reporting system based on the pertinence of reports received.Safety reports are acted on in a timely manner.The reporting system contributes to the continuous improvement of the organisation performance. |
| **Assessment results** |
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| **What to look for** |
| -Verify that the responsibilities as required by regulations have been defined and described in the job descriptions- Review the reporting system for access and ease of use [appropriateness of the reporting systems]. Depending on the size and complexity, the appropriateness ofthe reporting system can range from simple secured boxes to a digital system, including Apps to install on mobile devices. |

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| * Check if staff trusts the reporting system, are familiar with it and know what should be reported.
* Evidence that people do not fear to report in respect of the internal safety reporting scheme.
* Review how data protection and confidentiality is achieved.
* Evidence of feedback to reporter (or a feedback loop addressing the aggregation of reports with their analysis, depending on the volume of occurrences)
* Assess volume and quality of reports including self-reporting.
* Review report closure rates.
* Check availability to contracted organisations and customers to make reports.
* Check the training of the staff carrying out the investigations.
* Check whether a taxonomy is defined and used.
* Safety investigations are carried out to identify root causes (why it happened, not just what happened). Check the quality of the analysis
* The system supports analysis, follow-up, and report to the relevant Competent Authority/ CAA. There is a process in place to analyse safety data and safety information to look for trends and gain useable management information.
* Confirm responsibilities with regards to occurrence analysis, storage and follow-up are clearly defined.
* Check relevant staff are aware of which occurrences should be mandatory to report to CAA/ OTSB.
* Assess how the operational managers and the senior management engage with the outputs of the reporting system.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **2.1.2** | ORA.GEN.200 (a) (4) - include safety reporting principlesAMC1 ORA.GEN.200 (a) (2) (b) (5) - not to blame someone for reporting something which would not have been otherwise detectedGM1 ORA.GEN.200 (a) (2) - purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals |  |

**SUMMARY COMMENTS BY CAA:**

**2.1 HAZARD IDENTIFICATION**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2,2,2GM to 2.2.2 | The service provider shall develop and maintain a process that ensures ***analysis, assessment and control*** of the safetyrisks associated with identified hazards. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a process for the analysis and assessment of safety risks. | The risk assessment methodology, including ‘severity’ and ‘likelihood’ usable criteria are defined and fit the service provider’s actual environment, including consideration to the expert judgement when data are not available. The used definitions are sufficiently explicit or detailed.For the acceptance of the risk’s level, the right level of organisation’s authority within the organisation (responsibilities) in cooperation with the stakeholders is clearly defined. | Risk analysis and assessments are carried out in a consistent manner based on the defined process.Appropriate risks controls are being applied to reduce safety risks to an acceptable level, including timelines and allocation of responsibilities agreed with the stakeholders.Operational, technical, human and organisational factors are considered as part of the development of risks controls. Senior management is actively involved in medium and high risks and their mitigation and controls.Understanding of external inputs and outputs of safety risk management thatshould be addressed. | Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes.Risk assessments are regularly reviewed to ensure they remain current.Risk acceptability criteria are used routinely and applied in management decision making processes and are regularly reviewed. |
| **Assessment results** |
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| **What to look for** |
| * Review risk classification scheme and procedures.
* Check the methodology used to assess the risks; how this is documented, accurately defined, and used; check how the staff using that methodology is trained.
* Check any assumptions made and whether they are reviewed.
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| * Check that the process defines who can accept what level of risk.
* Check that the level of risk that the organisation is willing to accept is defined.
* Severity and likelihood definitions and criteria are sufficiently defined (or that an alternative methodology is described) and adapted to the activities. Severity ‘of what’ (‘possible worst scenario’ and consequence) is also described. Differentiation between ‘likelihood’ and ‘frequency’ is understood.
* Review whether risk assessments are carried out consistently and coherently across the organisation (e.g. consideration of various safety perspectives and views to make the relevant decision).
* Review how issues are classified when there is insufficient quantitative data available. When expert judgement is used, a collaborative risk assessment process is used (e.g. various expert judgement through cross-functional disciplines such as Flight operations, Design, Production, Human Performance experts), taking into account different safety perspectives and views to make the relevant decision, to ensure the reproducibility of the assessment.
* Consider how human performance is evaluated through the safety risk management and mitigation process (refer to ICAO Doc.10151)
* Check whether the outcome of the safety reporting system, including the mandatory and voluntary occurrence reporting systems, is used to test the robustness the risk assessment, including when the expert judgement was used (see section 3.1). Is the network of stakeholders involved in the collection of data and safety information informing the risk assessments, notably for the risk at the interfaces? (See also Section 5.1 of this tool).
* Verify whether the risk assessments are updated when new data from the safety reporting system are available. Review what triggers a risk assessment and its review over time. Check that the risk register is being reviewed and monitored by the appropriate safety committee(s), where appropriate. Verify how experience, feedback and monitoring of recently published safety information serves that regular update.
* Review layout of risk register e.g. initial assessment, residual risk, mitigation actions, ownership, associated safety performance and follow-up.
* Sample identified hazards and how these are processed and documented.
* Check which safety committee(s) or person(s) oversee the ‘acceptability’. Check the availability of instructions about implementation of ‘As Low As Reasonably Practical’ (ALARP). Check the right level of authority for decision-making.
* Evidence of risk reduction, evaluation of residual risk and risk acceptability, when appropriate, being applied in the data-driven decision-making.
* Evidence that risks, including those that are not generated by the organisation itself, are analysed and mitigated, without further transfer of risks.
* Check how trends and emerging issues are identified and managed.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **2.2** | AMC1 ORA.GEN.200(a)(3)(b)(1) & (2) - Risk assessment andmitigation processes |  |
| **2.2 Safety Risk Assessment and Mitigation** |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| AMC to 2.2.2 | The service provider shall develop and maintain a process that ensures [analysis, assessment and] ***control*** of thesafety risks associated with identified hazards. |  |

