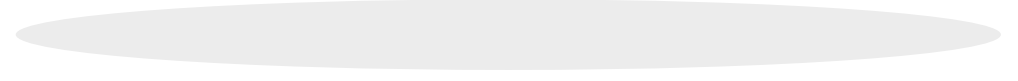
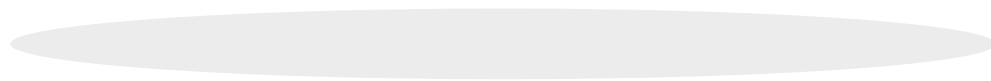
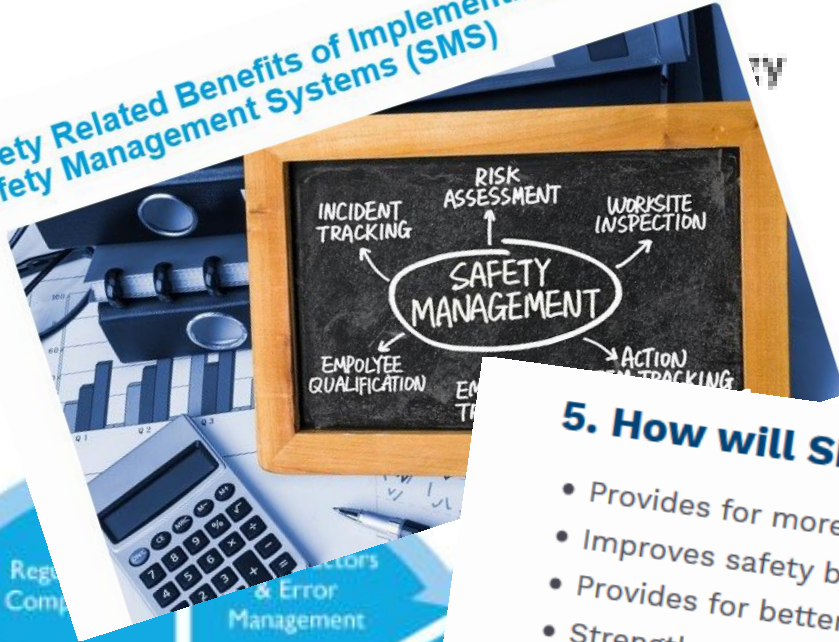


Alto Aerospace & Dynamic Aircraft Maintenance



Benefits of SMS

Safety Related Benefits of Implementing Aviation Safety Management Systems (SMS)



5. How will SMS benefit my organization?

- Provides for more informed decision-making;
- Improves safety by reducing risk of accidents;
- Provides for better resource allocation that will result in increased efficiencies and reduced costs;
- Strengthens corporate culture; and
- Demonstrates corporate due-diligence.



Process

Example
k/hazards

Third Party Risks

People

Loss

Why SMS?

It almost goes without saying that we all want aviation to be safe. There are many possible reasons for adopting SMS. As all organisations are different the benefits that they receive will vary but there are a number of safety benefits that everyone will share:

- A proactive method of improving safety rather than the old reactive approach, primarily after an accident
- Reduced loss of life and injuries through the prevention of accidents and incidents
- Improved employee satisfaction through involvement in the process
- More efficient interface with regulatory authorities

Benefits of Safety Management Systems



Customers

Better reputation amongst customers, leading to additional business.



Authority

Developed relationships with the regulating authorities and improved relationships with our surveyors.



Staff

Improved communication with staff, developed safety and just culture and improved staff confidence



Proactive

Improved safety performance utilizing the ability to manage hazards and risks proactively rather than reactively

Hazards in Part CAMO

Reactive

AD/SB omission

Failure in Procedures and Operating Practices – checklist incorrectly indicated task complete

Overfly - Operator non communication of flight hours

Sign off with expired authorization

Lack of manpower due COVID 19

Pro-active

Review of processes found error in recording of AD/SB requirements

Staff submitted NPA for electronic version of checklist as item line often missed when photocopied

Technical records assistant noticed increased flight activity that requires increased frequency of tech logs

Authorization procedure added to audit program with notification 30 days prior to expiry

Change of management procedure identified possible resource failures during periods unexpected absences

