Civil Aviation Safety Authority
of Papua New Guinea

Advisory Circular
AC100-1A

Safety Management Systems (SMS) Component 1 - Safety Policy, Objectives and Resources: A Practical Guide

Initial Issue

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GENERAL

Civil Aviation Authority Advisory Circulars (AC) contain information about standards, practices and procedures that the Director has found to be an Acceptable Means of Compliance (AMC) with the associated rule.

An AMC is not intended to be the only means of compliance with a rule, and consideration will be given to other methods of compliance that may be presented to the Director. When new standards, practices or procedures are found to be acceptable, they will be added to the appropriate Advisory Circular.

This Advisory Circular also includes Explanatory Material (EM) where it has been shown that further explanation is required. Explanatory Material must not be regarded as an acceptable means of compliance.

PURPOSE

This Advisory Circular provides methods, acceptable to the Director, for showing compliance with the Safety Management System requirements of Part 100 and explanatory material to assist in showing compliance.

RELATED CAR

This AC relates specifically to Civil Aviation Rule 100 Subpart B – Safety Management Systems.

CHANGE NOTICE

There was no previous issue of this AC, consequently no change is in effect.

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1. EM100.57 SAFETY POLICY AND OBJECTIVES

1.1 EM 100.51 Introduction

1.1.1 The first component of a safety management system (SMS) describes your organisation's safety policy and safety objectives. It sets out senior management's commitment to safety, its goals, and the supporting organisational structure for the SMS. Your safety policy and objectives should be periodically reviewed to ensure they remain current and are enhancing the SMS as it matures. It is important to remember your safety policy and objectives cannot be a '*set and forget'* process. Changes to Chief Executives, senior management personnel, and broader organisational structures need to be updated and reflected in your policy.

1.2 EM100.53 Safety Policy

1.2.1 A safety policy outlines what your organisation will do to manage safety. Your policy is a reminder of 'how we do business around here'. It is the organisation's fundamental approach to managing safety, defining management's commitment to safety and its overall safety vision. Your safety policy is a cultural statement on a page. It needs to be in the language and style appropriate for your audience, setting the tone from the top to the bottom of your organisation.

1.2.2 The aviation service provider should develop a safety policy which shall be signed by the Chief Executive and shall as a minimum:

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

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

(c) include safety reporting procedures;

(d) clearly indicate which types of behaviours are unacceptable related to the service provider's aviation activities and include the circumstances under which disciplinary action would not apply;

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

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

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

1.2.3 The Chief Executive is responsible for developing the Safety Policy statement, by direct involvement in the crafting of the wording and then endorsing the Safety Policy with their signature. Senior management, key safety personnel and, where appropriate, staff representative bodies (employee forums, trade unions) should be consulted in the development of the safety policy to promote a sense of shared responsibility.

1.2.4 The policy should not just be a picture on the wall, it should link the policy of the organisation to the culture that the Chief Executive wishes to embed. It is important that the Chief Executive's voice can be heard through the words that are chosen – not just standard impersonal phrases – and it should be made clear that they will do what it takes to meet that commitment – including resourcing to support the safety goals and objectives.

1.2.5 The safety policy should be visibly endorsed by senior management and the CE. 'Visible endorsement' refers to making management's active support of the safety policy visible to the rest of the organisation. This can be done via any means of communication and through the alignment of activities to the safety. The safety policy should be clearly visible, or available, to all personnel (including significant contracted organisations) and be included in key documentation and communication media. It is the responsibility of management to communicate the safety policy throughout the organisation to ensure all staff understand and work in accordance with the safety policy.

1.2.6 The Safety Policy outlines the organisation's safety reporting policy; staff need to know that there is a fair reporting system, and what type of behaviour would attract disciplinary action. Try to keep the policy short enough so that the reader can understand and remember what the Chief Executive has committed to, and what is expected of them. Safety goals can be stated within the policy, or the policy can describe where they can be found.

1.3 EM 100.53 SMS Self-Evaluation Tool: Safety Policy

1.3.1 To self-check the maturity and effectiveness of your *Safety Policy*, CASA has provided you with the below Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

1.3.2 A suggested checklist for a Safety Policy is provided below (Required for CASA SMS Acceptance).

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved?	Verified with evidence?
Evaluation	1	There is a safety policy, signed by the Chief Executive, which includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices.							
	2	The safety policy includes a statement to provide appropriate resources and the organisation is managing resources by anticipating and addressing any shortfalls.							
	3	There are policies in place for safety critical roles relating to all aspects of Fitness for Duty (for example, Alcohol and Drugs Policy or Fatigue).							

Guidance

What to look for

- Interview the Chief Executive to assess his/her knowledge and understanding of the safety policy.
- Check that the safety policy is reviewed periodically for content and currency.
- Confirm that the safety policy meets the requirements.
- 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.
- 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 (P)	Suitable (S)	Operating (O)	Effective (E)
There is a safety policy, signed by the Accountable Manager, which includes a commitment to continuous improvement; observes all applicable legal requirements and standards; and considers best practices. The safety policy 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 Accountable Executive 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.

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved?	Verified with evidence?
Evaluation	4	There is a means in place for the communication of the safety policy.							
	5	The Accountable Executive and the senior management team promote a positive safety/just culture and demonstrate their commitment to the safety policy through active and visible participation in the safety management system.							

	What to look for			
Guidance	- Review how the safety policy is communicated. - Is the Safety policy is clearly visible to all staff including relevant contracted staff and third-party organisations? - Have conversations with managers and staff regarding knowledge of the safety policy. - All managers are familiar with the key elements of the safety policy. - Evidence of senior management participation in safety meetings, training, conferences, etc. - Feedback from safety surveys that include specific just culture aspects. - Relationship with regulator and other stakeholders. - Review how a positive safety and just culture are promoted.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	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 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.

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref	How it is achieved?	Verified with evidence?
Evaluation	6	The safety policy actively encourages safety reporting.							
	7	A just culture policy and principles have been defined that clearly identifies acceptable and unacceptable behaviours to promote a just culture.							

	What to look for			
Guidance	- Evidence of when the just culture principles have been applied following an event. - Evidence of interventions from safety investigations addressing organisational issues rather than focusing only on the individual. - Review how the organisation is monitoring reporting rates. - Review the number of aviation safety reports appropriate to the activities. - Safety reports include the reporter's own errors and events they are involved in (events where no one was watching). - Feedback on just culture from staff safety culture surveys. - Interview staff representatives to confirm that they agree with just culture policy and principles. - Check that staff are aware of the just culture policy and principles.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	A just culture policy and principles have been defined.	The just culture policy clearly identifies acceptable and unacceptable behaviours. The principles ensure that the policy can be applied consistently across the whole organisation. The just culture policy and principles are understandable and clearly visible.	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 staff trust the policy. There is evidence that the line between acceptable and unacceptable behaviour has been determined in consultation with staff and staff representatives.

1.3.3 Some examples of Safety Policy are presented in ***Appendix A*** of this AC.

1.4 EM100.55 Safety Objectives

1.4.1 Safety objectives are what you are going to do – they should state an intended safety outcome. Safety objectives should be short, high-level statements of the organization's safety priorities, and address its most significant safety risks.

1.4.2 As your SMS moves from implementing, to operating, through to maturing towards effectiveness, your objectives should naturally evolve to recognize your enhanced SMS functionality and capabilities. This is a core aspect of an SMS' continuous improvement.

1.4.3 The safety objectives shall as a minimum:

(a) form the basis for safety performance measurement and monitoring as required by rule 100.55;

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

(c) be communicated throughout the organization; and

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

1.4.4 To demonstrate the extent to which each objective established under rule 100.55(a) is achieved, you should set safety performance targets (SPTs) and measure performance against those targets using safety performance indicators (SPIs).

1.4.5 Safety performance targets should be set and safety performance measured against those targets using safety performance indicators to monitor some or all of the following:

(a) accident counts or accident rates;
(b) serious incident counts or serious incident rates;
(c) incident counts or incident rates;
(d) controlled flight into terrain (CFIT) events;
(e) Loss of Control Inflight (LOC-I) events;
(f) Mid-air collision (MAC) events;
(g) Runway incursion and excursions events;
(h) Turbulence events;
(i) abnormal runway contact events;
(j) non-powerplant related aircraft system failures;
(k) powerplant- commanded inflight shutdown;
(l) powerplant – un commanded inflight shutdown;
(m) TCAS RA events;
(n) other events as appropriate to the organisation.

1.4.6 An organisation must clearly define the acceptable level of safety performance (ALoSP) for each of the SPT and associated SPI it develops from the above list in paragraph 1.4.5.

1.5 EM100.55 SMS Self-Evaluation Tool: Safety Objectives

1.5.1 To self-check the maturity and effectiveness of your *Safety Objectives*, CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

1.5.2 Suggested Checklist for Safety Objectives (Required for CASA SMS Acceptance)

	Acceptable Means of Compliance + Performance Indicators		**P**	**S**	**O**	**E**	**SMS Manual Ref.**	**How it is achieved?**	**Verified with evidence?**
Evaluation	8	Safety objectives have been established that are consistent with the safety policy and they are communicated throughout the organisation.							
	9	The PNG State Safety Programme (SSP) is being considered and addressed as appropriate.							

	What to look for			
Guidance	- Assess whether the safety objectives are appropriate and relevant. - Objectives are defined that will lead to an improvement in processes, outcomes, and the development of a positive safety culture. - Assess how safety objectives are communicated throughout the organisation. - Safety objectives are being measured to monitor achievement through SPIs and SPTs. - Assess if the safety objectives have considered the State safety objectives in the SSP.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	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.

