

# CAA oversight and experience



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# Gap Analysis

Many SMS attributes are already in place

- Risks may be considered already – contracting/subcontracting
- Quality/compliance system in place
- Compliance with 376/2014 Occurrence reporting requirements
  - Hazard identification
  - Risk assessment
  - Just culture
- HF training

Think how Safety and Quality/Compliance are integrated. Document it!

# What may be missing?

Policy, Processes and procedures – while you may be doing many things, they are not necessarily documented.

Promotion – how do you promote safety? This includes policy, reporting, understanding what happens if people make errors, do they trust your organisation that they will be treated fairly.

Safety assurance – how do you ensure that actions were completed and that they were effective?

# CAA SMS Evaluation markers



# What are we seeing?

Organisations have process/procedure in place but cannot demonstrate the markers are 'operating'

**Present:** There is evidence that the 'marker' is clearly visible and is documented within the organisation's SMS Documentation

**Suitable:** The marker is suitable based on the size, nature, complexity and the inherent risk in the activity

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

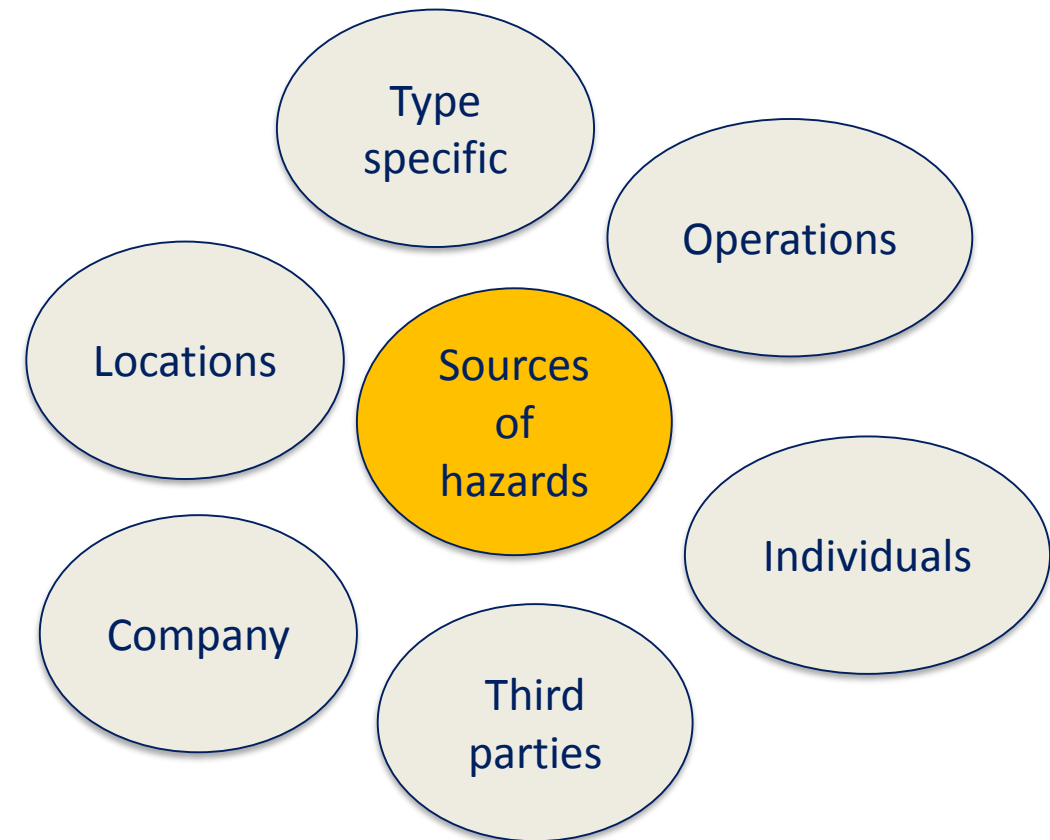
**Effective:** There is evidence that the element or component is effectively achieving the desired outcome

# Hazard Identification

**1.1.3 There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external). Information gathered and stored complies with EU 376/2014 Articles 4.1, 6.5, 7.1**

Frequently organisations can only demonstrate data from:

- Occurrence reports
- Audit findings



### 1.1.5 There is a process in place to analyse safety data and safety information to look for trends and gain useable management information.

