



PRINCIPLE

(OPS.08) Safety management systems assessment

March 2024



Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Inside front cover artwork: James Baban.

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Contents

Terminology	4
Acronyms and abbreviations	4
Definitions	4
Reference to regulations	5
1. Assessment scope	6
1.1 Assessment of an initial application	6
1.2 Assessment of a significant change application	6
1.3 Assessment instructions	6
1.3.1 Table explanations	7
1.3.2 Assessment worksheet user instructions	7
2. Safety management systems	8
2.1 General	8
2.2 Statement of the operator's safety policy and objectives	9
2.2.1 Management commitment	9
2.2.2 Safety accountability and responsibilities	14
2.2.3 Appointment of key personnel	17
2.2.4 Coordination of emergency response planning	20
2.2.5 SMS documentation	22
2.3 Safety risk management	24
2.3.1 Hazard identification	24
2.3.2 Safety risk and mitigation	29
2.4 Safety assurance	32
2.4.1 Safety performance monitoring and measurement	32
2.4.2 The management of change	37
2.4.3 Continuous improvement of the SMS	40
2.5 Safety training and promotion	42
2.5.1 Training and education	42
2.5.2 Safety communication	45
2.5.3 Training and education – interface management	47
2.6 Flight data analysis program (FDAP)	49
2.6.1 Provision of FDAP	49
2.6.2 Regular recording and analysis of flight data	49
2.6.3 Identity protection	50
2.6.4 No punitive action	50
3. Revision history	51

Terminology

Acronyms and abbreviations

Table 1. List of acronyms and abbreviations

Acronym/abbreviation	Description
AOC	air operator's certificate
CEO	chief executive officer
DAMP	drug and alcohol management plan
ERP	emergency response plan
FDAP	flight data analysis program
HF	human factors
SMS	safety management system
SPI	safety performance indicator
SPT	safety performance target
SSP	state safety programme

Definitions

Table 2. List of definitions

Term	Definition
chief executive officer (CEO)	is the person, however described, that holds the key personnel position under section 28(3) of the Act, regulation 119.130, 138.085 or subregulation 142.025(a)
organisation	A product or service provider, operator, business, and company, as well as aviation industry organisations.
state safety programme	Australia's national 'state safety programme' sets out how aviation safety in Australia is managed. It provides a framework for the continuous improvement of aviation safety through clearly establishing how various elements of Australia's safety system work together and includes the priorities, objectives and targets. Operators are encouraged to be informed about Australia's SSP and its relevance to formulating and maintaining a safety management system (SMS).
flight data analysis program (FDAP)	An FDAP is a type of safety data collection and processing system. It may sometimes be referred to as Flight Data Monitoring, or Flight Operational Quality Assurance.

Reference to regulations

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this Principle are references to the *Civil Aviation Safety Regulations 1998* (CASR).

1. Assessment scope

1.1 Assessment of an initial application

Inspectors use this protocol document suite to assess an application for, or transition to, an air operator's certificate (AOC) under Part 119 Australian air transport operators—certification and management, Part 142 Integrated and multicrew pilot training, contracted training and contracted checking, or a certificate under Part 138 Aerial work operations.

Regulation 11.055 states that if an application is submitted for an authorisation in accordance with these regulations, CASA may grant the authorisation if the applicant meets the criteria specified in the regulations.

CASA does not issue a specific approval for a safety management system (SMS), but rather, if CASA issues an AOC or certificate to the applicant, CASA is also taken to have approved the applicant's proposed SMS (if any).

For applications that involve an AOC and/or certificate across multiple operational Parts (for example Part 119 and Part 142), the application should include a single SMS across all activities covered by the authorisation.

Notes: The regulations do not prohibit an operator from developing more than one SMS to address differing operational Parts. In this instance, the inspector must consider how this will work in practice.

Part 2 and Part 4 of CASA exemption EX87/21—Flight Operations Regulations - SMS, HFP&NTS and T&C - Supplementary Exemptions and Directions Instrument 2021 provides transitional exemptions and directions relating to an SMS.

The assessment of the application will involve verification through a range of activities, including:

- desktop assessments of the documentation provided
- assessment of key personnel (using [Protocol \(OPS10\) Key personnel assessment](#)).

The inspector must be satisfied that the operator's SMS implementation plan is suitable for the size and scope of the proposed operations. CASA has produced guidance for industry for the implementation of an SMS which is available on the CASA website at [Create and submit your SMS implementation plan | Civil Aviation Safety Authority \(casa.gov.au\)](#).

1.2 Assessment of a significant change application

If required, inspectors will also use this protocol suite to assess an application for a significant change to an exposition/operations manual, relating to SMS processes or procedures.

1.3 Assessment instructions

As the content in this principle was taken from material prepared by the Safety Management International Collaboration Group (SM ICG), the layout is in the format of tables.

Figure 1, and the table explanations in section 1.3.1, outline how the fields in the tables should be used by inspectors.

Figure 1. Table and key

2.2.1 MANAGEMENT COMMITMENT cont'd a			
Evaluation	(d)	There should be a means in place for the communication of the safety policy. b	
	(e)	The Accountable Executive and the senior management team should promote a positive safety / just culture and should demonstrate their commitment to the safety policy through active and visible participation in the safety management system.	
Guidance	What to look for		
	c	Assessors may:	
		<ul style="list-style-type: none">- review how the safety policy is communicated- check that the safety policy is clearly visible to all staff, including relevant contractors- question managers and staff regarding knowledge of the safety policy- check that all managers are familiar with the key elements of the safety policy- request evidence of senior management participation in safety meetings- request to see feedback from safety surveys that include specific just culture questions- verify the organisation's relationship with regulator and other stakeholders- review how a positive safety and just culture are promoted.	
		<div><div>a Sub-section related to Element of SMS</div><div>b Performance Markers</div><div>c Guidance on what/where to look for evidence</div><div>d Present (P), Suitable (S), Operating (O), Effective (E)</div><div>Compliance + performance guidance word picture</div></div>	
		Present	
		Suitable	
		There is a means in place for the communication of the safety policy. The management commitment to safety is documented within the safety policy. d	
		The safety policy is clearly visible to all staff (consider multiple sites).	
		The safety policy is understandable (consider multiple languages). The Accountable Executive and the senior management team have a well-defined role in the safety management system.	
	The safety policy is communicated to all personnel (including relevant contract staff and organisations). The Accountable Executive and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.		
People across the organisation are familiar with the policy and can describe their obligations in respect of the safety policy. Decision making, actions, and behaviours reflect a positive safety/just culture and there is good safety leadership that demonstrates commitment to the safety policy.			

