COMPLIANCE MATRIX: EU Regulation (No) 2017/373 ATM/ANS		
Ref	Regulatory Requirement	Compliance Statement (SMS Reference)
ANNEX III - COMMON REQUIREMENTS FOR SERVICE PROVIDERS - PART ATM/ANS.OR		
SUBPART A - GENERAL REQUIREMENTS (ATM/ANS.OR.A)		
ATM/ANS.OR.A.040 Changes — general		
(a)	The notification and management of:	
(1)	a change to the functional system or a change that affects the functional system shall be carried out in accordance with point ATM/ANS.OR.A.045;	Refer to OR.A.045 for evidence.
(2)	a change to the provision of service, the service provider's management system and/or safety management system, that does not affect the functional system, shall be carried out in accordance with point (b).	**Changes to Management System** **Safety Objectives** 6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities.
(b)	Any change as referred to in point (a)(2) shall require prior approval before implementation, unless such a change is notified and managed in accordance with a procedure approved by the competent authority as laid down in point ATM/ANS.AR.C.025(c).	Documents that require notification of changes to the regulatory authority are listed.
ATM/ANS.OR.A.045 Changes to a functional system		
(a)	A service provider planning a change to its functional system shall:	**Changes to a functional system** **Safety Objectives** All Safety Objectives defined under SMS Core Objective 4
(1)	notify the competent authority of the change;	4-1: All planned changes are identified, described and assessed for its safety impact to the service.
(2)	provide the competent authority, if requested, with any additional information that allows the competent authority to decide whether or not to review the argument for the change;	4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management.
(3)	inform other service providers and, where feasible, aviation undertakings affected by the planned change.	4-4: Planned and unplanned activities (maintenance, installation, commissioning, transition and decommissioning) are managed to ensure no adverse impact on delivery of services. 4-5: Safety cases for changes are developed, where appropriate, to demonstrate to all stakeholders that the change introduced will be acceptably safe in-service.
(b)	Having notified a change, the service provider shall inform the competent authority whenever the information provided in accordance with points (a)(1) and (2) is materially modified, and the relevant service providers and aviation undertakings whenever the information provided in accordance with point (a)(3) is materially modified.	- Assess Safety Impact of Changes Process - Conduct Safety Risk Assessments Process - Develop Safety Case for Changes Process SMS Core Objective 4 provides a structured approach to assess and manage the safety impact of change dependent on the significance of the change.
(c)	A service provider shall only allow the parts of the change, for which the activities required by the procedures referred to in point ATM/ANS.OR.B.010 have been completed, to enter into operational service.	(a)(3)Notification of the change is provided as part of Assess Safety Impact of Changes Process. Further communication is conducted as part of the on-going safety assessment activities where the competent authority has determined there is oversight of the change.
(d)	If the change is subject to competent authority review in accordance with point ATM/ANS.AR.C.035, the service provider shall only allow the parts of the change for which the competent authority has approved the argument to enter into operational service.	(b) The process for notifying the Regulatory Authority if the original information provided has materially changed is described in the Assess Safety Impact of Change process. (c) and (d) The final request for acceptance by the Regulatory Authority occurs as part of the organisations change management processes. For major changes engage with the regulatory authority occures as part of the Develop Safety Case for Changes Process. For both processes the change is not implemented until acceptance is received by the regulatory authority.
(e)	When a change affects other service providers and/or aviation undertakings, as identified in point (a)(3), the service provider and these other service providers, in coordination, shall determine:	**Safety Objectives** 4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management. - Assess Safety Impact of Change Process
(1)	the dependencies with each other and, where feasible, with the affected aviation undertakings;	- Conduct Safety Risk Assessments Process 1-6: Safety dependencies between stakeholders are identified and adequately managed. - Agree Stakeholder Dependencies
(2)	the assumptions and risk mitigations that relate to more than one service provider or aviation undertaking.	Hazards associated with changes to service are identified proactively using a safety risk assessment process at the service level. The development of a Service Operational Context Diagram is the mechanism to define the interfaces with other stakeholders.