1.5.3 Suggested Best Practice Indicators for Safety Policy and Objectives (Not Required for CASA SMS Acceptance)

	Best Practice Indicators (Not Required for CASA SMS Acceptance)		P	S	O	E	SMS Manual Ref.	How it is achieved?	Verified with evidence?
Evaluation	9a	There is one Safety Policy that is visible to all personnel and is actively used and implemented at all levels of the organisation. [ie. Everyone walks the talk]							
	9b	Safety Policy objectives actually drive the organisation's safety goals and mission statements							
	9c	The organisation regularly verifies and ensures that all personnel throughout the organisation are familiar with and have understood the policy and its message. Eg new staff							
	9d	The Chief Executive and senior persons regularly prioritize attendance at the annual PNG Annual Safety & Security Conferences, PNG SSP, NANP, etc safety committee meetings and other similar safety meetings and forums.							
	9e	A non-punitive reporting policy is established and actively endorsed by the Chief Executive, senior persons and staff.							

Present (P)	Suitable (S)	Operating (O)	Effective (E)
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.

1.6 EM100.55 Human Performance (HP) Considerations in the development of Safety Policy and Objectives

1.6.1 **Integrating human performance considerations is essential to the success of any Safety Management System (SMS), as it directly influences safety outcomes across all levels of aviation operations.** To address the way that your organisation influences human performance there must be senior level support[1] to implement effective safety management. For example, a workplace with a positive safety culture is where safe and professional practices are not only expected normal behaviours but are routinely reinforced and supported by management, even when there are considerable time and customer pressures present. In this type of organisation, personnel will tend to 'do it by the book' and take the time to ensure appropriate work practices, inspections, cross-checks, and signoffs are carried out. In this case, the organisation's positive safety culture has influenced human performance. If, however, management overlooks routine shortcuts and workarounds taking place to enable quicker turnarounds and faster task completion, a 'near enough is good enough' attitude will prevail. This could ultimately result in the acceptance of lower standards of work and degraded safety performance.

1.6.2 Modern SMS practices must recognise the importance of assessing human contributions not only when things go wrong, but also when they go right. This includes understanding why actions made sense to individuals at the time, given the conditions and circumstances. By acknowledging that people can be both the source of and solution to safety risks, organisations can better support safe and effective operations.

ICAO Annex 19 stresses the importance of embedding the 5 HP principles into safety management processes.

We can accomplish this by, for example:

- Identifying potential threats to human performance;
- Designing operational tasks, procedures, equipment, and environments that respect human capabilities and limitations; and
- Fostering a culture that encourages open communication and reporting through learning from past events.

To manage human performance in the aviation system effectively, organisations need:

- Clearly documented individual safety management responsibilities;
- A positive safety culture including processes and procedures to encourage open hazard and occurrence reporting;

[1] ICAO Annex 19 - Management Commitment is the first element within the Safety Policy and Objectives pillar.

- Management of change processes that consider evolving tasks and the broader impact of changes at the individual level;
- Robust training programs;
- Fatigue management strategies; and
- Decision-making tools to support personnel under stress or uncertainty.

1.6.3 Incorporating human performance considerations in the development of your Safety Policy and objectives helps us identify related safety trends, offering insights that drive continuous safety improvements.

Appendix D of this AC provides further guidance and examples on how to consider HP principles when developing your Safety Policy and Objectives.

2. EM100.57 MANAGEMENT COMMITMENT AND RESPONSIBILITY

2.1 EM100.57 Safety Accountability and Responsibilities

2.1.1 The term “accountability” refers to obligations which cannot be delegated. The term “responsibilities” refers to functions and activities which may be delegated.

2.2 EM100.57 Safety Accountability and Responsibilities -Chief Executive (CE)

2.2.1 The Chief Executive (CE) is the person who has ultimate authority over the safe operation of the organization. The CE establishes and promotes the safety policy and safety objectives that instil safety as a core organizational value. CEs should: have the authority to make decisions on behalf of the organization, have control of resources, both financial and human, be responsible for ensuring appropriate actions are taken to address safety issues and safety risks, and they should be responsible for responding to accidents and incidents.

2.2.2 There might be challenges for the service provider to identify the most appropriate person to be the CE, especially in large complex organizations with multiple entities and multiple certificates, authorizations or approvals. It is important the person selected is organizationally situated at the highest level of the organization, thus ensuring the right strategic safety decisions are made.

2.2.3 The service provider is required to identify the CE, placing the responsibility for the overall safety performance at a level in the organization with the authority to take action to ensure the SMS is effective. Specific safety accountabilities of all members of management should be defined and their role in relation to the SMS should reflect how they can contribute towards a positive safety culture. The safety responsibilities, accountabilities and authorities should be documented and communicated throughout the organization. The safety accountabilities of managers should include the allocation of the human, technical, financial or other resources necessary for the effective and efficient performance of the SMS.

2.2.4 In the case where an SMS applies to several different certificates, authorizations or approvals that are all part of the same legal entity, there should be a single CE. Where this is not possible, individual accountable executives should be identified for each organizational certificate, authorization or approval and clear lines of accountability defined; it is also important to identify how their safety accountabilities will be coordinated.

2.2.5 One of the most effective ways a CE can be visibly involved, is by leading regular executive safety meetings. As they are ultimately responsible for the safety of the organization, being actively involved in these meetings allows the CE to:

(a) review safety objectives;

(b) monitor safety performance and the achievement of safety targets;

(c) make timely safety decisions;

(d) allocate appropriate resources;

(e) hold managers accountable for safety responsibilities, performance and implementation timelines; and

(f) be seen by all personnel as an executive who is interested in, and in charge of, safety.

2.2.6 The CEO is not usually involved in the day-to-day activities of the organization or the problems faced in the workplace and should ensure there is an appropriate organizational structure to manage and operate the SMS. Safety management responsibility is often delegated to the senior management team and other key safety personnel. Although responsibility for the day-to-day operation of the SMS can be delegated, the CE cannot delegate accountability for the system nor can decisions regarding safety risks be delegated.

For example, the following safety accountabilities cannot be delegated:

(a) ensuring safety policies are appropriate and communicated;
(b) ensuring necessary allocation of resources (financing, personnel, training, acquisition); and
(c) setting of the acceptable safety risk limits and resourcing of necessary controls.

2.2.7 As a minimum, the CE shall have the following safety accountabilities:

(a) provide enough financial and human resources for the proper implementation of an effective SMS;
(b) promote a positive safety culture;
(c) establish and promote the safety policy;
(d) establish the organization's safety objectives;
(e) ensure the SMS is properly implemented and performing to requirements; and
(f) see to the continuous improvement of the SMS.

2.2.8 The authority to make decisions regarding safety risk tolerability should be clearly defined. This includes who can make decisions on the acceptability of risks as well as the authority to agree that a change can be implemented. The authority may be assigned to an individual, a management position or a committee.

2.2.9 Authority to make safety risk tolerability decisions should be commensurate with the manager's general decision-making and resource allocation authority. A lower level manager (or management group) may be authorized to make tolerability decisions up to a certain level. Risk levels that exceed the manager's authority must be escalated for consideration to a higher management level with greater authority

2.3 EM100.57 SMS Self-Evaluation Tool: Safety Accountability and Responsibilities - Chief Executive (CE)

2.3.1 To help service providers, self-check the maturity and effectiveness of their *Safety Accountability and Responsibilities -Chief Executive*, CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

2.3.2 Suggested Checklist for Safety Accountability and Responsibilities -CE (Required for CASA SMS Acceptance)

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved?	Verified with Evidence?
Evaluation	1	A Chief Executive (CE) has been appointed with full responsibility and accountability to ensure the SMS is properly implemented and performing effectively.							
	2	The Chief Executive is 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			
	- Evidence that the CE has the authority to provide sufficient resources for relevant safety improvements. - Evidence of decision making on risk acceptability. - Review SMS activities are being carried out in a timely manner and the SMS is sufficiently resourced. - Evidence of activities being stopped due to unacceptable level of safety risk. - Look for evidence that Accountable Executive actions are consistent with the active promotion of a positive safety culture in the organisation.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	A CE has been appointed with full responsibility and ultimate accountability for the SMS.	The CE has control of resources.	The CE 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 CE is fully aware of their SMS roles and responsibilities. The CE is accessible to the staff in the organisation.	The CE ensures that the performance of the SMS is being monitored, reviewed, and improved.

2.4 EM100.57 Safety Accountability and Responsibilities -Senior Persons and Staff

2.4.1 Accountabilities and responsibilities of all personnel, management and staff, involved in safety-related duties supporting the delivery of safe products and operations should be clearly defined. The safety responsibilities should focus on the staff member's contribution to the safety performance of the organization (the organizational safety outcomes). The management of safety is a core function; as such every senior manager has a degree of involvement in the operation of the SMS.

2.4.2 All defined accountabilities, responsibilities and authorities should be stated in the service provider’s SMS Manual and SMS documentation should be communicated throughout the organization. The safety accountabilities and responsibilities of each senior manager are integral components of their job descriptions. This should also capture the different safety management functions between line managers and the safety manager

2.4.3 Lines of safety accountability throughout the organization and how they are defined will depend on the type and complexity of the organization, and their preferred communication methods. Typically, the safety accountabilities and responsibilities will be reflected in organizational charts, documents defining departmental responsibilities, and personnel job or role descriptions.2.3.4 …

2.4.5 The service provider should aim to avoid conflicts of interest between staff members’ safety responsibilities and their other organizational responsibilities. They should allocate their SMS accountabilities and responsibilities, in a way that minimizes any overlaps and/or gaps.

