BAINES SIMMONS
SAFETY SERVICES

Safety Management Performance Assessment 2022

ABL Final Report

November 2022

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Project Management

Project Client	ABL
Project Title	Safety Management Performance Audit
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Contents

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A. Executive Summary

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

A.1 Environmental Factor (Context)

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

This Performance Assessment was conducted in November 2022 and is the third assessment in a series of three. The first was conducted in 2019 and the second virtually (due to Covid) in late 2020. Since the last assessment there has been a significant change in personnel within the ABL with several analysts leaving, new replacements and additional analysts joining, additionally a change in management with a new Head of Information Department and a recently joined new Teamleader.

ABL (Analysebureau Luchtvaartvoorvallen, *Aviation Occurrence Analysis Agency*) is a separate department of the larger ILT (Inspectie Leefomgeving en Transport, *Human Environment & Transport Inspectorate)* organisation. The task of the ABL is to process, store and analyse the aviation safety reports it receives as part of the State Safety Programme (SSP / NLVP). The ABL is not a regulated aviation organisation with the need for a full Safety Management System, but as it works within the aviation safety sector and, therefore, shall follow the relevant parts of Regulation (EU)376/2014 it is appropriate to assess its performance against this European Aviation Safety Agency Management System Assessment Tool (EASA MSAT) in part. Where necessary the audit team has interpreted the assessment requirements to best fit the context of ABL and its role.
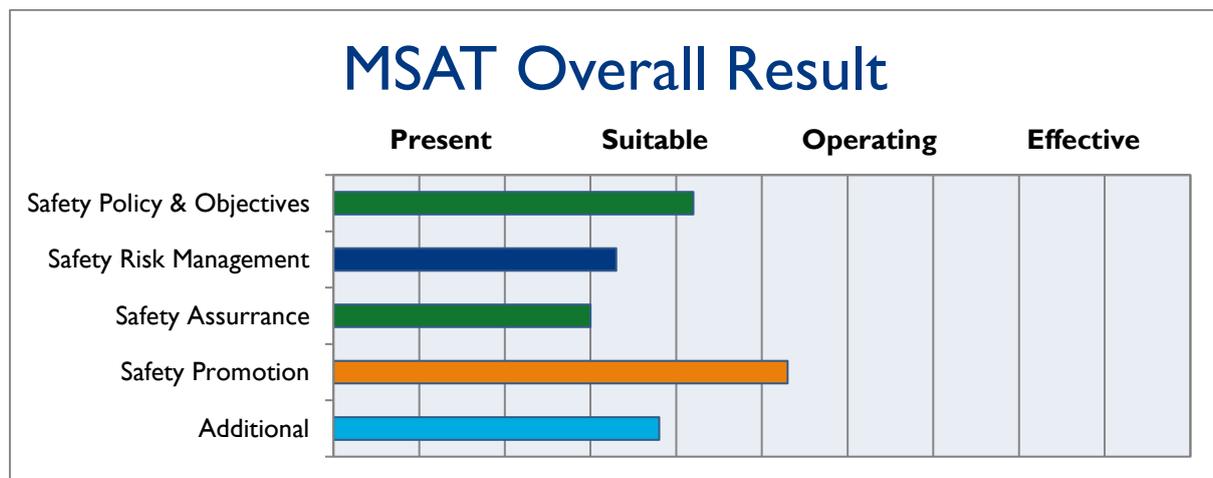
A.2 Assessment

Figure 1: Overall Assessment

Assessment - The overall performance of the management of safety in ABL, measured against PRESENT, SUITABLE, OPERATING, EFFECTIVE, as defined by the EASA Management System Assessment Tool (MSAT), is currently assessed as being at High SUITABLE*, which is below the global aviation industry average assessed by Baines Simmons of Low OPERATING, based on 35 Baines Simmons assessments conducted in the last 6 years. This is an improvement from the previous assessment of Low SUITABLE and demonstrates continuous improvement from the PRESENT assessment in 2019. In the view of Baines Simmons, the current regulatory requirement is at OPERATING.

As ABL is not an entity that owns and mitigates risk, rather a support function to the aviation sector, to enable understanding of its own risk exposure, interpretation has been required to fit the safety management system approach to the assessment of ABL. In ABL's core task of occurrence report handling it remains on an assessed level of OPERATING but the overall assessment is lower as there are many safety management elements which, although continuing to improve, remain yet to mature. The lack of effective risk classification remains a hindrance and will shortly become a non-compliance when it becomes a requirement in 2023.

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

The assessment must not be taken as a failing of ABL but in the context of ABL being part of a wider aviation sector and assessed as such with the MSAT tool. ABL has demonstrated continued improvement, especially in key areas and has a better understanding of the elements of a Safety Management System and the aviation sector as a whole.

* High SUITABLE shows that, on average, indicators assessed were in the higher end of the MSAT definition for SUITABLE which is: There is evidence the system is suitable for the size, nature and complexity of the organisation.