(f)	Those service providers affected by the assumptions and risk mitigations referred to in point (e)(2) shall only use, in their argument for the change, agreed and aligned assumptions and risk mitigations with each other and, where feasible, with aviation undertakings.	
ATM/ANS.OR.A.060 Immediate reaction to a safety problem		
	A service provider shall implement any safety measures, including safety directives, mandated by the competent authority in accordance with point ATM/ANS.AR.A.025(c).	**Safety Objectives** 4-1: All planned changes are identified, described and assessed for its safety impact to the service. - Assess Safety Impact of Changes Process Safety measures mandated by the Competent Authority are noted as a trigger to the Assess Safety Impact of Changes Process. All changes are implemented following this process.
ATM/ANS.OR.A.065 Occurrence reporting		
(a)	A service provider shall report to the competent authority, and to any other organisation required by the Member State where the service provider provides its services, any accident, serious incident and occurrence as defined in Regulation (EU) No 996/2010 of the European Parliament and of the Council (1) and Regulation (EU) No 376/2014.	**Safety Objectives** 2-1: Safety events, incidents and occurrences and normal working observations are reported by employees. - Report Mandatory Occurrences Process - Report Voluntary Safety Information Process Mandatory Reports are notified within 72 hours from identifying the condition. 2-3: Events are investigated, and the findings documented and communicated to stakeholders.

	COMPLIANCE MATRIX: EU Regulation (No) 2017/373 ATM/ANS	
Ref	Regulatory Requirement	Compliance Statement (SMS Reference)
(b)	Without prejudice to point (a), the service provider shall report to the competent authority and to the organisation responsible for the design of system and constituents, if different from the service provider, any malfunction, technical defect, exceeding of technical limitations, occurrence, or other irregular circumstance that has or may have endangered the safety of services and that has not resulted in an accident or serious incident.	- Investigate Safety Events Process - Investigate Special Events Process The processes for investigation safety events ensures appropraite follow-up with regulatory authority including improvement actions.
(c)	Without prejudice to Regulations (EU) No 996/2010 and (EU) No 376/2014, the reports referred to in points (a) and (b) shall be made in a form and manner established by the competent authority and contain all the pertinent information about the event known to the service provider.	
(d)	Reports shall be made as soon as possible and in any case within 72 hours of the service provider identifying the details of the event to which the report relates unless exceptional circumstances prevent this.	
(e)	Without prejudice to Regulation (EU) No 376/2014, where relevant, the service provider shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future, as soon as these actions have been identified. This report shall be produced in a form and manner established by the competent authority.	
SUBPART B - MANAGEMENT (ATM/ANS.OR.B)		
ATM/ANS.OR.B.005 Management system		
(a)	A service provider shall implement and maintain a management system that includes:	The SMS is part of this management system.
(1)	clearly defined lines of responsibility and accountability throughout its organisation, including a direct account-ability of the accountable manager;	**Organisational Safety Arrangements** Accountable Executive is designated and accountabilities defined. Safety Accountability Chain is defined for organisation. Accountabilities for other Managers in acountability chain are defined and accountabilities allocated.
(2)	a description of the overall philosophies and principles of the service provider with regard to safety, quality, and security of its services, collectively constituting a policy, signed by the accountable manager;	**Safety Policy** The Safety Policy reflects the organisations commitment to safety through a systems thinking approach. The Safety Policy is signed by the Accountable Executive on behalf of the organisation. The Safety Policy introduces a set of SMS Core Objectives which are used to describe the organisations Safety Objectives. The Safety Objectives are used as the structure for SMS implementation across the organisation. This was designed this way to help communication of the Safety Policy across the organisation through more detailed guidance and support. **Just Culture Policy** The Safety Policy is supported by a Just Culture Policy which provides clear view on activities that are unnacceptable within the organisation.