1.3.1 Table explanations

- a **Element:** This is the sub-section in the principle that aligns to the relevant element. Some elements have performance markers that are spread across three or four tables. This heading helps remind inspectors which element the table refers to.
- b **Performance markers:** These identify aspects that guide the assessor in evaluating the maturity and effectiveness of the organisation's SMS in a standardised manner.
- c **Guidance on what/where to look for evidence:** This section guides the assessor when looking at each individual feature and is not meant to be a checklist. The items listed are not specific to an individual Present, Suitable, Operating, or Effective level, but remind the assessor of areas they may want to consider. Some items in this column may not be relevant depending on the size, type, or nature of the organisation.
- d **Compliance + performance guidance:** To recommend an authorisation, inspectors must be satisfied the regulatory requirements have been met using the assessment decision making process of 'present' and 'suitable'. When conducting surveillance the inspector must also be satisfied the SMS is 'operating' and 'effective'.

1.3.2 Assessment worksheet user instructions

This principle provides guidance to the assessor when using the associated Worksheet (OPS.08) Safety management systems assessment.

The worksheet provides inspectors with a regulation-based tool for recording the outcomes of the assessment. It is set out as follows:

- user instructions
- assessment worksheets
- assessment summary
- approval data sheet.

2. Safety management systems

2.1 General

Subregulations 119.190(1), 138.070(1) and 142.160(1) require the operator to have an organisational structure that is appropriate for the size, nature and complexity of the operations. This is an over-arching question in Worksheet (OPS.08) and, therefore, is likely to be easier to assess after completing the more specific assessment in the subsequent sections.

Subregulation 119.190(2) requires all air transport operators to have an SMS. Regulations 138.140 and 142.265 define particular operators who must have an SMS. Operators required to have an SMS must include a statement of the operator's safety policy and objectives, which is one of the four main components.

This principle has structured the assessment as depicted in Table 3.

Table 3. SMS assessment structure

Component	Elements	Performance Markers
2.2 Safety Policy and Objectives	2.2.1 Management commitment	(a)-(i)
	2.2.2 Safety accountabilities and responsibilities	(a)-(c)
	2.2.3 Appointment of key safety personnel	(a)-(c)
	2.2.4 Coordination of the emergency response plan	(a) and (b)
	2.2.5 SMS documentation	(a) and (b)
2.3 Safety Risk Management	2.3.1 Hazard identification	(a)-(g)
	2.3.2 Safety risk assessment and mitigation	(a)-(d)
2.4 Safety Assurance	2.4.1 Safety performance monitoring and measurement	(a)-(g)
	2.4.2 The management of change	(a) and (b)
	2.4.3 Continuous improvement of the SMS	(a)
2.5 Safety Promotion	2.5.1 Safety training and education	(a)-(e)
	2.5.2 Safety communication	(a)

Each component has been broken down into a series of elements, not only to align with CASA guidance¹ offered to industry but also to assist CASA inspectors with conducting an SMS assessment.

Each element is, in turn, sub-divided into performance markers, which CASA inspectors should use to evaluate the organisation's SMS components and elements, and to determine the overall level of the SMS's maturity and effectiveness.

¹ [AC 119-01 v2.1 - Safety management systems for air transport operations \(sharepoint.com\)](#) and [SMS for Aviation – A Practical Guide: Safety Policy and Objectives \(Booklet 2\)](#)

2.2 Statement of the operator's safety policy and objectives

This section of the principle aligns:

- paragraph 119.190(2)(a), subregulation 138.145(a) and paragraph 142.265(2)(b); and
- component 1 of ICAO Annex 19.

2.2.1 Management commitment

This sub-section of the principle aligns:

- subparagraph 119.190(2)(a)(i), paragraph 138.145(a)(i) and subparagraph 142.265(2)(b)(i); and
- component 1, element 1.1 of ICAO Annex 19.

To assist inspectors, the commitments to and the responsibility for safety have been broken down into 9 palpable performance markers identifiable by letters (a) to (i) on the subsequent pages, all under the element 2.2.1 Management commitment.

The 9 performance markers in this sub-section align to *section 5.1 Management commitment* in [AC 119-01 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.2.1 MANAGEMENT COMMITMENT				
Evaluation	(a)	Management's commitment should be signed by the CEO, including a commitment to continuous improvement, observing all applicable legal requirements and standards, and considering best practices.		
	(b)	The safety policy should include a statement to provide appropriate resources and affirm that the organisation is managing resources by anticipating and addressing any shortfalls.		
	(c)	There should be policies in place for safety critical roles relating to all aspects of fitness for duty (e.g. Alcohol and Drugs Policy or Fatigue).		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– interview the CEO to assess their knowledge and understanding of the safety policy– confirm that the safety policy is suitable for the scope, size and complexity of the operation– check that the safety policy is reviewed periodically for content and currency– interview staff to determine to what extent the safety policy is known, as well as how readable and understandable it is– review available resources including personnel, equipment and financial– check that there are sufficient and competent personnel– review planned resources versus actual resources– check how a positive safety culture is encouraged and impacts the overall effectiveness.			
	Present		Suitable	
	Operating		Effective	
	There is a safety policy, signed by the CEO which includes a commitment to continuous improvement, observes all applicable legal requirements and standards and considers best practices. The safety policy includes a statement to provide appropriate resources.		The safety policy is easy to read. The content is customised to the organisation. There is a process for assessing resources and addressing any shortfalls.	
The safety policy is reviewed periodically to ensure it remains relevant to the organisation. The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls.		The CEO is familiar with the contents of the safety policy and endorses it. The organisation is reviewing and taking action to address any forecasted shortfalls in resources.		

2.2.1 MANAGEMENT COMMITMENT cont'd				
Evaluation	(d)	There should be a means in place for the communication of the safety policy.		
	(e)	The CEO and the senior management team should promote a positive safety/just culture and should demonstrate their commitment to the safety policy through active and visible participation in the safety management system.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review how the safety policy is communicated– check that the safety policy is clearly visible to all staff, including relevant contracted staff and third-party organisations– question managers and staff regarding knowledge of the safety policy– check that all managers are familiar with the key elements of the safety policy– request evidence of senior management participation in safety meetings, training, conferences etc.– request to see feedback from safety surveys that include specific just culture aspects– verify the organisation's relationship with regulator and other stakeholders– review how a positive safety and just culture are promoted.			
	Present	Suitable	Operating	Effective
	There is a means in place for the communication of the safety policy. The management commitment to safety is documented within the safety policy.	The safety policy is clearly visible to all staff (consider multiple sites). The safety policy is understandable (consider multiple languages). The CEO and the senior management team have a well-defined role in the safety management system.	The safety policy is communicated to all personnel (including relevant contract staff and organisations). The CEO and the senior management team are promoting their commitment to the safety policy through active and visible participation in the safety management system.	People across the organisation are familiar with the policy and can describe their obligations in respect of the safety policy. Decision making, actions and behaviours reflect a positive safety/just culture and there is good safety leadership that demonstrates commitment to the safety policy.