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

MSAT Results Overview
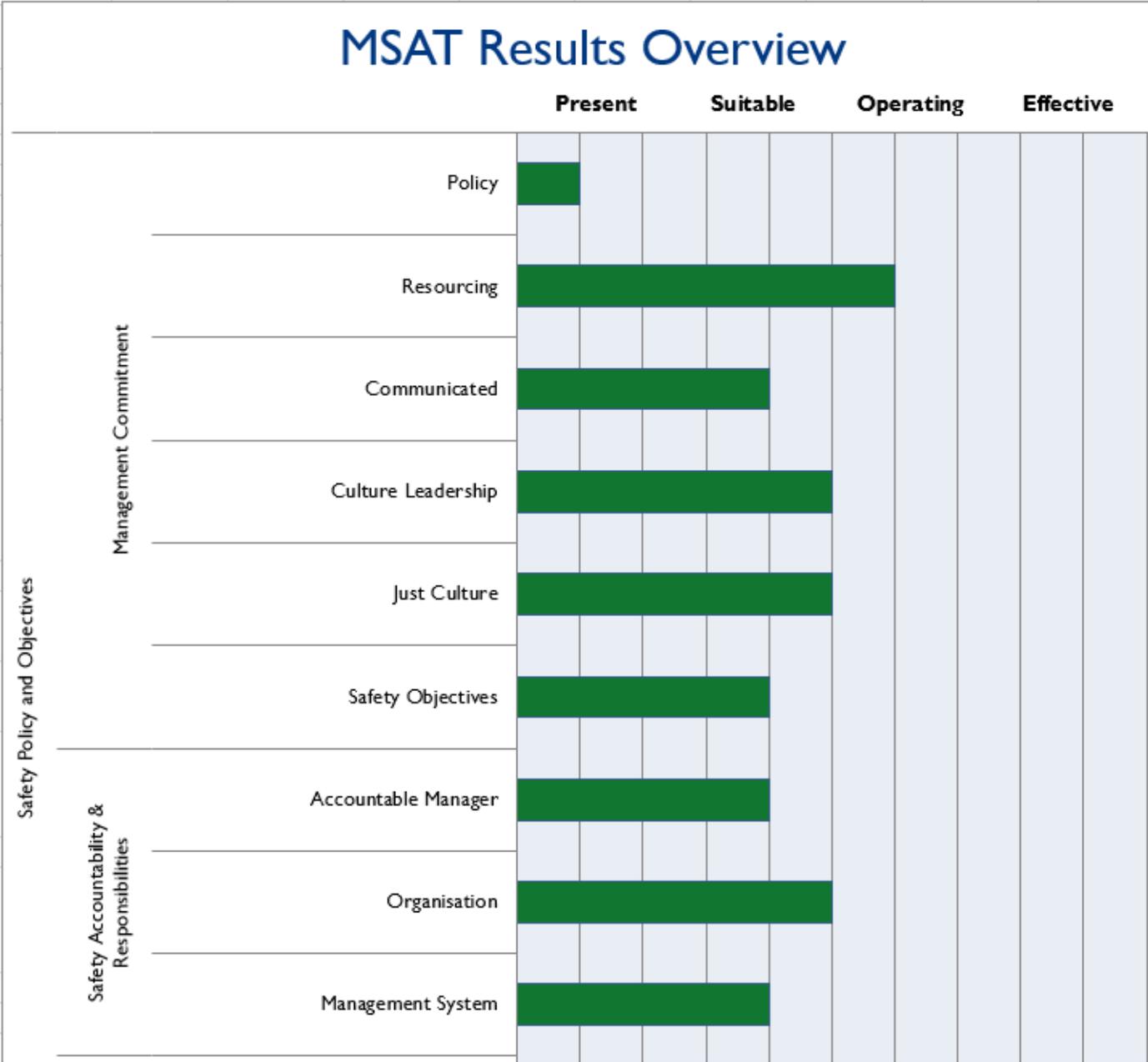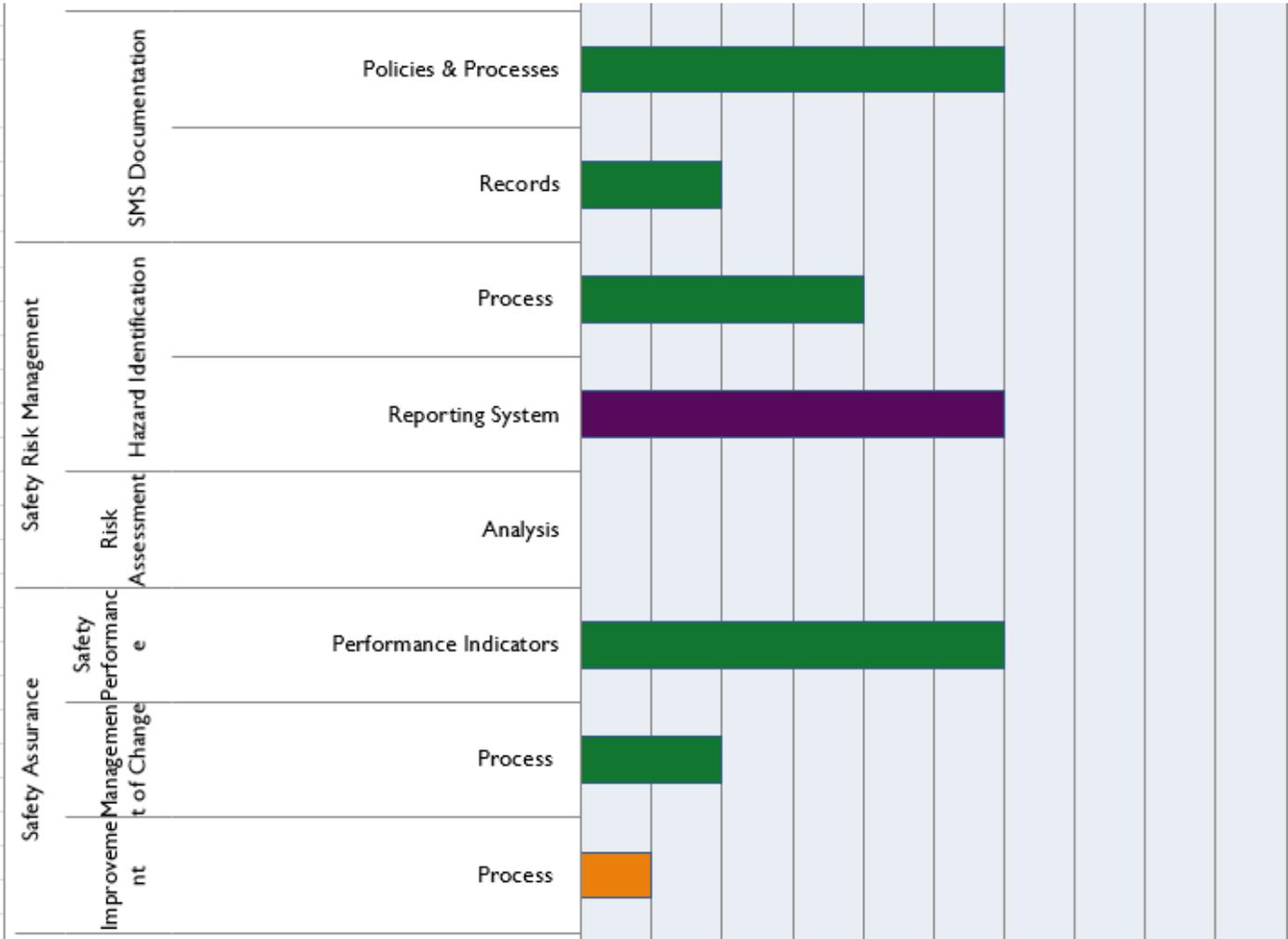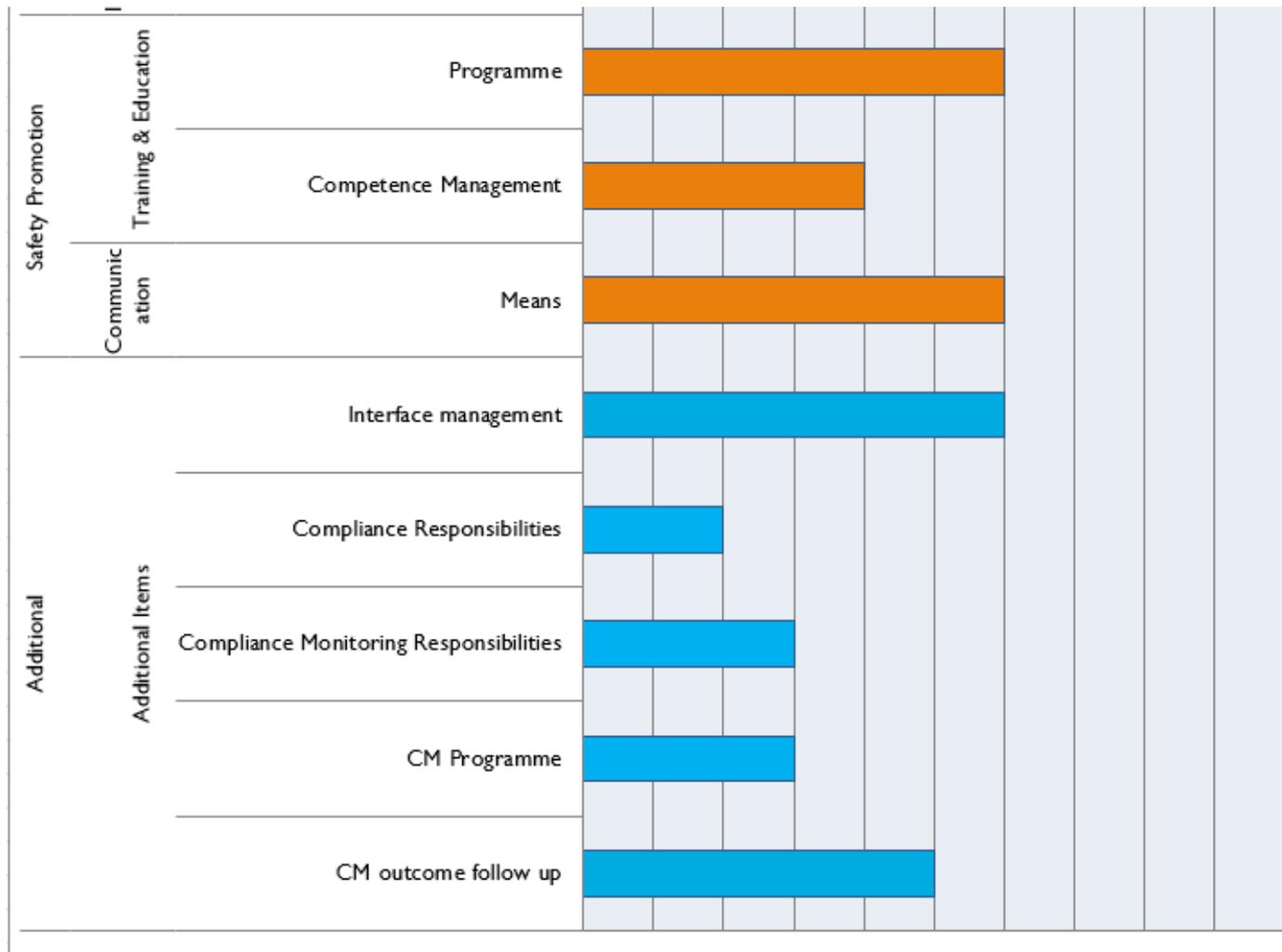
Figure 2: MSAT Overall Assessment Results Chart

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

▶ **Safety Policy and Objectives**

The ILT does have a common management system that ABL uses which has a good structure and was recently updated, it is accessible and contains some specific ABL processes; however, it is not set up on the principles of an aviation Safety Management System and ABL staff did not appear familiar with the content nor use generic processes. The ABL specific processes are used and these processes are known and relevant. There has been a further improvement connecting the statistical analysis agency to aviation and in particular the ILT inspectors, therefore enabling performance based oversight.

There is continued follow up of overdue reports and quality of received reports. However, there are still some parts of the sector that are not completing all required data in the reports which is a hinders ABLs ability to conduct proper analysis and any future automation. The ECCAIRS 2 format and mandatory field requirement is perceived as a potential hindrance to reporting, especially from the General Aviation sector.

There has been an improvement in available resource and in the aviation competence of ABL staff.

▶ **Safety Risk Management**

The core task of ABL is the processing, analysis and storage of aviation occurrence reports and regulation (EU)376/2014 governs this. Report information and trends are used by aviation sector partners, with a reliable feed to the Schiphol ISMS dashboards and visible performance information available on the public and pro websites. Output to ILT Inspectors has also improved, enabling performance based oversight. There remains no additional risk classification placed on incoming reports and trends are based on number of reports rather than severity of risk. Requirements for risk classification and reporting using the European Risk Classification Scheme are soon to be introduced and may require additional resource or competence to achieve.

▶ **Safety Assurance**

Safety objectives are now set internally within ABL but not formalised, internal performance is assessed with ECCAIRS 2 output. The public website dashboard is reporting trends and there are quarterly and annual reports, with the 2021 report released shortly after the diagnostic visit. There is now a management of change process included in the Mavim Management System but this has not yet been used by ABL, even with the implementation of ECCAIRS 2, a significant change. The audit activities taking place within ILT have yet to include ABL. There has been an improvement to the ILT Management system and a Quality Officer appointed.