(3)	the means to verify the performance of the service provider's organisation in light of the performance indicators and performance targets of the management system;	**Safety Objectives** 5-4: The effectiveness of safety management system activities are independently reviewed, and near and long-term actions are planned and implemented. - Conduct Audits and Reviews Process SMS effectiveness is reviewed as part of the business wide process management system and is done as part of the integrated audit activities. Sharing and exchange of lessons learned on SMS implementation is conducted with external organisations within the industry and also in other related industries. 3-2: Safety improvement actions are identified through exchange of information with external stakeholders - Identify Safety Improvement Actions Process 2-1: Safety events, incidents and occurrences and normal working observations are reported by employees. - Report Voluntary Safety Information Process The voluntary reporting scheme is used to gather data about performance of the services being delivered as well as the performance of the management system. 2-2: System behaviour in operations is analysed through survey of the day-to-day service delivery. Behaviour of the system is analysed through specific survey's conducted by peer groups and system/human performance experts.
(4)	a process to identify changes within the service provider's organisation and the context in which it operates, which may affect established processes, procedures and services and, where necessary, change the management system and/or the functional system to accommodate those changes;	**Changes to Operators Organisation** **Safety Objectives** 5-1: Safety accountabilities and responsibilities for employees (and contractors) are allocated, appropriately discharged and maintained. - Allocate Safety Accountability to Managers Process Organisational changes are reviewed to determine the impact on the allocation of safety accountabilities within the safety accountability chain. The process controls any required changes as a result. **Changes to Context of Operation** **Safety Objectives** 4-1: All planned changes are identified, described and assessed for its safety impact to the service. - Assess Safety Impact of Changes Process SMS Core Objective 4 provides a structured approach to assess and manage the safety impact of change dependent on the significance of the change.

	COMPLIANCE MATRIX: EU Regulation (No) 2017/373 ATM/ANS	
Ref	**Regulatory Requirement**	**Compliance Statement (SMS Reference)**
(5)	a process to review the management system, identify the causes of substandard performance of the management system, determine the implications of such substandard performance, and eliminate or mitigate such causes;	**Safety Objectives** 6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities. - Refer to Quality Management Processes The organisations Quality Management Processes comply with ISO9001 and are used to amend all documentation within the organisation.
(6)	a process to ensure that the personnel of the service provider are trained and competent to perform their duties in a safe, efficient, continuous and sustainable manner. In this context, the service provider shall establish policies for the recruitments and training of its personnel;	**Safety Objectives** 5-2: Safety staff, and contractors, are competent (qualified, trained and continuously monitored) to perform their responsibilities. - Assess Competency of Safety Personnel **Role and Groups - Management of Employee Competence in SMS** Managing the competence of employees and contractors in the organisation is based on a Role based approach. A Competency Framework has been created to support employees along with a learing and development catalogue.
(7)	a formal means for communication that ensures that all personnel of the service provider are fully aware of the management system that allows critical information to be conveyed and that makes it possible to explain why particular actions are taken and why procedures are introduced or changed.	**Safety Objectives** 6-1: The SMS documentation is published in a format that ensures staff can access SMS information relevant to their position. - The SMS is Role based that allows employees to access information directly connected to their position in the organisation and their responsibilities. 5-5: The safety management system is actively promoted to internal and external stakeholders (where appropriate and approved). - Communicate Safety Information
(b)	A service provider shall document all management system key processes, including a process for making personnel aware of their responsibilities, and the procedure for the amendment of those processes.	**Safety Objectives** 1-1: Procedures describe how services are provided in normal, abnormal and fall-back scenarios. The key procedures that describe the operating activities for the organisation are documented within the management system. In the context of the safety management system these are used to provide context to the safety activities. 6-1: SMS documentation is published in a format that ensures employees can access SMS information relevant to their position and duties. 5-1: Safety accountabilities and responsibilities for employees (and contractors) are allocated, appropriately discharged and maintained. - Allocate Safety Accountability to Managers Process The SMS is designed to promote effective access to SMS responsibilities based on the role people perform in the organisations. For specific employees who hold safety accountabilities a specific process is in place to define and allocate these. For employees and contractors general responsibilities are defined and communicated annually. 6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities. - Refer to Quality Management Processes The organisations Quality Management Processes comply with ISO9001 and are used to amend all documentation within the organisation.