2.2.1 MANAGEMENT COMMITMENT cont'd				
Evaluation	(f)	The safety policy should actively encourage safety reporting.		
	(g)	There should be a just culture policy and principles that clearly identifies acceptable and unacceptable behaviours to promote a just culture.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– request evidence of when the just culture principles have been applied following an event– request evidence of interventions from safety investigations addressing organisational issues, rather than focusing only on the individual– review how the organisation is monitoring reporting rates– review the number of aviation safety reports appropriate to the activities– verify whether safety reports include the reporter's own errors and events they are involved in (events where no one was watching)– identify feedback on just culture from staff safety culture surveys– interview staff representatives to confirm that they agree with just culture policy and principles– check that staff are aware of the just culture policy and principles.			
	Present	Suitable	Operating	Effective
	A just culture policy and principles have been defined.	<p>The just culture policy clearly identifies acceptable and unacceptable behaviours.</p> <p>The principles ensure that the policy can be applied consistently across the whole organisation.</p> <p>The just culture policy and principles are understandable and clearly visible.</p>	There is evidence of the just culture policy and supporting principles being applied and promoted to staff.	<p>The just culture policy is applied in a fair and consistent manner and staff trust the policy.</p> <p>There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff and staff representatives.</p>

2.2.1 MANAGEMENT COMMITMENT cont'd				
Evaluation	(h)	There should be safety objectives that are consistent with the safety policy, and these should be communicated throughout the organisation.		
	(i)	The State Safety Programme (SSP) should be considered and addressed as appropriate.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– assess whether the safety objectives are appropriate and relevant– check whether defined objectives will lead to an improvement in processes, outcomes and the development of a positive safety culture– assess how safety objectives are communicated throughout the organisation– check whether safety objectives are being measured to monitor achievement through Safety Performance Indicators (SPI)s and Safety Performance Targets (SPT)s– assess whether the safety objectives have considered the State safety objectives in the SSP.			
	Present		Suitable	
	Operating		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 its activities. Safety objectives are understandable and clearly visible. Safety objectives are aligned with the SSP.	
	Safety objectives 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.	

2.2.2 Safety accountability and responsibilities

This sub-section of the principle aligns:

- subparagraph 119.190(2)(a)(ii), paragraph 138.145(a)(ii) and subparagraph 142.265(2)(b)(ii); and
- component 1, element 1.2 of ICAO Annex 19.

To assist inspectors, the safety accountabilities and responsibilities have been broken down into 3 palpable performance markers identifiable by letters (a) to (c) on the subsequent pages, all under the element 2.2.2 Safety accountabilities and responsibilities.

The 3 performance markers in this sub-section align to *section 5.2 Safety accountabilities and responsibilities* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.2.2 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES				
Evaluation	(a)	The CEO should be appointed with full responsibility and accountability to ensure the SMS is properly implemented and performing effectively.		
	(b)	The CEO should be fully aware of their SMS roles and responsibilities in respect of the safety policy, safety standards and safety culture of the organisation.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– request to see evidence that the CEO has the authority to provide sufficient resources for relevant safety improvements– request to see evidence of decision making on risk acceptability– review SMS activities are being carried out in a timely manner and the SMS is sufficiently resourced– request to see evidence of activities being stopped due to unacceptable level of safety risk– look for evidence that CEO actions are consistent with the active promotion of a positive safety culture in the organisation.			
	Present	Suitable	Operating	Effective
	A CEO has been appointed with full responsibility and ultimate accountability for the SMS.	The CEO has control of resources.	The CEO 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 CEO is fully aware of their SMS roles and responsibilities. The CEO is accessible to the staff in the organisation.	The CEO ensures that the performance of the SMS is being monitored, reviewed and improved.

2.2.2 SAFETY ACCOUNTABILITIES AND RESPONSIBILITIES cont'd.

Evaluation	(c)	Safety accountabilities, authorities and responsibilities should be defined and documented throughout the organisation and staff understand their own responsibilities.			
Guidance	What to look for				
	Inspectors may: <ul style="list-style-type: none">– question managers and staff regarding their roles and responsibilities– confirm senior managers are aware of the organisation’s safety performance and its most significant risks– request to see evidence that managers have safety related performance targets– look for active participation of the management team in the SMS– request to see evidence of appropriate risk mitigation, action and ownership– consider the levels of management authorised to make decisions on how risk acceptance is defined and applied– check for any conflicts of interest and that they have been identified and managed.				
	Present	Suitable	Operating	Effective	
	The safety accountability, authorities and responsibilities are clearly defined and documented.	Individuals have access to their safety accountability, authorities and responsibilities (e.g. through job descriptions or organisational charts).	Everyone in the organisation is aware of and fulfil their safety responsibilities, authorities and accountabilities, and are encouraged to contribute to the SMS.	The CEO and the senior management team are aware of the risks faced by the organisation and SMS principles exist throughout the organisation so that safety is part of the everyday language.	

2.2.3 Appointment of key personnel

This sub-section of the principle aligns:

- subparagraph 119.190(2)(a)(iii), paragraph 138.145(a)(iii) and subparagraph 142.265(2)(b)(iii); and
- component 1, element 1.3 of ICAO Annex 19.

To assist inspectors, the appointments of key personnel have been broken down into 3 palpable performance markers identifiable by letters (a) to (c) on the subsequent pages, all under the element 2.2.3 Appointment of key personnel.

The 3 performance markers in this sub-section align to section 5.3 *Appointment of key safety personnel* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#)

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.2.3 APPOINTMENT OF KEY PERSONNEL				
Evaluation	(a)	A competent safety manager who is responsible for the implementation and maintenance of the SMS should be appointed with a direct reporting line to the CEO.		
	(b)	The organisation should have allocated sufficient resources to manage the SMS including, but not limited to, competent staff for safety investigation, analysis, auditing and promotion.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review safety manager role, including credibility and status– review the training that the safety manager has received– request to see evidence of maintained competency– review how the safety manager gets access to internal and external safety information– review how the safety manager communicates and engages with operational staff and senior management– review the safety manager’s workload/allocated time to fulfil role– check there are sufficient resources for SMS activities such as safety investigation, analysis, auditing, safety meeting attendance and promotion– review of safety report action and closure timescales– interview the CEO and safety manager– check for any conflicts of interest and that they have been identified and managed.			
	Present	Suitable	Operating	Effective
	A safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line to the CEO.	The safety manager is competent. Sufficient time and resources are allocated to maintain the SMS.	The safety manager has implemented, and is maintaining, the SMS. The safety manager is in regular communication with the CEO and escalates safety issues when appropriate. The safety manager is accessible to staff in the organisation.	The safety manager is competent to manage the SMS and identifies improvements in a timely manner. There is a close working relationship with the CEO, and the safety manager is considered a trusted advisor and given appropriate status in the organisation.