▶ **Safety Promotion**

The contact with Aviation Sector Partners has improved, continuing to provide the public with aviation safety reporting information but with the addition of the Pro website increasing the usefulness of data output to sector partners to assist in their safety risk management. The public facing website shows aviation reporting trmends, an additional factsheet has been produced and there is evidence of annual safety reviews and quarterly updates, but these require updating. The ABL+ meetings

continue where safety data is presented to show trends and there is two-way dialogue which is demonstrating results in building trust and understanding. The existing commercial and general aviation meetings have been added to with four additional meetings for ILT Inspectors. The overall understanding of the aviation sector has improved and a better understanding of what the numbers mean in the context of aviation, with a competence development plan for ABL staff and also a change of staff profile to better reflect the role of not only analysing numbers but being able to communicate safety information back to the aviation sector.

▶ **Other**

▶ **Interfaces**

ABL provides the Schiphol ISMS with a reliable data feed to populate their safety dashboards which are used to monitor ISMS Safety Performance. This data flow also includes identified precursor events that enable ISMS to be proactive in their safety barrier assessments and potentially mitigate hazards before they are realised into an undesired consequence. With a robust, reliable data feed the need for interaction between ABL & ISMS has reduced and the relationship has become routine and potentially stagnated. Innovations in data usage and tools may re-invigorate this useful relationship in the future. There has been a marked improvement in the interface between ABL and the ILT Inspectors, with ease of access to data and more contact regarding reports of interest and support to oversight activities, this has enabled the inspectors to enact performance based oversight in their audit activities and also gives ABL better access to the Inspectors aviation safety knowledge.

▶ **Compliance**

There are improved internal compliance activities within ILT but these are yet to demonstrate effect on ABL, as they await to be audited, so can only be considered to be SUITABLE. ABL has reacted positively to this series of Performance Assessments provided by Baines Simmons and has addressed any highlighted non-compliances as well as demonstrating continuous improvement.

▶ **Schiphol Safety Improvement Covenant Questions**

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

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

This is assessed as OPERATING in that there is a functioning system to report aviation occurrences and analysis is made by ABL. There is an improvement in output and connection

to the Aviation Sector, with ABL providing data and analysis that the sector can actively use in hazard identification and safety risk management.

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

Art.12: Steps in improvement ABL
The improvements of ABL consists of:
  a. *Monthly sharing of usable trend analysis of occurrences reported by sector parties, such that sector parties can use these insights to judge if and what measurements need to be implemented to improve safety.*

This is achieved by a monthly update of occurrence statistics on the publicly accessible website, which is robust and reliable. The sector parties can also access a pro version with advanced features to better gain insight into safety hazards and risk.

  b. *Further development of the analysis function of ABL by:*
  o *smarter use of data, for which collaboration with other oversight authorities is sought*

ABL has an improved relation to the ILT Inspectors and the inspectors have access to data with the Loket tool, information from ABL has enabled performance based oversight by the Inspectorate. ABL still needs to build a capability to analyse risk as well as quantitative report data. This will be mandated as of 1st January 2023 (as per EU Implementing Regulation 2021/2082)..

  o *the development of concrete innovative products and techniques and the usage of them*
The work completed with the Schiphol ISMS to analyse precursor events now provides a stable data source and enhances the ISMS proactive risk treatment.

  o *improving the knowledge of analysis methods*
The Safety Analysts receive continuation training in analysis methodology.

  o *the automation of reporting of occurrences by sector parties*
ABL can accept occurrence reports in the required E5X format and some (though not all) sector parties utilise this. ABL can accept reports in various formats and this will remain so, as not all sector parties (for example General Aviation) may have access to an automatic capable system. ABL has implemented the new European standard ECCAIRS 2 reporting protocol, and is a leading example in this, including participation in pan-European user group. This was a significant undertaking and not only meets the requirement but enhances capability.

  o *better classification of occurrences, as stated in art 14.*
Competence in aviation matters has improved but there remains a deficiency in the risk classification of reports. ABL may require additional resource and/or competence to fulfil the risk assessment requirement.

  o *Proactively sharing with sector parties of remarkable developments and results of analysis, besides the trend analysis.*
Factsheets continue to be produced but there is limited output. The Annual report for 2021 is yet to be released. There is proactive sharing at the ABL+ meetings, additionally ABL inputs information to the production of the State Safety Programme (SSP / NLVP), the "Staat van Schiphol" report and the National Action Plan (NALV).

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

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

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

   The sector parties report occurrences in accordance to the current regulation, follow up of any late reporting or missing data is conducted, so far, this has been conducted in an 'encouraging and collaborative' manner in an attempt to maintain and encourage a positive reporting culture. ILT Inspectors are now made aware by ABL of any sector party that is not complying so this can be followed up upon during oversight activities.

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

   ABL has the capability to receive automated reports and does so from several of the major sector parties. ECCAIRS 2 capability is in place with a functional automated feed.

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

   ABL has an improved capability to process this data with ECCAIRS 2, but it was only activated in September 2022 so difficult to assess maturity at this time.

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

   ABL provides a robust and reliable data output to the ISMS and to ILT Inspectors providing transparent trend analysis data on the public and pro websites.

5. *In 2018, ILT makes separate agreements with sector parties concerning:*
   a. Operational agreements to further organize a good connection between ABL and ISMS.
   b. Mutual exchange of analysis to come to good understanding of questions and specification of answers needed.
   c. Usage of information of ABL from Dutch and European databases, in accordance with requirements of EU 376/14.

   Agreements made and producing output. Within ISMS, sector parties have signed Non-Disclosure Agreements to gain insight from reports and investigations. Access and implementation of the ECCAIRS 2 digital platform (European Coordination Centre for Accident and Incident Reporting Systems) completed in September 2022.

▶ **Overall**

   With an overall MSAT assessment of High SUITABLE, ABL has shown continuous improvement especially in areas previously highlighted, such as connection to ILT Inspectors and aviation competence. In fact most areas assessed have shown improvement, with only one criteria (the communication of internal policies) regressing, as staff familiarity was not as previously observed. Over the three assessments conducted ABL have responded to the results and it is very satisfying to witness the progress made.

   The key area for ABL of safety reporting is assessed as OPERATING, which is the core task. It should again be stressed that a full Safety Management System may not be appropriate for an agency such as this but as it interfaces with the SMS' of the

aviation sector it must understand those systems and the requirements of where ABL can add value and assist those SMS' with viable, usable data. ABL continues with good, enthusiastic staff that, even with several personnel changes, continues to consolidate knowledge of aviation systems and enhance competence.

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

ABL continues to improve so that all parties can better draw timely lessons from incidents with a view to improving aviation safety. Improvements are evident but there is still more to do regarding applying risk assessments.

The department does provide data on the frequency, but not the severity, of safety related occurrences which still requires improvement. It provides data analysis of trends and these areas are now performing to a level that delivers proactive, reliable data, enabling key safety performance indicators to be used within the ISMS and by other sector parties. Uploading data to the European Database takes place and the ECCAIRS 2 platform has been successfully implemented.

Overall improvements have been made in line with the covenant and demonstrable effort has been made both in improving output and relationships with sector parties. There remains much to do in creating the now required risk assessment capability but the fundamentals of ABL's role are, again, in a much better position from the previous assessment.

B. Objective and Scope

B.1 Background

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

B.2 Scope

	Location
ABL staff	Sloterdijk
ILT Manager & Teamleader	Sloterdijk
Interfaces: ILT Inspectors, Schiphol ISMS & ABL+ meeting members	Sloterdijk & Schiphol

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

B.3 Objective

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

▸ A review of how effective the work done by the agency to date has been in building its management systems

▸ Assessing the extent of any gaps against the ABL desired status of EFFECTIVE on the PSOE scale and against the relevant Regulation (EU)376/2014.

B.4 Task Breakdown

▸ **Planning Stage:**   The Principal Consultant nominated as Project Manager conducted a project team launch meeting and orientation; scoping, planning and initiation.

▸ **On-site phase.** Information was captured and documented from one-to-one interviews and focus groups. This involved staff at all levels and any relevant stakeholders to provide a robust assessment of the groups in scope.

▸ **Analysis.** Comments, evidence and observations collected throughout our engagement were captured as facts (confirmed using cross checking techniques), plotted against the evaluation criteria below and subsequently grouped in order to develop findings and conclusions.

▸ **Report Writing Phase:** This report details the findings and conclusions, including an Executive Summary and industry benchmarking.

▸ **Report Presentation:** The report will be delivered by the Baines Simmons Project Manager to the Executive team.

B.5 Deliverables

The key deliverables are:

▸ A report with key results including:

  – An assessment of the constituent parts of ABL's management systems against the EASA MSAT and PSOE performance markers.

▸ Report presentation to the ABL Guidance Committee summarising the conclusions.

  – Follow up meeting to discuss the conclusions.