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| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| Risk Controls take Human Performance into consideration. The organisation has a process in place to decide and apply the risk controls. | Responsibilities and timelines for determining and accepting the risk controls are defined.Appropriate risk mitigation strategies and perspectives are considered. | Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities.The organisation follows the process in place to make decisions and apply appropriate and effective risk controls. Human Performance are considered aspart of the development of risk controls. | Risk controls are practical and sustainable, applied in a timely manner and do not create additional risks.The effectiveness of the risks controls is monitored through safety performance, using qualitative and/or quantitative means.Risk Controls take Human Performance into consideration. |
| **Assessment results** |
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| **What to look for** |
| * Risk controls clearly identified. Evidence of risk controls being actioned and follow up.
* Quantitative and/or qualitative means are used to monitor the effectiveness of the risk controls, such as to SMART SPIs, SPTs, alert levels.
* Check how trends are monitored and used.
* Aggregate risk is being considered.
* Check whether the risk controls have reduced the residual risk.
* Check that new risk controls do not create additional risks.
* Check how the policy considers ALARP – verify the implementation of it.
* Check how specific domain-related risks are appropriately controlled, such as Fatigue Risk Management, flight data monitoring, HUMS, subcontracting and interfaces, etc.
* Check whether the acceptability of the risks is made at the right management level.
* Operational managers and senior management have visibility of medium and high risk as well as their mitigation and controls.
* Review the use of risk controls that rely solely on human intervention.
* Risk controls consider human performance and organisational factors.
* Verify how the effectiveness of the safety barriers for the significant risks at the interfaces is assured (see also Section 5.1 of this tool).
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| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **2.2** | AMC1 ORA.GEN.200(a)(3)(b)(1) & (2) - Risk assessment andmitigation processes |  |
| **SUMMARY COMMENTS BY CAA:****2.2 RISK ASSESSMENT AND MITIGATION** |
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| **SAFETY RISK MANAGEMENT SUMMARY** |
| Number of Requirements assessed as being effective: | (out of 4) |  |
| Percentage of Requirements assessed as being effective: | (100/4 x number of effective Requirements) |  |
| **Effectiveness Achieved for Component:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

1. **SAFETY ASSURANCE**
	1. **SAFETY PERFORMANCE MONITORING AND MEASUREMENT**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.3.1 | The service provider shall develop and maintain the means to verify the safety performance of the organization and tovalidate the effectiveness of safety risk controls. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The organisation has a documented internal audit programme with a link to amanagement review process. | Responsibilities, methods, and timelines for assessing risk controls are appropriately defined. | Information from the reporting system(s), safety assurance, compliance monitoring activities or any other | Appropriate risk controls are assessed, and actions taken to ensure they are effective and delivering a safe service |