2.4.6 ***Accountability and Responsibility in respect to external organisations:*** A service provider is responsible for the safety performance of external organizations where there is an SMS interface. The service provider may be held accountable for the safety performance of products or services provided by external organizations supporting its activities even if the external organizations are not required to have an SMS. It is essential for the service provider’s SMS to interface with the safety systems of any external organizations that contribute to the safe delivery of their product or services. A service provider should consider this before finalizing and signing off on Service Level Agreements (SLA) with third-parties.

2.5 EM100.57 SMS Self-Evaluation Tool: Safety Accountability and Responsibilities – Senior Persons (includes Safety Manager) and Staff

2.5.1 To help service providers, self-check the maturity and effectiveness of their *Safety Accountability and Responsibilities – Senior Persons and staff*, CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

2.5.2 Suggested Checklist for Safety Accountability and Responsibility -Senior Persons (including Safety Manager) and other staff (Required for CASA SMS Acceptance)

Evaluation	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved?	Verified with evidence?
	3	Safety accountabilities, authorities, and responsibilities are defined and documented throughout the organisation and all staff understand their own responsibilities.							

Guidance	What to look for			
	- 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. - Evidence of managers having safety related performance targets. - Look for active participation of the management team in the SMS. - Evidence of appropriate risk mitigation, action, and ownership. - The levels of management authorised to make decisions on risk acceptance are defined and applied. - Check for any conflicts of interest and that they have been identified and managed.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	The safety accountability, authorities, and responsibilities are clearly defined and documented.	Individuals have access to their safety accountability, authorities, and responsibilities (for example, through job descriptions or organisational charts).	Everyone in the organisation is aware of and fulfil their safety responsibilities, authorities, and accountabilities and are encouraged to contribute to the SMS.	The CE 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.

2.6 EM100.57 Safety Accountability and Responsibilities -Safety Manager

2.6.1 Appointment of a competent person to fulfil the role of safety manager is essential to an effectively implemented and functioning SMS. The safety manager may be identified by different titles and sometimes can refer to the functions performed, not necessarily to the individual. The safety manager is responsible to the CE for the performance of the SMS and delivery of safety services to other departments in the organisation. The safety manager advises the accountable executive and line managers on safety management matters, and is responsible for coordinating and communicating safety issues within the organisation, as well as with external members of the broader aviation community.

2.6.2 As a minimum, the safety manager is responsible for:

- drafting the SMS manual
- implementing, maintaining, reviewing and revising the SMS
- providing safety advice to management and staff
- promoting safety awareness and a positive safety culture
- maintaining an appropriate reporting system to identify and manage hazards
- performing or facilitating hazard identification and safety risk analysis
- investigating incidents and accidents
- monitoring corrective actions and evaluating their results
- identifying ongoing safety training requirements to support the SMS objectives
- overseeing internal and external SMS audit programs
- providing periodic reports on the organisation's safety performance
- maintaining the emergency response plan

- monitoring safety concerns in the broader aviation industry and their perceived impact on the organisation.

3. EM100.57 APPOINTMENT OF KEY SAFETY PERSONNEL

3.1 EM100.57 Safety Manager

3.1.1 Appointment of a competent person or persons to fulfil the role of safety manager is essential to an effectively implemented and functioning SMS. The safety manager may be identified by different titles. For the purposes of this manual, the generic term “safety manager” is used and refers to the function, not necessarily to the individual. The person carrying out the safety manager function is responsible to the accountable executive for the performance of the SMS and for the delivery of safety services to the other departments in the organization.

3.1.2 The safety manager advises the CE and line managers on safety management matters, and is responsible for coordinating and communicating safety issues within the organization as well as with external members of the aviation community.

3.2 EM100.57 Functions of a Safety Manager

3.2.1 Functions of the safety manager include, but are not limited to:

(a) manage the SMS implementation plan on behalf of the CE (upon initial implementation);

(b) perform/facilitate hazard identification and safety risk analysis;

(c) monitor corrective actions and evaluate their results;

(d) provide periodic reports on the organization’s safety performance;

(e) maintain SMS documentation and records;

(f) plan and facilitate staff safety training;

(g) provide independent advice on safety matters;

(h) monitor safety concerns in the aviation industry and their perceived impact on the organization’s operations aimed at product and service delivery; and

(i) coordinate and communicate (on behalf of the CE) with the Director, CASA and other State authorities as necessary on issues relating to safety.

3.2.2 In most organizations, an individual is appointed as the safety manager. Depending on the size, nature and complexity of the organization, the safety manager role may be an exclusive function or it may be combined with other duties. Moreover, some organizations may need to allocate the role to a group of persons. The organization must ensure that the option chosen does not result in any conflicts of interest. Where possible, the safety manager should not be directly involved in the product or service delivery but should have a working knowledge of these. The appointment should also consider potential conflicts of interest with other tasks and functions.

Such conflicts of interest could include:

(a) competition for funding (e.g. financial manager being the safety manager);

(b) conflicting priorities for resources; and

(c) where the safety manager has an operational role and the ability to assess the SMS effectiveness of the operational activities the safety manager is involved in.

3.2.3 In cases where the function is allocated to a group of persons, (e.g. when service providers extend their SMS across multiple activities) one of the persons should be designated as “lead” safety manager, to maintain a direct and unequivocal reporting line to the CE and whose name shall be endorsed on the aviation document operations specifications.

3.2.4 Depending on the size, nature and complexity of the organization, additional staff may support the safety manager. The safety manager and supporting staff are responsible for ensuring the prompt collection and analysis of safety data and appropriate distribution within the organization of related safety information such that safety risk decisions and controls, as necessary, can be made.

3.3 EM100.57 Competencies of a Safety Manager

3.3.1 The competencies for a safety manager should include, but not be limited to, the following:

(a) safety/quality management experience;

(b) operational experience related to the product or service provided by the organization;

(c) technical background to understand the systems that support operations or the product/service provided;

(d) interpersonal skills;

(e) analytical and problem-solving skills;

(f) project management skills; g) oral and written communications skills; and h) an understanding of human factors.

3.4 EM100.57 SMS Self-Evaluation Tool: Safety Manager Competence and Sufficiency of SMS Resources

3.4.1 To help service providers, self-check the maturity and effectiveness of their *Safety Manager competence and sufficiency of SMS resources*, CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

3.4.2 A CASA suggested self-evaluation checklist for Safety Manager competence and sufficiency of SMS resources (Required for CASA SMS Acceptance) is provided below:

	Acceptable Means of Compliance + Performance Indicators		**P**	**S**	**O**	**E**	**SMS Manual Ref.**	**How it is achieved?**	**Verified with Evidence?**
Evaluation	1	A competent safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line to the Accountable Executive.							
	2	The organisation has 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: - Review safety manager role including credibility and status. - Review the training that the safety manager has received. - Evidence of maintained competency. - Review how the safety manager gets access to internal and external safety information. - Review how the safety manager communicates and engages with operational staff and senior management. - Review 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. - FPP Interviews with CE and safety manager. - Check for any conflicts of interest and that they have been identified and managed.			
	Present (P)	**Suitable (S)**	**Operating (O)**	**Effective (E)**
	A safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line to the CE.	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 CE 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 CE and the safety manager is considered a trusted advisor and given appropriate status in the organisation.

3.5 EM100.57 Safety Review Board (SRB)

3.5.1 Service providers should establish appropriate safety committees that support the SMS functions across the organization. This should include determining who should be involved in the safety committee and frequency of the meetings.

3.5.2 The highest-level safety committee, sometimes referred to as a safety review board (SRB), includes the CE and senior managers with the safety manager participating in an advisory capacity. The SRB is strategic and deals with high-level issues related to safety policies, resource allocation and organizational performance.

3.5.3 The terms of reference of the SRB includes but not limited to monitoring the:

(1) effectiveness of the SMS;

(2) timely response in implementing necessary safety risk control actions;

(3) safety performance against the organization's safety policy and objectives;

(4) overall effectiveness of safety risk mitigation strategies;

(5) effectiveness of the organization's safety management processes which support:

(a) the declared organizational priority of safety management; and

(b) promotion of safety across the organization.

3.6 EM100.57 SMS Self-Evaluation Tool: SRBs and SAGs

3.6.1 To help service providers, self-check the maturity and effectiveness of their *Safety Review Board, Safety Action Group, etc*, CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, <u>*may*</u> use the Best Practice indicators to achieve a higher level of safety performance.