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

C.1 Introduction

Note: *The following information is primarily extracted from the EASA Management System Assessment Tool (MSAT) ver1.0 as intended for guidance to regulators. Baines Simmons have applied our QIEJ (Question, Indicators, Evidence and Judgement) assessment methodology to the Key Performance Questions (KPQs) of the MSAT.*

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

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

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

C.2 How and when the tool is used

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

C.2.1   Initial certification/implementation

Before issuing the certificate, the competent authority should make sure that all processes are PRESENT and SUITABLE, so that all the required enablers of a functioning SMS are implemented by the organisation. In this initial certification phase, a large part of the SMS assessment could be carried out by a desktop review of relevant Management System/SMS Documentation. However, carrying this out at the organisation provides an opportunity for the inspector to advise and guide the

organisation on its Management System/SMS implementation and support standardised implementation.

C.2.2   Continuing oversight

After initial implementation, the organisation should start using the Management System/SMS as part of its operations. The competent authority should ensure that within the first oversight planning cycle the organisation's Management System/SMS processes are PRESENT, SUITABLE and OPERATING. An organisation may eventually have EFFECTIVE processes, which is the evidence of an EFFECTIVE SMS. In order to check that SMS processes are indeed OPERATING and/or EFFECTIVE the Management System/SMS should be re-evaluated on a regular basis to assess how well it is performing. The review should assess all of the items in the assessment tool which can be done by a combination of organisational visits, meetings and desk top reviews.

As an organisation's Management System/SMS processes mature and it moves to OPERATING and EFFECTIVE this may also require the 'suitability' criteria to be revisited. Changes to an organisation's approval may also require a reconsideration of the suitability of the SMS processes. So, when significant changes take place the competent authority may determine the need to review the existing assessment to ensure it is still appropriate.

C.3   Credit for other oversight activities

Valuable information about Management System/SMS effectiveness can be gained from other oversight activities. This may include such activities as routine compliance audits and inspections, occurrence investigations and meetings with the organisation. This should be taken into consideration by the inspector through liaison with other inspectors involved in the oversight of the organisation. Competent Authorities may also consider giving credit where an organisation has received accreditation for meeting an industry standard.

C.4   Dealing with multiple certificate holders

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

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

C.5 Tool guidance

The tool assesses the compliance and effectiveness of the Management System/SMS through a series of features based on ICAO Annex 19 Second Edition and EASA Management System requirements for organisations. It is set out using the 12 elements of the ICAO SMS Framework and some additional EASA Management System requirements. Each feature should be reviewed to determine whether the feature is PRESENT, SUITABLE and OPERATING and EFFECTIVE, using the definitions and guidance set out below.

The tool is used by the competent authority inspector to evaluate and record the assessment. Alternatively, it can be partially completed by the organisation to assess itself and by the competent authority to verify and validate the organisation's assessment.

C.6 Applicability

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

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

C.7 Definitions used in the tool

Present (P):	Evidence that the 'indicator' is clearly visible and is documented
Suitable (S):	Evidence that it is suitable based on the size, nature, complexity of the organisation
Operating (O):	Evidence that the indicator is in use and a clear output is being produced
Effective (E):	Evidence that the indicator is effective and achieving the desired outcome
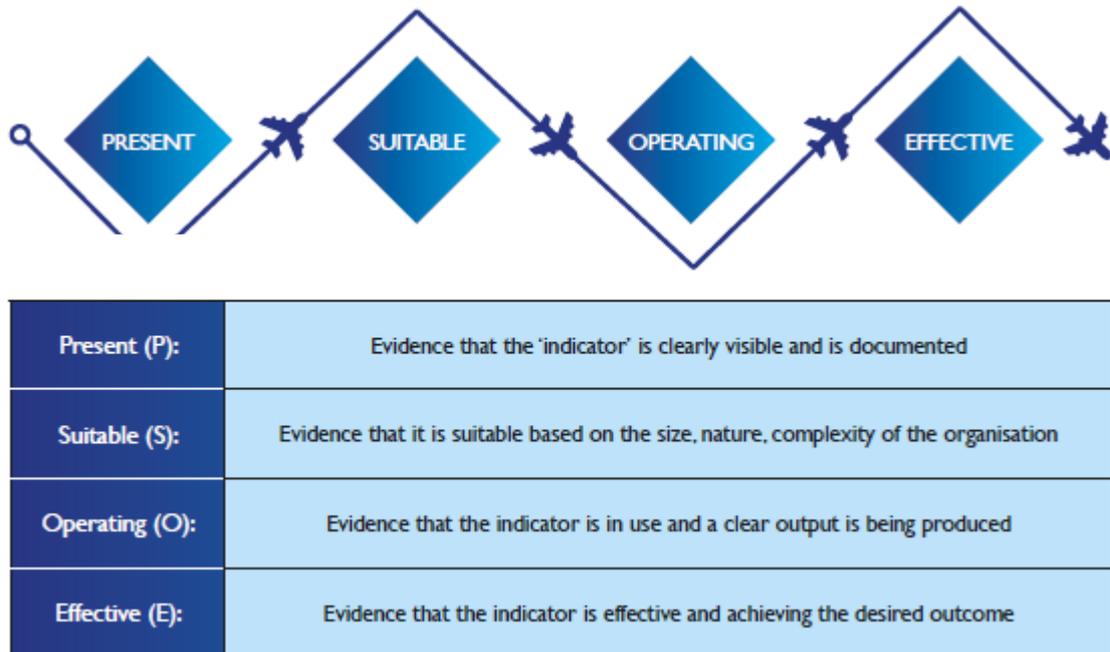
Figure 3: PSOE Definitions

For PRESENT, OPERATING and EFFECTIVE a 'word picture' is included to help the inspector determine the correct level. There is no word picture for SUITABLE as this is specific to the individual organisation and impossible to define for all types and sizes of organisations. It is the responsibility of the organisation to determine the suitability and to justify to the competent authority who will then assess it.

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

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

C.8 Level of detail to be recorded

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

C.9 Addressing findings and observations (for regulators)

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

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

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

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

1. Safety Policy and Objectives

1.1 Management Commitment

Annex 19 reference & text
1.1.1 The service provider shall define its safety policy in accordance with international and national requirements. The safety policy shall:
e) be signed by the accountable executive of the organization
g) be periodically reviewed to ensure it remains relevant and appropriate to the service provider

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a safety policy that includes a commitment to continuous improvement, observe all applicable legal requirements, standards and considers best practice signed by the accountable manager.		It is reviewed periodically to ensure it remains relevant to the organisation.	The accountable manager is familiar with the contents of the safety policy.

Verification Examples
• The policy was available on the Intranet. All in Dutch language only.
• Policy statements very brief, linking into working procedures.
• ABL procedure documentation is available, whilst not including a safety policy does define the work in the aviation safety environment.
• ABL staff were not overly familiar with the location of policy documents within the Mavim management System.

Conclusion
There was not a specific Safety Policy but within the ILT management system there were policy statements that included safety.
This assessment criteria is logical as being part of the total safety system.

Corresponding EU/EASA Requirements				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATCO Training Org.**
ORO.GEN.200 'Management system' point (a)(2) and (a)(6)

AMC1 ORO.GEN.200(a)(2) 'Management system' - [complex operators]

AMC1 ORO.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex operators] | ORA.GEN.200 'Management system' point (a)(2) and (a)(6)

AMC1 ORA.GEN.200(a)(2) 'Management system' - [complex organisations]

AMC1 ORA.GEN.200(a)(1)(2)(3)(5) 'Management system' point (e) - [non-complex organisations] | ADR.OR.D. 005 'Management system' point (b)(2) and AMC1 ADR.OR. D.005 'Management system' point (b)(2) | ATS.OR.200 'Safety management system'

Point (1)

AMC1 ATS.OR.200(1) (i) Safety management system

SAFETY POLICY — COMPLEX ATS PROVIDERS

AMC1 ATS.OR.200(1); (2); (3) Safety management system

GENERAL [non-complex ATS providers] | ATCO.OR.C.001 'Management system of training organisations 'point (b)

AMC1 ATCO.OR.C.001(b) Management system of training organisations

SAFETY POLICY |

Annex 19 reference & text
1.1.2 The safety policy shall
b) include a clear statement about the provision of the necessary resources for the implementation of the safety policy

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety policy includes a statement to provide appropriate resources.		The organisation is assessing the resources being provided to deliver a safe service and taking action to address any shortfalls.	The organisation is reviewing and taking action to address any forecasted shortfalls in resources

Verification Examples

- ABL department consists of 2 data entry staff, 3 Safety Analysts, 1 coordinating Safety Analyst and an Analyst working on ECCAIRS 2 implementation.
- There has been an increase in dedicated resource since the 2020 assessment.
- The Safety Analysts are very competent statisticians but only one has any aviation competence and this is not a requirement for the position.
- There has been a shift in emphasis of competence and staff are more knowledgeable about the aviation environment.
- The Weekly ABL meeting discusses resource and workload.
- The recently appointed Teamleader of Analysis 1 Group (including ABL) has been deliberately allocated reduced commitments in other areas to concentrate on the aviation environment until gaining experience in role.
- The implementation of ECCAIRS 2 has increased the ability to track performance, aiding resource allocation
- Output from the ABL has improved with a clear focus on relationship building, communication with the Schiphol ISMS and increased connection to ILT inspectors.
- The requirement to use the European Risk Classification Scheme to risk assess and report could increase the need for resource and additional (aviation risk) competence within ABL as currently the Safety Analysts do not add a risk assessment to reports.