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| There is a documented process to assess whether the appropriate risk controls are applied and effective with respect to SMS key processes. A person or group of persons with responsibilities for the monitoring function have been identified and they have direct access to the Accountable Executive. | Safety performance measurement targets the effectiveness of the mitigation measures addressing the key risks, and by extension, the safety objectives.Safety performance measurement is focused on what is important rather than what is easy to measure.The contribution of contracted organisations should be considered in the safety performance process, considering the potential effect it may have on the safety performance of the organisation. | relevant source feeds back into the safety risk management process.Appropriate risk controls are being verified to assess whether they are applied and effective.Follow-up of the corrective/preventive actions plan is evidenced and reviewed by the relevant SMS governance body (i.e. Adequate authority level based on the size of the organisation and the complexity of its operations).The interface between compliance- based audits and the safety risk management processes is described and operating. | The reasons for ineffectiveness of risk controls are investigated.Human performance is taken into consideration.There is comprehensive integration of external and internal interfaces, as appropriate, into organisation's Safety Risk Management and Safety Assurance processes.The outcome of the organisation' safety performance considers and provides feedback to the SMS governance body, as relevant, for review and ultimately to the Competent Authority.The effectiveness of the SMS processesare reviewed on a regular basis. |
| **Assessment results** |
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| **What to look for** |
| * Check if there is a mechanism in place to ensure that the organisation utilises all relevant data feeding sources, to get a true picture of their risks, evaluate its safety performance; and, in time take appropriate actions and check their effectiveness.
* Evidence of responsibilities, methods, and timelines to assess whether the risk controls are applied and effective: survey controls being assessed and monitored for effectiveness (e.g. audits, surveys, reviews, qualitative and/or quantitative means to measure and monitor safety performance such as SPIs, SPTs, alert levels, wherever appropriate, reporting systems).
* Evidence that the organisation’s risk assessment processes, including residual risks, are evaluated regularly.
* Safety assurance takes into account activities carried out at the interfaces internally and externally (i.e. stakeholders): evidence of risk controls applied by contracted organisations / third parties, other departments being assessed and overseen (e.g. quality check, reviews, and regular meetings).
* Information from safety assurance and compliance monitoring activities (see section 5.2.4) feeds back into the safety risk management process (see section 2.2).
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| * Review where risk controls have been changed as a result of the assessment.
* What type of information and sources may support the safety performance measurement?
* Check to which extent the organisation pays attention to information stemming from internal and external occurrences, investigation reports; automatic data collection (such as flight data monitoring for air operators); safety meetings, workshops, seminars, hazard reports, sector risk profile; audits and statistics from the compliance monitoring function, safety data analysis, SSP and/or NASP, (industry and/or EASA) safety roadmaps, RPAS (notably where SPIs are proposed for monitoring), ICAO’s or EASA’s or State’s Annual Safety Report / Review (ASR) or recognized International Organisations (like IATA, CANSO) ASRs; State safety promotion, surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation 3.3.2.2 etc.
* Consider how human performance (ICAO doc.10151) is taken into consideration when contributing to the safety performance and assurance of safety.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **3.1.1** | AMC1 ORA.GEN.200(a)(3)(d) - Safety performance monitoring and measurementAMC1 ORA.GEN.200(a)(1)(b)(3) - The safety review boardshould monitor: (i) safety performance |  |
| **3.1 Safety Performance Monitoring and Measurement** |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.3.1AMC 3 to 2.3.1AMC 1 to 2.3.1 | The service provider’s safety performance shall be verified in reference to the safety performance indicators and Safety performance targets of the SMS in support of the organization’s safety objectives. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a documented process in place to measure the safety performance of the organisation, covering all the appropriate areas, including qualitative and quantitative means linked to the organisation’ssafety objectives and to | The quantitative means are focused on what is important rather than what is easy to measure.Reliability of data sources is considered in the design of qualitative means and/or quantitative means such as SPIs and SPTs.The qualitative and quantitative means are linked to the identified risks, the effectiveness of the safety barriers and thesafety objectives. | The safety performance of the organisation is being measured through qualitative and quantitative means, which are being continuously monitored and analysed for trends, wherever appropriate.The effectiveness of safety risk controls is being measured and supports actionable decisions. | The qualitative and quantitative means are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data.The qualitative and quantitative means are reviewed; regularly updated to ensure they remain relevant, then reviewed with the relevant SMS governance body and allow the maturation of the organisation’s SMS. |