3.6.2 A CASA suggested self-evaluation checklist for the establishment and implementation of appropriate safety committee(s) including SRBs and SAGs (Required for CASA SMS Acceptance) is provided below:

<table>
<tr><td rowspan="2">Evaluation</td><td colspan="2">Acceptable Means of Compliance + Performance Indicators</td><td>P</td><td>S</td><td>O</td><td>E</td><td>How it is achieved</td><td>Comments</td></tr>
<tr><td>3</td><td>The organisation has established appropriate safety committee(s) that discuss and address safety risks and compliance issues and includes the CE and the heads of functional areas.</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td rowspan="5">Guidance</td><td colspan="8">What to look for:</td></tr>
<tr><td colspan="8">- Review safety committee [SRBs, SAGs etc] and meeting structure and Terms of Reference for each committee/meeting.
- Review meeting attendance levels.
- Review meeting records and actions.
- Check that outcomes are communicated to the rest of the organisation.
- Evidence of safety objectives, safety performance, and compliance are being reviewed and discussed at meetings.
- Participants challenge what is being presented when there is limited evidence.
- Senior management are aware of the most significant risks faced by the organisation and the overall safety performance of the organisation.</td></tr>
<tr><td colspan="2">Present (P)</td><td colspan="3">Suitable (S)</td><td colspan="2">Operating (O)</td><td>Effective (E)</td></tr>
<tr><td colspan="2">The organisation has established safety committee(s).</td><td colspan="3">Safety committee(s)' structure and frequency supports the SMS functions across the organisation.
The scope of the safety committee(s) includes safety risks and compliance issues.
The attendance of the highest-level safety committee [SRB] includes at least the CE and the heads of functional areas.</td><td colspan="2">There is evidence of meetings taking place detailing the attendance, discussions, and actions.
The safety committee(s) monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources.
Actions are being monitored and appropriate safety objectives and SPIs have been established.</td><td>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.</td></tr>
</table>

3.7 EM100.57 Safety Action Groups (SAG)

3.7.1 Once a strategic direction has been developed by the highest-level safety committee (SRB), implementation of safety strategies should be coordinated throughout the organization. This may be accomplished by creating safety action groups (SAGs) that are more operationally focused. SAGs are normally composed of managers and front-line personnel and are chaired by a designated manager.

3.7.2 SAGs are tactical entities that deal with specific implementation issues in accordance with the strategies developed by the SRB.

3.7.3 The terms of reference of the SAGs shall include but are not limited to:

(a) monitor operational safety performance within their functional areas of the organization and ensure that appropriate SRM activities are carried out;

(b) review available safety data and identify the implementation of appropriate safety risk control strategies and ensure employee feedback is provided;

(c) assess the safety impact related to the introduction of operational changes or new technologies;

(d) coordinate the implementation of any actions related to safety risk controls and ensure that actions are taken promptly; and

(e) review the effectiveness of specific safety risk controls.

4. EM100.71 COORDINATION OF EMERGENCY RESPONSE PLANNING

4.1 EM100.71 Definition of Emergency, Coordination and Emergency Response Plan (ERP)

4.1.1 By definition, an emergency is a sudden, unplanned situation or event requiring immediate action. Coordination of emergency response planning refers to planning for activities that take place within a limited period of time during an unplanned aviation operational emergency situation.

4.1.2 Coordination of emergency response planning applies only to those service providers required to establish and maintain an ERP. This coordination should be exercised as part of the periodic testing of the ERP.

4.1.3 Organisations engaged in aircraft operations should ensure that an emergency response plan that provides for the orderly and efficient transition from normal to emergency operations and the return to normal operations, and is properly coordinated with the emergency response plans of those organisations it must interface with during the provision of its service.

4.1.4 For service providers not located on an airfield, the emergency response plan might be as simple as documenting actions to be taken in the event that a customer experiences an emergency. Such actions would likely include communication channels and delegated emergency authorities, securing of documents, permitted access by investigators, identification of who can authorise return to normal operations. These may also be integrated with existing business continuity plans.

4.1.5 An emergency response plan (ERP) is an integral component of a service provider's SRM process to address aviation-related emergencies, crises or events. Where there is a possibility of a service provider's aviation operations or activities being compromised by emergencies such as a public health emergency/pandemic, these scenarios should also be addressed in its ERP as appropriate. The ERP should address foreseeable emergencies as identified through the SMS and include mitigating actions, processes and controls to effectively manage aviation-related emergencies.

4.1.6 Some rule parts require organisations to have an 'emergency situation action plan' for handling in-air and on-ground emergency situations and minimising risk of injury to persons. SMS builds on and enhances this by encouraging multiple organisations to coordinate their emergency response planning so that the desired safety outcomes from emergency situations can be achieved.

4.2 EM100.71 Overall objectives of the ERP

4.2.1 The overall objective of the ERP is the safe continuation of operations and the return to normal operations as soon as possible. This should ensure an orderly and efficient transition from normal to emergency operations, including assignment of emergency responsibilities and delegation of authority. It includes the period of time required to re-establish "normal" operations following the emergency.

4.2.2 The ERP identifies actions to be taken by responsible personnel during an emergency. Most emergencies will require coordinated action between different organizations, possibly with other service providers and with other external organizations such as non-aviation-related emergency services. The ERP should be easily accessible to the appropriate key personnel as well as to the coordinating external organizations.

4.3 EM100.71 What an Effective ERP looks like

4.3.1 For your ERP to be effective, you need to address some critical issues.

You must ensure you have:

- adequate training and competency arrangements
- well thought-out procedures (easily assessable, understood and applied)
- clear understanding of roles in emergency response situations
- clear lines of command and communication
- realistic expectations of people's abilities in an emergency
- prepared and practiced for an emergency.

4.3.2 ***ERP Responsibilities for Air Operators:*** The aircraft operator's ERP should be coordinated with the airport emergency plan, so both operator and airport management know who is responsible for what.

As part of emergency response planning, aircraft and airport operators together must:

- provide training to prepare personnel for emergencies
- make arrangements to handle phone queries about the emergency
- designate a suitable holding area for uninjured people ('meeters and greeters')
- outline duties for company personnel (the person-in-command, receptionists for receiving passengers in holding areas)
- gather essential passenger information and ensure passengers' safety
- establish mutual support arrangements with other operators and agencies for an emergency
- prepare and maintain an emergency communications kit containing: – necessary administrative supplies, such as forms, paper, name tags, computers and laptops – critical telephone numbers and contact details, such as doctors, local hotels, translators, linguists, caterers, airline transport companies.

4.4 EM100.71 Testing your Organisation's ERP

4.4.1 Aviation accidents / serious incidents are rare events and despite the importance of implementing immediate and positive action, evidence shows that very few organisations are prepared when such an event occurs. Initiation of timely and appropriate action is extremely critical in situations where delays or the implementation of incorrect actions may affect the chances of someone's survival.

4.4.2 People who have been involved in the immediate response to an aircraft accident will readily agree that during the first few minutes (and maybe hours) events can be confusing and chaotic. How an organisation performs in the aftermath of an accident or other emergency can depend on how well it handles the immediate response during that time immediately following a major safety event.

4.4.3 Successful response to an emergency begins with effective planning. The ERP provides the basis for adopting a systematic approach to managing the organisation's affairs and operations following a significant and unplanned event.

4.4.4 To improve its effectiveness, and to ensure designated emergency response team members are prepared, the plan should be practiced and reviewed regularly by conducting exercises. Training in emergency response may take two forms, table-top exercises or full-scale exercises.

4.4.5 ***Table-top Exercise:*** The table-top exercise is designed to provide training, to evaluate plans and procedures, and to resolve questions of coordination and emergency response team responsibilities in an informal, non-threatening format.

4.4.6 ***Full-Scale Exercise:*** The full-scale exercise is the most comprehensive test. It is intended to evaluate the operational capability of the emergency management system in a stress environment with actual mobilisation and deployment of resources and personnel. The decision to conduct a full-scale exercise should be coordinated with other local organisations and agencies where practicable.

4.4.7 At the conclusion of an exercise or actual emergency, a formal review should take place. It should measure the effectiveness of the plan with feedback from participants and by assessing the impact, this feedback has a flow on effects for evaluating and revising policies, plans and procedures.

4.5 EM100.71 SMS Self-Evaluation Tool: ERP

4.5.1 To help service providers, self-check the maturity and effectiveness of their *ERP,* CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

4.5.2 A CASA suggested self-evaluation checklist for the establishment and testing of ERP (Required for CASA SMS Acceptance) is provided below:

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved	Comments
Evaluation	1	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.							
	2	The ERP is periodically tested for the adequacy of the plan and the results reviewed to improve its effectiveness.							

Guidance

What to look for

- 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 (P)	Suitable (S)	Operating (O)	Effective (E)
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.

4.6 EM100.71 Human Performance Considerations in ERP

4.6.1 Critical incidents can lead to stress reactions- so-called post-traumatic stress reactions – for the staff involved. Critical Incident Stress Management (CISM) programmes are a formal framework designed to help people negatively affected by such events, to recover from these affects and return to normal functioning and behaviour. Even if your organisation doesn't have the resource to develop such a programme, there are still things that you can do to minimise the risk associated with humans performing work after experiencing a traumatic event.

4.6.2 As with all forms of stress, there are basically two approaches to take; prevention and coping. Whilst you cannot guarantee to prevent the incident or accident occurring, there are still some prevention methods that can be applied to minimise the effects:

- ***ERP training*** – the better a person is prepared for the role, the better they perform when under pressure and therefore better that they can cope with unusual situations
- ***Open, supportive attitudes and behaviours*** – this can be reflected broadly as the way the organisation communicates and works, or down at a personal level, where you have someone you trust available to step in to perform essential roles or tasks. If you are a small, intimate organisation and / or perhaps have a personal relationship with the person involved in the incident,

it is unlikely that you will be able to continue to function effectively in a critical role for a period of time.

4.6.3 When it comes to coping with the effects of an incident, the ability to recognise signs of stress in yourself or others is key. The risk of an error being made as a result of distraction or tiredness is much higher after a stressful event. People may be reliving the event over and over, they may have a loved one who was badly injured or killed, they may not be sleeping due to external influences (e.g. aftershocks to an earthquake, family members unwell etc.). Managers and supervisors are likely to be the first to notice sudden changes in emotional symptoms, mental functioning or behaviour in their teams, that might indicate a need for professional support.