Conclusion

The department has statistical competence, an increased focus on aviation knowledge and an increase in overall resource, leading to an improvement in resource to a solid Operational level.
The department is resourced and competent to handle the processing and statistical analysis of aviation occurrence reports but the additional task of adding or validating a safety risk classification to reports will be a challenge.

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

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

Annex 19 reference & text

1.1.3 The safety policy shall

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

2.1.2 for c) include safety reporting procedures

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

Verification Examples

- Policy is generic for all of ILT and not specific to ABL.
- No aviation or safety content within policy.
- No communication or promotion of policy visible.
- ABL staff unfamiliar with location of policies and no clear understanding.
- ABL staff understood a commitment to aviation oversight but were not aided by management system.
- ABL staff knew they could contact a "trusted individual" for internal reporting but had not used this.

Conclusion

Regarding ABL there are so few staff to reach that the placement of the policy within the Management system on the Intranet was suitable to reach the limited audience. However, there appeared to be little knowledge of where the policies were in the Mavim system and how they were relevant. This is a regression from the previous assessment.

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

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

Annex 19 reference & text

1.1.4   The safety policy shall

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

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

Verification Examples

- Analysts attend a now weekly meeting where safety issues are discussed and the content of these has been improved.
- A new management team (Head of Information Dept & Teamleader) show commitment and understanding of aviation safety with a drive to continue the improvement of ABL.
- There is a vision for future direction of ABL by the management team but it will take time for this to reach fruition before any further assessment can be made.
- Just Culture previously mentioned briefly in management system but not apparent either internally or how external reports are dealt with. The ABL staff though do have a good understanding of applying Just Culture in the context of their work.
- Commitment to safety not explicit in management system policies, but is evident in ABL staff and the connection to the aviation sector.

Conclusion

There has been an improvement in ABL culture with a stronger focus on the aviation environment and the departments input into improved safety across the sector. Management are actively engaged and have a vision for further development.

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

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

Annex 19 reference & text

1.1.5 The safety policy shall

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

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

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

Verification Examples

- Just Culture mentioned in Management system but no specific policy or principles clearly defined.
- No clear Just Culture within ABL (or wider ILT) to encourage open reporting, there were options of contacting a working environment representative if needed.
- An improvement in the understanding of Just Culture and the EU376 requirement.
- There are meetings held with the Public Prosecutors Office to build trust with aviation sector partners in that reports are treated with Just Culture principles.
- Actively engaged to encourage open reporting (both mandatory and voluntary)

Conclusion

There is an improved understanding of Just Culture from the last assessment but still only very limited description of what it entails in the management system documentation, both internally within ABL and also in the handling of external aviation occurrence reports. The staff do have more appreciation of Just Culture and it was frequently discussed.

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

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

Annex 19 reference & text

(New Std. 1.1.2)

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

The safety objectives shall:

 a) form the basis for safety performance monitoring and measurement as required by 3.1.2

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

 c) be communicated throughout the organization

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
Safety objectives have been established that are consistent with the safety policy and there is a means to communicate them throughout the organisation.	ABL has started working with internal goals and also providing input to the SSP.	Safety objectives are relevant to the organisation and are being regularly reviewed and are communicated throughout the organisation.	Achievement of the safety objectives is being monitored by senior management and action taken to ensure they are being met.

Verification Examples

- Goals are set internally by the ABL team and followed at the weekly meeting, currently little direction by management.
- Reporting statistics are now being used to input to the State Safety Programme (SSP) where state safety objectives can be set, this is an entirely appropriate use of ABL output and will in future define the measurement of performance.
- Internal performance measurement has improved with the implementation of ECCAIRS 2.
- There is improved quality and regularity of the website data dashboard and the initiation of a "Pro" version for aviation sector partners to use for more advanced requirements.
- ABL is outputting data for Schiphol ISMS to monitor in the ISMS dashboards.

Conclusion

There is improvement in that ABL output is used in determining objectives for the SSP and that internal goals are being set and monitored. A more formal approach to this, with direction from the SSP and Management will be the next step on an improvement journey.

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

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

1.2   Safety Accountability and Responsibilities

Annex 19 reference & text
1.2.1   The service provider shall a) identify the accountable executive who, irrespective of other functions, is accountable on behalf of the organization, for the implementation and maintenance of an effective SMS

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
An accountable manager has been appointed with full responsibility and ultimate accountability for the SMS.	The Department Head is engaged with Aviation Sector Partners.	The accountable manager ensures that the SMS is properly resourced, implemented and maintained and has the authority to stop the operation if there is an unacceptable level of safety risk.	The accountable manager ensures that the performance of the SMS is being monitored, reviewed and improved.

Verification Examples
• There is a Department Head that is in charge of a wider team within ILT, of which ABL is one and currently of increased focus. • The Department Head has greater engagement with aviation sector partners and overall aviation safety awareness has improved. • There is no clear definition of responsibility for an effective management system. • ABL uses the main ILT management system for its policies and procedures.

Conclusion
In the context of a state statistics department a full Safety Management System is not necessarily appropriate, there is a person responsible for the effective running of ABL but not accountable for an SMS. A closer engagement to the aviation safety sector has developed and the improved relation with ILT Inspectors is positive but in the context of the required assessment criteria the assessment remains SUITABLE. This assessment criteria is logical as being part of the total safety system.

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

Annex 19 reference & text

1.2.2   The service provider shall

b) clearly define lines of safety accountability throughout the organization, including a direct accountability for safety on the part of senior management,

c) identify the responsibilities of all members of management, irrespective of other functions, as well as of employees, with respect to the safety performance of the organisation

d) document and communicate safety accountability, responsibilities, and authorities throughout the organization,

e) define the levels of management with authority to make decisions regarding safety risk tolerability.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The safety accountability, authorities and responsibilities are clearly defined and documented.		Everyone in the organisation is aware of and fulfil their safety responsibilities, authorities and accountabilities and encouraged to contribute to the SMS.	The accountable manager and the senior management team are aware of the risks faced by the organisation and safety management system principles exist throughout the organisation so that safety is part of the everyday language.

Verification Examples

- The staff of ABL are aware of their responsibilities within their management system but it is unclear as to safety responsibility due to the generic nature of the system.
- ABL's work has a relation to the safety of the wider aviation sector and this is defined in the ABL procedure document.
- ABL owns no risk and therefore has no need to define risk tolerability responsibility within their organisation.
- ABL forwards notable reports to the relevant ILT Inspector for further scrutiny and to inform if any oversight follow up is suitable. There has been development of the criteria regarding this and the inspection teams report that the output has been satisfactory for the last 18 months.
- Future requirements to conduct a risk analysis on received reports using the European Risk Classification System will add additional training and resource burden to the department.
- Overall aviation safety awareness continues to improve.

Conclusion

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

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

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

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

1.3 Appointment of Key Personnel

Annex 19 reference & text
1.3.1   The service provider shall appoint a safety manager who is responsible for the implementation and maintenance of the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
A competent safety manager who is responsible for the implementation and maintenance of the SMS has been appointed with a direct reporting line with the accountable manager.	See Annex 19 Note:	The safety manager has implemented and is maintaining the SMS. The safety manager is in regular communication with the accountable manager and escalates safety issues when appropriate.	The safety manager is competent to manage the SMS and identifying improvements in a timely manner. There is a close working relationship with the accountable manager and the safety manager is considered a trusted advisor and given appropriate status in the organisation.

Verification Examples
•   There is no Safety Manager nor one required for an organisation such as ABL.

Conclusion
Not applicable and not included in overall assessment scoring. This assessment criteria included as a matter of course of the maturity assessment.

Corresponding EU/EASA Requirements				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATCO Training Organisations**
ORO.GEN.210 'Personnel requirements' point (b) AMC1 ORO.GEN.200(a)(1) 'Management system' point (a)(1)- [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex operators]	ORA.GEN.210 'Personnel requirements' point (b) AMC1-ORA.GEN.200(a)(1) 'Management system' point (a)(1)- [complex organisations] AMC1-ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' point (c)- [non-complex organisations]	ADR.OR.D.015 'Personnel requirements' point (c) and AMC1 ADR.OR.D.015(c) 'Personnel requirements'	ATS.OR.200(1)(iii)	ATCO.OR.C.010 Personnel requirements

Annex 19 Note: *Depending on the size of the service provider and the complexity of its aviation products or services, the responsibilities for the implementation and maintenance of the SMS may be assigned to one or more persons, fulfilling the role of safety manager, as their sole function or combined with other duties, provided these do not result in any conflicts of interest.*

1.3.2 EASA reference:

Management System AMCs for complex organisations

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has established appropriate safety committees(s) that discuss and address safety risks and compliance issues and includes the accountable manager and the heads of functional areas.	Safety Meetings continue and recently expanded to include ILT Inpectors.	There is evidence of meetings taking place in accordance with the terms of reference detailing the attendance and frequency of meetings. The safety committees monitor the effectiveness of the SMS and compliance monitoring function by reviewing there are sufficient resources, actions are being monitored and appropriate safety objectives and SPIs have been established.	Safety committees include key stakeholders. The outcomes of the meetings are documented and communicated and any actions are agreed, taken and followed up in a timely manner. The safety performance and safety objectives are reviewed and actioned as appropriate.

