

# Safety Management Performance Assessment 2019

## ABL Final Report



June 2019

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Ian Holder, MD

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## Project Management

Project Client	ABL
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## A. Executive Summary

This section outlines the environmental factors, key themes and overall assessment criteria.

### A.1 Environmental Factor (Context)

Every organisation is susceptible to its own set of unique external influences and, when assessing an organisation’s maturity, it is imperative that relevant business and environmental factors are understood, as these factors may have an impact on diagnostic results.

ABL (Analysebureau Luchtvaartvoorvallen, *Aviation Occurrence Analysis Agency*) is a separate department of the larger ILT (Inspectie Leefomgeving en Transport, *Human Environment & Transport Inspectorate*) organisation. The task of the ABL is to process, store and analyse the aviation safety reports it receives as part of the State Safety Programme. The ABL is not a regulated aviation organisation with the need for a full Safety Management System, but as it works within the aviation safety sector and, therefore, shall follow the relevant parts of Regulation (EU)376/2014 it is appropriate to assess its performance against this European Aviation Safety Agency Management System Assessment Tool (EASA MSAT) in part. Where necessary the audit team has interpreted the assessment requirements to best fit the context of ABL and its role.

### A.2 Assessment

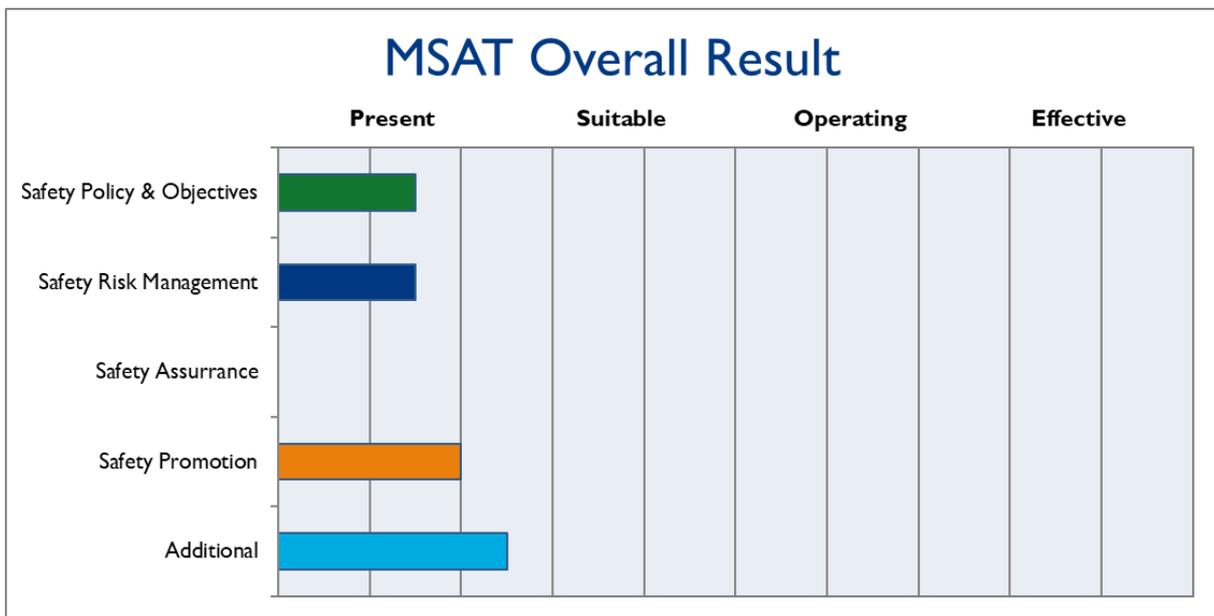


Figure 1: Overall Assessment

**Assessment** - The overall performance of the management of safety in ABL, measured against PRESENT, SUITABLE, OPERATING, EFFECTIVE, as defined by the EASA Management System Assessment Tool (MSAT), is currently assessed as being at PRESENT, which is below the industry

average of high SUITABLE based on 22 Baines Simmons assessments conducted in the last 3 years . In the view of Baines Simmons, the current regulatory requirement is at OPERATING; however, few regulators are yet mature enough in their Performance Based Oversight programmes to assess this accurately.

As ABL is not an entity that owns and mitigates risk rather a support function to the aviation sector, so it can understand its own risk exposure, interpretation has been required to fit the safety management system approach to the assessment of ABL. In ABLs core task of occurrence report handling and analysis it achieved an assessed level of high SUITABLE but the overall assessment is much lower as there are many safety management elements either missing or assessed as PRESENT.

Within the assessment framework it has been stated if the element was required (under regulation EU376), if the element is logical to include as part of a total safety system (to align with sector partners) or if it was included as a matter of course within the assessment criteria. All of these elements were included in calculating the average assessment level. If an element was outside the scope of the assessment (for example Emergency Response) it was not included in the scoring.

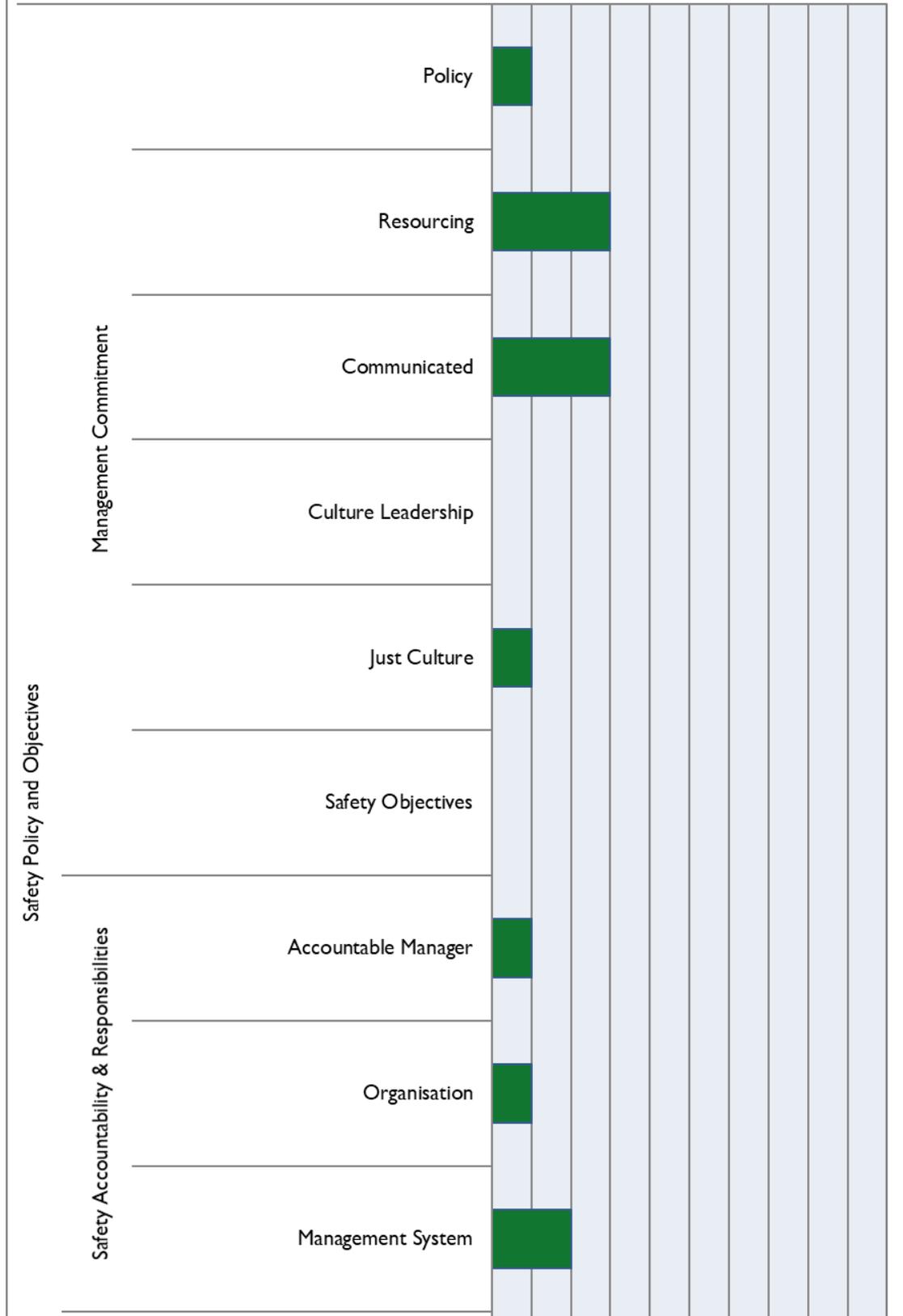
The elements that are required regarding regulation (EU)376/2014 do have non-compliances to address as a priority.

The lower assessment must not be taken as a failing of ABL but due to the context of ABL being part of a wider aviation sector. What ABL requires is a better understanding of SMS so a reasoned decision can be taken as to what is relevant to align with to provide an improved interface into the sector and what is deliberately not, with a clear justification.