4.6.4 Time management and prioritising tasks becomes even more important. It is likely that there will be a reduced number of staff available to complete work. Everyone has their own level of resilience which is influenced by the nature of the incident as well as the physical and mental condition of the person affected. This means that some may take longer before they are ready to return to work. The organisation will need to assess their ability to return to work and at what level of criticality, and level of supervision required.

4.6.5 The work itself may have been interrupted by the incident so it will be necessary to review and re-establish known points before continuing. An example is where a complex task, such as a maintenance activity, was in progress; it will be necessary to establish the current state (of airworthiness) from physical surveys, staff interviews and document review, before establishing what can be re-started versus what needs to be completely re-done.

4.6.6 Another important consideration is how the organisation supports staff as they come to terms with the incident. Developing support systems for staff can range from the individual developing an adequate coping mechanism (with or without the support of others, family or friends), support from the organisation via an employee assistance programme, through to referral to an externally appointed professional counselling service or mental health practitioner.

5. EM100.79 SMS DOCUMENTATION

5.1 EM100.79 SMS Manual

5.1.1 The SMS documentation should include a top-level “SMS manual”, which describes the service provider’s SMS policies, processes and procedures to facilitate the organization’s internal administration, communication and maintenance of the SMS. It should help personnel to understand how the organization’s SMS functions, and how the safety policy and objectives will be met. The documentation should include a system description that provides the boundaries of the SMS. It should also help clarify the relationship between the various policies, processes, procedures and practices, and define how these link to the service provider’s safety policy and objectives. The documentation should be adapted and written to address the day-to-day safety management activities that can be easily understood by personnel throughout the organization

5.1.2 The SMS manual also serves as a primary safety communication tool between the service provider and key safety stakeholders (e.g. CASA for the purpose of regulatory acceptance, assessment and subsequent monitoring of the SMS). The SMS manual may be a stand-alone document, or it may be integrated with other organizational documents (or documentation) maintained by the service provider. Where details of the organization’s SMS processes are already addressed in existing documents, appropriate cross-referencing to such documents is enough. This SMS document must be kept up to date. CA**S**A agreement may be required before significant amendments are made to the SMS manual, as it is a controlled manual.

5.1.3 A SMS Manual should contain a detailed description of the service provider’s policies, processes and procedures including:

(a) safety policy and safety objectives;

(b) reference to any applicable regulatory SMS requirements;

(c) system description;

(d) safety accountabilities and key safety personnel;

(e) voluntary and mandatory safety reporting system processes and procedures;

(f) hazard identification and safety risk assessment processes and procedures;

(g) safety investigation procedures;

(h) procedures for establishing and monitoring safety performance indicators;

(i) SMS training processes and procedures and communication;

(j) safety communication processes and procedures;

(k) internal audit procedures;

(l) management of change procedures;

(m) SMS documentation management procedures;

(n) as applicable, coordination of ERP.

Appendix B to this AC provides detailed guidance to help you in the development of your SMS Manual.

5.2 EM100.79 SMS Documentation

5.2.1 SMS documentation also includes the compilation and maintenance of operational records substantiating the existence and ongoing operation of the SMS. Operational records are the outputs of the SMS processes and procedures such as the SRM and safety assurance activities. SMS operational records should be stored and kept in accordance with existing retention periods.

5.2.2 SMS documentation are operational records that sit outside the SMS manual, evidencing outputs of the SMS processes and procedures, and typically include:

- hazard registers and hazard (safety) reports
- SPI and SPT and related charts tracking
- completed safety risk assessments and change management risk registers
- SMS reviews and audit reports
- SMS and safety training records
- safety committee (SRB, SAG, etc) meeting minutes
- SMS gap analysis and implementation plan (during initial implementation

5.2.3 Your documentation should reflect the intent and processes of the SMS. Therefore, if you change your SMS, you will probably need to update your SMS manual. To make it easy to use and understand, keep your SMS manual concise and to the point. Any information you expect to change regularly (e.g. the names of personnel with specific safety responsibilities) should be presented as annexes or appendices at the back of your manual.

5.2.4 ***Document Control:*** make sure that when you amend and distribute SMS documents, they are controlled. In other words, make sure that the approved person authorizes them, they are distributed to all the places where they will be needed, and that old or obsolete versions are removed or replaced promptly to avoid confusion.

5.2.5 ***EM100.63 Contractor and Third-party Interfaces***: Third-party interfaces are often known as contractors within most organisations. However, in respect to an SMS, a third-party interface is any party that can influence your safety management. For example, at an airport, a refueller is a third party for both the airport and an aircraft operator, but would only be considered a contractor to the operator. Yet the refueller can influence both the airport and operator SMS.

As an aviation service provider, you will often employ contractors in areas such as refuelling, catering, ground handling, aircraft maintenance, crew training, flight planning and dispatch. These contractors will be referred to as ‘third-party interfaces’ in your SMS. You have probably always had contractual arrangements with your providers. Your SMS provides an opportunity (and an obligation) to extend these contractual arrangements or service level agreements to include safety performance. Your SMS documentation should outline how you will manage any risks posed by using third parties, as well as how you will ensure these providers are complying with your SMS policy and procedures.

While a contractor provides you with a service, you still hold overall responsibility for the safety of services they provide. The safety standards specified in your SMS must not be eroded by any products and services provided by external organisations. You do not want all your hard work in implementing an SMS to be undone through negative safety behaviours or actions of your contractors when they interact with your organisation or staff at the interfaces.

It is a good idea to investigate and/or audit the third party’s previous safety record thoroughly and establish whether they have ever breached any regulations. Simply asking around – talking to other organisations currently using their services, or who have used them in the past – will quickly give you a sense of how professional they are. Your positive safety culture can be disabled through contract staff actions either directly, via unsafe actions, or indirectly through negative safety behaviours observed by your own staff that are seen to go unmanaged.

5.2.6 The following minimum standards should apply when engaging third-party contractors via a service level agreement or contract:

- Any agreement for the provision of services should be supported by a written contract before these services commence.
- All third-party providers should hold the appropriate qualifications, credentials or approvals for the work being carried out.
- All third parties should understand your SMS, and their responsibilities within it. This would include ensuring they have been trained in your SMS policy, processes, and acceptable verses unacceptable safety behaviours.
- Where possible, the organisation should provide SMS induction training for all third-party services providers.
- All third-party organisations should be able to demonstrate their ability to provide trained and competent staff (training may be provided by your organisation, where relevant).

5.2.7 **EM100.63** ***Contractor and third-party interface documentation checklist:***

- Do the Contracts or service level agreements specify the safety standards to be met, including any unacceptable safety behaviours that will not be tolerated.
- Are there provisions to ensure contractors comply with the prescribed safety standards.
- Have you researched, investigated or audited the previous safety record of, and any regulatory breaches by, the third party before engagement.
- Do the processes and checks ensure the level of safety is not adversely affected by services and supplies provided by external organisations.
- Have you inducted Contractors and third-party providers into your SMS and Do they thoroughly understand their responsibilities within it? including training and any safety briefings needed when working on site or with your equipment?

Appendix D Example 2 provides further guidance on how to consider Human Performance principles in SMS Interfaces.

5.3 SMS Self-Evaluation Checklist: SMS Documentation

5.3.1 To help service providers, self-check the maturity and effectiveness of their *SMS Documentation,* CASA has provided you with the below Guidance and Checklist using the PSOE acronym from guidance material developed by the Safety Management International Collaboration Group (SM-ICG) and summarized below:

Present (P)	There is evidence that the indicator is clearly visible at all levels of the organisation and is documented within the organisation's SMS manual.
Suitable (S)	There is evidence that the indicator is suitable based on the nature, size and complexity of the organisation and/or the inherent risk in the activity.
Operating (O)	There is evidence that the indicator is in use and an output is being produced
Effective (E)	There is evidence that the indicator is effective and is achieving the desired outcome
Best Practice	Organisations striving to continuously improve their SMS, *may* use the Best Practice indicators to achieve a higher level of safety performance.

5.3.2 A CASA suggested self-evaluation checklist for the establishment and testing of ERP (Required for CASA SMS Acceptance) is provided below:

	Acceptable Means of Compliance + Performance Indicators		P	S	O	E	SMS Manual Ref.	How it is achieved	Comments
Evaluation	1	The SMS documentation includes the policies and processes that describe the organisation's safety management system and processes and is readily available to all relevant personnel.							
	2	SMS documentation, including SMS related records, are regularly reviewed and updated with appropriate version control in place.							

Guidance

What to look for

- 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 (P)	Suitable (S)	Operating (O)	Effective (E)
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.

5.3.3 One of the formal ways to communicate your safety approach effectively to all employees and third parties is through clear safety management documentation. This safety documentation demonstrates to your managers, staff and third parties that you always conduct business based on safety management principles. If your procedures are in separate manuals (as can happen in larger, more complex operations), you must make this clear, so your staff have simple, effective access to the detailed information about your safety management procedures. Where this does occur, appropriate, yet simple cross-referencing from your SMS manual to such documents is appropriate. However, you need to ensure that, if cross-referencing to other documents or manuals, all personnel have access to such supporting documents so they can clearly understand the integration and day-to-day processes of the SMS.

Appendix A – Sample Safety Policy Statements

Example 1 - Safety Policy Statement #1

Safety is one of our core business functions. We are committed to developing, implementing, maintaining and constantly improving strategies and processes to ensure that all our aviation activities take place under a balanced allocation of organisational resources, aimed at achieving the highest level of safety performance and meeting national and international standards, while delivering our services.

All levels of management and employees are accountable for the delivery of this highest level of safety performance, starting with the [chief executive officer (CEO) / managing director / or as appropriate to the organisation].