Risks in Part CAMO

Multiple changes in regulation, implementation of Part CAMO

Outsourced Part 145

Operator Understanding

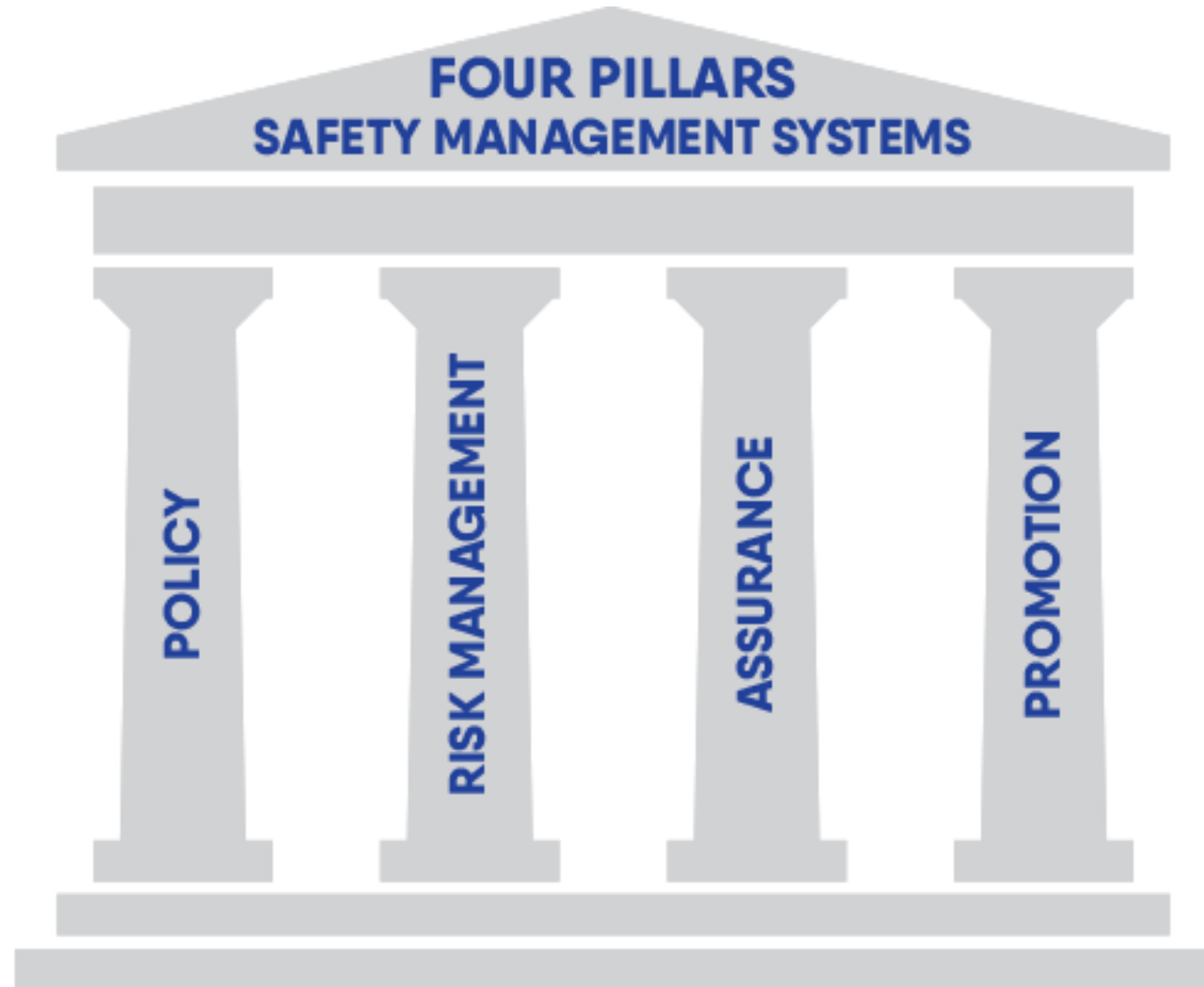
Aging Software

Unknown changes – Brexit & Covid

Third Party Risks



Safety Assurance



ALTOs SMS



CAA SMS Evaluation Tool v6

Organisation:	Approval Reference (s):
Name and Signature:	Position:
SMS or MS Manual Revision:	Date of signing:

To be completed and signed for by the Safety Manager or Accountable Manager

For CAA use only

CAA Staff:				
Name and Dept:				
Date of assessment:				

Stepped approach for transition to Part-CA(M)O

Overview:

Step 1	Eligibility to Part-CA(M)O - GAP Analysis
Step 2	Implementation plan Implementation plan execution
Step 3	Exposition/manual amendment Acceptance of the plan and oversight programme adjustment
Step 4	Compliance with Regulation (EU) 2019/1383 and 2020/XXXX Request for Part-CA(M)O approval
Step 5	Finding notifications Initial CA(M)O approval
Step 6	Oversight during transition
Step 7	Final CA(M)O approval End of transition and changes to organisation

Gap Analysis

AutoSave Off CAMO transition - Excel Sandra Weeks SW

File Home Insert Draw Page Layout Formulas Data Review View Developer Help Acrobat Search

Clipboard Font Alignment Number Styles Cells Editing Ideas

E7 Exposition update and audit prior to submission

	A	B	C	D	E	F
1	PART M to PART CAMO					
2						
3	PART 145	CAMO	Reg requirement	Differences/gap analysis	Actions	Compliance Check
4	M.A.702	AMC1 CAMO.A.115	An application should be made on an EASA Form 2 (Appendix I to AMC1 CAMO.A.115) or an equivalent form that is acceptable to the competent authority. EASA Form 2 is also valid for application for other types of organisations pursuant to Regulation (EU) No 1321/2014. Organisations that apply for several certificates may do so using a single EASA Form 2.	Review at application	Review at application	
5		AMC2 CAMO.A.115	GENERAL (a) Draft documents should be submitted at the earliest opportunity so that assessment of the application can begin. The initial certification or approval of changes cannot take place until the competent authority has received the completed documents. (b) This information, including the results of the pre-audits specified in point CAMO.A.115(b)(1), will enable the competent authority to conduct its assessment in order to determine the volume of certification and oversight work that is necessary, and the locations where it will be carried out. (c) The intent of the internal pre-audit referred to in point CAMO.A.115(b)(1) is to ensure that the organisation has internally verified its compliance with the Regulation. This should allow the organisation to demonstrate to the competent authority the extent to which the applicable requirements are complied with, and to provide assurance that the organisation management system is established to a level that is sufficient to perform continuing airworthiness management activities.	Pre-Audit required prior to application	Part CAMO compliance Audit to be developed and loaded onto Centrik. Pre Audit to be conducted prior to application submission	
6		GM1 CAMO.A.115(b)	PROCEDURE FOR CHANGES NOT REQUIRING PRIOR APPROVAL	N/A	N/A	
7		AMC1 CAMO.A.115(b)(2)	DOCUMENTATION FOR DEMONSTRATION OF COMPLIANCE (a) Documentation to be provided to the competent authority in the frame of an application for an initial Part-CAMO certificate should include, as a minimum, the continuing airworthiness management exposition (CAME), containing in particular: for CAT, commercial specialised operations and commercial ATO/DTO operations, the description of the aircraft technical log system; -The technical content of the contract between the CAMO and the organisation subcontracted to carry out continuing airworthiness management tasks, when such arrangement exists. (b) Upon request by the competent authority, the CAMO should be able to demonstrate that arrangements are in place for all base and scheduled line maintenance for an appropriate period of time.	Current Exposition not Part CAMO compliant	Exposition update and audit prior to submission	
8	N/A	CAMO.A.120	ALT MOC	Not Applicable to current operations	N/A	
9	M.A.711	AMC1 CAMO.A.125(d)(3)	Subcontracting of Continuing Airworthiness	Not Applicable to current operations	N/A	
10		GM1 CAMO.A.125(e)	Terms of approval and Privileges	N/A	N/A	
11		GM1 CAMO.A.125(f)	Terms of approval and privileges	N/A	N/A	
12	M.A.713	AMC2 CAMO.A.130	MANAGEMENT OF CHANGES The organisation should manage the safety risks related to any changes to the organisation in accordance with AMC1 CAMO.A.200(a)(3) point (e). For changes requiring prior approval, it should conduct a risk assessment and provide it to the competent authority upon request.	Change Management Part M to Part CAMO	Change Management workflow & safety case to be raised and managed via CENTRIK for PART CAMO implementation	
13		GM1 CAMO.A.130	CHANGES REQUIRING OR NOT REQUIRING PRIOR APPROVAL	N/A	N/A	
14		GM1 CAMO.A.130(v1)	CHANGES THAT AFFECT THE SCOPE OF THE CERTIFICATE OR THE TERMS OF APPROVAL	N/A	N/A	