2.2.3 APPOINTMENT OF KEY PERSONNEL cont'd.

Evaluation	(c)	The organisation should have established appropriate safety committee(s) that discuss and address safety risks and compliance issues and include(s) the CEO and the heads of functional areas.			
Guidance	What to look for				
	Inspectors may: <ul style="list-style-type: none">– review safety committee and meeting structure and <i>Terms of Reference</i> for each committee/meeting– review meeting attendance levels– review meeting records and actions– check that outcomes are communicated to the rest of the organisation– request to see evidence of safety objectives, safety performance and compliance are being reviewed and discussed at meetings– check if participants are able to challenge what is being presented when there is limited evidence– check if senior management are aware of the most significant risks faced by the organisation and the overall safety performance of the organisation.				
	Present	Suitable	Operating	Effective	
	The organisation has established safety committee(s).	<p>Safety committee(s) structure and frequency supports the SMS functions across the organisation.</p> <p>The scope of the safety committee(s) includes safety risks and compliance issues.</p> <p>The attendance of the highest-level safety committee includes at least the CEO and the heads of functional areas.</p>	<p>There is evidence of meetings taking place detailing the attendance, discussions, and actions.</p> <p>The safety committee(s) monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources.</p> <p>Actions are being monitored and appropriate safety objectives and SPIs have been established.</p>	<p>Safety committees include key stakeholders.</p> <p>The outcomes of the meetings are documented and communicated, and any actions are agreed, taken and followed up in a timely manner.</p> <p>The safety performance and safety objectives are reviewed and actioned as appropriate.</p>	

2.2.4 Coordination of emergency response planning

This sub-section of the principle aligns:

- subparagraph 119.190(2)(a)(iv), paragraph 138.145(a)(iv) and subparagraph 142.265(2)(b)(vii); and
- component 1, element 1.4 of ICAO Annex 19.

To assist inspectors, the coordination of emergency response planning has been broken down into 2 palpable performance markers identifiable by letters (a) and (b) on the following page, under the element 2.2.4 Coordination of emergency response planning.

The 2 performance markers in this sub-section align to *section 5.4 Coordination of the emergency response plan* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#)

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.2.4 COORDINATION OF EMERGENCY RESPONSE PLANNING				
Evaluation	(a)	An appropriate emergency response plan (ERP) has been developed and distributed that defines the procedures, roles, responsibilities and actions of the various organisations and key personnel.		
	(b)	The ERP is periodically tested for the adequacy of the plan and the results reviewed to improve its effectiveness.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review emergency response plan– review how coordination with other organisations is planned– review how ERP is distributed and where copies are held– interview key personnel and check they have access to the ERP– check that different types of foreseeable emergencies have been considered– review when the plan was last reviewed and tested and actions taken.			
	Present	Suitable	Operating	Effective
	A coordinated ERP has been developed and defined.	Key personnel have easy access to the relevant parts of the ERP at all times. The ERP defines the procedures, roles, responsibilities and actions of the various organisations and key personnel. The frequency and methods for testing the ERP are defined. The coordination with other organisations (including non-aviation organisations) is defined with appropriate means.	The ERP is reviewed and tested to make sure it remains up to date. There is evidence of coordination with other organisations as appropriate.	The results of the ERP review and testing are assessed and actioned to improve its effectiveness.

2.2.5 SMS documentation

This sub-section of the principle aligns:

- subparagraph 119.190(2)(a)(v), paragraph 138.145(a)(v) and subparagraph 142.265(2)(b)(viii); and
- component 1, element 1.5 of ICAO Annex 19.

To assist inspectors, the SMS documentation has been broken down into 2 palpable performance markers identifiable by letters (a) and (b) on the following page, under the element 2.2.5 SMS documentation.

The 2 performance markers in this sub-section align to *section 5.5 SMS documentation* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#)

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.2.5 SMS DOCUMENTATION				
Evaluation	(a)	The SMS documentation should include the policies and processes that describe the organisation's safety management system and processes, and should be readily available to all relevant personnel.		
	(b)	SMS documentation, including SMS related records, should be regularly reviewed and updated with appropriate version control in place.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review the SMS documentation and amendment procedures– check for cross references to other documents and procedures– check availability of SMS documentation to all staff– check that staff know where to find safety-related documentation including procedures appropriate to their role– review the supporting SMS documentation (hazard logs, meeting minutes, safety performance reports, risk assessments etc.)– check how safety records are stored and version controlled– check appropriate staff are aware of the records control processes and procedures.			
	Present	Suitable	Operating	Effective
	The SMS documentation includes the policies and processes that describe the organisation's SMS and processes. The SMS documentation defines the SMS outputs and which records of SMS activities will be stored. Records to be stored, storage period and location are identified.	SMS documentation is readily available to all relevant personnel. SMS documentation is comprehensible. SMS documentation is consistent with other internal management systems and is representative of the actual processes in place. Data protection and confidentiality rules have been defined.	Changes to the SMS documentation are managed. Everyone is familiar with and follows the relevant parts of the SMS documentation. SMS activities are appropriately stored and found to be complete and consistent with data protection and confidentiality control rules.	SMS documentation is proactively reviewed for improvement. SMS records are routinely used as inputs for safety management-related tasks and continuous improvement of the SMS.

2.3 Safety risk management

This section of the principle aligns:

- paragraph 119.190(2)(b), subregulation 138.145(b) and paragraph 142.265(2)(c); and
- component 2 of ICAO Annex 19.

2.3.1 Hazard identification

This sub-section of the principle aligns:

- subparagraph 119.190(2)(b)(i), paragraph 138.145(b)(i) and subparagraph 142.265(2)(c)(i); and
- component 2, element 2.1 of ICAO Annex 19.

To assist inspectors, hazard identification has been broken down into 7 palpable performance markers identifiable by letters (a)-(g) on the subsequent pages, under the element 2.3.1 Hazard identification.