Our commitment is to:

- support the management of safety by providing appropriate resources to build an organisational culture that fosters safe practices, encourages effective safety reporting and communication, and actively manages safety with the same attention given to results as the other management systems of the organisation
- enforce the management of safety as a primary responsibility of all managers and employees
- clearly define for staff, managers and employees their accountabilities and responsibilities for the delivery of the organisation’s safety performance and the performance of our safety management system
- establish and operate hazard identification and risk management processes, including a hazard reporting system, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities to a point which is as low as reasonably practicable (ALARP)
- ensure that no action will be taken against any employee who discloses a safety concern through the hazard reporting system, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or wilful disregard of regulations or procedures
- comply with and, wherever possible, exceed legislative and regulatory requirements and standards
- ensure there are enough people skilled and trained available to implement safety strategies and processes
- ensure that staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters, and are only allocated tasks in line with their skills
- establish and measure our safety performance against realistic safety performance indicators and safety performance targets
- continually improve our safety performance through management processes that ensure relevant safety action is taken and is effective
- ensure externally supplied systems and services to support our operations are delivered and meet our safety performance standards.

(Signed) CEO / Managing Director / or as appropriate

Example 2 - Safety Policy Statement #2

Safety is one of our core business functions. We are committed to developing, implementing, maintaining and constantly improving strategies and processes to ensure that all our aviation activities take place under an appropriate allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting regulatory requirements, while delivering our services.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the [Chief executive officer (CEO)/managing director/or as appropriate to the organization].

Our commitment is to:

- support the management of safety through the provision of all appropriate resources that will result in an organizational culture that fosters safe practices, encourages effective safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- ensure that the management of safety is a primary responsibility of all managers and employees;
- clearly define, for all staff, managers and employees alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our safety management system;
- establish and operate hazard identification and risk management processes, including a hazard reporting system, in order to eliminate or mitigate the safety risks of the consequences of hazards resulting from our operations or activities, to achieve continuous improvement in our safety performance;
- ensure that no action will be taken against any employee who discloses a safety concern through the hazard reporting system, unless such disclosure indicates, beyond any reasonable doubt, gross negligence or a deliberate or wilful disregard of regulations or procedures;
- comply with and, wherever possible, exceed, legislative and regulatory requirements and standards;
- ensure that sufficient skilled and trained human resources are available to implement safety strategies and processes;
- ensure that all staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters, and are allocated only tasks commensurate with their skills;
- establish and measure our safety performance against realistic safety performance indicators and safety performance targets;
- continually improve our safety performance through continuous monitoring and measurement, regular review and adjustment of safety objectives and targets, and diligent achievement of these; and
- ensure that externally supplied systems and services to support our operations are delivered meeting our safety performance standards.

(Signed) CEO / Managing Director / or as appropriate

Example 3 - Safety Policy Statement #3

Safety is the first priority in all our activities. We are committed to implementing, developing and improving strategies, management systems and processes to ensure that all our aviation activities uphold the highest level of safety performance and meet national and international standards.

Our commitment is to:

- develop and embed a safety culture in all our aviation activities – one that recognises the value of effective safety management and acknowledges that safety is paramount
- clearly define all personnel's accountabilities and responsibilities for developing and delivering aviation safety strategy and performance • minimise the risks associated with aircraft operations to a point that is as low as reasonably practicable
- ensure that externally supplied systems and services affecting the safety of our operations meet appropriate safety standards • develop and improve our safety processes to conform to world-class standards
- comply with, and, wherever possible, exceed legislative and regulatory requirements and standards
- ensure that all staff have adequate and appropriate aviation safety information and training, are competent in safety matters, and are only allocated tasks in line with their skills
- ensure there are enough skilled and trained personnel to implement safety strategy and policy
- establish and measure our safety performance against realistic objectives and targets
- achieve the highest levels of safety standards and performance in all our aviation activities
- continually improve our safety performance
- conduct safety and management reviews and ensure we take relevant action
- ensure that an effective SMS is integral to all our aviation activities.

(Signed) CEO / Managing Director / or as appropriate

Example 4 - Safety Policy Statement #4

Management is committed to providing safe, healthy, secure work conditions and fostering positive safety attitudes.

The organisation's owner / CEO is committed to:

- ongoing pursuit of an accident-free workplace, including no harm to people and no damage to equipment, the environment or property
- a culture of open reporting of all safety hazards
- an open reporting culture in which management will not initiate disciplinary action against any personnel who, in good faith, disclose a hazard or safety occurrence resulting from unintentional conduct
- supporting effective communication throughout the organisation
- support for safety training and awareness programs
- conducting regular audits of safety policies, procedures and practices
- monitoring industry activity to ensure best safety practices are incorporated into the organisation
- providing the necessary resources to support this policy
- requiring all employees to maintain a safe work environment through adherence to approved policies, procedures and training; and familiarising themselves (and complying) with safety policies and procedures
- all levels of management, starting with organisation's owner / CEO, being accountable for safety performance. To be a good leader, you must be a good safety leader
- principle that the organisation is strengthened by making safety excellence an integral part of all activities

(Signed) CEO / Managing Director / or as appropriate

Appendix B – Guidance for Development of a SMS Manual

Example 1 – SMS Manual format

1. GENERAL

1.1 This appendix serves to guide organizations in their compilation of a top-level SMS manual (or document) to define their SMS framework and its associated elements. The manual can be a stand-alone SMS manual or be integrated as a consolidated SMS section/chapter within an appropriate approved manual of the organization (e.g. the organization's exposition manual or company manual). The actual configuration may depend on regulatory expectation.

1.2 Using the suggested format and content items in this appendix and adapting them as appropriate is one way in which an organization can develop its own top-level SMS manual. The actual content items will depend on the specific SMS framework and elements of the organization. The description under each element will be commensurate with the scope and complexity of the organization's SMS processes.

1.3 The manual will serve to communicate the organization's SMS framework internally as well as with relevant external organizations. The manual may be subject to endorsement or approval by the CAA as evidence of the acceptance of the SMS.

Note.— A distinction is to be made between an SMS manual and its operational supporting records and documents. The latter refers to historical and current records and documents generated during implementation and operation of the various SMS processes. These are documentary evidence of the ongoing SMS activities of the organization.

2. FORMAT OF THE SMS MANUAL

2.1 The SMS manual may be formatted in the following manner:

(a) Section heading;
(b) Objective;
(c) Scope
(d) Cross-reference documents.

2.2 Below each numbered "section heading" is a description of the "objective" for that section, followed by its "criteria" and "cross-reference documents". The "objective" is what the organization intends to achieve by doing what is described in that section. The "scope" defines what should be considered when writing that section. The "cross- reference documents" links the information to other relevant manuals or SOPs of the organization which contain details of the element or process as applicable.

3. CONTENTS OF THE SMS MANUAL

3.1 The contents of the manual may include the following sections:

1. Document control;
2. SMS regulatory requirements;
3. Scope and integration of the safety management system;
4. Safety policy;
5. Safety objectives;
6. Safety accountabilities and key personnel;
7. Safety reporting and remedial actions;
8. Hazard identification and risk assessment;
9. Safety performance monitoring and measurement;
10. Safety-related investigations and remedial actions;
11. Safety training and communication;
12. Continuous improvement and SMS audit;
13. SMS Documentation;
14. Management of change; and

15. Emergency/contingency response plan.

3.2 Below is an example of the type of information that could be included in each section using the format prescribed in 2.2.

1. Document control

Objective

Describe how the manual(s) will be kept up to date and how the organization will ensure that all personnel involved in safety-related duties have the most current version.

Scope

(a) Hard copy or controlled electronic media and distribution list.

(b) The correlation between the SMS manual and other existing manuals such as the maintenance control manual (MCM) or the operations manual.

(c) The process for periodic review of the manual and its related forms/documents to ensure their continuing suitability, adequacy and effectiveness.

(d) The manual's administration, approval and regulatory acceptance process.

Cross-reference documents

Quality manual, engineering manual, etc.

2. SMS regulatory requirements

Objective

Address current SMS regulations and guidance material for necessary reference and awareness by all concerned.

Scope

(a) Spell out the current SMS regulations/standards. Include the compliance timeframe and advisory material references as applicable.

(b) Where appropriate, elaborate on or explain the significance and implications of the regulations to the organization.

(c) Establish a correlation with other safety-related requirements or standards where appropriate.

Cross-reference documents

SMS regulation/requirement references, SMS guidance document references, etc.

3. Scope and integration of the safety management system

Objective

Describe the scope and extent of the organization's aviation-related operations and facilities within which the SMS will apply. The scope of the processes, equipment and operations deemed eligible for the organization's hazard identification and risk management (HIRM) programme should also be addressed.

Scope

(a) Spell out the nature of the organization's aviation business and its position or role within the industry as a whole.

(b) Identify the major areas, departments, workshops and facilities of the organization within which the SMS will apply.

(c) Identify the major processes, operations and equipment which are deemed eligible for the organization's HIRM programme, especially those which are pertinent to aviation safety. If the scope of the HIRM-eligible processes, operations and equipment is too detailed or extensive, it may be controlled under a supplementary document as appropriate.

(d) Where the SMS is expected to be operated or administered across a group of interlinked organizations or contractors, define and document such integration and associated accountabilities as applicable.

(e) Where there are other related control/management systems within the organization, such as QMS, OSHE and SeMS, identify their relevant integration (where applicable) within the aviation SMS.