**Assessment Breakdown** – On the next page is a breakdown of the assessment by the MSAT Pillars and Sections:

# MSAT Results Overview

Present Suitable Operating Effective





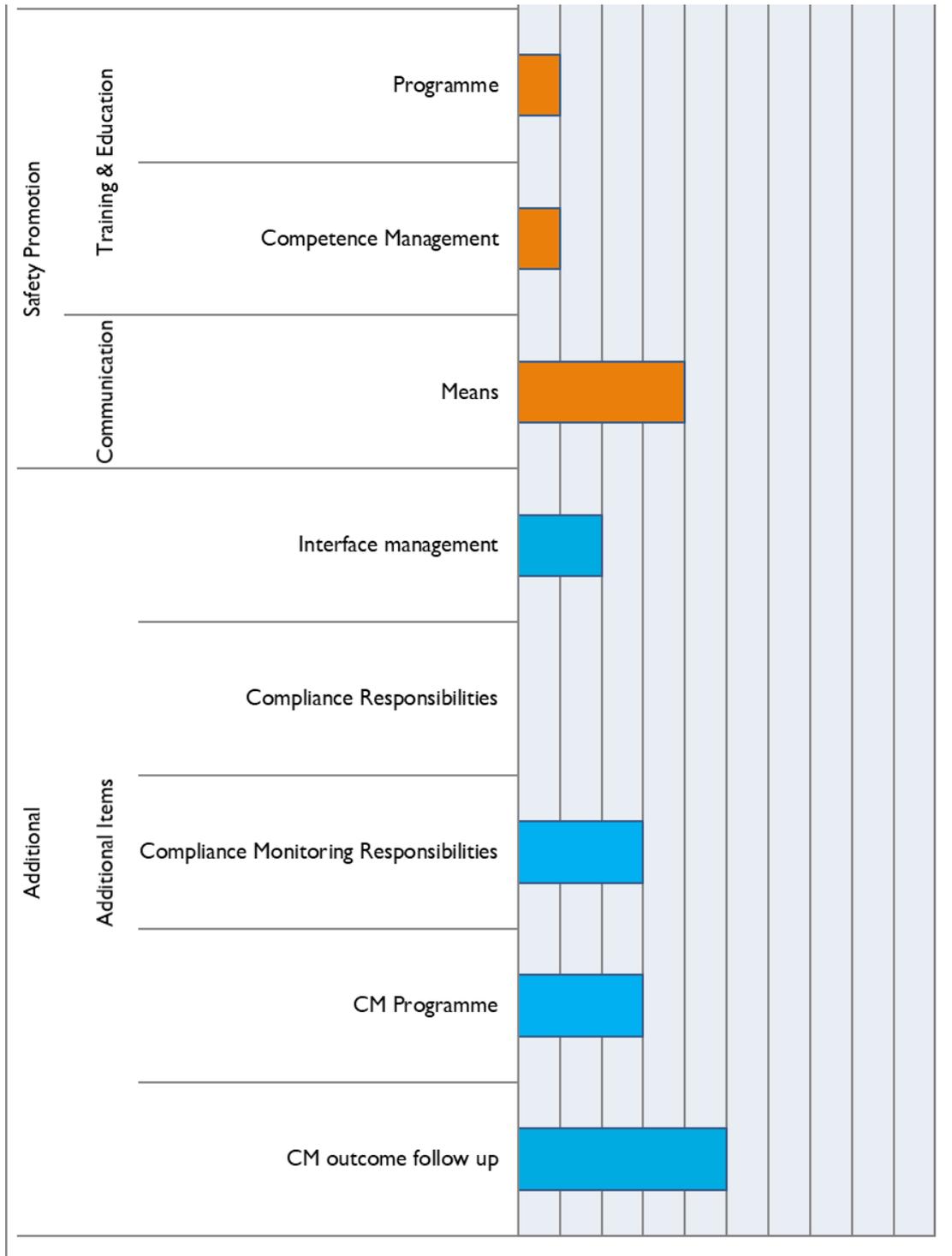


Figure 2: MSAT Overall Assessment Results Chart

**Key Themes.** A more detailed set of conclusions for each component can be found in Sections 1 to 5; however, a few key themes, both positive and those that are holding back the management system from moving to SUITABLE and OPERATING, are highlighted here:

▶ **Safety Policy and Objectives**

The ILT does have a common management system that ABL uses and there is a good structure to this, it is accessible and contains some specific ABL processes; however, it is not set up on the principles of an aviation Safety Management System. There are elements that are lacking in safety and Just Culture policy, safety objectives and formalising the hazard identification, internal safety meeting and Just Culture structure. There is a need to connect the statistical analysis agency to aviation and in particular aviation safety, as there is little understanding of its relevance and the link to the work that they do.

There is currently little follow up of reports that are overdue against regulated deadlines or that are received with mandatory information missing; this means that valuable Analyst time is used on interpreting incomplete data into something usable, that time may be better spent on analysis and hazard identification.

Under the Government Covenant there has been a recent increase of analysis resource (2 staff) which should enable improvements.

▶ **Safety Risk Management**

The core task of ABL is the processing, analysis and storage of aviation occurrence reports and regulation (EU)376/2014 governs this; whilst ABL has made some changes to meet this regulation, there are still areas of non-compliance and poor effectiveness that need to be addressed. For example lack of a risk assessment process, lack of voluntary reporting procedures and not publishing an annual review. The database of this information stored by ABL could be used at European Union, National and Operator level to aid in hazard identification, trending and benchmarking and by meeting the regulation and the timely sharing of data, safety across the aviation sector could be enhanced.

▶ **Safety Assurance**

As there are no set safety objectives it is difficult for ABL to determine required performance; furthermore, there are currently no safety performance indicators or key performance indicators in place, for example: How long it takes to process a report in use at ABL. There are also no management of change processes that would enable changes to be risk assessed as to their potential consequences. There are some audit activities taking place, but these are reactive in nature and not specifically targeted at an aviation Safety Management System approach.

## ▶ Safety Promotion

The training for ABL analysts does not include any aviation safety or Safety Management System training nor aviation familiarisation. With only one of the three analysts having an aviation background, training is required to improve their understanding of the aviation sector. There is operational output from ABL which mainly addresses questions that are asked of them by press, politicians and the public. A public facing website shows aviation reporting trends but there is no annual safety review of safety report data or analysis published. The ABL+ meetings are held 8 times a year with commercial and general aviation representatives where safety data is presented to show trends and there is two-way dialogue, these meetings have improved in content recently.

## ▶ Other

### ▶ Interfaces

As a supporting function to the aviation sector ABL has many interfaces and relationships. In the past ABL has suffered from a poor reputation due to its perceived poor quality of output. With the recent increase in resource, the improvement plan and link to the Schiphol project there is an opportunity to reverse this and ABL provide meaningful data to the aviation sector that can be used to enhance safety. The Schiphol project and link to the ISMS (Schiphol Integral Safety Management System) is a critical relationship that can enable a sharing of knowledge and experience to improve competence, with just one meeting held the relationship is not yet fully established.

## ▶ Schiphol Safety Improvement Covenant Questions

In answer to the questions within the covenant and with reference to the performance assessment conducted it can be said:

*To what degree ABL succeeds in the objective to timely learn from occurrences to improve aviation safety, together with the sector parties, as it is envisaged with EU 376/14.*

This is assessed as **SUITABLE** in that there is a functioning system to report aviation occurrences and analysis is made by ABL. The output though is not fully meeting the needs of the sector parties, to achieve this, these needs should be better communicated by the parties and ABLs aviation sector competence improved. This will enable a pathway to **OPERATING** in the future.

In regard to Article 12 (of the covenant) which states:

**Art.12: Steps in improvement ABL**

*The improvements of ABL consists of:*

- a. *Monthly sharing of usable trend analysis of occurrences reported by sector parties, such that sector parties can use these insights to judge if and what measurements need to be implemented to improve safety.*

This is currently achieved by a monthly update of occurrence statistics on the publically accessible website. This is quite generic and the sector parties could assist ABL with specific requirements.

- b. *further development of the analysis function of ABL by:*

- *smarter use of data, for which collaboration with other oversight authorities is sought*
- *the development of concrete innovative products and techniques and the usage of them*
- *improving the knowledge of analysis methods*

The above points are not yet initiated but the increase in resource should enable these to progress.

- *the automation of reporting of occurrences by sector parties*

ABL can accept occurrence reports in the required E5X format and some (though not all) sector parties utilise this. ABL can accept reports in various formats and this will remain so, as not all sector parties (for example General Aviation) may have access to a automatic capable system.

- *better classification of occurrences, as stated in art 14.*

More competence required in aviation matters and potentially more resource, though time for newly hired resources to become experienced required first before this can be quantified.

- *Proactively sharing with sector parties of remarkable developments and results of analysis, besides the trend analysis.*

Some progress with the use of factsheets (for example Drone analysis) but again more competence required.

In regard to Article 14 (of the covenant) which states:

**Art.14: connection between ABL and ISMS concerning data on Schiphol**

1. *The sector parties report in accordance with current regulation to ABL*

The sector parties report occurrences in accordance to the current regulation but there is little or no follow up of late or missing information from ABL (this information should be passed to ILT aviation inspectors for enforcement)

2. *The sector parties report, within the framework of 1, occurrences in automated fashion to ABL, as soon as this is technically possible and the operational requirements are agreed between ABL and the sector parties.*

ABL has the capability to receive automated reports and does so from the sector parties though an improvement in the operational requirements could assist in standardising the inputs.