#### Data limited to:

Flight operations trends

Number of audit findings

Number of occurrence reports

Reliability data

#### Expectation

Part CAMO specific data

Consider root causes, not just outcomes

Evidence of management decisions

Corrective/preventive actions identified and verified

For example: identified trend from VORs should be entered into the occurrence reporting database and reported to the CAA



# Risk assessment and mitigation

**1.2.1 There is a process for the management of risk that includes the analysis, assessment of risk associated with identified hazards, expressed in terms of likelihood and severity.**

**1.2.3 The organisation has a process in place to decide and apply appropriate and effective risk controls.**

- Postholder perception of top risks not matching risk register
- Risk register not up-to-date
- Risk register not reviewed
- Not clear who can accept risk
- Inconsistent application of risk assessment across organisation

Risk	Probability	Impact	Score	Actions	Owner
Resources may not be available when required	Medium	High		Create a resource management plan	Project Manager
Funding may not be available to complete the changes	High	High		Secure additional funding	Sponsor

## 2. Safety Assurance – all markers

### The weakest area!

- Safety objectives do not align with Safety Performance Indicators (SPIs)
- SPIs are unrealistic/unachievable or encourage the wrong behaviours
- Risk mitigations and controls are not verified/audited to ensure they are working and effective
- SPIs do not consider human performance issues
- SPIs not regularly reviewed
- No visibility of risk controls applied by third parties

Objectives	How are objectives achieved	Safety Performance Indicators
Ensure Effective Risk Management	Events are reviewed to identify risk line and barrier activity	Review undertaken within 3 working days of event
	Mitigation strategies are developed	All risks are ALARP
	Risk management tool entries have been reviewed and accepted - noting any required amendments- by SQEP personnel	Less than 3 months since recorded review
Create an Engaged Safety Culture	Evidence of Air Safety promotion activity	Latest air safety promotional material is displayed
	Evidence of Safety meetings being held	Safety meetings held in accordance with schedule
	Number of occurrence reports raised	1. Positive increase on previous month 2. Increase in maturity of reports (improving number of 2nd and 3rd age reports)
Report and Investigate Occurrences	Evidence that occurrences are accepted and appropriately managed	Occurrence reports are accepted within 3 working days
	Evidence that investigations are appropriately managed	Investigation reports are released within 10 working days of SAG review
	Occurrence reporting trends monitored	3 months or less since reporting trends reviewed by SAGs

# Management of Change

**2.2.1 The organisation has a process to identify whether changes have an impact on safety and to manage any identified risks in accordance with existing safety risk management processes.**

**2.2.2 Human Factors issues have been considered as part of the change management process and where appropriate the organisation has applied the appropriate human factors/ human-centred design standards to the equipment and physical environment design.**

- Process not used (e.g. Change of postholder)
- Documented post change
- Tick-box exercise
- Impact on human performance not considered
- **Transition from Part M SpG to Part CAMO – use the Management of Change process!**



# Continuous improvement

**2.3.1 The organisation is continuously monitoring and assessing its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.**

- Appreciate it requires SMS working for some time

However, during the implementation you can already demonstrate:

- Pre-audit assessing compliance with CAMO.A.200
- Safety surveys (past or planned)
- Evidence of follow up actions (findings from pre-audit)
- Testing new procedures/processes (document it!)
- Best practices identification

# Safety Promotion

**4.1.2 there is a process in place to measure the effectiveness of training and to take appropriate action to improve subsequent training.**

**4.1.4HF The competence of trainers is defined and assessed and appropriate remedial action taken when necessary.**

**4.1.5HF Training includes human and organisational factors including just culture and non-technical skills with the intent of reducing human error.**

- Has the Senior Leadership team received the training?
- How do you know the training is effective?
- Can every employee explain their individual role in SMS?



# Interface management

## **5.1.1 The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.**

- Not documented
- Third party hazards not considered
- Third party risk controls not present
- Do you share safety information with third parties?

# Small organisations

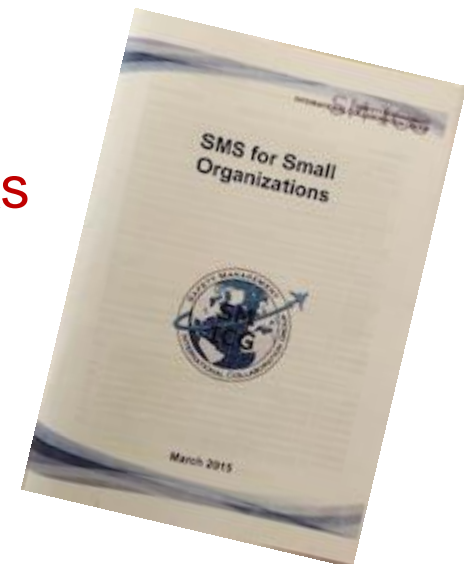
Management System processes/procedures can be described in CAME or in a separate document

SAG/SRB meetings – items can be discussed at regular management meetings as long as they are fixed on the agenda and decisions/actions are documented

Risk register can be a simple excel file – as long as it is treated as a live document, regularly reviewed and updated

CAA expect to see how you manage identified risks

CAMO.A.305 Safety and/or compliance may be combined with other duties (subject to CAA agreement)



# SMS benefits

- Helps to improve operational performance
- Mitigates the risks that have been identified
- Recognises human and organisational factors
- Helps to prioritise resources
- Corporate memory on previous decisions/actions

# Slido Questions