Cross-reference documents

Quality manual, engineering manual, etc.

4. Safety policy

Objective

Describe the organization's intentions, management principles and commitment to improving aviation safety in terms of the product or service provider. A safety policy should be a short description similar to a mission statement.

Scope

(a) The safety policy should be appropriate to the size and complexity of the organization.

(b) The safety policy states the organization's intentions, management principles and commitment to continuous improvement in aviation safety.

(c) The safety policy is approved and signed by the accountable executive.

(d) The safety policy is promoted by the accountable executive and all other managers.

(e) The safety policy is reviewed periodically.

(f) Personnel at all levels are involved in the establishment and maintenance of the safety management system.

(g) The safety policy is communicated to all employees with the intent that they are made aware of their individual safety obligations.

Cross-reference documents

OSHE safety policy, etc.

5. Safety objectives

Objective

Describe the safety objectives of the organization. The safety objectives should be a short statement that describes in broad terms what the organization hopes to achieve.

Scope

(a) The safety objectives have been established.
(b) The safety objectives are expressed as a top-level statement describing the organization's commitment to achieving safety.
(c) There is a formal process to develop a coherent set of safety objectives.
(d) The safety objectives are publicized and distributed.
(e) Resources have been allocated for achieving the objectives.
(f) The safety objectives are linked to safety indicators to facilitate monitoring and measurement where appropriate.

Cross-reference documents

Safety performance indicators document, etc.

6. Roles and responsibilities

Objective

Describe the safety authorities, responsibilities and accountabilities for personnel involved in the SMS.

Scope

(a) The accountable executive is responsible for ensuring that the safety management system is properly implemented and is performing to requirements in all areas of the organization.
(b) An appropriate safety manager (office), safety committee or safety action groups have been appointed as appropriate.
(c) Safety authorities, responsibilities and accountabilities of personnel at all levels of the organization are defined and documented.
(d) All personnel understand their authorities, responsibilities and accountabilities with regard to all safety management processes, decisions and actions.
(e) An SMS organizational accountabilities diagram is available.

Cross-reference documents

Company exposition manual, SOP manual, administration manual, etc.

7. Safety reporting systems

Objective

A reporting system should include both reactive (accident/incident reports, etc.) and proactive/ predictive (hazard reports). Describe the respective reporting systems. Factors to consider include: report format, confidentiality, addressees, investigation/evaluation procedures, corrective/ preventive actions and report dissemination.

Scope

(a) The organization has a procedure that provides for the capture of internal occurrences including accidents, incidents and other occurrences relevant to SMS.
(b) A distinction is to be made between mandatory reports (accidents, serious incidents, major defects, etc.), which are required to be notified to the CASA, and other routine occurrence reports, which remain within the organization.
(c) There is also a voluntary and confidential hazard/occurrence reporting system, incorporating appropriate identity/data protection as applicable.
(d) The respective reporting processes are simple, accessible and commensurate with the size of the organization.
(e) High-consequence reports and associated recommendations are addressed to and reviewed by the appropriate level of management.
(f) Reports are collected in an appropriate database to facilitate the necessary analysis.

Cross-reference documents

- - - - - - - - - - - - - -

8. Hazard identification and risk assessment

Objective

Describe the hazard identification system and how such data are collated. Describe the process for the categorization of hazards/risks and their subsequent prioritization for a documented safety assessment. Describe how the safety assessment process is conducted and how preventive action plans are implemented.

Scope

(a) Identified hazards are evaluated, prioritized and processed for risk assessment as appropriate.

(b) There is a structured process for risk assessment involving the evaluation of severity, likelihood, tolerability and preventive controls.

(c) Hazard identification and risk assessment procedures focus on aviation safety as their fundamental context.

(d) The risk assessment process utilizes worksheets, forms or software appropriate to the complexity of the organization and operations involved.

(e) Completed safety assessments are approved by the appropriate level of management.

(f) There is a process for evaluating the effectiveness of the corrective, preventive and recovery measures that have been developed.

(g) There is a process for periodic review of completed safety assessments and documenting their outcomes.

Cross-reference documents

- - - - - - - - - - - - - -

9. Safety performance monitoring and measurement

Objective

Describe the safety performance monitoring and measurement component of the SMS. This includes the organization’s SMS safety performance indicators (SPIs).

Scope

(a) The formal process to develop and maintain a set of safety performance indicators and their associated performance targets.

(b) Correlation established between the SPIs and the organization’s safety objectives where applicable and the process of regulatory acceptance of the SPIs where required.

(c) The process of monitoring the performance of these SPIs including remedial action procedure whenever unacceptable or abnormal trends are triggered.

(d) Any other supplementary SMS or safety performance monitoring and measurement criteria or process.

Cross-reference documents

- - - - - - - - - - - - - -

10. Safety-related investigations and remedial actions

Objective

Describe how accidents/incidents/occurrences are investigated and processed within the organization, including their correlation with the organization’s SMS hazard identification and risk management system.

Scope

(a) Procedures to ensure that reported accidents and incidents are investigated internally.

(b) Dissemination of completed investigation reports internally as well as to the CASA as applicable.

(c) A process for ensuring that corrective actions taken or recommended are carried out and for evaluating their outcomes/effectiveness.

(d) Procedure on disciplinary inquiry and actions associated with investigation report outcomes.

(e) Clearly defined conditions under which punitive disciplinary action would be considered (e.g. illegal activity, recklessness, gross negligence or willful misconduct).

(f) A process to ensure that investigations include identification of active failures as well as contributing factors and hazards

(g) Investigation procedure and format provides for findings on contributing factors or hazards to be processed for follow-up action by the organization's hazard identification and risk management system where appropriate.

Cross-reference documents

- - - - - - - - - - - - - -

11. Safety training and communication

Objective

Describe the type of SMS and other safety-related training that staff receive and the process for assuring the effectiveness of the training. Describe how such training procedures are documented. Describe the safety communication processes/channels within the organization.

Scope

(a) The training syllabus, eligibility and requirements are documented.

(b) There is a validation process that measures the effectiveness of training.

(c) The training includes initial, recurrent and update training, where applicable.

(d) The organization's SMS training is part of the organization's overall training programme.

(e) SMS awareness is incorporated into the employment or indoctrination programme.

(f) The safety communication processes/channels within the organization.

Cross-reference documents

- - - - - - - - - - - - - -

12. Continuous improvement and SMS audit

Objective

Describe the process for the continuous review and improvement of the SMS.

Scope

(a) The process for regular internal audit/review of the organization's SMS to ensure its continuing suitability, adequacy and effectiveness.

(b) Describe any other programmes contributing to continuous improvement of the organization's SMS and safety performance, e.g. MEDA, safety surveys, ISO systems.

Cross-reference documents

- - - - - - - - - - - - - -

13. SMS Documentation

Objective

Describe the method of storing all SMS-related records and documents.

Scope

(a) The organization has an SMS records or archiving system that ensures the retention of all records generated in conjunction with the implementation and operation of the SMS.

(b) Records to be kept include hazard reports, risk assessment reports, safety action group/safety meeting notes, safety performance indicator charts, SMS audit reports and SMS training records.

(c) Records should be traceable for all elements of the SMS and be accessible for routine administration of the SMS as well as internal and external audits purposes.

Cross-reference documents

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14. Management of change

Objective

Describe the organization's process for managing changes that may have an impact on safety risks and how such processes are integrated with the SMS.

Scope

(a) Procedures to ensure that substantial organizational or operational changes take into consideration any impact which they may have on existing safety risks.

(b) Procedures to ensure that appropriate safety assessment is performed prior to introduction of new equipment or processes which have safety risk implications.

(c) Procedures for review of existing safety assessments whenever there are changes to the associated process or equipment.

Cross-reference documents

Company SOP relating to management of change, etc.

15. Emergency/contingency response plan

Objective

Describe the organization's intentions regarding, and commitment to dealing with, emergency situations and their corresponding recovery controls. Outline the roles and responsibilities of key personnel. The emergency response plan can be a separate document or it can be part of the SMS manual.

Criteria (as applicable to the organization)

(a) The organization has an emergency plan that outlines the roles and responsibilities in the event of a major incident, crisis or accident.
(b) There is a notification process that includes an emergency call list and an internal mobilization process.
(c) The organization has arrangements with other agencies for aid and the provision of emergency services as applicable.
(d) The organization has procedures for emergency mode operations where applicable.
(e) There is a procedure for overseeing the welfare of all affected individuals and for notifying next of kin.
(f) The organization has established procedures for handling the media and insurance-related issues.
(g) There are defined accident investigation responsibilities within the organization.
(h) The requirement for preservation of evidence, securing the affected area, and mandatory/ governmental reporting is clearly stated.
(i) There is emergency preparedness and response training for affected personnel.
(j) A disabled aircraft or equipment evacuation plan has been developed by the organization in consultation with aircraft/equipment owners, aerodrome operators or other agencies as applicable.
(k) A procedure exists for recording activities during an emergency response.

Cross-reference documents

ERP manual, etc.

Appendix C – Guidance for Safety Committees (SRBs, SAGs, etc)

Role of Safety Committees

The safety committee's role includes:

- acting as a source of safety expertise and advice for senior management
- reviewing progress on hazards identified and mitigating actions taken
- making safety recommendations to address safety hazards
- reviewing internal safety audit reports and investigation reports
- reviewing and approving the audit response and any resulting actions
- encouraging lateral thinking about safety issues
- helping to identify hazards, and defences and controls
- preparing and reviewing safety reports to be presented to the CEO
- reviewing progress against –
  – safety objectives
  – safety performance indicators
  – safety performance targets.