3. *Within the framework of 1, sector parties report results of root cause analysis digitally to ABL, to be incorporated in the database of ABL.*

ABL is not currently processing results of root cause analysis.

4. *ABL delivers monthly trend analysis to sector parties and reports remarkable developments, as stated in art.12, directly.*

ABL provides monthly trends on the public website but does not deliver specific analysis to ISMS.

5. *In 2018, ILT makes separate agreements with sector parties concerning:*

- a. *Operational agreements to further organize a good connection between ABL and ISMS.*

*b. Mutual exchange of analysis to come to good understanding of questions and specification of answers needed.*

*c. Usage of information of ABL from Dutch and European databases, in accordance with requirements of EU 376/14.*

Agreements made but only now in initial phase of implementation (one meeting held between ABL & ISMS and a series of workshops conducted in June).

## ► Overall

With an overall MSAT assessment of PRESENT there is obviously scope for improvement with how ABL works with safety management. That said, ABL is at a high SUITABLE level in the area of safety reporting which is their core task. It should again be stressed that a full Safety Management System may not be appropriate for an agency such as this but as it interfaces with the SMS' of the aviation sector it must understand those systems and the requirements of where ABL can add value and assist those SMS' with viable, usable data. ABL has good, enthusiastic staff that do require more knowledge of aviation systems to enhance their competence. There are already identified key areas for improvement in the Improvement Plan (ABL Versterkning 2019) with the aim of improving procedures to meet the regulation and strengthen key relationships.

In respect to the evaluation criteria of the Schiphol Safety Improvement Covenant the following assessment is made:

ABL shall improve so that all parties can draw timely lessons from incidents with a view to improving aviation safety. Improvements are evident but there is still more to do so that timely lessons are achieved effectively. Non compliance with regulation (EU)376/2014 means that this is not fulfilled.

The department does provide data on the frequency, and to a lesser extent the severity of safety related occurrences. It provides some data analysis of trends but these areas are not yet performing to the level to achieve proactive data for key safety performance indicators to be used within the ISMS or for policy development, as aimed for within the covenant. Uploading data to the European Database is not done within current regulated timeframes and the sector parties' access to this European data is not yet provided in an effective manner.

Trend data is shared monthly via the public website but there are no specific requirements from the sector parties for analysis. Regarding the further development of analysis capability, the recent addition of two analysts has enabled capacity for this to take place and new methodology explored but it is currently too soon to evaluate how much effect this has had, the lack of experience with aviation currently restricts this more than analytical capability.

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Overall improvements have been made in line with the covenant but these are only the first steps in fulfilling all the criteria and there is a journey ahead to reach the point where the data obtained by ABL can be used proactively by the sector parties. Initial meetings have been made with the ISMS in particular to better understand what is required.

## B. Objective and Scope

### B.1 Background

ABL have engaged Baines Simmons to conduct a Performance Audit (PA) utilising the EASA Management System Assessment tool (MSAT).

### B.2 Scope

	Location
ABL staff	AMS
ILT support staff	AMS
ILT Manager	AMS
Interfaces: ILT Inspectors, Schiphol ISMS & ABL+ meeting members	AMS

The scope of the PA is defined by the groups identified above and the topic areas identified in the MSAT. We have used our professional consulting techniques to gather facts and findings on which we have formed conclusions, the issuing of recommendations was outside of the scope of this assessment. Our approach of considering the human-in-the-system during the PA addresses the resultant behavioural markers of staff, to arrive at a considered opinion of the management system performance.

### B.3 Objective

**The objective of the PA** is to provide ABL with a formal, independent and unbiased confirmation of the level of management system performance that includes:

- ▶ A review of how effective the work done by the agency to date has been in building its management systems
- ▶ Assessing the extent of any gaps against the ABL desired status of EFFECTIVE on the PSOE scale and against the relevant Regulation (EU)376/2014.

### B.4 Task Breakdown

- ▶ **Planning Stage:** The Principal Consultant nominated as Project Manager conducted a project team launch meeting and orientation; scoping, planning and initiation.
- ▶ **On-site phase.** Information was captured and documented from one-to-one interviews and focus groups. This involved staff at all levels and any relevant stakeholders to provide a robust assessment of the groups in scope.

- ▶ **Analysis.** Comments, evidence and observations collected throughout our engagement were captured as facts (confirmed using cross checking techniques), plotted against the evaluation criteria below and subsequently grouped in order to develop findings and conclusions.
- ▶ **Report Writing Phase:** This report details the findings and conclusions, including an Executive Summary and industry benchmarking.
- ▶ **Report Presentation:** The report will be delivered by the Baines Simmons Project Manager to the Executive team.

## B.5 Deliverables

The key deliverables are:

- ▶ A report with key results including:
  - An assessment of the constituent parts of ABL’s management systems against the EASA MSAT and PSOE performance markers.
- ▶ Report presentation to the ABL Guidance Committee summarising the conclusions.
  - Follow up meeting 2-3 weeks later to discuss the conclusions.

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## C. Definitions and Methodology – EASA Management System Assessment Tool (MSAT)

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### C.1 Introduction

**Note:** *The following information is primarily extracted from the EASA Management System Assessment Tool (MSAT) ver 1.0 as intended for guidance to regulators. Baines Simmons have applied our QIEJ (Question, Indicators, Evidence and Judgement) assessment methodology to the Key Performance Questions (KPQs) of the MSAT.*

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 Management System/SMS within the scope of authority oversight.

A common approach to assessing Management System/SMS effectiveness supports competent authorities to evolve from traditional, compliance-based oversight to performance-based oversight, provides a common baseline for 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 competent authorities but it could also be used by organisations, to assess the effectiveness of their own Management System/SMS, for the purpose of continuous improvement. The resulting assessment could be discussed with the competent authority, in order to obtain a common understanding of Management System/SMS effectiveness. Organisations could also use the tool to assess the Management System/SMS of subcontract organisations.

### C.2 How and when the tool is used

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

#### C.2.1 Initial certification/implementation

Before issuing the certificate, the competent authority should 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 could be carried out by a desktop review of relevant 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 Management System/SMS implementation and support standardised implementation.

## C.2.2 Continuing oversight

After initial implementation, the organisation should start using the Management System/SMS as part of its operations. The competent authority should ensure that within the first oversight planning cycle the organisation's 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 Management System/SMS should be re-evaluated on a regular basis to assess how well it is performing. The review should assess 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 Management System/SMS processes mature and it moves to OPERATING and EFFECTIVE this may also require the 'suitability' criteria to be revisited. Changes to an organisation's approval may also require a reconsideration of the suitability of the SMS processes. So, when significant changes take place the competent authority may determine the need to review the existing assessment to ensure it is still appropriate.

## C.3 Credit for other oversight activities

Valuable information about 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. Competent Authorities may also consider giving credit where an organisation has received accreditation for meeting an industry standard.

## C.4 Dealing with multiple certificate holders

In the case of an organisation holding multiple approval certificates, the use of the Management System/SMS assessment tool should follow the rule "1 Management System/SMS = 1 assessment". Therefore, if one organisation integrates all certificates within a single Management System/SMS, the assessment should consider the Management System/SMS as a whole.

Yet, it may be the case that different teams of inspectors oversee the same Management System/SMS with regard to different certificates, and a single assessment may be impracticable. In such case, the different assessments should be shared with the various teams of inspectors, and a common message coming from the competent authority(ies) should be provided.

## C.5 Tool guidance

The tool assesses the compliance and effectiveness of the Management System/SMS through a series of features based on ICAO Annex 19 Second Edition and EASA Management System requirements for organisations. It is set out using the 12 elements of the ICAO SMS Framework and some additional EASA 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 used by the competent authority inspector to evaluate and record the assessment. Alternatively, it can be partially completed by the organisation to assess itself and by the competent authority to verify and validate the organisation's assessment.

## C.6 Applicability

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

The tool has been designed to capture the generic Management System/SMS requirements. As currently there are no common EASA Management System/SMS requirements there may be some additional sector specific requirements that may need to be considered as part of the assessment.

## C.7 Definitions used in the tool

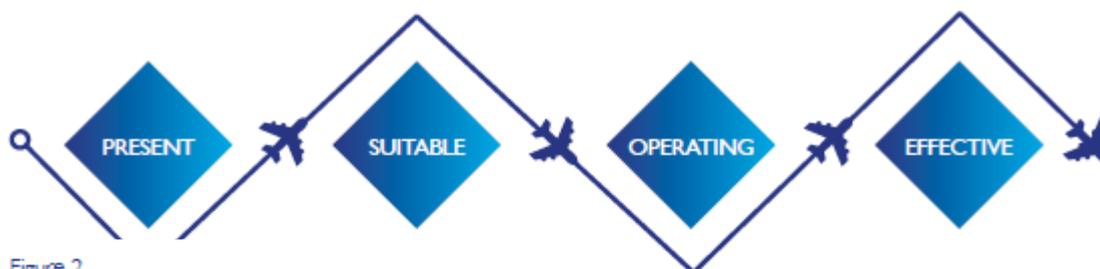


Figure 2

Present (P):	Evidence that the 'indicator' is clearly visible and is documented
Suitable (S):	Evidence that it is suitable based on the size, nature, complexity of the organisation
Operating (O):	Evidence that the indicator is in use and a clear output is being produced
Effective (E):	Evidence that the indicator is effective and achieving the desired outcome

Figure 3: PSOE Definitions

For PRESENT, OPERATING and EFFECTIVE a 'word picture' is included to help the inspector determine the correct level. There is no word picture for SUITABLE 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 competent authority 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.