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| measure the effectiveness of safety risk controls | Frequency of and responsibility for the trend monitoring of qualitative means are defined. Realistic targets have been set, wherever appropriateQualitative and quantitative means related to the State safety objectives from the SSP/NASP are taken into consideration, as applicable.The qualitative and quantitative means consider key internal and external interfaces (or risks at the interfaces), when meaningful. Individuals responsible for gathering, evaluating, monitoring the effectiveness of SPI and SPT are competent. | Frequency and responsibility for the trend monitoring of qualitative/quantitative means are appropriate and reliable. | Where the qualitative and quantitative means indicate a risk control not being effective, appropriate action is taken. The State’s safety objectives on the SSP/NASP are appropriately considered,when relevant, and continuous discussion with the State drives the continuous improvement of the process. |
| **Assessment results** |
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| **What to look for** |
| * How is safety performance monitored and measured? Check that the defined SPIs, SPTs, alert levels and targets, when used and defined, are appropriate to the organisation’s activities, risks, and safety objectives.
* Verify that the interfaces having an impact on the performance of the SMS are appropriately considered (see also Section 5.1 of this tool).
* How does the occurrence reporting scheme efficiently and timely enable the measurement and evaluation of the organisation’s safety performance? Hook with the continuous improvement of the SMS.
* How does ‘compliance monitoring’ feed the monitoring and measurement of the organisation’s safety performance?
* Evidence that the qualitative means or quantitative means such as SPIs, SPTs, alert levels are based on any kind of reliable data-feeding sources to inform the performance of the organisation and the progress made on the achievement of the safety objectives.
* Evidence of when the qualitative and quantitative means were last reviewed.
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| * The qualitative means such as the SPIs are focused on what is important rather than what is easy to measure. SPIs are focused on the safety objectives and the effectiveness of the safety barriers, notably on the preventive ones: check that they allow the maturation of the organisation’s performance over time.
* Evidence that the organisation’s qualitative and quantitative means are balanced (leading / lagging, State-level / self-generated / representative of safety objectives) and accurately represent the risk picture of individual organisations and can serve as a tool for the monitoring of their safety performance.
* Evidence that, when the alert levels have been reached, the organisation takes adequate actions and report at higher level, when appropriate (SRB, safety committees etc.)
* Consideration of any State’s safety objectives (stemming from SSP and/or NASP); or following State surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation 3.3.2.2)
* Consider whether the monitoring of the safety objectives, including relevant SPIs in the RPAS, wherever appropriate, are being considered.
* Consider any relevant safety performance indicator or target stemming from Accident Safety Report or any other occurrence reporting system (internal, voluntary etc.).**,** ICAO’s or State’s Annual Safety Report / Review (ASR) or recognized International Organisations (like IATA, CANSO) ASRs.
* Review whether any action has been taken when the monitoring of the performance indicates a negative trend (reflecting non-effective risk control(s) or inappropriate qualitative/quantitative means or negative impact on the organisation’s performance).
* Verify whether any standard SPIs or targets used in a risk sector profile or safety roadmap or standard monitoring process (e.g. flight data monitoring programme for Air Ops; ANS performance scheme) or valuable Industry good practices / standards are being considered.
* Evidence that results of safety performance monitoring are discussed for its safety relevance at senior management level (or Safety Review Board or any Safety committees or any other appropriate level of Authority within the organisation, as appropriate). Hook with the continuous improvement of the SMS (see section 3.3).
* Evidence of feedback provided to the accountable manager.
* Evidence, where alert levels are relevant, that, when the alert levels associated to SPTs have been reached, the organisation takes adequate actions and reviews its safety objectives, wherever needed.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **3.1.2** | AMC1 ORA.GEN.200(a)(1)(b)(3) - The safety review board should monitor: (i) safety performance against the safety policy andobjectives |  |
| **SUMMARY COMMENTS BY CAA:****3.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT** |
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* 1. **MANAGEMENT OF CHANGE**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.3.2AMC to 2.3.2, GM 1 to 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 fromthose changes. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The organisation has established a change management process to identify whether changes have an impact on safety activities and to manage significant, identified risks in accordance with existing safety risk management processes.Methods, responsibilities, and timelines are defined in the process. | Triggers for the change management process are defined.The process also considers business related changes and interfaces with other organisations/departments, having an impact on safety. | The organisation is using a defined change management process to identify whether substantive changes have an impact on safety.Any identified risks are managed in accordance with existing safety risk management processes and are monitored through safety assurance.Internal and external factors such as Technical, Environmental, Human and Organisational related hazards are being considered, as appropriate. | The Management of change process considers the accumulation or impact of multiple changes, and the change and impact to safety-related functions are communicated with other organisations, including internal and external stakeholders.There is a means to share information with respect to management of change impact with external stakeholders (partners, suppliers, contractors, etc.). Safety risks are being managed consistent with the scope andtime scale associated with the change. Risk mitigation actions resulting frommanagement of change are part of the SMS performance monitoring. |
| **Assessment results** |
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| **What to look for** |
| * Key stakeholders are involved in the process. This may include individuals from other departments of the organisation and/or external organisations.
* Review what triggers the ‘management of changes’ process. Consider organisational, financial, commercial factors etc. as well as any other change that may affect safety (e.g. security, cybersecurity, environment, sanitary crisis, sickness, or staff retirement & transfer of knowledge).
* Review recent changes that have been through the risk assessment process.
* Check that change is signed off by an appropriately authorised person.
* Transitional risks are being identified and managed.
* Review follow up actions such as whether any assumptions made have been validated.
* Review whether there is an impact on previous risk assessments and existing hazards.
* Review whether consideration is given to the cumulative effect of multiple changes.
* Review that business-related changes have considered safety risks (organisational restructuring, upsizing, or downsizing, IT projects, etc.).
* Evidence of Human Performance (HP) issues being addressed during changes.
* Assess whether the risk mitigation actions resulting from these changes are evident and consistent with positive performance monitoring trends.
* Review impact of change on training and competencies.
* Review previous changes to confirm they remain under control.
* Consider how the reasons for these changes are communicated and how the changes are planned and communicated to those people affected by the change externally and internally. Consider how stakeholders (other departments, partners, suppliers, contractors, Authorities) affected by the changes are involved in the process.
* Review whether the standard contractual arrangements address ‘management of changes’ on both contractual sides. Check evidence of implementation.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **3.2** | AMC1 ORA.GEN.200(a)(3)(e ) - The management of change |  |
| **SUMMARY COMMENTS BY CAA:****3.2 THE MANAGEMENT OF CHANGE** |
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* 1. **CONTINUOUS IMPROVEMENT OF THE SMS**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.3.3AMC to 2.3.3, GM to 2.3.3 | The service provider shall monitor and assess its SMS processes to maintain or continuously improve theoverall effectiveness of the SMS. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a documented process in place to monitor and review the effectiveness of the SMS using the available data and information. | The overall system, including the Safety assurance activities, is producing SMS data / information that is being periodically reviewed by the safety management organisation to improve SMS implementation.External information is considered in addition to internal information.Appropriate senior managers are notably involved when it affects different departments.The decision-making is data informed. | There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken.The SMS is being periodically reviewed by the senior management team to support the assessment of its effectiveness and that appropriate actions are being taken.The organisation is using SMS and safety data to develop and assess effectiveness of the SPIs to enhance safety and continuous improvement of SMS processes | The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements.The measurement of the organisation’s safety performance addresses the continuous improvement of the SMS in a proactive manner, as well as the safety objectives, which are regularly updated.The contribution of SMS and safety data from key external interface organisations is taken into consideration.A robust and comprehensive set of SMS and safety data is developed [SMS Database with data governance] that supports the use of predictive data analysis.The organisation shares best practices and lessons learned as a global leader in SMS. |