Minutes and Agenda of Safety Committee meetings

(1) ***Meeting Chair***: The senior manager, or the safety manager, can chair the meetings.

(2) ***Meeting Minutes***: all committee meetings shall be minuted. As soon as possible after the meeting, each committee member should receive a copy of the minutes with a clear indication of action items and timelines for completion. Copies of the minutes should be displayed on the safety notice board for employees.

(3) ***Meeting Agenda***: a committee member, usually the safety manager, drafts the agenda after adequate notice of any discussion items. The safety manager will typically distribute the agenda at least one week before the meeting.

A typical agenda for Safety Committee meetings might include some or all the following items:

- review outstanding issues from previous meetings
- review safety action plans
- review safety investigation reports (CA 005 incidents, etc.)
- review the effectiveness of previous safety recommendations (from audit reports, PNG AIC investigation reports, etc.)
- notify members of committee activities
- assess and resolve identified hazards
- review safety audits and action plans
- monitor and promote safety involvement
- monitor SPIs and SPT tracking in trend charts against pre-set ALoSP
- carry out risk assessments on any new equipment, routes or procedures
- plan and organise staff training
- plan for the safety impact of operational changes.

(4) ***Frequency of safety committee meetings:*** The safety committee shall aim to meet at least on a monthly basis. [How often your committee meets depends on the size of your organisation and the number and severity of identified hazards. Some safety committees will meet weekly, while others will need to meet less frequently (e.g. once every two months).]

Appendix D – Human Performance (HP) Considerations in SMS Safety Policy, Objectives and Interfaces

ICAO's Five (5) HP Principles

According to ICAO there are 5 principles that apply to human performance[2] (HP). Knowing and applying these principles helps us shape, improve, and optimize safety performance at all levels of an aviation system.

Table 1 identifies the 5 HP principles and offers some corresponding questions to help you apply the principles in an operational context. Please note that the questions listed are for illustrative purposes and are not exhaustive.

Table 1: ICAO's 5 HP principles in Practice

Principle	In Practice
Principle 1: People's performance is shaped by their capabilities and limitations	• Are people trained so they can perform their duties competently? • Are people hired with the qualifications and experience we need? • Are people maintaining their competencies and currency with the programs we have? • Are people working with an optimal level of workload most of the time? • Are people's capabilities and limitations such as their vision, hearing, size and other individual characteristics understood and considered when developing tasks and procedures?
Principle 2: People interpret situations differently and perform in ways that make sense to them	• Did the actions and assessments of the people involved make sense at the time given the conditions and circumstances present during an event? • Are we working to detect drift in practices from procedures? • What knowledge and skills do people need to perform their work? • Are there cultural norms, beliefs and values influencing people's performance? • Are people learning from their experiences through the safety risk management process?
Principle 3: People adapt to meet the demands of a complex and dynamic work environment	• Do leaders appreciate that adaptation is necessary in an operational setting, and should be managed, underpinned by consideration of human performance? • What pressures and demands of work goals are driving the actions and decisions of our people? • When people 'find a way' – for better or worse, how do we learn from the experience? • When we implement a change, what steps do we take to manage it?
Principle 4: People assess risks and make trade-offs	• What activities and decisions are too risky and are people supported to stop or pause a flight or task? • What actions and decisions are beyond the risk acceptance of our organisation? • Do operational personnel know about the threats and hazards in their day-to-day work and how to manage them? • Do we provide adequate risk assessment tools and training so that operational personnel can make good decisions? • Are people adapting and drifting away from how we want the work to be done? What are we doing to understand why?

[2] ICAO Doc 10151, Human Performance (HP) Manual for Regulators

Principle	In Practice
Principle 5: People's performance is influenced by working with other people, technology, and the environment	• Are people working in ways that are aligned with our culture, policies and procedures? • Are peers influencing safe or unsafe practices? • Are we learning from our safety risk management and safety assurance processes? • Do we have problems keeping people in our organisation? • Are any of our people struggling with personal issues that are negatively affecting their work performance? • Do managers take an interest in their employees at an individual level - do they try to understand and truly appreciate each person doing the work and take this into consideration when allocating tasks? • Are our work processes harnessing the benefits of automation and computerized processes? Is there more we can do to be safe and efficient? • Are there any ergonomic issues that need to be addressed in our aircraft, in our hangars, in our control towers, our offices, etc.?

Human Performance in Safety Policy and Objectives – Examples

Example 1: Human Performance in SMS - Safety Policy and Objectives

Here is an example of how to consider the 5 HP principles in relation to SMS Component 1 – Safety Policy and Objectives.

Policy and Objectives Element	HP Principle	What To Consider in Practice
1.1 Management commitment	**Principle 1**: People's performance is shaped by their capabilities and limitations	• Does senior management recognize people's skills, attitudes and knowledge and are these clearly articulated in policy? • Does senior management act in practice according to their commitment? • Is there assurance that personnel are adequately trained to do their work? • Does the policy affirm that procedures are in place to provide adequate supervision where staff capability is under development?
	Principle 3: People adapt to meet the demands of a complex and dynamic work environment	• Does management recognise the value of adaptability in achieving goals and its importance in getting work done? • Have adaptations been identified and managed through appropriate processes?
1.2 Safety accountability and responsibilities	**Principle 5**: People's performance is influenced by working with other people,	• Has management clearly documented and communicated the organisational structure, reporting lines, and safety responsibility/accountability? • Does the safety policy clearly identify the importance of reporting and is endorsed by senior management?

Policy and Objectives Element	HP Principle	What To Consider in Practice
	technology, and the environment	• Has the system description been written with reference to the 5 HP principles? • Are people provided with the environment, equipment, and procedures to perform their tasks safely and efficiently?
1.3 Appointment of key safety personnel	**Principle 3:** People adapt to meet the demands of a complex and dynamic work environment	• Do senior managers understand and promote an appreciation that risky adaptations may occur when key personnel are either not in place (understaffing), or ineffective? • Do senior managers accept that where key personnel are not appointed, negative adaptations may result?
1.4 Coordination of emergency response planning	**Principle 2:** People interpret situations differently and perform in ways that make sense to them	• Are emergency procedures well considered, trained, and communicated so that personnel do not need to improvise or adopt sub-optimal solutions that meet their own needs?
1.5 SMS documentation	**Principle 1:** People's performance is shaped by their capabilities and limitations	• Is it recognized by the organisation that documentation is both an enabler and limiter, and that it can enhance human performance or cause detriment to it. • Does the organisation foster an informed culture reinforced through robust documentation?
	Principle 4: People assess risks and make trade-offs	• Are all safety-critical processes documented? **Note:** The absence of good documentation presents a risk to SMS functioning. SMS documentation must be of a high standard in order to prevent personnel developing their own trade-offs within the SMS. This is particularly relevant in core and safety critical tasks such as risk management.

Example 2 – HP Considerations in SMS Interfaces

The below table summarises an example of how to consider the 5 HP principles in the interfaces within an SMS. Safety Management Systems do not operate in isolation, and the criticality of Interface Management is recognised as a key component in SMS. **Every** interface will involve **people** and human performance/Human Factors principles should always be considered as part of the interface system description and management.

Interfaces	HP Principle	What To Consider in Practice
Internal and external interfaces	**Principle 1:** People's performance is shaped by their capabilities and limitations	• Have you considered the level of training and experience of people in the interfacing organisation? • Have you considered the workload and pressure of the interfacing organisation in your risk management?
	Principle 2: People interpret situations differently and perform in ways that make sense to them	• Is the interfacing organisation doing things differently? **Note:** Just because the interfacing organisation does things differently does not make it wrong. The safety cultural principles of flexibility and learning will support continuous improvement.
	Principle 3: People adapt to meet the demands of a complex and dynamic work environment	• If the interfacing organisation implements a change, how will it impact on your own organisation?
	Principle 4: People assess risks and make trade-offs	• Have you compared the acceptability of risk of the interfacing organisation? How will you manage these differences?
	Principle 5: People's performance is influenced by working with other people, technology, and the environment	• Have you considered how the interfacing organisation differs from your own? How will you manage expectations? **Note:** Examples of differences include levels of resource; employment of technology; operating environment; culture (safety, organisational, etc.).
3rd Party Service Provider Interfaces 1. Identify all external service providers 2. Define the boundaries of each interface arrangement 3. Identify how each interface is reviewed 4. Identify the scope of data or service	**Principle 1:** People's performance is shaped by their capabilities and limitations	• Are qualifications, training and experience levels of personnel in external service providers the same or better than your own staff?
	Principle 2: People interpret situations differently and perform in ways that make sense to them	• Are roles and responsibilities clearly defined and communicated to personnel in both organisations? • What differences training should be provided to staff for alignment?
	Principle 3: People adapt to meet the demands of a complex and dynamic work environment	• What types of data or service analytics will be essential for personnel in both organisations to adapt to changes and challenges? How can these be shared and utilized by both organisations?

Interfaces	HP Principle	What To Consider in Practice
provided across the interface 5. Include procedures for identifying potential hazards and applying mitigations across the interface arrangement		• What training or support mechanisms will be implemented to ensure that staff of both organisations are equipped to interpret and act on the provided data?
	Principle 4: People assess risks and make trade-offs	• What collaboration and feedback mechanisms are available to facilitate mutual understanding and alignment when managing risk appetites of personnel in both organisations?
	Principle 5: People's performance is influenced by working with other people, technology, and the environment	• How can both parties communicate effectively to facilitate needed flexibility to account for routine differences and changes in each organization?