## C.8 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.

## C.9 Addressing findings and observations (for regulators)

The current findings definitions used in EU regulations are not consistent across domains and do not necessarily fit the Management System/SMS assessment which requires more focus on the effectiveness of the processes. Observations should be used to identify areas for continuous improvement and encourage a positive safety culture.

For the initial certification or as part of a transition to new Management System/SMS requirements for existing certificate holders all the processes should be PRESENT and SUITABLE. If any are not then the approval should not be granted or transition accepted. Once a Management System/SMS is OPERATING and transition periods expired, during the assessment if a process is found not to be OPERATING, a finding should be raised.

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

The completed assessment tool with the competent authority remarks from the assessment or at least a summary of the Management System/SMS assessment should be provided to the organisation along with a report that captures any findings and observations. Providing the organisation with detailed comments of the assessment will assist in continuous improvement of the Management System/SMS and supports a positive safety culture at a State level.

# I. Safety Policy and Objectives

## I.1 Management Commitment

Annex 19 reference & text				
1.1.1 The service provider shall define its safety policy in accordance with international and national requirements. The safety policy shall:				
e) be signed by the accountable executive of the organization				
g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a safety policy that includes a commitment to continuous improvement, observe all applicable legal requirements, standards and considers best practice signed by the accountable manager.		It is reviewed periodically to ensure it remains relevant to the organisation.	The accountable manager is familiar with the contents of the safety policy.	
Verification Examples				
<ul style="list-style-type: none"> <li>The policy was available on the Intranet. All in Dutch language only.</li> <li>Policy statements very brief, linking into working procedures.</li> <li>Staff not immediately familiar with location.</li> </ul>				
Conclusion				
There was not a specific Safety Policy but within the ILT management system there were policy statements that included safety.				
This assessment criteria is logical as being part of the total safety system.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Org.
ORO.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(2) and (a)(6) AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations] AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1) AMC1 ATS.OR.200(1) (i) Safety management system SAFETY POLICY — COMPLEX ATS PROVIDERS AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	ATCO.OR.C.001 'Management system of training organisations' point (b) AMC1 ATCO.OR.C.001(b) Management system of training organisations SAFETY POLICY

**Annex 19 reference & text**

1.1.2 The safety policy shall

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety policy includes a statement to provide appropriate resources.		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

**Verification Examples**

- ABL department consists of 2 data entry staff and 3 Safety Analysts.
- The Safety Analysts assigned recently increased by 2 to the current level of 3.
- The Safety Analysts are very competent statisticians but only one has any aviation competence and this is not a requirement for the position.
- There are no performance indicators, for example backlog or processing time, in place so it is difficult for management to assess resource requirement to task workload.
- There is the opportunity to reallocate analysts from other departments within ILT to support ABL if required, though this is rarely done as ABL is perceived to be well staffed compared to other departments.
- The ABL analysts may also be used on other tasks within ILT, and some do support other projects.
- Much of the analysts time is spent on data processing and cleaning as opposed to analyzing content.
- External feedback points to a need for greater output from ABL

**Conclusion**

The department has statistical competence and a recent increase in resource will assist in following a designated improvement plan, there is a lack of aviation competence and a need for increased output.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations]	AMC1 ADR.OR. D.005 'Management system' point (b)(2)	ATS.OR.200 'Safety management system' Point (1)	ATCO.OR.C.001 'Management system of training organisations' 'point (b)
AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]		and related AMCs/GM	and related AMCs/GM

**Annex 19 reference & text**

1.1.3 The safety policy shall

f) be communicated, with visible endorsement, throughout the organization See

2.1.2 for c) include safety reporting procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a means in place for the communication of the safety policy.	The Management system policy is available on the Intranet	The safety policy is communicated to all personnel (including relevant contract staff and organisations).	People across the organisation are familiar with the policy and can describe their obligations in respect of the safety policy

**Verification Examples**

- Policy is generic for all of ILT and not specific to ABL.
- No aviation or safety content within policy.
- No communication or promotion of policy visible.

**Conclusion**

Regarding ABL there are so few staff to reach that the placement of the policy within the Management system on the Intranet was suitable to reach the limited audience.

This assessment criteria included as a matter of course of the maturity assessment.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex operators	AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex operators] Point (a)(3) Not addressed for non-complex organisations	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR.D.005(b)(2) 'Management system' point (a)(4)	ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200(1)(i) 'Safety management system' SAFETY POLICY — [complex ATS providers] AMC1 ATS.OR.200(1); (2); (3) Safety management system GENERAL [non-complex ATS providers]	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' point (d)

**Annex 19 reference & text**

1.1.4 The safety policy shall

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The management commitment to safety is documented within the safety policy.		The accountable manager and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.	Decision making, actions and behaviours reflect a positive safety culture and there is good safety leadership that demonstrates commitment to the safety policy.

**Verification Examples**

- Analysts attend fortnightly meeting where safety issues are discussed but not a formal agenda item.
- Just Culture mentioned briefly in management system but not apparent either internally or how external reports are dealt with.
- Commitment to safety not explicit in management system policies.

**Conclusion**

Specifically, when operating in an aviation safety sector it must be concluded that the organisational commitment and promotion of a positive safety culture is not currently PRESENT in the ABL management system.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) 'Management system' point (a)(2) - [complex operators]	AMC1 ORA.GEN.200(a)(2) 'Management system' point (a)(2) - [complex organisations]	ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (a)(3)	ATM/ANS.OR.B.015(a)(2) GM3 ATM/ANS.OR.B.005(a)(2) Management system SAFETY CULTURE and ATS.OR.200 'Safety management system' (1)(i) AMC1 ATS.OR.200 (1)(i) 'Safety management system'	AMC1 ATCO.OR.C.001(b) 'Management system of training organisations' points (c), (e) and (f)
AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations]			

**Annex 19 reference & text**

1.1.5 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.

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
A Just Culture Policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours to promote a Just Culture.		There is evidence of the Just Culture policy and supporting principles being applied and promoted to staff.	The Just Culture policy is applied in a fair and consistent manner and people trust the policy.  There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff and staff representatives.

**Verification Examples**

- Just Culture mentioned in Management system but no specific policy or principles clearly defined.
- No clear Just Culture within ABL (or wider ILT) to encourage open reporting, there were options of contacting a working environment representative if needed.
- No clear Just Culture understanding of dealing with external aviation occurrence reports processed within ABL.
- External occurrence reports received that contained issues of “Gross Negligence” would be forwarded to the prosecution service. Although, in experience this has not yet happened, there were no clear definitions of what would constitute “Gross Negligence” or a process to deal with this in a transparent manner.

**Conclusion**

There is little understanding of Just Culture and only very limited description of what it entails in the management system documentation, both internally within ABL and also in the handling of external aviation occurrence reports.

This assessment criteria is mandatory within Regulation (EU)376/2014

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 376/2014 Article 16(11)  AMC1 ORO.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11)  AMC1 ORA.GEN.200(a) (2) ‘Management system’ point (a)(4) ‘safety reporting principles’ - [complex organisations]	Reg. 376/2014 Article 16(11)  ADR.OR.D. 005 ‘Management system’  AMC1 ADR.OR. D.005(b)(2) ‘Management system’ point (b)(3)	Reg. 376/2014 Article 16(11)  ATS.OR.200 ‘Safety management system’ (1)(i)  AMC1 ATS.OR.200(1) (i) ‘Safety management system’ SAFETY POLICY – [complex ATS providers]  ATM/ANS.OR.A.065	Reg. 376/2014 Article 16(11)  AMC1 ATCO.OR.C.001(b) ‘Management system of training organisations’

**Annex 19 reference & text**

(New Std. 1.1.2)

1.1.6 Taking due account of its safety policy, the service provider shall define safety objectives.

The safety objectives shall:

- a) form the basis for safety performance monitoring and measurement as required by 3.1.2
- b) reflect the service provider’s commitment to maintain or continuously improve the overall effectiveness of the SMS
- c) be communicated throughout the organization
- d) be periodically reviewed to ensure they remain relevant and appropriate to the service provider.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
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 are being regularly reviewed and are communicated throughout the organisation.	Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met.

**Verification Examples**

- There was no evidence of safety objectives been set for ABL and its work with the aviation sector.
- There were no internal key performance questions (KPQ’s) or key performance indicators (KPI’s) to actively measure the performance of ABL to its task.
- Safety Performance Indicators (SPI’s) were not formally being used but some of the output of ABL (public website statistics) could be considered as SPI’s.