(c)	A service provider shall establish a function to monitor compliance of its organisation with the applicable requirements and the adequacy of the procedures. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary.	**Safety Objectives** 2-4: Safety performance monitoring data is collated, reviewed and analysed with respect safety performance indicators and targets to identify trends in performance. - Analyse Safety Performance Process. The organisations safety performance is verified by analysing trends in performance and, where possible, comparing safety performance indicators to predetermined targets.
(d)	A service provider shall monitor the behaviour of its functional system and, where underperformance is identified, it shall establish its causes and eliminate them or, after having determined the implication of the underperformance, mitigate its effects.	**Safety Objectives** 3-1: Safety improvement actions are identified to manage adverse trends in safety performance. - Identify Safety Improvement Actions Process Performance trends are analysed to identify improvement actions. This activity is extended to other organisations within the aerodrome who contribute to the delivery of operations.
(e)	The management system shall be proportionate to the size of the service provider and the complexity of its activities, taking into account the hazards and associated risks inherent in those activities.	*The justification of the scope and content of the SMS should be made by the organisation.*
(f)	Within its management system, the service provider shall establish formal interfaces with the relevant service providers and aviation undertakings in order to:	**Safety Objectives** 1-3: Hazards, and associated consequences, for the scope of delivered services are identified and documented. 1-4: Safety controls are in-place to mitigate all hazards associated with the service and the residual risk is accepted by management.
(1)	ensure that the aviation safety hazards entailed by its activities are identified and evaluated, and the associated risks are managed and mitigated as appropriate;	- Conduct Safety Risk Assessments Process 4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management.

	COMPLIANCE MATRIX: EU Regulation (No) 2017/373 ATM/ANS	
Ref	**Regulatory Requirement**	**Compliance Statement (SMS Reference)**
(2)	ensure that it provides its services in accordance with the requirements of this Regulation.	- Assess Safety Impact of Change Process - Conduct Safety Risk Assessments Process 1-6: Safety dependencies between stakeholders are identified and adequately managed. - Agree Stakeholder Dependencies Hazards associated with the service are identified proactively using a safety risk assessment process at the service level. The development of a Service Operational Context Diagram is the mechanism to define the interfaces. Hazards, or the impact on existing hazards, introduced as a result of change are also identified following the same process. Hazards associated with the service are analysed to determine their safety risk level. The impact of change on the Safety Risk Level is also reviewed following the same processes. Dependencies with other organisations are documented formally using the above process.
(g)	In the case that the service provider holds also an aerodrome operator certificate, it shall ensure that the management system covers all activities in the scope of its certificates.	*Noted - Refer to separate Aerodrome compliance.*
ATM/ANS.OR.B.010 Change management procedures		
(a)	A service provider shall use procedures to manage, assess and, if necessary, mitigate the impact of changes to its functional systems in accordance with points ATM/ANS.OR.A.045, ATM/ANS.OR.C.005, ATS.OR.205 and ATS.OR.210, as applicable.	**Changes to Change Management Procedures** **Safety Objectives** 6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities. **Document Management - Notification of Management System Changes to Regulatory Authority**
(b)	The procedures referred to in point (a) or any material modifications to those procedures shall:	Documents that require notification of changes to the Regulatory Authority are listed. The processes related to the impact of changes to the functional system include:
(1)	be submitted, for approval, by the service provider to the competent authority;	
(2)	not be used until approved by the competent authority.	- Assess Safety Impact of Changes Process - Conduct Safety Risk Assessments Process - Develop Safety Case for Changes Process
(c)	When the approved procedures referred to in point (b) are not suitable for a particular change, the service provider shall:	These are approved by the Regulatory Authority. When approved processes are not suitable for the task, the organisation may choose to follow an alternative method. In this case the organisation will request an exemption to deviate from the Regulatory
(1)	make a request to the competent authority for an exemption to deviate from the approved procedures;	Authority and provide the details of the deviation and the justification for its use. The deviation must be approved by the Regulatory Authority prior to its application.
(2)	provide the details of the deviation and the justification for its use to the competent authority;	
(3)	not use the deviation before being approved by the competent authority.	