The 2 performance markers in this sub-section align to *section 6.2 Hazard identification* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#)

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.3.1 HAZARD IDENTIFICATION				
Evaluation	(a)	There should be a confidential reporting system to capture errors, hazards and near misses that is simple to use and accessible to all staff.		
	(b)	There should be a confidential reporting system that provides appropriate feedback to the reporter and, where appropriate, to the rest of the organisation.		
	(c)	Personnel should express confidence and trust in the organisation's reporting policy.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review the reporting system for access and ease of use– check staff's trust of, and familiarity with, the reporting system, and check whether they know what should be reported– review how data protection and confidentiality is achieved– request to see evidence of feedback to reporter, the organisation and third parties– assess volume and quality of reports, including whether personnel are reporting their own errors and mistakes– review report closure rates– check whether contracted organisations and customers are able to make reports– review how reports in the system are analysed– confirm that responsibilities with regards to occurrence analysis, storage and follow-up are clearly defined– check that relevant staff are aware of which occurrences should be mandatory– assess how senior management engage with the outputs of the reporting system.			
	Present	Suitable	Operating	Effective
	There is a confidential reporting system to capture mandatory occurrences and voluntary reports that includes a feedback system and stored on a database. The process identifies how reports are actioned, and timescales are specified and addressed.	The reporting system is accessible and easy to use by all personnel. Responsibilities, timelines and format for the feedback are meaningful and well defined. Data protection and confidentiality is ensured.	The reporting system is being used by all personnel. There is feedback to the reporter of any actions taken (or not taken) and, where appropriate, to the rest of the organisation. Reports are evaluated, processed, analysed and stored.	There is a healthy reporting system based on the volume of reporting and the quality of reports received. Safety reports are acted on in a timely manner. Personnel express confidence and trust in the organisation's reporting policy and process.

			<p>Staff are aware of and fulfil their responsibilities in respect to the reporting system.</p> <p>Reports are processed within the defined timescales.</p>	<p>The reporting system is being used to make better management decisions and continuously improve.</p> <p>The reporting system is available for third parties to report (partners, suppliers and contractors).</p>
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2.3.1 HAZARD IDENTIFICATION cont'd.				
Evaluation	(d)	There is a process that defines how hazards are identified from multiple sources through reactive and proactive methods (internal and external).		
	(e)	The hazard identification process identifies human performance related hazards.		
	(f)	There is a process in place to analyse safety data and safety information to look for trends and gain useable management information.		
	(g)	Safety investigations are carried out by appropriately trained personnel to identify root causes (why it happened, not just what happened).		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review how hazards are identified, analysed, addressed and recorded– review structure and layout of hazard log– consider hazards related to:<ul style="list-style-type: none">– possible accident scenarios– human and organisational factors– business decisions and processes– third-party organisations– regulatory factors.– review what internal and external sources of hazards are considered – such as safety reports, audits, safety surveys, investigations, inspections, brainstorming, management of change activities, commercial and other external influences.– review whether safety investigations identify human and organisational contributing factors.			
	Present	Suitable	Operating	Effective
	There is a process that defines how hazards are identified though reactive and proactive methods. The triggers for safety investigations are identified.	Multiple sources of hazards (internal and external) are considered and reviewed, as appropriate. The data analysis process enables gaining useable safety information. Hazards are documented in an easy-to-understand format.	The hazards are identified and documented. Human and organisational factors related to hazards are being identified. Safety investigations are carried out and recorded.	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 the operational environment and involves all key personnel and appropriate

		The level of sign-off for safety investigations is defined and adequate to the level of risk.		stakeholders, including external organisations. Hazards are continuously assessed in a systematic and timely manner. Safety investigations identify causal/contributing factors that are acted upon.
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2.3.2 Safety risk and mitigation

This sub-section of the principle aligns:

- subparagraph 119.190(2)(b)(ii), paragraph 138.145(b)(ii) and subparagraph 142.265(2)(c)(ii); and
- component 2, element 2.2 of ICAO Annex 19.

To assist inspectors, safety risk and mitigation has been broken down into 4 palpable performance markers identifiable by letters (a)-(d) on the subsequent pages, under the element 2.3.2 Safety risk and mitigation.

The 2 performance markers in this sub-section align to *section 6.3 Safety risk assessment and mitigation* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.3.2 SAFETY RISK AND MITIGATION				
Evaluation	(a)	There should be a process for the management of risk that includes the analysis and assessment of risk associated with identified hazards expressed in terms of likelihood and severity (or alternative methodology).		
	(b)	There should be criteria for evaluating the level of risk the organisation is willing to accept, and risk assessments and ratings are appropriately justified.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review the risk classification scheme and procedures– check that severity and likelihood criteria are defined (or that an alternative methodology is described)– review whether risk assessments are carried out consistently– sample an identified hazard and review how it is processed and documented– review what triggers a risk assessment– check any assumptions made and whether they are reviewed– review how issues are classified when there is insufficient quantitative data available– check that the process defines who can accept what level of risk– check that the risk register is being reviewed and monitored by the appropriate safety committee(s)– look for evidence of risk acceptability being routinely applied in decision-making processes.			
	Present	Suitable	Operating	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.	Severity and likelihood criteria are clearly defined and fit the service provider's actual circumstances. The risk matrix and acceptability criteria are clearly defined and usable. Responsibilities and timelines for accepting the risk are clearly 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.

2.3.2 SAFETY RISK AND MITIGATION cont'd.				
Evaluation	(c)	The organisation should have a process in place to make decisions and apply appropriate and effective risk controls.		
	(d)	Senior management should have visibility of medium and high-risk hazards, as well as their mitigation and controls.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– check whether risk controls consider human and organisational factors– look for evidence of risk controls being actioned and followed up on– check whether aggregate risk is being considered– check whether the risk controls have reduced the residual risk– check whether risk controls are clearly identified– review the use of risk controls that rely solely on human intervention– check that new risk controls do not create additional risks– check whether the acceptability of the risks is made at the right management level.			
	Present	Suitable	Operating	Effective
	The organisation has a process in place to decide and apply risk controls.	Responsibilities and timelines for determining and accepting the risk controls are defined.	Appropriate risk controls are being applied to reduce the risk to an acceptable level, including timelines and allocation of responsibilities. Human Factors (HF) are considered as part of the development of risk controls.	Risk controls are practical and sustainable, applied in a timely manner, and do not create additional risks. Risk controls take HF into consideration.

2.4 Safety assurance

This section of the principle aligns:

- paragraph 119.190(2)(c), subregulation 138.145(c) and paragraph 142.265(2)(d); and
- component 3 of ICAO Annex 19.

2.4.1 Safety performance monitoring and measurement

This sub-section of the principle aligns:

- subparagraph 119.190(2)(c)(i), paragraph 138.145(c)(i) and subparagraph 142.265(2)(d)(i)(A); and
- component 3, element 3.1 of ICAO Annex 19.

To assist inspectors, safety performance monitoring and measurement has been broken down into 7 palpable performance markers identifiable by letters (a)-(g) on the subsequent pages, under the element 2.4.1 Safety performance monitoring and measurement.