**Conclusion**

Safety objectives are not defined for ABL, there are no internal performance indicators and very limited safety performance communication.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ORA.GEN.200(a)(2) ‘Management system’ point (c)(3) - [complex organisations]	AMC1 ADR.OR.D.005(b)(2) Management system point (c)(3)	ATM/ANS.OR.B.005(a)(3) ‘Management system’	ATCO.OR.C.001 Management system of training organisations
AMC1 ORO.GEN.200(a)(3) Management system point (d)(1) - [complex organisations]	AMC1 ORA.GEN.200(a)(3) Management system point (d)(1) - [complex organisations]		AMC2 ATM/ANS.OR.B.005(a)(3) Management system	AMC1 ATCO.OR.C.001(b) Management system of training organisations
AMC2 ORO.GEN.200(a)(5) Management system point (a) - [complex organisations]	AMC2 ORA.GEN.200(a)(5) Management system point (a) - [complex organisations]		AMC1 ATS.OR.200(1)(i) Safety management system	SAFETY POLICY
			SAFETY POLICY — COMPLEX ATS PROVIDERS point (b)(3)	

## I.2 Safety Accountability and Responsibilities

### Annex 19 reference & text

1.2.1 The service provider shall

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
An accountable manager has been appointed with full responsibility and ultimate accountability for the 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 ensures that the performance of the SMS is being monitored, reviewed and improved.

#### Verification Examples

- There is a Department Head that is in charge of several domains within ILT, of which ABL is one.
- There is no clear definition of responsibility for an effective management system.
- ABL uses the main ILT management system for its policies and procedures.

#### Conclusion

In the context of a state statistics department a full Safety Management System is not necessarily appropriate, there is a person responsible for the effective running of ABL but not accountable for an SMS.

This assessment criteria is logical as being part of the total safety system.

#### Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(1) ORO.GEN.210 'Personnel requirements' point (a)	ORA.GEN.200 'Management system' point (a)(1) ORA.GEN.210 'Personnel requirements' point (a)	ADR.OR.D.015 'Personnel requirements' point (a)	ATS.OR.200 'Safety management system' point (1)(ii)(iii) AMC1 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES AMC2 ATS.OR.200(1)(ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]	ATCO.OR.C.001 Management system of training organisations, (a) ATCO.OR.C.010 'Personnel requirements' point (a)

**Annex 19 reference & text**

1.2.2 The service provider shall

- b) clearly define lines of safety accountability throughout the organization, including a direct accountability for safety on the part of senior management,
- c) identify the responsibilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the organisation
- d) document and communicate safety accountability, responsibilities, and authorities throughout the organization,
- e) define the levels of management with authority to make decisions regarding safety risk tolerability.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety accountability, authorities and responsibilities are clearly defined and documented.		Everyone in the organisation is 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 risks faced by the organisation and safety management system principles exist throughout the organisation so that safety is part of the everyday language.

**Verification Examples**

- The staff of ABL are aware of their responsibilities within their management system but it is unclear as to safety responsibility due to the generic nature of the system.
- Safety accountability not clearly defined or stated how ABLs work has a relation to the safety of the wider aviation sector.
- ABL owns no risk and therefore has no need to define risk tolerability responsibility within their organisation.
- ABL does process external aviation occurrence reports but due to current resource and competence levels is unable to risk classify these. There is an informal fast track for “interesting” reports from the data input team to the analysts.

**Conclusion**

There is limited focus on aviation safety within the management system; however, the staff of ABL are aware of what they need to achieve in their day-to-day roles.

This assessment criteria included as a matter of course of the maturity assessment.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
b) ORO.GEN.200 'Management system' point (a)(1)	b) ORA.GEN.200 'Management system' point (a)(1)	b) ADR.OR.D. 005 'Management system' point (b)(1)	b) ATM/ANS.OR.B.005(a)(1) and (b), ATS.OR.200 'Safety management system' (1)(ii)	b) ATCO.OR.C.001 'Management system of training organisations 'point (a)
c) ORA.GEN.200 'Management system' point (a)(1)  ORO.GEN.210 'Personnel requirements' points (a) and (b)	c) ORA.GEN.200 'Management system' point (a)(1)  ORO.GEN.210 'Personnel requirements' points (a) and (b)	c) ADR.OR.D. 005 'Management system' (b)(1) and ADR. OR.D.015 'Personnel requirements' (a);(b)	c) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200(1)(ii)	c) ATCO.OR.C.001 'Management system of training organisations 'point (b)  ATCO.OR.C.010 Personnel requirements, point (a) and (b)
d) ORO.GEN.200 'Management system' point (a)(5)  AMC1 ORO.GEN.200(a)(5)  AMC2 ORO.GEN.200(a)(5)  [complex operators]	d) ORA.GEN.200 'Management system' point (a)(5)  AMC1 ORO.GEN.200(a)(5)  AMC1 ORO.GEN.200(a)(5)  [complex organisations]	d) ADR.OR.D.005'Management system' point (c),AMC1 ADR. OR.D.005(c) 'Management system' and AMC2 ADR. OR.D.005(c) 'Management system'	d) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 'Safety management system' (1)(ii)	d) ATCO.OR.C.001 'Management system of training organisations', point (e)

<p>e) AMC1 ORO.GEN.200(a) (3) 'Management system' point (b)(2) - [complex operators]</p> <p>AMC1 ORO.GEN.200(a) (1)(2)(3)(5) 'Management system' point (d) - [non- complex organisations]</p>	<p>e) AMC1 ORO.GEN.200(a) (3) 'Management system' point (b)(2) - [complex operators]</p> <p>AMC1 ORO.GEN.200(a) (1)(2)(3)(5) 'Management system' point (d) - [non- complex organisations]</p>	<p>e) AMC1 ADR.OR.D.005(b)(4) 'Management system'</p>	<p>e) ATM/ANS.OR.B.005(a)(1) and ATS.OR.200 'Safety management system' 1)(ii)</p>	<p>e) ATCO.OR.C.001 'Management system of training organisations'</p>
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### 1.3 Appointment of Key Personnel

Annex 19 reference & text				
1.3.1 The service provider shall appoint a safety manager who is responsible for the implementation and maintenance of the SMS.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
A competent safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line with the accountable manager.	<i>See Annex 19 Note:</i>	The safety manager has implemented and is maintaining the SMS.  The safety manager is in regular communication with the accountable manager and escalates safety issues when appropriate.	The safety manager is competent to manage the SMS and identifying improvements in a timely manner.  There is a close working relationship with the accountable manager and the safety manager is considered a trusted advisor and given appropriate status in the organisation.	
Verification Examples				
<ul style="list-style-type: none"> <li>There is no Safety Manager nor one required for an organisation such as ABL.</li> </ul>				
Conclusion				
Not applicable and not included in overall assessment scoring.				
This assessment criteria included as a matter of course of the maturity assessment.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.210 'Personnel requirements' point (b)  AMC1 ORO.GEN.200(a)(1) 'Management system' point (a)(1)- [complex operators]  AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex operators]	ORA.GEN.210 'Personnel requirements' point (b)  AMC1-ORA.GEN.200(a)(1) 'Management system' point (a)(1)- [complex organisations]  AMC1-ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex organisations]	ADR.OR.D.015 'Personnel requirements' point (c) and AMC1 ADR.OR.D.015(c) 'Personnel requirements'	ATS.OR.200(1)(iii)	ATCO.OR.C.010 Personnel requirements

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.

1.3.2 EASA reference:

Management System AMCs for complex organisations

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established appropriate safety committees(s) that discuss and address safety risks and compliance issues and includes the accountable manager and the heads of functional areas.		There is evidence of meetings taking place in accordance with the terms of reference detailing the attendance and frequency of meetings. The safety committees monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources, actions are being monitored and appropriate safety objectives and SPIs have been established.	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.

**Verification Examples**

- There is a fortnightly meeting between the analysts where safety issues may be discussed but it is not a formal agenda item.
- There are 8 ABL+ meetings each year, 4 for commercial aviation and 4 for General Aviation. These are not safety committees per se, more information meetings but are an opportunity for safety issues to be brought up by both sides

**Conclusion**

There are meetings where safety issues may be discussed but currently there is little evidence that there are formal safety elements that would make them more suitable from a management system perspective.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ORO.GEN.200(a) (1) 'Management system' points (b), (c) and (d)	AMC1 ADR.OR.D.005(b)(1) 'Management system'	Note; An air traffic services provider should be considered as complex unless it is eligible to apply for a limited certificate and fulfils the criteria set out in ATM/ANS.OR.A.010(a).  AMC1 ATS.OR.200(1)(i) Safety management system AMC1 ATS.OR.200(1)(ii) Safety management system ACCOUNTABILITIES [complex ATS providers] AMC2 ATS.OR.200(1) (ii);(iii) Safety management system ORGANISATION AND ACCOUNTABILITIES [complex ATS providers]	Not applicable

## 1.4 Emergency Response - not in scope of Performance Audit

## I.5 SMS Documentation

### Annex 19 reference & text

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

- a) safety policy and objectives
- b) SMS requirements
- c) SMS processes and procedures
- d) accountability, responsibilities and authorities for SMS processes and procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The SMS documentation includes the policies and processes that describe the organisation’s safety management system and processes.	See Annex 19 note	SMS documentation is consistent with other internal management systems and is representative of the actual processes in place. Changes to the SMS documentation are managed Everyone has easy access to, familiar with and follow the relevant parts of the SMS documentation.	SMS Documentation is proactively reviewed for improvement

### Verification Examples

- The ILT Mavim system incorporates the documentation that covers policy, requirements and processes and procedures.
- The Mavim system is available for all internally on the intranet.
- It was only possible to view the system on-site on the intranet and it was only in Dutch language which is challenging for any external or international audit.