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| **Assessment results** |
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| **What to look for** |
| - What type of information and sources support the continuous improvement of the SMS? Check to which extent the organisation pays attention to information stemming from internal and external sources, investigation reports; automatic data collection (such as flight data monitoring for air operators); safety meetings, workshops, seminars, hazard reports, sector risk profile; audits and statistics from the compliance monitoring function, safety data analysis, SSP and/or NASP, industry and RASP (notably where SPIs are proposed for monitoring), ICAO or Regional Annual Safety Review (ASR) or State ASR or recognized International Organisations (like IATA, CANSO) ASRs; State safety promotion, surveillance & acceptance of the SPIs/SPTs by the State according to Annex 19 Recommendation3.3.2.2 etc.* Review the information and safety data used for management decision making for continuous improvement.
* Evidence of:
* Lessons learnt being incorporated into SMS and operational processes.
* Best practices being sought and embraced.
* Surveys and assessments of organisational culture being carried out and acted upon.
* Data being analysed and results shared with Safety Committees.
* Evidence of follow up actions.
* How does the measurement of the service provider’s safety performance liaise with the safety objectives? How are such processes updated? Check whether a methodology is used to so that safety objectives are expressed and matured; and so that associated SPIs are being SMART, improved and balanced (leading / lagging, State-level / self-generated), accurately representing the risk picture and serving for the monitoring and continuous improvement of its safety performance. Check that the Safety SPTs) linked to the organisation’s safety objectives are being monitored for continuous improvement over time (as a minimum).
* Assess the willingness and leadership of the senior management at continuously improving the SMS, taking into consideration the induced cost and return of investment-SSPIA
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **3.3** | AMC1 ORA.GEN.200(a)(3)(f) - Continuous improvement |  |

**SUMMARY COMMENTS BY CAA:**

**3.3 CONTINUOUS IMPROVEMENT OF THE SMS**

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| **SAFETY ASSURANCE SUMMARY BY CAA:** |
| Number of Markers assessed as being effective: | (out of 4) |  |
| Percentage of Markers assessed as being effective: | (100/4 x number of effective markers ) |  |
| **Effectiveness Achieved for Component:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

1. **SAFETY PROMOTION**
	1. **TRAINING AND EDUCATION**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.4.1 (a)2.4.1 (b) | The service provider shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform their SMS duties.The scope of the safety training programme shall beappropriate to each individual’s involvement in the SMS. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a training programme for SMS in place that includes initial and recurrent training. | The training covers individual safety duties (including roles, responsibilities, and accountabilities) and how the organisation’s SMS operates.Training material and methodology are adapted to the audience and include Human Performance when relevant.All staff requiring training are identified. | The SMS training programme is delivering appropriate training to the different staff in the organisation and being delivered by competent personnel. | SMS Training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment.Training is routinely reviewed to take into consideration feedback from different sources. |

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| **Assessment results** |
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| **What to look for** |
| * Check that the training covers individual safety duties (including roles, responsibilities, and accountabilities) and how the organisation’s SMS operates.
* Does the training consider feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis, training, course evaluations etc.?
* Check that the training includes human and organisational factors, just culture and non-technical skills with the intent of reducing organisational risks that may lead to human errors.
* Check training records against the training programme.
* Review how the competence of the trainers is being assessed and maintained.
* Check whether there is a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training. How the effectiveness of the training is rated?
* Review how training is assessed for new staff and changes in position.
* Review any training evaluation.
* Ask staff about their own understanding of their safety duties in the organisation’s SMS.
* Check all staff are reminded of compliance on top of SMS.
* How are the continuous improvement of the SMS as well as the monitoring and measurement of the service provider’s safety performance, including the update of the safety objectives, taken into consideration the recurrent safety training?
* If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review whether the training delivered by the CAMO meet the needs of the different operators involved, covering their different policies and (operating) procedures, responsibilities and communication, duties and areas of interfaces, lines of communication.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| 4.1.1 | GM1 ORA.GEN.200 (a) (4) - TRAINING AND COMMUNICATION ON SAFETY.AMC1 ORA.ATO.230 (a) (7) Training Records (8) Safety training. |  |