The 7 performance markers in this sub-section align to *section 7.1 Safety performance monitoring and measurement* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

For further information on the guidance provided to industry, refer to Booklet 4 [Safety Management Systems for aviation: a practical guide SMS 4 Safety assurance 3rd Edition \(casa.gov.au\)](#)

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.4.1 Safety performance monitoring and measurement				
Evaluation	(a)	Safety performance indicators (SPIs) linked to the organisation’s safety objectives should be defined, promulgated, monitored and analysed for trends.		
	What to look for			
Guidance	Inspectors may: <ul style="list-style-type: none">– check that SPIs are based on reliable sources of data– look for evidence of when SPIs were last reviewed– check whether the defined SPIs and targets are appropriate to the organisation’s activities, risks and safety objectives– check whether SPIs are focused on what is important rather than what is easy to measure– check whether any consideration has been given to any State SPIs– review whether any action has been taken when an SPI is indicating a negative trend (reflecting a risk control or an inappropriate SPI)– look for evidence that results of safety performance monitoring are discussed at the senior management level– request to see evidence of feedback provided to the CEO.			
	Present	Suitable	Operating	Effective
		There is a process in place to measure the safety performance of the organisation, including SPIs and targets linked to the organisation’s safety objectives, and to measure the effectiveness of safety risk controls.	SPIs are focused on what is important rather than what is easy to measure. Reliability of data sources is considered in the design of SPIs. SPIs are linked to the identified risks and safety objectives. Frequency and responsibility for the trend monitoring of SPIs are appropriate. Realistic targets have been set. State SPIs are considered, as applicable.	The safety performance of the organisation is being measured and meaningful SPIs are being continuously monitored and analysed for trends.

2.4.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT cont'd.					
Evaluation	(b)	Risk mitigations and controls should constantly be verified/audited to confirm they are working and effective.			
	(c)	Safety assurance should take into account activities carried out by all directly contracted organisations.			
Guidance	What to look for				
	Inspectors may: <ul style="list-style-type: none">– look for evidence of risk controls being assessed for effectiveness (e.g. audits, surveys, reviews, SPIs and SPTs, reporting systems)– look for evidence of risk controls applied by contracted organisations being assessed and overseen (e.g. quality check, reviews and regular meetings)– check whether information from safety assurance and compliance monitoring activities feeds back into the safety risk management process– review where risk controls have been changed as a result of the assessment.				
	Present		Suitable	Operating	Effective
	There is a process in place to assess whether the risk controls are applied and effective.		Responsibilities, methods and timelines for assessing risk controls are defined. Contracted organisations are included in the safety assurance process.	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.

2.4.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT cont'd.				
Evaluation	(d)	Responsibilities and accountability for ensuring compliance with safety regulations should be defined, and applicable requirements should be clearly identified in organisation manuals and procedures.		
	(e)	There should be an internal audit program, including details of the schedule of audits and procedures for audits, reporting, follow-up and records.		
	(f)	Responsibilities and accountabilities for the internal audit process should be defined, and there should be a person or group of persons with responsibilities for internal audits with direct access to the CEO.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review how senior management ensures the organisation remains compliant– review job descriptions for compliance responsibilities– look for evidence that senior management take action on internal and external audit results– review how independence of the internal audit function is achieved– review how the internal audit function interacts with:<ul style="list-style-type: none">– senior management– line managers– the safety management staff.– assess the contents of the program against any regulatory requirements.			
	Present	Suitable	Operating	Effective
	Responsibilities and accountabilities for compliance are defined. The organisation has an internal audit program, and procedures for audits, reporting and records. A person or group of persons with responsibilities for internal audits has been identified and they have direct access to the CEO.	The internal audit program covers all applicable regulations and includes details of the schedule of audits. Independence of the internal audit function is achieved.	The compliance monitoring program is being followed and regularly reviewed. All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures. Internal and external audit results are reported to the CEO and senior management.	Individuals are proactively identifying and reporting potential non-compliances. The CEO and senior management actively seek feedback on the status of internal and external audit activities.

2.4.1 SAFETY PERFORMANCE MONITORING AND MEASUREMENT cont'd.				
Evaluation	(g)	After an audit, there should be appropriate analysis of causal factors, and corrective/preventive actions should be taken.		
	What to look for			
Guidance	Inspectors may: <ul style="list-style-type: none">– review the methods used for causal analysis– check that the method is used consistently– review any repeat findings and check for actions not implemented or overdue– check for timely implementation of actions– review senior management awareness of the status of significant findings and related corrective/preventive actions– check that appropriate personnel participate in the determination of causes and contributing factors– look for consistency between internal audit results and external audit results– review whether causal factors are considered as potential hazards.			
	Present	Suitable	Operating	Effective
	The process for the identification and follow-up of corrective/preventive actions is defined. The interface between internal audits and the safety risk management processes is described.	Responsibilities and timelines for determining, accepting and following up the corrective/preventive action are defined. Compliance monitoring includes contracted activities.	The identification and follow up of corrective/preventive actions is carried out in accordance with the procedures, including causal analysis to address root causes. The status of corrective/preventive actions is regularly communicated to relevant senior management and staff.	The organisation investigates the systemic causes and contributing factors of findings. The organisation proactively reviews the status of corrective/preventive actions. Effectiveness of the corrective/preventive actions is verified.

2.4.2 The management of change

This sub-section of the principle aligns:

- subparagraph 119.190(2)(c)(ii), paragraph 138.145(c)(ii) and subparagraph 142.265(2)(d)(i)(C); and
- component 3, element 3.2 of ICAO Annex 19.

To assist inspectors, the management of change has been broken down into 2 palpable performance markers identifiable by letters (a) and (b) on the following page, under the element 2.4.2 The management of change.