### Conclusion

The Mavim system was consistent with providing an operational method to administer the work done by ABL with policy, procedures etc that were in proportion to the task of ABL.

This assessment criteria is logical as being part of the total safety system.

### Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO.GEN.200(a)(5) ‘Management system’ point (a)	ORA.GEN.200 ‘Management system’ point (a)(5)	ADR.OR.D.005 ‘Management system’ point (c) and AMC1 ADR.OR.D.005(c)	ATM/ANS.OR.B.005(b)	AMC1 ATCO.OR.C.001(e)
AMC2 ORO.GEN.200(a)(5) - [complex operators]	AMC1 ORA.GEN.200(a)(5) ‘Management system’ point (a)	ADR.OR.D.005(c) ‘Management system’	AMC1 ATM/ANS. OR.B.005(b) ‘Management system’ and Annex IV ATS. OR.200(1)(v)	Management system of training organisations Point (e)(8)
	AMC1 ORA.GEN.200(a)(5)- [complex organisations]		AMC1 ATS.OR.200(1)(v) Safety management system	

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 organizational documents (or documentation) maintained by the service provider..

Annex 19 reference & text				
1.5.2 The service provider shall develop and maintain SMS operational records as part of its SMS documentation.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The SMS documentation defines the SMS outputs and which records of SMS activities will be stored.		SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and control.	SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS	
Verification Examples				
<ul style="list-style-type: none"> <li>There was no evidence seen of SMS outputs defined or stored.</li> </ul>				
Conclusion				
The SMS output definition and storage was not present.				
This assessment criteria is logical as being part of the total safety system.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.220 'Record-keeping'	ORA.GEN.220 'Record-keeping'	ADR.OR.D.035 'Record keeping'	ATM/ANS.OR.B.030 Record keeping	ATCO.OR.C.020 Record keeping
AMC1 ORO.GEN.220(b) 'Record-keeping'	AMC1 ORA.GEN.220(b) 'Record-keeping'	AMC1 ADR.OR.D.035 'Record keeping'	ATS.OR.200(1)(v) AMC2 ATS.OR.200(1) (v) Safety management system	AMC1 ATCO.OR.C.020(a);(b) Record keeping
		AMC2 ADR.OR.D.035 'Record keeping'		

## 2. Safety Risk Management

### 2.1 Hazard Identification

Annex 19 reference & text				
2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactive and proactive methods.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).		The hazards are identified and documented. Human and organisational Factors related hazards are being identified.	The organisation has a register of the hazards that is maintained and reviewed to ensure it remains up to date. It is continuously and proactively identifying hazards related to its activities and operational environment and involves all key personnel and appropriate stakeholders. Hazards are assessed in a systematic and timely manner	
Verification Examples				
<ul style="list-style-type: none"> <li>There is no documented process for reactive or proactive hazard identification within ABL.</li> <li>ABL has a source of reactive hazard identification from the external aviation occurrence reports.</li> <li>There is informal hazard identification possible at the fortnightly analysts meeting.</li> <li>The drone factsheet in production by ABL is an example of context being given to a recognised aviation safety hazard.</li> <li>The statistical analysis completed on the external occurrence reports focusses mainly on the questions asked by press, public or politicians or to populate the public website. There is little aviation sector input or direction given to ABL to be able to proactively identify or analyse aviation safety hazards.</li> </ul>				
Conclusion				
There is no hazard identification process present. ABL lacks guidance and input from the aviation sector to build competence in active hazard identification and analysis of the aviation safety data they have.				
This assessment criteria is logical as being part of the total safety system.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(3)	ATM/ANS.OR.B.005(a)(5) ATS.OR.200(2)(i)	ATCO.OR.C.001 Management system of training organisations point (c)
AMC1 ORO.GEN.200(a)(3) 'Management system' point (a)(1) - [complex operators]	AMC1 ORA.GEN.200(a)(3) 'Management system' point (a)(1) - [complex organisations]	AMC1 ADR.OR.D.005(b)(3) 'Management system'	AMC1 ATS.OR.205(b)(1) AMC2 ATS.OR.205(b)(1)	AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]			

2.1.2 Regulation (EU) 376/2014 and Annex 19 Appendix 2 Std. 1.1.1.c) safety reporting procedures

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
<p>There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database.</p> <p>Responsibilities have been defined as required by Reg. (EU) 376/2014.</p> <p>The process identifies how reports are actioned and timescales specified.</p>	<p>Reports are evaluated, processed, analysed and stored adequately but regulation (EU)376/2014 is not fulfilled.</p>	<p>The reporting system is simple to use, being used and accessible to all personnel.</p> <p>There is feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organisation.</p> <p>Reports are evaluated, processed, analysed and stored.</p> <p>People are aware and fulfil their responsibilities in respect of the reporting system</p> <p>Reports are processed within the defined timescales.</p>	<p>There is a healthy reporting system based on the volume of reporting and the quality of reports received.</p> <p>Safety reports are acted on in a timely manner</p> <p>Personnel express confidence and trust in the organisations reporting policy and process.</p> <p>The reporting system is being used to make better management decision making and continuous improvement</p> <p>The reporting system is available for third parties to report (partners, suppliers, contractors).</p>

Verification Examples

- There is no internal occurrence or safety reporting system within ABL but for the context of this section how external aviation safety reports are handled will be the focus.
- There are several and varied methods of submitting occurrence reports to ABL including automatically from an operator’s own reporting system via E5X protocol, via pdf web forms or even by handwritten. This is to ensure all have the opportunity to report from across the whole aviation sector.
- Report data is stored in an ECCAIRS (European Coordination Centre for Aviation Incident Reporting Systems) compatible database.
- ABL currently only processes Mandatory Occurrence Reports and has no mechanism or distinction for Voluntary Occurrence Reports.
- There is no follow-up of the late submission of Mandatory Occurrence Reports.
- There is no performance measurement in place to evaluate that reports are processed in time and that suitable follow up (conclusions) are sent in by the reporter.
- Reports are evaluated, processed, analysed and stored, this being ABL’s primary task.
- The upload of report data to the EASA database only takes place quarterly as opposed to every 30 days due to resource. This means there is a lag in the completeness of European safety data.
- ABL does not produce an annual safety review of safety data and trends but does provide updated information on the public website.
- The protections given the reporter are understood but a clearer understanding of Just Culture and its use would be beneficial, the term “Gross Negligence” is used where (EU)376/2014 article 16 refers to a “manifest, severe and serious disregard of an obvious risk and profound failure of professional responsibility”.

Conclusion

The safety reporting procedures are only deemed high SUITABLE because although reports are evaluated, processed, analysed and stored in a suitable database, there are non-compliances regarding Regulation (EU)376/2014 that need to be addressed before the system can be deemed to be OPERATING. Specifically these are:  
 Lack of voluntary reporting procedures.  
 Follow up on late submission time,  
 Follow up on submission of preliminary results and actions submitted.  
 Determination if remedial and/or corrective action needed.  
 Publishing an annual safety review.  
 Uploading to EASA database every 30 days.

This assessment criteria is mandatory under Regulation (EU)376/2014

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>Regulation (EU) 376/2014 Article 4 ‘Mandatory reporting’, Article 5 ‘Voluntary reporting’, Article 13 ‘Occurrence analysis and follow-up at national level’, Article 16 ‘Protection of the information source’.</p>				

## 2.2 Risk Assessment and Mitigation

### Annex 19 reference & text

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

See Annex 19 note.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process for the analysis and assessment of safety risks. The level of risk the organisation is willing to accept is defined.		Risk analysis and assessments are carried out in a consistent manner based on the defined process.  The defined risk acceptability is being applied.	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.

### Verification Examples

- ABL do not make any analysis or assessment on the safety risks, they only include directly any risk assessment made by the reporter. This is due to resource and competence.
- There is no risk analysis process or risk matrix in use.
- There is no evidence of process as to how the Safety Analysts conduct their analysis of data from occurrence reports.
- The reports or analysis generated are often based on the questions asked of ABL with little strategic direction.

### Conclusion

There is no Risk Analysis process present. There is little strategic direction of ABL analysis output and a lack of analysis process.

This assessment criteria is logical as being part of the total safety system.

### Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(4) and AMC1 ADR.OR.D.005(b)(4) 'Management system'	ATS.OR.200(2)(i)	ATCO.OR.C.001 'Management system of training organisations' point (c)  AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'
AMC1 ORO.GEN.200(a)(3) 'Management system' point (b)(1) - [complex operators]	AMC1 ORA.GEN.200(a)(3) 'Management system' point (b)(1) - [complex organisations]			
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]			

Annex 19 Note: The process may include predictive methods of safety data analysis.