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.4.1 | Requirements for maintaining personnel trained and competent toperform their safety and compliance tasks |  |

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| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| A competency framework is defined for the staff having an impact on Safety, including trainers. | There is a process in place to periodically assess the actual safety competency of personnel against the framework. | There is evidence of the process being used and being recorded. | The competence assessment programme and process are routinely reviewed and improved.The competence assessment takes appropriate remedial action when necessary and feeds into the trainingprogramme. |
| **Assessment results** |
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| **What to look for** |
| * Review how is competence assessment carried out on initial recruitment and recurrently.
* Is there a process that evaluates the individual’s competence and takes appropriate remedial action when necessary? Does it consider ‘human performance’?
* Check whether the competence assessment includes competence assessment safety duties and responsibilities, as well as compliance management.
* Is the competence of trainers defined and assessed?
* Are appropriate remedial actions taken when necessary?
* In the case of international contracts, check that all relevant personnel have sufficient skills in the common language, such as English and in the use of the documentation.
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **4.1.2** | AMC1 ORA.GEN.200 (a) (4) (a) (1) All personnel should receive safety training as appropriate for their safety responsibilities.(2) Adequate records of all safety training provided should be kept |  |

**SUMMARY COMMENTS BY CAA:**

**4.1 TRAINING AND EDUCATION**

* 1. **SAFETY COMMUNICATION**

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| **CAR 100 Reference** | **CAR 100 Requirements** | **Operator Manual Ref** |
| 2.4.2GM to 2.4.2 | The service provider shall develop and maintain a formal means for safety communication that:* ensures personnel are aware of the SMS to a degree commensurate with their positions
* conveys safety-critical information
* explains why particular actions are taken to improve safety; and
* explains why safety procedures are introduced or changed
 |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| There is a process to communicate safety critical information. | The process determined what, when, and how safety information needs to be communicated.The process includes contracted organisations and personnel, where appropriate.The means of communication are adapted to:* The size and complexity of the organisation;
* the audience and the significance of what is being communicated.
 | Safety critical information is being identified and communicated throughout the organisation to all personnel as relevant including contracted organisations and personnel where appropriate. | The organisation analyses and communicates safety critical information effectively through a variety of blended methods, as appropriate, to maximise it being understood.Safety communication is assessed to determine how it is being used and understood, and to improve it where appropriate.The promotion of the safety policy and its positive safety culture is visible. Decision making, actions, and communication reflect a positive safety culture and safety leadership demonstrating commitment tothe safety policy. |
| **Assessment results** |
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| **What to look for** |
| *Note: communication is essential to build a positive safety culture through hazard reporting or sharing of safety information.** Review the sources of information used for safety communication.
* Review the methods used to communicate safety information e.g., meetings, presentations, briefings, videos, emails, websites, newsletters, leaflets, bulletins, posters etc.
* Assess whether the means of communication is appropriate, based on the organisation’s structure and the audience. The communication should be simple and concise so that it is easily understood.
* Is the means for safety communication being reviewed for effectiveness and material used to update relevant training?
* Check that lessons learned, significant events, changes and investigation outcomes are being communicated.
* Check that a positive safety culture is regularly promoted, enhancing ‘reporting culture’ (where, how, when etc.) and the principles of ‘just culture’.
* Check accessibility to safety information.
* Ask staff about any recent safety communication.
* Review whether information from occurrences is timely communicated to key stakeholders (internal and external) and whether it has been appropriately dis- identified.
* Does the organisation extend safety communication, as appropriate, to external key stakeholders (e.g., customers, suppliers)?
* Check whether the staff know where to find the safety objectives and associated safety performance monitoring? Check whether the staff know the safety objectives in their domain of competence? Does the organisation communicate the status of safety objectives’ achievement or monitoring?
 |
| **Annex 19 Appendix 2** | **CAR-ORA** | **Operator’s Manual Ref** |
| **4.2.** | AMC1 ORA.GEN.200(a)(4)(b) - (1) - (i),(ii),(iii),(iv) ; (2) |  |
| **SUMMARY COMMENTS BY CAA:****4.2 SAFETY COMMUNICATION** |
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| **SAFETY PROMOTION SUMMARY** |
| Number of Markers assessed as being effective: | (out of 3) |  |
| Percentage of Markers assessed as being effective: | (100/3 x number of effective markers) |  |
| **Effectiveness Achieved for Component:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

1. **ADDITIONAL ITEMS TO BE CONSIDERED**

**These additional items included for the assessment are related to new notes in Annex 19 Edition 2. They are considered important parts of an effective SMS and optional for assessment until these are reflected in future amendments of CAR-Part X.**