Verification Examples

- There is a weekly (previously fortnightly) meeting between the analysts where safety issues are discussed.
- The 8 ABL+ meetings each year, 4 for commercial aviation and 4 for General Aviation have continued with the addition of 4 more meetings for ILT Inspectors. These are not safety committees per se, more information meetings but are an opportunity for safety issues to be brought up by both sides. These meetings are functioning well though do focus on process and have not significantly developed since the previous assessment.
- Relations with Aviation Sector Partners has shown further improvement and some progress made.
- The relationship with ILT Inspectors has enabled a more informed oversight capability. ABL+ meetings for inspectors have been implemented.
- The connection to the ILT Management system (Mavim) was weak both in relevance and practice to ABL.

Conclusion

This assessment remains Suitable, as there is progress made in furthering the connection with Aviation Sector Partners and especially with ILT Inspectors but this is in spite of, rather than supported by, the Management System. ABL does have some specific procedures but the connection to the overall ILT Management System could be improved.

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

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

1.4   Emergency Response - not in scope of Performance Audit

1.5   SMS Documentation

Annex 19 reference & text

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

a) safety policy and objectives

b) SMS requirements

c) SMS processes and procedures

d) accountability, responsibilities and authorities for SMS processes and procedures

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

Verification Examples

- The ILT Mavim system incorporates the documentation that covers policy, requirements and processes and procedures.
- The Mavim system is available for all internally on the intranet, but is not widely used.
- It was only possible to view the system on-site on the intranet and it was only in Dutch language which is challenging for any external or international audit.
- A (Dutch language) internal ABL Procedure has been implemented to address issues where the generic Mavim system does not cover aviation specific requirements.

Conclusion

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

The ABL Procedure addresses specific aviation requirements and states how ABL shall fulfill its commitment to EU376.

The Mavim system was recently upgraded but there was no significant change from the previous assessment in regard to ABL performance.

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

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

Annex 19 reference & text			
1.5.2 The service provider shall develop and maintain SMS operational records as part of its SMS documentation.			
PRESENT	**SUITABLE**	**OPERATIONAL**	**EFFECTIVE**
The SMS documentation defines the SMS outputs and which records of SMS activities will be stored.		SMS activities are appropriately stored and found to be complete and consistent with appropriate data protection and control.	SMS records are routinely used as inputs for safety management related tasks and continuous improvement of the SMS

Verification Examples

- There are examples of SMS output such as factsheets and the updates to aviation sector partners.
- Databases are maintained with report data.
- The public website displays report trend information and is improved in its output. There is a "Pro" version with 50 users within the aviation sector.
- Formal storage criteria are lacking for ABL but covered in general by ILT procedures but these were not demonstrated.
- The ECCAIRS 2 implementation has facilitated increased capability.

Conclusion

The SMS output definition and storage is present but not fully documented.
There is evidence of some improvement but the assessment currently remains at Present.

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

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.220 'Record-keeping' AMC1 ORO.GEN.220(b) 'Record-keeping'	ORA.GEN.220 'Record-keeping' AMC1 ORA.GEN.220(b) 'Record-keeping'	ADR.OR.D.035 'Record keeping' AMC1 ADR.OR.D.035 'Record keeping' AMC2 ADR.OR.D.035 'Record keeping'	ATM/ANS.OR.B.030 Record keeping ATS.OR.200(1)(v) AMC2 ATS.OR.200(1)(v) Safety management system	ATCO.OR.C.020 Record keeping AMC1 ATCO.OR.C.020(a);(b) Record keeping

2. Safety Risk Management

2.1 Hazard Identification

<table>
<tr><td colspan="4">Annex 19 reference & text</td></tr>
<tr><td colspan="4">2.1.1 The service provider shall develop and maintain a process to identify hazards associated with its aviation products or services. Hazard identification shall be based on a combination of reactive and proactive methods.</td></tr>
<tr><td>PRESENT</td><td>SUITABLE</td><td>OPERATIONAL</td><td>EFFECTIVE</td></tr>
<tr><td>There is a process that defines how reactive and proactive hazard identification is gathered from multiple sources (internal and external).</td><td>Examples of ABL output are used for industry Hazard Identification</td><td>The hazards are identified and documented. Human and organisational Factors related hazards are being identified.</td><td>The organisation has a register of the hazards that is maintained and reviewed to ensure it remains up to date. It is continuously and proactively identifying hazards related to its activities and operational environment and involves all key personnel and appropriate stakeholders.

Hazards are assessed in a systematic and timely manner</td></tr>
</table>

Verification Examples

- There is no documented process for reactive or proactive hazard identification within ABL.
- ABL has a source of reactive hazard identification from the external aviation occurrence reports.
- Hazard identification is discussed at the weekly analysts meeting.
- The examples of factsheets previously produced by ABL demonstrate the use of report trend data to highlight hazards.
    - o Aviation Incidents due to Fatigue of Pilots & Cabin Crew
    - o Drones
    - o Unruly Passengers.
  There has since the last assessment been one additional fact sheet produced regarding;
    - o Airspace Infringement
- These factsheets are initiated on what ABL staff find as interesting trends, potentially with additional input from ILT, there is currently no formal initiating criteria but the connection to the SSP / NLVP may assist in identifying relevant subjects.
- ABL data is used by Schiphol ISMS to analyze precursor events (Threats) and within the Bow Tie analysis model are presented on the ISMS Safety Dashboard. It can be used proactively to monitor any risk increase of outcomes (use of Bow Tie Analysis model). This will enable a proactive hazard assessment and enhances the ISMS Safety Dashboard.
- ABL data analysis did highlight a potential hazard that was forwarded to ILT Inspectors for investigation.

Conclusion

Output from ABL is used by the aviation sector partners to enable hazard identification. It is within these sector partners that the expertise in hazard identification lies, though ABL competence is increasing with experience and is starting to provide examples.

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

Corresponding EU/EASA Requirements

Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(3) AMC1 ORO.GEN.200(a)(3) 'Management system' point (a)(1) - [complex operators] AMC1 ORO.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex operators]	ORA.GEN.200 'Management system' point (a)(3) AMC1 ORA.GEN.200(a)(3) 'Management system' point (a)(1) - [complex organisations] AMC1 ORA.GEN.200(a)(1);(2);(3);(5) 'Management system' points (a), (b) and (d) - [non-complex organisations]	ADR.OR.D.005 'Management system' point (b)(3) AMC1 ADR.OR.D.005(b)(3) 'Management system'	ATM/ANS.OR.B.005(a)(5) ATS.OR.200(2)(i) AMC1 ATS.OR.205(b)(1) AMC2 ATS.OR.205(b)(1)	ATCO.OR.C.001 Management system of training organisations point (c) AMC1 ATCO.OR.C.001(c) 'Management system of training organisations'

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

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

Verification Examples

- There is no internal occurrence or safety reporting system within ABL but for the context of this section how external aviation safety reports are handled will be the focus.
- Reports are evaluated, processed, analysed and stored, this being ABL's primary task.
- There are several and varied methods of submitting occurrence reports to ABL including automatically from an operator's own reporting system via E5X protocol, via pdf web forms or even by handwritten. This is to ensure all have the opportunity to report from across the whole aviation sector.
- Report data is stored in an ECCAIRS 2 (European Coordination Centre for Aviation Incident Reporting Systems) compatible database. With the change from ECCAIRS 1 to ECCAIRS 2 successfully completed in September 2022.
- ABL currently processes both Mandatory Occurrence Reports and Voluntary Occurrence Reports.
- There is improved follow-up of the late submission of Mandatory Occurrence Reports.
- There is performance measurement in place to evaluate that reports are processed in time and the reported conclusions follow up has improved with the implementation of ECCAIRS 2.
- The upload of report data to the EASA database is taking place every 30 days as per European requirements. There was a technical hitch with ECCAIRS 2 uploads showing a successful upload receipt but not actually taking place, which is being resolved.
- ABL produced an annual report in 2019 and 2020 but the 2021 report was not yet published (Published the week after the onsite visit). There are Quarterly reports available though on the public website but none uploaded for 2022.
- The requirement for so many mandatory fields to be completed in the ECCAIRS 2 standard is perceived as hindering reporting willingness, especially in the General Aviation sector.
- Where mandatory data is not provided initially ABL follows up with the reporter / organisation but there is now a connection to ILT Inspectors so this can also be included in oversight activities if required.
- The protections given the reporter are understood and enacted, there are quarterly meetings with the Prosecutors office if there are any enforcement activities suitable, these also demonstrate transparency and build trust amongst the aviation sector.
- ABL is on course to process around 20,000 reports in 2022 which is a return to pre-Covid levels.

Conclusion

The safety reporting procedure is deemed OPERATIONAL because reports are evaluated, processed, analysed and stored in a suitable database. The system is accessible and timelines are followed up on.

The reporting procedures have improved, moving from low to mid Operational. The significant effort required to successfully implement the ECCAIRS 2 system should not be underestimated. This system has enabled increased visibility of report status and therefore oversight / follow up.

The previous non-compliance regarding follow up on submission of preliminary results and actions submitted is addressed with the ECCAIRS 2 implementation.