The 2 performance markers in this sub-section align to *section 7.2 The management of change* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.4.2 THE MANAGEMENT OF CHANGE				
Evaluation	(a)	The organisation should have a process to identify whether changes have an impact on safety, and to manage any identified risks in accordance with existing safety risk management processes.		
	(b)	Human Factor (HF) issues should be considered as part of the change management process and, where appropriate, the organisation should apply the appropriate HF/human-centred design standards to the equipment and physical environment design.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– check that key stakeholders are involved in the process– review what triggers the process– review recent changes that have been through the risk assessment process– check that change is signed off by an appropriately authorised person– check whether transitional risks are being identified and managed– review follow-up actions, such as whether any assumptions made have been validated– review whether there is an impact on previous risk assessments and existing hazards– review whether consideration is given to the accumulative effect of multiple changes– review that any business-related changes have considered safety risks (organisational restructuring, upsizing or downsizing, IT projects etc.)– check for evidence of HF issues being addressed during changes– review impact of change on training and competencies– review previous changes to confirm they remain under control– consider how the changes are communicated to those people impacted by the change.			
	Present	Suitable	Operating	Effective
	The organisation has established a change management process to identify whether changes have an impact on safety, and to manage any identified risks in accordance with existing safety risk management processes.	Triggers for the change management process are defined. The process considers business related changes and interfaces with other organisations/departments. The process is integrated with the risk management and safety	The change management process is being used and includes hazard identification and risk assessments, with appropriate risk controls being put in place before a decision to make the change is taken. HF issues have been considered and	The change management process is used for all changes that may impact safety, including HF issues, and considers the accumulation of multiple changes. It is initiated in a planned, timely and consistent manner and includes

		assurance processes. Responsibilities and timelines are defined.	been addressed as part of the change management process.	follow up action that ensures the change was implemented safely. The change is communicated to those affected. Risk control and mitigation strategies associated with changes are achieving the planned effect.
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2.4.3 Continuous improvement of the SMS

This sub-section of the principle aligns:

- subparagraph 119.190(2)(c)(iii), paragraph 138.145(c)(iii) and subparagraph 142.265(2)(d)(i)(D); and
- component 3, element 3.3 of ICAO Annex 19.

To assist inspectors, continuous improvement of the SMS is summarised into 1 palpable performance marker (a) on the following page, under the element 2.4.3 Continuous improvement of the SMS.

The performance marker in this sub-section aligns to *section 7.3 Continuous improvement of the SMS* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.4.3 CONTINUOUS IMPROVEMENT OF THE SMS				
Evaluation	(a)	The organisation should continuously monitor and assess its SMS processes to maintain, or continuously improve, the overall effectiveness of the SMS.		
	What to look for			
Guidance	Inspectors may: <ul style="list-style-type: none">– review the information and safety data used for management decision making and continuous improvement– look for evidence of:<ul style="list-style-type: none">– lessons learnt being incorporated into SMS and operational processes– best practices being sought and embraced– surveys and assessments of organisational culture being carried out and acted upon– data being analysed and results shared with Safety Committees– follow up actions.– look for information from external occurrences, investigation reports, safety meetings, hazard reports, audits and safety data analysis all contribute towards continuous improvement of the SMS.			
	Present	Suitable	Operating	Effective
	There is a process in place to monitor and review the effectiveness of the SMS, using the available data and information.	The SMS is periodically reviewed, and the review is supported by safety information and safety assurance activities. Senior management and different departments are involved. The decision making is data informed. External information is considered in addition to internal 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 improvement.

2.5 Safety training and promotion

This section of the principle aligns:

- paragraph 119.190(2)(d), subregulation 138.145(d) and paragraph 142.265(2)(e); and
- component 4 of ICAO Annex 19.

For further information on the guidance provided to industry, refer to Booklet 5 [SMS 5 - Safety promotion \(casa.gov.au\)](#)

2.5.1 Training and education

This sub-section of the principle aligns the element with:

- subparagraph 119.190(2)(d)(i), paragraph 138.145(d)(i) and subparagraph 142.265(2)(e)(i); and
- component 4, element 4.1 of ICAO Annex 19.

To assist inspectors, training and education has been broken down into 5 palpable performance markers identifiable by letters (a)-(e) on the subsequent pages, under the element 2.5.1 Training and education.

The 5 performance markers in this sub-section align to *section 8.2 Training and education* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the tables below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.5.1 TRAINING AND EDUCATION					
Evaluation	(a)	There should be a training program for SMS in place, which includes initial and recurrent training. The training should cover individual safety duties (i.e. roles, responsibilities and accountabilities) and how the organisation's SMS operates.			
	(b)	There should be a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training.			
	(c)	Training should include human and organisational factors, including just culture and non-technical skills, with the intent of reducing human error.			
Guidance	What to look for				
	Inspectors may: <ul style="list-style-type: none">– review the SMS training program, including course content and delivery method– check training records against the training program– review how the competence of the trainers is being assessed and maintained– check whether training considers feedback from external occurrences, investigation reports, safety meetings, hazard reports, audits, safety data analysis, training, course evaluations etc.– review how training is assessed for new staff and changes in position– review any training evaluation– check that the training includes human and organisational factors– ask staff about their own understanding of their role in the organisation's SMS and their safety duties– check that all staff are briefed on compliance.				
	Present		Suitable	Operating	Effective
	There is an SMS training program in place that includes initial and recurrent training.		The training covers individual safety duties (including roles, responsibilities and accountabilities) and how the organisation's SMS operates. Training material and methodology are adapted to the audience and include human factors. All staff requiring training are identified.	The SMS training program is delivering appropriate training to the different staff in the organisation and is being delivered by competent personnel.	SMS training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests etc.) and is linked to the competency assessment. Training is routinely reviewed to take feedback from different sources into consideration.

2.5.1 TRAINING AND EDUCATION cont'd.				
Evaluation	(d)	There is a process that evaluates the individual's competence and takes appropriate remedial action when necessary.		
	(e)	The competence of trainers is defined and assessed, and appropriate remedial action taken when necessary.		
Guidance	What to look for			
	Inspectors may: <ul style="list-style-type: none">– review how competence assessment is carried out on initial recruitment and recurrently– check it includes safety duties and responsibilities, as well as compliance management.			
	Present	Suitable	Operating	Effective
	A competency framework is defined for all personnel, including trainers.	There is a process in place to periodically assess the actual competency of personnel against the framework.	There is evidence of the process being used and being recorded.	The competence assessment program and process are routinely reviewed and improved. The competence assessment takes appropriate remedial action when necessary and feeds into the training program.

2.5.2 Safety communication

This sub-section of the principle aligns:

- subparagraph 119.190(2)(d)(ii), paragraph 138.145(d)(ii) and subparagraph 142.265(2)(e)(ii); and
- component 4, element 4.2 of ICAO Annex 19.

To assist inspectors, safety communication is summarised into 1 palpable performance marker identifiable by letter (a) on the following page, under the element 2.5.2 Safety communication.