ProjectSchedule GAP ANALYSIS

Gap Analysis

Potential transition findings are identified in blue		
Part-M subpart G requirement where applicable	Part-CAMO requirement	Oversight policy to be applied to grandfathered Part-CAMO from 24 March 2020 to 24 September 2021
M.A.702 - Application	CAMO.A.115 – Application for an organisation certificate	<p>In case of non-compliance with CAMO.A.115(a)/(b)(2), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>CAMO.A.115(b)(1) is a new requirement for the organisation to provide the results of a pre-audit against the applicable requirements together with its application. When the organisation is grandfathered to Part-CAMO, provision of the result of that pre-audit is not mandatory at the time the Part-CAMO certificate is issued.</p> <p>If not already in place, the organisation should provide the competent authority with a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority before 24 September 2021 (refer to CAMO.A.130).</p>
N/A – New requirement introduced by Part-CAMO	CAMO.A.120 – Means of compliance	Potential transition finding if the organisation intends to use AltMoC: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain appropriate provisions to address CAMO.A.120 requirements”.
M.A.703 – Extend of approval	CAMO.A.125(a)/(b)/(c) – Terms of approval and privileges of the organisation	<p>In case of non-compliance with CAMO.A.125(a)/(b)/(c), an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p> <p>CAMO.A.125 covers both M.A.703 and M.A.711 requirements (refer to the line dedicated to M.A.711), M.A.711 ‘Privileges of the organisation’ is incorporated (new points (d) to (f)) and relevant references updated. Only minor changes are made to the text stemming from M.A.711 to update the cross references and replace ‘quality system’ with ‘management system’. The text is further amended to include the Part-M/Part-ML references for the extension of the ARC (cf. point (d)(4)) and for the issue of a recommendation for the airworthiness review by the competent authority (cf. point (e)(2)).</p>
M.A.711 – Privileges of the organisation	CAMO.A.125(d)/(e)/(f) – Terms of approval and privileges of the organisation	In case of non-compliance with CAMO.A.125(d)/(e)/(f), an oversight finding should be raised and managed i.a.w. CAMO.B.350.
M.A.713 – Changes to the approved continuing airworthiness organisation	CAMO.A.130 – Changes to the organisation	<p>Potential transition finding: “Due to on-going transition from Part-M subpart G to Part-CAMO, current exposition does not contain necessary provisions to address CAMO.A.130 requirements”.</p> <p>CAMO.A.130 introduces the term ‘changes not requiring prior approval’ replacing the ‘indirect approval’. Changes not requiring prior approval will be managed as agreed between the organisation and the authority. The organisation should amend current exposition to account for CAMO.A.130 before 24 September 2021.</p> <p>Until the organisation is fully compliant with Part-CAMO changes to the organisation should be managed i.a.w. the organisation current approved procedure. As a result, in case of non-compliance with M.A.713 and/or with the current procedure in place within the organisation, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
M.A.715 – Continued validity of approval	CAMO.A.135 – Continued validity	<p>Changes are made to update references and for consistency throughout the new Part-CAMO.</p> <p>In case of non-compliance with CAMO.A.135, an oversight finding should be raised and managed i.a.w. CAMO.B.350.</p>
N/A – New requirement introduced by Part-CAMO	CAMO.A.140 - Access	<p>A new CAMO.A.140 Access is added. It contains the requirements for granting access to the competent authority for the purpose of determining continued compliance.</p> <p>In case of non-compliance with CAMO.A.140, an oversight finding should be raised and managed i.a.w. CAMO.B.350 as this requirement was already existing in point (a)(2) of M.A.715 and is therefore not considered as a novelty.</p>

- Links to useful Documents

- <https://www.easa.europa.eu/sites/default/files/dfu/Guide%20for%20transition%20to%20Part-CA%28M%29O%20-%20revision%20Jan%202020.pdf> ICAO Doc 9859 Safety Management Manual
- https://publicapps.caa.co.uk/docs/33/CAP795_SMS_guidance_to_organisations.pdf
- CAA [Safety Management Systems \(SMS\)](#)
- [ICAO Integrated Safety Management website](#);
- https://www.skybrary.aero/index.php/Portal:Safety_Management
- <https://www.asms-pro.com/SMS/AviationSafetyManagementSystem.aspx>
- <https://www.caa.co.uk/Safety-initiatives-and-resources/Working-with-industry/Safety-management-systems/Safety-management-systems/>
- [https://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_\(SM_ICG\)](https://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_(SM_ICG))
- <https://www.caa.co.uk/Safety-initiatives-and-resources/Working-with-industry/Safety-management-systems/Safety-management-systems/>