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

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

2.2   Risk Assessment and Mitigation

Annex 19 reference & text
2.2.1 The service provider shall develop and maintain a process that ensures ***analysis, assessment*** [and control] of the safety risks associated with identified hazards.   See Annex 19 note.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process for the analysis and assessment of safety risks. The level of risk the organisation is willing to accept is defined.		Risk analysis and assessments are carried out in a consistent manner based on the defined process. The defined risk acceptability is being applied.	Risk analysis and assessments are reviewed for consistency and to identify improvements in the processes. Risk assessments are regularly reviewed to ensure they remain current. Risk acceptability criteria are used routinely and applied in management decision making processes and are regularly reviewed.

Verification Examples
• ABL do not make any analysis or assessment on the safety risks, they only include directly any risk assessment made by the reporter. This is due to current resource and competence.   • There is no risk analysis process or risk matrix in use. Use of the European Risk Classification System will soon be a requirement as of 1st January 2023 (as per EU Implementing Regulation 2021/2082). It is not clear how ABL will meet this need.   • ABL is engaged with ERCS and has connected with the EASA NoA ERCS Working Group   • Machine Learning is being considered for use in assisting with risk assessing 20,000 reports per annum.

Conclusion
There is no functioning Risk Analysis process present and classification by severity is not yet functional. ABL may require additional resource, upskilling and/or risk assessment competence to meet the Risk Classification reporting requirements. The assessment must conclude that risk analysis and assessment remains not Present.   This assessment criteria is logical as being part of the total safety system.

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

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

Annex 19 reference & text
2.2.2 The service provider shall develop and maintain a process that ensures [analysis, assessment and] *control* of the safety risks associated with identified hazards.

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

Verification Examples
• ABL does not "own" risk and therefore has no active controls.

Conclusion
Not applicable and not included in overall assessment scoring. This assessment criteria included as a matter of course of the maturity assessment.

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

3.   Safety Assurance

3.1   Safety Performance Monitoring and Measurement

<table>
<tr><td colspan="4">Annex 19 reference & text</td></tr>
<tr><td colspan="4">3.1.1 The service provider shall develop and maintain the means to verify the safety performance of the organization and to validate the effectiveness of safety risk controls.
See Annex 19 Note.</td></tr>
<tr><th>PRESENT</th><th>SUITABLE</th><th>OPERATIONAL</th><th>EFFECTIVE</th></tr>
<tr><td>There is a process in place to assess whether the risk controls are applied and effective.</td><td></td><td>Risk controls are being verified to assess whether they are applied and effective.</td><td>Risk controls are assessed and actions taken to ensure they are effective and delivering a safe service.

The reasons for ineffectiveness of risk controls are investigated.</td></tr>
<tr><td colspan="4">Verification Examples</td></tr>
<tr><td colspan="4"></td></tr>
<tr><td colspan="4">Conclusion</td></tr>
<tr><td colspan="4">Not applicable and not included in overall assessment scoring.

This assessment criteria included as a matter of course of the maturity assessment.</td></tr>
</table>

<table>
<tr><th colspan="5">Corresponding EU/EASA Requirements</th></tr>
<tr><th>Air Operations</th><th>Aircrew</th><th>Aerodromes</th><th>ATM/ANS</th><th>ATCO Training Organisations</th></tr>
<tr><td>ORO.GEN.200 'Management system' point (a)(3)

AMC1 ORO.GEN.200(a)(3) 'Management system' point (d)(1) - [complex operators]</td><td>ORA.GEN.200 'Management system' point (a)(3)

AMC1 ORA.GEN.200(a)(3) 'Management system' point (d)(1) - [complex organisations]</td><td>ADR.OR.D.005 'Management system' point (b)(5) and AMC1 ADR.OR.D.005(b)(5) 'Management system'</td><td>ATS.OR.200 (3)(i)</td><td>Not applicable, however Air Traffic Service Provider provisions apply.</td></tr>
</table>

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

Annex 19 reference & text

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

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

Verification Examples

- There are Safety Performance Indicators (SPIs) being used to monitor safety performance.
- The performance of the department is monitored with basic performance indicators based on ECCAIRS 2 functionality.
- The dashboard presents report trends to the public and there is the addition of the "pro" aviation sector enhanced version.
- Precursor data for proactive trend analysis is supplied to the Schiphol ISMS.
- There is an output to the SSP / NLVP.

Conclusion

Measurement of performance has improved in the department and data from reports is being used to monitor trends. ABL data is being actively used by sector parties. To further improve, ABL could commence analysis of the mitigations or risk controls implemented by the reporting organisations utilizing ECCAIRS 2 data.

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

Corresponding EU/EASA Requirements

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

3.2 The Management of Change

Annex 19 reference & text
3.2.1 The service provider shall develop and maintain a process to identify changes which may affect the level of safety risk associated with its aviation products or services and to identify and manage the safety risks that may arise from those changes.

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

Verification Examples

- Management of Change process now available in ILT Management System, Mavim.
- Management of Change process has not been actively used yet by ABL.
- Management of Change principles used in implementation of ECCAIRS 2 project but not the Mavim process.

Conclusion

There is an improvement in this area as there is now a documented Management of Change process within the Mavim system. This process is yet to be practically applied by ABL, especially for projects such as ECCAIRS 2 implementation that the assessment is at Present, not yet Suitable.

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

Corresponding EU/EASA Requirements

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

3.3 Continuous Improvement of The SMS

<table>
<tr><td colspan="4">Annex 19 reference & text</td></tr>
<tr><td colspan="4">3.3.1 The service provider shall monitor and assess its SMS processes to maintain or continuously improve the overall effectiveness of the SMS.</td></tr>
<tr><td>PRESENT</td><td>SUITABLE</td><td>OPERATIONAL</td><td>EFFECTIVE</td></tr>
<tr><td>There is a process in place to monitor and review the effectiveness of the SMS using the available data and information.</td><td></td><td>There is evidence of the SMS being periodically reviewed to support the assessment of its effectiveness and appropriate action being taken.</td><td>The assessment of SMS effectiveness uses multiple sources of information including the safety data analysis that supports decisions for continuous improvements.</td></tr>
</table>

Verification Examples

- There was no monitoring of management system performance.
- The ILT Management System has been updated and upgraded with a new version of Mavim and updated procedures.
- There has been continued improvements in key areas made by ABL in response to the previous Performance Assessment.

Conclusion

The Management System is the generic ILT one and there was little performance monitoring. ABL continues to make improvements internally. The ILT system does not effectively support the specific operation of ABL.

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

Corresponding EU/EASA Requirements

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

4. Safety Promotion

4.1 Training and Education

Annex 19 reference & text
4.1.1 The service provider shall develop and maintain a safety training programme that ensures that personnel are trained and competent to perform their SMS duties. The scope of the safety training programme shall be appropriate to each individual's involvement in the SMS.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a training programme for SMS in place that includes initial and recurrent training. The training covers individual safety duties (including roles, responsibilities and accountabilities) and how the organisation's SMS operates.		The SMS training programme is delivering appropriate training to the different staff in the organisation and being delivered by competent personnel.	SMS Training is evaluated for all aspects (learning objectives, content, teaching methods and styles, tests) and is linked to the competency assessment. Training is routinely reviewed to take into consideration feedback from different sources.

Verification Examples
• There is a training programme for analysts joining. These training requirements were decided by the line manager and with inputs from ILT Inspectorate aviation specialists. • There is an increased awareness of aviation amongst the newer team members and a programme to improve competence. • There is a change of analyst profile and competence to suit the requirements of ABL. • There is an ILT training programme for Analysts to develop further analytical competence.

Conclusion
ABL staff are attending courses and conducting practical visits to enhance their understanding of the aviation sector. There is a greater understanding of what is required to be able to fully support the aviation safety work within ABL in addition to the analytical skillset. This assessment criteria is logical as being part of the total safety system.

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

4.1.2 EASA reference

EASA ORX.GEN.200(a)(4) requirements for maintaining personnel trained and competent to perform their

safety and compliance tasks

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process in place to ensure that the organisation has trained and competent personnel.	A programme is in place, based on individual needs, to enhance overall competence, including aviation knowledge.	There is evidence of the process being used and being recorded.	The competency assessment programme takes appropriate remedial action when necessary and feeds into the training programme.

Verification Examples

- Training programme for new hires initiated.
- Greater understanding of the need to build relationships with the aviation sector, networking and communication.
- There were recognized challenges in dealing with reports concerning Airworthiness, due to the often very complex and technical nature of these.

Conclusion

The management system has provision for process and records.
ABL staff both new and existing receive further training, currently this is adapted to individual needs, as is appropriate in a small team but needs more structure and formalization.

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

Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
ORO.GEN.200 'Management system' point (a)(4) AMC1 ORO.GEN.200(a)(4) 'Management system' point (a)	ORA.GEN.200 'Management system' point (a)(4) AMC1 ORA.GEN.200(a)(4) 'Management system' point (a)	ADR.OR.D.005 'Management system' (b)(8) and AMC1 ADR.OR.D.005(b)(8)	ATM/ANS.OR.B.005(a)(6) Annex IV ATS.OR.200 'Safety management system' (4)(i)	AMC1 ATCO.OR.C.001(d) Management system of training organisations PERSONNEL

4.2 Safety Communication

Annex 19 reference & text
4.2.1 The service provider shall develop and maintain a formal means for safety communication that: • ensures personnel are aware of the SMS to a degree commensurate with their positions • conveys safety-critical information • explains why particular actions are taken to improve safety; and • explains why safety procedures are introduced or changed See also Reg. (EU) 376/2014 (Article 13(3))

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
There is a process to determine what safety critical information needs to be communicated and how it is communicated throughout the organisation to all personnel as relevant. This includes contracted organisations and personnel where appropriate.		Safety critical information is being identified and communicated throughout the organisation to all personnel as relevant including contracted organisations and personnel where appropriate.	The organisation analyses and communicates safety critical information effectively through a variety of methods as appropriate to maximise it being understood. Safety communication is assessed to determine how it is being used and understood and to improve it where appropriate.