The performance marker in this sub-section aligns to *section 8.3 Training and education* in the [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the table below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.5.2 SAFETY COMMUNICATION				
Evaluation	(a)	There should be 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 should include contracted organisations and personnel where appropriate.		
	What to look for			
Guidance	Inspectors may: <ul style="list-style-type: none">– review the sources of information used for safety communication– review the methods used to communicate safety information (e.g. meetings, presentations, emails, website access, newsletters, bulletins, posters etc.)– assess whether the means of communication is appropriate– check whether the means for safety communication is reviewed for effectiveness and material used to update relevant training– check whether significant events, changes and investigation outcomes are being communicated– check accessibility to safety information– ask staff about any recent safety communication– review whether information from occurrences is timely, communicated to all relevant personnel (internal and external) and has been appropriately deidentified.			
	Present	Suitable	Operating	Effective
	There is a process to communicate safety critical information.	The process determines <i>what</i> , <i>when</i> , and <i>how</i> safety information needs to be communicated. The process includes contracted organisations and personnel where appropriate. The means of communication are adapted to the audience and the significance of what is being communicated.	Safety-critical information is being identified and communicated throughout the organisation to all personnel, as relevant, including contracted organisations and personnel where appropriate.	The organisation analyses and communicates safety-critical information effectively through a variety of 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.

2.5.3 Training and education – interface management

This sub-section of the principle aligns:

- paragraph 119.190(2)(d) ; and
- appendix 2, note 2 of ICAO Annex 19.

To assist inspectors, interface management is summarised into 1 palpable performance marker identifiable by letter (a) on the following page, under the element 2.5.3 Interface management.

The performance marker in this sub-section aligns to parts of *section 8.2 Training and education* in [AC 119-01 v2.1 - Safety management systems for air transport operations](#).

It is recommended that inspectors use the guidance in the table below, together with the word pictures (Present, Suitable, Operating, Effective) to assist in the assessment of the SMS, in terms of maturity and effectiveness in a consistent way.

2.5.3 INTERFACE MANAGEMENT				
Evaluation	(a)	The organisation should identify and document the relevant internal and external interfaces and the critical nature of such interfaces.		
	What to look for			
Guidance	Inspectors may: <ul style="list-style-type: none">– review how interfaces have been documented, which may be included in a system description– look for evidence that:<ul style="list-style-type: none">– safety critical issues, areas and associated hazards are identified– safety occurrences are being reported and addressed– risk control actions are applied and regularly reviewed– interfaces are reviewed periodically.– check whether training and safety promotion sessions are organised with relevant external organisations– check whether external organisations participate in SMS activities and share safety information– check the identified interfaces (e.g. interfaces with aerodromes, airlines, Air Traffic Control , training organisations, contracted organisations and the State).			
	Present	Suitable	Operating	Effective
		The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.	All relevant interfaces are addressed. The way the interfaces are managed is appropriate to the criticality, in terms of safety. The means for communicating safety information is defined.	The organisation is managing the interfaces through hazard identification and risk management. There is an assurance activity to assess risk mitigations being delivered by external organisations.

2.6 Flight data analysis program (FDAP)

This sub-section of the principle aligns:

- regulation 119.195 ; and
- Part I and Part III of ICAO Annex 6.

Guidance below is aligned to the specific questions in the Worksheet (OPS.08) to assist those conducting the assessment of the FDAP, in terms of maturity and effectiveness in a consistent way.

Further guidance is also available in [AC 119-04 v1.1 – Flight Data Analysis Programmes \(FDAP\) for air transport operations](#).

2.6.1 Provision of FDAP

To comply with subparagraph 119.195(3)(b)(c)(d), operators need to ensure that FDAP is provided by appropriate persons from either within their organisation or outside.

All FDAP team members should be provided with appropriate training or have appropriate experience for their respective area of data analysis and should be subject to a confidentiality agreement.

Some roles that may be involved in the FDAP include:

- team leader
- flight operations interpreter
- flight operations manager
- technical interpreter
- flight crew contact person
- engineering technical support
- air safety coordinator
- replay operative and administrator.

2.6.2 Regular recording and analysis of flight data

To comply with paragraph 119.195(3)(a), overviews and summaries of FDA data should be compiled on a regular basis, usually weekly or bi-weekly, while individual significant events should be expected to be followed up in a timely fashion. All data should be reviewed to identify specific exceedances and emerging undesirable trends, and to disseminate the information to flight crews.

Lessons learned from an FDAP may warrant inclusion in the company's safety promotion activities.

As in any closed-loop process, follow up monitoring should assess the effectiveness of any corrective actions taken. Flight crew feedback should identify and resolve safety problems and could include answering the following example questions:

- Is the implementation and effectiveness of corrective actions adequate?
- Are the risks mitigated, or unintentionally transferred to another part of the operations?
- Have new problems been introduced into the operation as a result of implementing corrective actions?

All successes and failures should be recorded, comparing planned program objectives with expected results. This provides a basis for review of an FDAP and the foundation for future program development.

2.6.3 Identity protection

To comply with subparagraph 119.195(3)(c)(i)(ii)(iii), operators should have a policy on FDA data de-identification that is carefully written out and agreed upon before it is needed in extreme circumstances. Management assurance on the non-disclosure of individuals should be expressly clear and binding. A principle of exception applies when the operator/flight crew believes that there is a continuing unacceptable safety risk if specific action regarding the flight crew is not taken. In this case, an identification and follow up action procedure, previously agreed upon before the particular event, can be brought into play.

Experience has shown that this is very rarely required. Most often, a flight crew responds to advice from the FDA flight crew contact person to submit an aviation safety report, and they may then be covered by protection assured under that program.

It is recommended that there be an initial stage during which the data can be identified to allow confidential follow up by the crew representative or trusted individual agreed upon by the operator and the flight crews. Strict rules of access should be enforced during this period. In the case of a mandatory occurrence or accident, any data retained by the program may not be de-identified or removed from the system prior to the investigation, or for confirmation that it is not required. This will allow the safety investigators access to all relevant information.

2.6.4 No punitive action

Punitive action may come in the guise of preventative action or remedial action.

To comply with paragraph 119.195(3)(d), FDAPs should be non-punitive and contain adequate safeguards to protect the source(s) of the data, subject to the provision of it to:

- a person whose duties require that person to analyse operational flight data
- a person who has access to the identified person's identity solely for the purpose of analysing operational flight data
- a pilot appointed by the operator to liaise with flight crew in relation to matters arising from the flight data analysis program
- anyone with the written consent of the person
- anyone as required by CASA
- anyone as required or authorised by law to receive it.

It is recommended that operators have a written non-punitive company policy that covers FDA and makes it clear that the main objective of an FDAP should be to improve safety, and not to allocate blame or liability.

Note: there are requirements in the civil aviation legislation related to this topic.

3. Revision history

Amendments/revisions for this principle are recorded below in order of the most recent first.

Table 4. Revision history table

Version No.	Date	Parts / Sections	Details
2.0	March 2024	All	Reformatted. Revised chapter 1 to reflect Protocol framework.
1.1	May 2022	All	Revised to include Part 142 references. Title change from 'Approval' to 'Assessment'.
1.0	December 2021	All	First issue