* 1. **INTERFACE MANAGEMENT**

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| **Ref** | **Doc 9859** | **Operator’s Manual Reference** |
| 9.7.2 | Safety Risks faced by service providers are affected by interfaces. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces. | The way the interfaces are managed is appropriate to the criticality in terms of safety.The means for communicating safety information is defined.The contracts adequately addressed the safety critical nature of the interfaces and the need to appropriately feed the Hazard Identification and Risk Assessment (HIRA), including the risk mitigations. | The organisation is managing the interfaces through hazard identification and risk management.There is assurance activity to assess risk mitigations being delivered by external organisations. | The organisation has a good understanding of interface management and there is evidence that the safety critical nature of the interface risks is being identified and acted upon.Interfacing organisations are sharing safety information, management of changes and take actions when needed.Evidence shows that a positive safety culture is promoted with interfacingorganisations. |
| **Assessment results** |
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| **What to look for** |
| * Review how interfaces internally (with other departments) and externally (e.g. contractors, customers, State) have been identified and documented. Review the system description of the interfaces, should it be documented in the SMS manual or any other equivalent document.
* If several operators forming part of a single air carrier business grouping use the same CAMO for the continuing airworthiness management of all aircraft they operate, review how the interfaces between that group CAMO and all the different operators involved are properly addressed. In particular, the continuing
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| airworthiness management contracts shall describe how the individual management systems of the operators and of the CAMO are harmonised between each other.- Evidence that:* Safety critical issues, areas and associated hazards are identified;
* Safety occurrences are being reported and addressed;
* Risk controls actions are applied and regularly reviewed;
* Interfaces are reviewed periodically.
* The organisation’s SMS covers hazard identification for the external services, activities and internal interfaces.
* Training and safety promotion sessions are organised with relevant external organisations.
* External organisations participate in SMS activities and share safety information.
* Review how positive safety culture is promoted at the interfaces.
* The organisation’s occurrences reporting system needs to extend to the external organisations, wherever appropriate.
* Management of changes impacting safety are appropriately addressed through the contracts.
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| **SUMMARY COMMENTS BY CAA:****5.1 INTERFACE MANAGEMENT** |
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| **INTERFACE MANAGEMENT SUMMARY BY CAA:** |
| Number of Markers assessed as being effective: | (out of 1) |  |
| Percentage of Markers assessed as being effective: | (100/1 x number of effective markers) |  |
| **Effectiveness Achieved for Item:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

* 1. **COMPLIANCE MONITORING**

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| **Ref** | **Requirement** | **Operator’s Manual Ref** |
| 5.2.19.5.4.1 | SMS Assessment Checklist SMS-003Doc 9859: Internal Audit. Responsibilities and accountability forensuring compliance are defined |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| It has been documented that there is a person or group of persons with the responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager.The accountable manager’s accountability and responsibilities for compliancemonitoring is documented. | Independence of the compliance monitoring audit function is achieved. | The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme. The accountable manager is ensuring that there are sufficient compliance monitoring resources and independence of the audit function is being maintained. | The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager.The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities. |
| **Assessment results** |
|  |  |  |  |
| **What to look for** |
| * How does the compliance monitoring manager interact with:

o senior management,o line managers,o the safety management staff,o the staff of external organisations, having a significant contribution to the safety?* Evidence that senior management act on compliance monitoring results.
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| * 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
 |
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| **Ref** | **Requirement** | **Operator’s Manual Ref** |
| 5.2.23.1.1 Note | SMS-003: Responsibilities and accountabilities for compliance Monitoring.**Annex 19 Appendix 2:** Compliance Monitoring |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| 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 accountable manager’s accountability and responsibilities for compliancemonitoring is documented. | The compliance monitoring audit programme covers all applicable regulations and includes details of the schedule of audits.The compliance monitoring programme adequately covers the external organisations supporting the delivery of services, having a significant contribution to the safety. | The compliance monitoring programme is being followed and regularly reviewed.This includes the modification of the programme to address identified risks or organisational and operational changes.Compliance monitoring is independent from operational activities and includes contracted activities | The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.The effectiveness of the SMS processes is reviewed on a regular basis. |
| **Assessment results** |
|  |  |  |  |
| **What to look for** |
| * Assess the contents of the programme against any regulatory requirements.
* Review how risk and performance is used to determine the depth and frequency of monitoring activities.
 |

* Review how independence is achieved.
* Assess what triggers a change in the programme.
* Review whether there are any potential conflicts of interest.