Verification Examples

- Publicly available website with safety data present. Temporary problem with last quarter update due to ECCAIRS 2 implementation.
- "Pro" version of website developed to provide advanced information to aviation sector.
- ILT inspectors have improved access to report database with the "Loket" tool enhancing oversight capability.
- ABL+ meetings continue to present and engage with aviation sector. An additional series of meetings for ILT Inspectors has been initiated.
- Factsheet production, one additional factsheet produced since the last assessment.
- No formal Annual Safety Review published since 2020 but there is a quarterly report published on the website which could be considered over and above the requirement, but does lack a collective view of the year's results.

Conclusion

There is communication and engagement at the ABL+ meetings and these have been expanded to include the ILT Inspectors, this demonstrates a two-way dialogue. The public publishing of safety information and factsheets on the website is a good example of safety communication from a state agency and the implementation of the "pro" version of the website also demonstrates an understanding that the data is not just for public interest but also a useful industry safety resource.

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

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

5. Additional Items to be Considered

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

5.1 Interface Management

Annex 19 reference & text
5.1.1   Appendix 2 Note 2.— The service provider's interfaces with other organizations can have a significant contribution to the safety of its products or services.

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has identified and documented the relevant internal and external interfaces and the critical nature of such interfaces.		The organisation is managing the interfaces through hazard identification and risk management. There is assurance activity to assess risk mitigations being delivered by external organisations.	The organisation has a good understanding of interface management and there is evidence that interface risks are being identified and acted upon. Interfacing organisations are sharing safety information and take actions when needed.

Verification
• ABL recognises the importance of the engagement with the aviation sector and is working to strengthen this further. After an improved relation to the aviation sector partners the advancement of communication and trust with the ILT Inspectors has strengthened a previously weak area • The interface with the Schiphol project and the ISMS organisation has previously been a source of shared learning but with a functional, reliable data stream in place this has become more routine. In itself a good thing but there would need to be a demonstration of innovation or new capability from ABL before this relation would be developed further. Feedback from the ISMS could assist in stimulating this.

Conclusion
Improvements have been made and the relation to interfaces is now assessed as low Operational. This assessment criteria is logical as being part of the total safety system.

Corresponding EU/EASA Requirements				
Air Operations	Aircrew	Aerodromes	ATM/ANS	ATCO Training Organisations
Not explicitly addressed See ORO.GEN.205 'Contracted activities' and related GM1 & 2	Not explicitly addressed See ORA.GEN.205 'Contracted activities 'and related GM1 & 2	ADR.OR.D.010 'Contracted activities' and ADR.OR.D.025 'Coordination with other organisations'	ATM/ANS.OR.B.005 'Management system' point (f) GM1 ADR.OR.B.040(f) 'Changes' points (b)(2) and (b)(3)	Not explicitly addressed

5.2 Responsibilities for Compliance and Compliance Monitoring Function

5.2.1 Responsibilities and accountability for ensuring compliance are defined			
PRESENT	**SUITABLE**	**OPERATIONAL**	**EFFECTIVE**
Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures. Responsibilities and accountabilities for compliance are defined for all staff.		Organisation manuals and procedures are regularly reviewed in light of changes in applicable requirements. All staff are aware of their responsibilities and accountabilities for compliance and to follow processes and procedures.	Enhancements to processes and procedures are suggested from the workforce and management. Individuals are proactively identifying and reporting potential non-compliances.

Verification Examples
• The Requirement for following EU376 is laid down in the ABL Procedure. • Compliance monitoring has been added to the ILT Management system. ABL are yet to be included in the audit programme.

Conclusion
Documentation is in place detailing EU376 requirements. Compliance assurance was not yet present but would be conducted by ILT. This assessment criteria is logical as being part of the total safety system.

Corresponding EU/EASA Requirements				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATCO Training Organisations**
ORO.GEN.205 'Personnel requirements' point (b)	ORA.GEN.205 'Personnel requirements' point (b)	ADR.OR.D.005 'Management system'' point (b)(11)	ATM/ANS.OR.B.020 Personnel requirements	ATCO.OR.C.010 Personnel requirements, point (b)

5.2.2 Responsibilities and accountabilities for compliance monitoring are defined			
PRESENT	**SUITABLE**	**OPERATIONAL**	**EFFECTIVE**
It has been documented that there is a person or group of persons with responsibilities for compliance monitoring including the person acting as compliance monitoring manager with direct access to the accountable manager. The accountable manager's accountability and responsibilities for compliance monitoring is documented.	There is an ILT Internal Compliance monitoring function with a Quality Officer in place.	The compliance monitoring manager has implemented and is maintaining a compliance monitoring programme The accountable manager is ensuring there are sufficient compliance monitoring resources and independence of the audit function is being maintained.	The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the accountable manager. The accountable manager and senior management actively seek feedback on the status of compliance monitoring activities.

Verification Examples
• There has been an improvement to the ILT Management system regarding internal compliance monitoring. • Compliance and quality issues are provided from within ILT centrally by the Quality Officer. • Internal compliance monitoring has taken place within ILT but not yet with ABL as the subject. • There have been external audits conducted, including recently EASA.

Conclusion
The compliance programme is documented and has output but is not comparable to a full aviation system in that there is no formal audit programme, compliance monitoring is on the ILT system and not aviation or safety specific. A Quality Officer is in place but as yet with no compliance activities performed on ABL, therefore the assessment is low Suitable. This assessment criteria included as a matter of course of the maturity assessment.

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

5.2.3 Compliance monitoring programme			
PRESENT	**SUITABLE**	**OPERATIONAL**	**EFFECTIVE**
The organisation has a compliance monitoring programme including details of the schedule of monitoring activities and procedures for audits and inspections, reporting, follow up and records. The way independence of compliance monitoring is achieved is documented.	There is an ILT internal audit programme which plans to include ABL in future audits.	The compliance monitoring programme is being followed and regularly reviewed. This includes the modification of the programme to address identified risks or organisational and operational changes. Compliance monitoring is independent from operational activities and includes contracted activities	The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.

Verification Examples
• Compliance overseen by central ILT compliance. • There is an ILT audit programme in place but has not yet assessed ABL. • There have been external audits conducted, including EASA.

Conclusion
The compliance programme is in place but has yet to perform an audit on ABL, therefore this is assessed as low Suitable This assessment criteria included as a matter of course of the maturity assessment.

Corresponding EU/EASA Requirements				
Air Operations	**Aircrew**	**Aerodromes**	**ATM/ANS**	**ATCO Training Organisations**
AMC1 ORO.GEN.200(a)(6) 'Management system' Point (d)(2) (vi) GM2 ORO.GEN.200(a)(6) 'Management system' [complex organisations] GM3 ORO.GEN.200(a)(6) 'Management system' [non-complex organisations]	AMC1 ORO.GEN.200(a)(6) 'Management system' Point (d)(2) (vi)	AMC1 ADR.OR.D.005(b)(11) Management system point (c)(2)(vi)	AMC1 ATM/ANS.OR.B.005 (c) Management system COMPLIANCE MONITORING	GM1 ATCO.OR.C.001(f) 'Management system of training organisations' point (c)(2)(vi)

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

PRESENT	SUITABLE	OPERATIONAL	EFFECTIVE
The organisation has documented procedures for the identification and follow-up of corrective actions and preventive actions. There is a process for how audit results are communicated to the accountable manager and senior management. The interface between compliance monitoring and the safety risk management processes is described.		The identifying and follow-up of corrective and preventive actions is carried out in accordance with the procedures including causal analysis to address root causes. The status of corrective and preventive actions is regularly communicated to relevant senior management and staff.	The organisation regularly reviews the status of corrective and preventive actions. The organisation investigates the systemic causes and contributing factors of findings. Significant findings are used in internal safety training & safety promotion sessions. The audit results and root causes, causal and contributing factors are analysed and considered when reviewing internal policies and procedures. There is regular communication between compliance monitoring staff and staff involved in other SMS activities.

Verification Examples
• The Mavim system now has a process (Managing of Audits) to log and follow up on audit findings with corrective and preventative measures. • The registration system is maintained by the quality team. ABL are informed and/or asked to take action by them, when there is a finding/action associated to the work processes.

Conclusion
The Mavim system provides an operational follow up of compliance monitoring outcomes. This assessment criteria included as a matter of course of the maturity assessment.

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

D. Recommendations

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

UNDERSTAND
Establishing 'Point A' - measuring the current situation

BUILD
Developing key systems, processes and enablers

POWER-UP
Inspiring your people to engage in your management system

PERFORM
Securing business and safety performance improvements

Figure 4: Implementation Phases