**Annex 19 reference & text**

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has a process in place to decide and apply the appropriate risk controls.		Appropriate risk controls are being applied to reduce the risk to an acceptable level including timelines and allocation of responsibilities.  Human Factors are considered as part of the development of risk controls	Risk controls are practical and sustainable and applied in a timely manner and do not create additional risks.  Risk Controls take into consideration Human Factors.

**Verification Examples**

- ABL does not “own” risk and therefore has no active controls.

**Conclusion**

Not applicable and not included in overall assessment scoring.

This assessment criteria included as a matter of course of the maturity assessment.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO. GEN.200(a)(3) ‘Management system’ point (b)	AMC1 ORA.GEN.200(a)(3) ‘Management system’ point (b)	AMC1 ADR.OR.D.005(b)(4) ‘Management system’	ATS.OR.200(2)(i)	ATCO.AR.B.001 Management system, (a)(4);  Furthermore, ATSP provisions apply.

### 3. Safety Assurance

#### 3.1 Safety Performance Monitoring and Measurement

<b>Annex 19 reference &amp; text</b>				
3.1.1 The service provider shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risk controls.				
See Annex 19 Note.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
There is a process in place to assess whether the risk controls are applied and effective.		Risk controls are being verified to assess whether they are applied and effective.	Risk controls are assessed and actions taken to ensure they are effective and delivering a safe service.  The reasons for ineffectiveness of risk controls are investigated.	
Verification Examples				
Conclusion				
Not applicable and not included in overall assessment scoring.				
This assessment criteria included as a matter of course of the maturity assessment.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)  AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators]	ORA.GEN.200 'Management system' point (a)(3)  AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]	ADR.OR.D.005 'Management system' point (b)(5) and AMC1 ADR.OR.D.005(b)(5) 'Management system'	ATS.OR.200 (3)(i)	Not applicable, however Air Traffic Service Provider provisions apply.

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

**Annex 19 reference & text**

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place on how the safety performance of the organisation will be measured including safety performance indicators and targets linked to the organisation’s safety objectives.		The safety performance of the organisation is being measured and the SPIs are being continuously monitored and analysed for trends.	<p>SPIs are demonstrating the safety performance of the organisation and the effectiveness of risk controls based on reliable data.</p> <p>SPIs are reviewed and regularly updated to ensure they remain relevant.</p> <p>Where the SPIs indicate a risk control not being effective appropriate action is taken.</p>

**Verification Examples**

- There were no Safety Performance Indicators (SPIs) being used to monitor safety performance.
- There were no Key Performance Indicators being used to monitor the performance of the department.
- There was no process regarding SPIs or KPIs.

**Conclusion**

There was no verification of safety performance present.  
 This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(3) AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex operators]	ORA.GEN.200 ‘Management system’ point (a)(3) AMC1 ORA.GEN.200(a)(3) ‘Management system’ point (d)(1) - [complex organisations]	ADR.OR.D.005 ‘Management system’ point (b)(5) and AMC1 ADR.OR.D.005(b)(5) ‘Management system’	ATM/ANS.OR.B.005(a)(3) AMC2 ATM/ANS.OR.B.005(a)(3) Management system AMC1 ATS.OR.200(1)(v) Safety management system	Not applicable, however Air Traffic Service Provider provisions apply.

## 3.2 The Management of Change

### Annex 19 reference & text

3.2.1 The service provider shall develop and maintain a process to identify changes which may affect the level of safety risk associated with its aviation products or services and to identify and manage the safety risks that may arise from those changes.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established a management of change process to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.		The management of change process is being used. It includes hazard identification and risk assessments with appropriate risk controls being put in place before the decision to make the change is taken.  Human Factors issues have been considered and being addressed as part of the change management process.	The management of change process is used for all safety related changes including Human Factors issues and considers the accumulation of multiple changes. It is initiated in a planned, timely and consistent manner and includes follow up action that the change was implemented safely.

### Verification Examples

- There was no process for management of change.
- There were no examples of management of change evident.

### Conclusion

The identification of safety risk from management of change process is not present.

This assessment criteria is logical as being part of the total safety system.

### Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3)	ORA.GEN.200 'Management system' point (a)(3)	ADR.OR.D.005 'Management system' point (b)(6) and AMC1 ADR.OR.D.005(b)(6)	ATM/ANS.OR.A.040 Changes — general	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (c)
AMC1 ORO.GEN.200(a)(3) 'Management system' point (e) - [complex operators]	AMC1 ORA.GEN.200(a)(3) 'Management system' point (e) - [complex organisations]	ADR.OR.B.040 'Changes' in particular point (f)	ATM/ANS.OR.A.045 Changes to a functional system	
AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (b) - [non-complex operators]	AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (b) - [non-complex organisations]		ATM/ANS.OR.B.005(a)(4) ATM/ANS.OR.B.010 Changes - General	
			ATS.OR.205 Safety assessment and assurance of changes to the functional system ATS.OR.210 Safety criteria	

### 3.3 Continuous Improvement of The SMS

**Annex 19 reference & text**

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place to monitor and review the effectiveness of the SMS using the available data and information.		There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken.	The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements.

**Verification Examples**

- There was no monitoring of management system performance.
- There was no evidence of continuous improvement of the management system.
- There is an ABL improvement plan “Versterkning ABL 2019” which aims to address improvements in ABL output, consolidate cooperation with the aviation sector and improve data quality. This does not though address the management system.

**Conclusion**

The Management System is the generic ILT one and there was no performance monitoring or continuous improvement present.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Reg. 216/2008 Essential requirements for air operations point 8.a.4 ORO.GEN.200 ‘Management system’ point (a)(3) and (a)(6) AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (f) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) ‘Management system’ point (e) - [non-complex operators]	Reg. 216/2008 Essential requirements for pilot licensing point 3.a.1(ii) for ATOs and 4.c.1(ii) for AeMCs ORA.GEN.200 ‘Management system’ point (a)(3) and (a)(6) AMC1 ORO.GEN.200(a)(3) ‘Management system’ point (f) - [complex organisations] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) ‘Management system’ point (e) - [non-complex organisations]	ADR.OR.D.005 ‘Management system’ point (b)(7) and AMC1 ADR.OR.D.005(b)(7) ‘Management system’	ATS.OR.200(2)(iii)	AMC1 ATCO.OR.C.001(e) Management system of training organisations point (b)

## 4. Safety Promotion

### 4.1 Training and Education

**Annex 19 reference & text**

4.1.1 The service provider shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform their SMS duties.

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a training programme for SMS in place that includes initial and recurrent training. The training covers individual safety duties (including roles, responsibilities and accountabilities) and how the organisation’s SMS operates.		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.

**Verification Examples**

- There is a training programme for analysts joining. The training requirements were decided by the line manager.
- The training programme and records for an ILT aviation inspector were shown but there was no equivalent for an ABL analyst.
- There is no aviation safety training / familiarization for ABL analysts and no requirement for this.

**Conclusion**

ABL staff receive internal training regarding the management system and procedures but there is no specific aviation safety training.

This assessment criteria is logical as being part of the total safety system.

**Corresponding EU/EASA Requirements**

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 ‘Management system’ point (a)(4)	ORA.GEN.200 ‘Management system’ point (a)(4)	ADR.OR.D.005 ‘Management system’ (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 ‘Safety management system’ (4)(i)	ATCO.OR.C.001 ‘Management system for training organisation’, point (d)
AMC1 ORO.GEN.200(a)(4) ‘Management system’ point (a)	AMC1 ORA.GEN.200(a)(4) ‘Management system’ point (a)			

4.1.2 EASA reference				
EASA ORX.GEN.200(a)(4) requirements for maintaining personnel trained and competent to perform their safety and compliance tasks				
<b>PRESENT</b>		<b>SUITABLE</b>	<b>OPERATIONAL</b>	<b>EFFECTIVE</b>
There is a process in place to ensure that the organisation has trained and competent personnel.			There is evidence of the process being used and being recorded.	The competency assessment programme takes appropriate remedial action when necessary and feeds into the training programme.
<b>Verification Examples</b>				
<ul style="list-style-type: none"> <li>The ILT management system had requirements and records for ILT inspectors but not ABL analysts.</li> </ul>				
<b>Conclusion</b>				
The management system has provision for process and records but currently there is no requirement internally for the ABL analysts to be trained in safety tasks.				
This assessment criteria is logical as being part of the total safety system.				
<b>Corresponding EU/EASA Requirements</b>				
<b>Air Operations</b>	<b>Aircrew</b>	<b>Aerodromes</b>	<b>ATM/ANS</b>	<b>ATCO Training Organisations</b>
ORO.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ORA.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ADR.OR.D.005 'Management system' (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 'Safety management system' (4)(i)	AMC1 ATCO.OR.C.001(d) Management system of training organisations PERSONNEL

## 4.2 Safety Communication

### Annex 19 reference & text

4.2.1 The service provider shall develop and maintain a formal means for safety communication that:

- 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

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process to determine what safety critical information needs to be communicated and how it is communicated throughout the organisation to all personnel as relevant. This includes contracted organisations and personnel where appropriate.	There is output both publicly and to aviation sector.	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 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.