|  |  |  |
| --- | --- | --- |
| **Ref** | **Requirement** | **Operator’s Manual Ref** |
| **5.2.3**Note 3.1.1 | SMS-003: Compliance monitoring programme.Appendix 2 of An19, 2nd Ed: Compliance |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| 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 isachieved is documented. | The compliance monitoring audit programme covers all applicable regulations and includes details of the schedule of audits.The compliance monitoring programme adequately covers the external organisations supporting the delivery of services, having a significant contribution to the safety. | The compliance monitoring programme is being followed and regularly reviewed.This includes the modification of the programme to address identified risks or organisational and operational changes. Compliance monitoring is independent from operational activities and includes contracted activities. | The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.The effectiveness of the SMS processes is reviewed on a regular basis. |
| **Assessment results** |
|  |  |  |  |
| **What to look for** |
| * Assess the contents of the programme against any regulatory requirements.
* Review how risk and performance is used to determine the depth and frequency of monitoring activities.
* Review how independence is achieved.
* Assess what triggers a change in the programme.
* Review whether there are any potential conflicts of interest.
 |
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| **Ref** | **Requirement** | **Operator’s Manual Ref** |
| **5.2.4**3.1.1 Note | SMS-003, Compliance monitoring outcomes e.g. audit results including corrective and preventive actions follow-up.Appx 2 An. 19: Safety performance monitoring and measurement. |  |
| **PRESENT** | **YES** | **NO** | **SUITABLE** | **YES** | **NO** | **OPERATING** | **YES** | **NO** | **EFFECTIVE** | **YES** | **NO** |
| The organisation has documented procedures for the identification and follow- up of corrective actions and preventive actions.There is a process for how audit results are communicated to the accountable manager and senior management.The interface between compliance monitoring and the safety risk management processes is described. | Responsibilities and timelines for determining, accepting, and following- up the corrective/preventive action are defined.Compliance monitoring includes contracted activities.The tools for the follow-up of corrective and preventive actions are adapted to the compliance monitoring outcomes and appropriately liaise with the SMS tools, when necessary.The methods used for causal analysis are appropriate to the size of the organisation and the complexity of its aviation products and services. | The identifying and follow-up of corrective and preventive actions is carried out in accordance with the procedures including causal analysis to address root causes.The status of corrective and preventive actions is regularly communicated to relevant senior management and staff. | The organisation regularly reviews the status of corrective and preventive actions, as well as its effectiveness.The organisation investigates the systemic causes and contributing factors of findings, which further liaise with the hazard identification and risk assessment (HIRA) as well as the safety objectives.Significant findings are used in internal safety training & safety promotion sessions.The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures.There is regular communication between compliance monitoring staff and staff involved in other SMS activities. |
| **Assessment results** |
|  |  |  |  |
| **What to look for** |
| * Review the methods used for causal analysis.
* - Is the method used consistently, and adapted to the size of the organisation and its complexity of activities?
* - Review any repeat findings or where actions have not been implemented or overdue.
* - Check for timely implementation of actions.
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| * - Awareness of senior management of the status of significant findings and related CA/PAs.
* - Appropriate personnel participate in the determination of causes and contributing factors.
* - Look for consistency between internal audit results and external audit results.
* - Check how the identification of the systemic causes and contributing factors of findings liaise with the hazard identification and risk assessment (HIRA), including the safety objectives and its associated safety performance measurement & monitoring, when appropriate.
* - Check what type of information should be reported to the Accountable manager (or Safety Review Board or any safety committees, as appropriate) to support the HIRA and the establishment of safety objectives.
 |
| **Operators Post Holder Name:** | **Signature:** | **Date:** |
| **BY CAA:** |
| **SUMMARY COMMENTS:****5.2 RESPONSIBILITIES FOR COMPLIANCE AND COMPLIANCE MONITORING FUNCTION** |
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| --- |
| **COMPLIANCE MONITORING SUMMARY BY CAA** |
| Number of Markers assessed as being effective: | (out of 4) |  |
| Percentage of Markers assessed as being effective: | (100/4 x number of effective markers) |  |
| **Effectiveness Achieved for Item:** | (Must be in excess of 75%) | **YES / NO** (delete as appropriate) |

1. **ASSESSMENT RESULT BY CAA**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **SAFETY POLICY AND OBJECTIVES** | **SAFETY RISK MANAGEMENT** | **SAFETY ASSURANCE** | **SAFETY PROMOTION** | **INTERFACE MANAGEMENT** | **COMPLIANCE MONITORING** |
| **Number of effective markers:** |  |  |  |  |  |  |
| **Percentage of effective****markers:** |  |  |  |  |  |  |
| **COMBINED PERCENTAGE OF MARKERS ASSESSED AS EFFECTIVE:** |  |
| **ASSESSMENT RESULT** |  **SMS IS EFFECTIVE** |  **SMS IS NOT EFFECTIVE** |

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| **Title** | **Name of CAA Inspector** | **Signature** | **Date:** |
| **FOI** |  |  |  |
| **AWI** |  |  |  |
| **GOI/DGI** |  |  |  |
| **CSI** |  |  |  |
| **Review No:** | **Results** | **Approved** | **Not Approved** |
| ☐ | ☐ |
| **Chief Operations Section (COS) Name** | **Signature** | **Date:** |
|  |  |  |