### Verification Examples

- Publicly available website with safety data present.
- ABL+ meetings to present and engage with aviation sector. These have improved in quality after previously avoided by aviation sector due to poor output.
- Factsheet production (for example recently on drone risk)
- There is no annual safety review published as per (EU)376/2014 Article 13.
- There is no process documented in the ILT management system.

### Conclusion

There is communication and engagement at the ABL+ meetings but that has not always been the case. The public publishing of safety information and factsheets on the website is a good example of safety communication from a state agency but there is non-compliance with (EU)376/2017 Article 13 in that there is no annual safety review published.

Elements of this criteria are mandatory under Regulation (EU)376/2014.

### Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(4)	ORA.GEN.200 'Management system' point (a)(4)	ADR.OR.D.005 'Management system' point (b)(9) and AMC1 ADR.OR.D.005(b)(9)	ATM/ANS.OR.B.005(a)(7) ATS.OR.200(4)(ii)	Not applicable, however Air Traffic Service Provider provisions apply.
ORO.GEN.200 'Management system' point (a)(5)	ORA.GEN.200 'Management system' point (a)(5)	'Management system'	AMC1 ATM/ ANS.OR.B.005(a) (7) Management system	
AMC1 ORO.GEN.200(a) (4) 'Management system' point (b)	AMC1 ORA.GEN.200(a) (4) 'Management system' point (b)			

## 5. Additional Items to be Considered

These additional items included for the assessment relate to EASA Management System requirements or new notes in Annex 19 Edition 2. They are considered important parts of an EFFECTIVE SMS.

### 5.1 Interface Management

Annex 19 reference & text				
5.1.1 Appendix 2 Note 2.—				
The service provider’s interfaces with other organizations can have a significant contribution to the safety of its products or services.				
PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE	
The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.		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 interface risks are being identified and acted upon.  Interfacing organisations are sharing safety information and take actions when needed.	
Verification				
<ul style="list-style-type: none"> <li>• ABL recognizes the importance of the engagement with the aviation sector and is working to strengthen this as part of the improvement plan, Versterkning ABL 2019.</li> <li>• The interface with the Schiphol project and the ISMS organisation is seen as a great opportunity to learn and share. ABL has data and ISMS a requirement for information to feed an EFFECTIVE Safety Management System. Understanding those needs will assist ABL in improving.</li> <li>• There has been past frustration from external interfaces with ABLs output but when asked if they had given feedback or asked questions themselves the answer was no. There is learned behavior of some of those users that needs to be corrected by a proactive approach from ABL encouraging a new active dialogue.</li> <li>• ABL has a credibility perception problem with its interface users to overcome.</li> </ul>				
Conclusion				
The improvement plan for 2019 is in place with one of its aims to improve relations with the aviation sector, with enhancements to the ABL+ meetings and one meeting with the ISMS held so far, it is too early to assess the effectiveness of the actions taken.				
This assessment criteria is logical as being part of the total safety system.				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Not explicitly addressed See ORO.GEN.205 'Contracted activities' and related GM1 & 2	Not explicitly addressed See ORA.GEN.205 'Contracted activities' and related GM1 & 2	ADR.OR.D.010 'Contracted activities' and ADR.OR.D.025 'Coordination with other organisations'	ATM/ANS.OR.B.005 'Management system' point (f)  GM1 ADR.OR.B.040(f) 'Changes' points (b)(2) and (b)(3)	Not explicitly addressed

## 5.2 Responsibilities for Compliance and Compliance Monitoring Function

5.2.1 Responsibilities and accountability for ensuring compliance are defined					
PRESENT		SUITABLE	OPERATIONAL		EFFECTIVE
Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures. Responsibilities and accountabilities for compliance are defined for all staff.			<p>Organisation manuals and procedures are regularly reviewed in light of changes in applicable requirements.</p> <p>All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures.</p>		Enhancements to processes and procedures are suggested from the workforce and management. Individuals are proactively identifying and reporting potential non-compliances.
Verification Examples					
<ul style="list-style-type: none"> <li>There was no evidence of the applicable requirements, especially (EU)376/2014 being transcribed into manuals and procedures.</li> </ul>					
Conclusion					
<p>The compliance assurance was not present.</p> <p>This assessment criteria is logical as being part of the total safety system.</p>					
Corresponding EU/EASA Requirements					
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations	
ORO.GEN.205 'Personnel requirements' point (b)	ORA.GEN.205 'Personnel requirements' point (b)	ADR.OR.D.005 'Management system' point (b)(11)	ATM/ANS.OR.B.020 Personnel requirements	ATCO.OR.C.010 Personnel requirements, point (b)	

5.2.2 Responsibilities and accountabilities for compliance monitoring are defined

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
<p>It has been documented that there is a person or group of persons with responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager.</p> <p>The accountable manager's accountability and responsibilities for compliance monitoring is documented.</p>		<p>The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme</p> <p>The accountable manager is ensuring there are sufficient compliance monitoring resources and independence of the audit function is being maintained.</p>	<p>The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager.</p> <p>The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities.</p>

Verification Examples

- There is no compliance monitoring manager, but no requirement for one either.
- Compliance and quality issues are provided from within ILT centrally.
- Compliance monitoring generally takes place in preparation for external audits.

Conclusion

The compliance programme is documented and has output but is not comparable to a full aviation system in that there is no formal audit programme, compliance monitoring is on the ILT system and not aviation or safety specific.

This assessment criteria included as a matter of course of the maturity assessment.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
AMC1 ORO. GEN.200(a)(6) 'Management system' point (c)	AMC1 ORA.GEN.200(a)(6) 'Management system' point (c)	AMC1 ADR.OR.D.005(b) (11) Management system point (b) and AMC2 ADR.OR.D.005(b) (11) Management system	AMC1 ATM/ANS. OR.B.005(c) Management system  COMPLIANCE MONITORING	AMC2 ATCO.OR.C.001(f) Management system of training organisations  COMPLIANCE MONITORING

5.2.3 Compliance monitoring programme				
PRESENT	SUITABLE	OPERATIONAL		EFFECTIVE
<p>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.</p> <p>The way independence of compliance monitoring is achieved is documented.</p>		<p>The compliance monitoring programme is being followed and regularly reviewed.</p> <p>This includes the modification of the programme to address identified risks or organisational and operational changes.</p> <p>Compliance monitoring is independent from operational activities and includes contracted activities</p>		<p>The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.</p>
Verification Examples				
<ul style="list-style-type: none"> <li>• Compliance overseen by central ILT compliance.</li> <li>• Reactive. Audits and activity to prepare for external audits.</li> </ul>				
Conclusion				
<p>The compliance programme is present but reactive in that it is used to prepare for external audits not regular and scheduled.</p> <p>This assessment criteria included as a matter of course of the maturity assessment.</p>				
Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p> <p>GM2 ORO.GEN.200(a)(6) 'Management system' [complex organisations]</p> <p>GM3 ORO.GEN.200(a) (6) 'Management system' [non-complex organisations]</p>	<p>AMC1 ORO.GEN.200(a) (6) 'Management system' Point (d)(2) (vi)</p>	<p>AMC1 ADR.OR.D.005(b) (11) Management system point (c)(2)(vi)</p>	<p>AMC1 ATM/ANS.OR.B.005 (c) Management system</p> <p>COMPLIANCE MONITORING</p>	<p>GM1 ATCO.OR.C.001(f) 'Management system of training organisations' point (c)(2)(vi)</p>

5.2.4 Compliance monitoring outcomes e.g. audit results including corrective and preventive actions follow-up.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
<p>The organisation has documented procedures for the identification and follow-up of corrective actions and preventive actions.</p> <p>There is a process for how audit results are communicated to the accountable manager and senior management.</p> <p>The interface between compliance monitoring and the safety risk management processes is described.</p>		<p style="background-color: yellow;">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.</p> <p style="background-color: yellow;">The status of corrective and preventive actions is regularly communicated to relevant senior management and staff.</p>	<p>The organisation regularly reviews the status of corrective and preventive actions.</p> <p>The organisation investigates the systemic causes and contributing factors of findings.</p> <p>Significant findings are used in internal safety training &amp; safety promotion sessions.</p> <p>The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures.</p> <p>There is regular communication between compliance monitoring staff and staff involved in other SMS activities.</p>

Verification Examples

- The CARPAR system logs and follows up on audit findings with corrective and preventative measures.
- It was unclear how overdue audit findings would be escalated within ILT.

Conclusion

The CARPAR system provides an operational follow up of compliance monitoring outcomes.

This assessment criteria included as a matter of course of the maturity assessment.

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(6)	ORA.GEN.200 'Management system' point (a)(6)	AMC1 ADR.OR.D.005(b) (11) 'Management system' point (a)(1)  points (b) and (e)	AMC1 ATM/ANS.OR.B.005(c) Management system  COMPLIANCE MONITORING	ATCO.OR.C.001 'Management system of training organisations' point (f)

## D. Recommendations

As concluded in the Executive Summary and indicated by the performance indicators, ABL has a PRESENT management system for controlling operational risk. Recommendations were outside of the scope of this assessment. In our experience, to achieve lasting success, a safety improvement plan should follow the Understand, Build, Power-up, Perform model, with this report being the foundation of the Understand phase.



Figure 4: Implementation Phases



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