ATM/ANS.OR.B.020 Personnel requirements		
(a)	A service provider shall appoint an accountable manager, who has the authority over ensuring that all activities can be financed and carried out in accordance with the applicable requirements. The accountable manager shall be responsible for establishing and maintaining an effective management system.	**Organisational Safety Arrangements** Accountable Executive is designated as highest level authority in the organisation and accountabilities are defined. The Accountabilities include "I shall provide and allocate sufficient human, technical, financial or other resources as necessary for the effective and efficient performance of the SMS"
(b)	A service provider shall define the authority, duties and responsibilities of the nominated post holders, in particular of the management personnel in charge of safety, quality, security, finance and human resources-related functions as applicable.	**Organisational Safety Arrangements** Safety Accountability Chain is defined for organisation. Accountabilities for other Managers in acountability chain are defined and accountabilities allocated
SUBPART C — SPECIFIC ORGANISATION REQUIREMENTS FOR SERVICE PROVIDERS OTHER THAN ATS PROVIDERS (ATM/ANS.OR.C)		
ATM/ANS.OR.C.005 Safety support assessment and assurance of changes to the functional system		
ANNEX IV - SPECIFIC REQUIREMENTS FOR PROVIDERS OF AIR TRAFFIC SERVICES (Part-ATS)		
SUBPART A - ADDITIONAL ORGANISATION REQUIREMENTS FOR PROVIDERS OF AIR TRAFFIC SERVICES (ATS.OR)		
SECTION 2 - SAFETY OF SERVICES		
ATS.OR.200 Safety management system		
An air traffic services provider shall have in place a safety management system (SMS), which may be an integral part of the management system required in point ATM/ANS.OR.B.005, that includes the following components:		
(a)	Safety policy and objectives	**Safety Policy** The Safety Policy reflects the organisations commitment to safety through a systems thinking approach. The Safety Policy is signed by the Accountable Executive on behalf of the organisation. The Safety Policy introduces a set of SMS Core Objectives which are used to describe the organisations Safety Objectives. The Safety Objectives are used as the structure for SMS implementation across the organisation. This was designed this way to help communication of the Safety Policy across the organisation through more detailed guidance and support.
(i)	Management commitment and responsibility regarding safety which shall be included in the safety policy.	**Just Culture Policy** The Safety Policy is supported by a Just Culture Policy which provides clear view on activities that are unnacceptable within the
(ii)	Safety accountabilities regarding the implementation and maintenance of the SMS and the authority to make decisions regarding safety.	organisation.
(iii)	Appointment of a safety manager who is responsible for the implementation and maintenance of an effective SMS;	**Organisational Safety Arrangements** Safety Manager is designated and accountabilities defined. Safety Accountability Chain is defined for organisation.

Ref	Regulatory Requirement	Compliance Statement (SMS Reference)
(iv)	Coordination of an emergency response planning with other service providers and aviation undertakings that interface with the ATS provider during the provision of its services.	**Safety Objectives** 1-2: Service plans are in place to manage emergency situations and they are coordinated with interfacing organisations. The Emergency Response Plan (ERP) is referenced as part of the organisations SMS and is used as important context and input in to the organisations safety risk management activities. Note: The ERP is a business document and not part of the SMS documentation. Evidence of the ERP should be within the businses functions.
(v)	SMS documentation that describes all the elements of the SMS, the associated SMS processes and the SMS outputs.	**Safety Objective** SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities. - Document Control and Records Management is managed as part of the Quality Management System Process. **Document Management** The structure of the SMS material is defined along with the arrangements for Process Ownership which details accountabilities and responsibilities. **Processes** The complete set of management processes that support safety management implementation are defined. Each process records the defined quality records that must be managed under the SMS record management activity.
(2)	**Safety risk management**	
(i)	A process to identify hazards associated to its services which shall be based on a combination of reactive, proactive and predictive methods of safety data collection.	**Safety Objectives** 1-3: Hazards, and associated consequences, for the scope of delivered services are identified and documented. - Conduct Safety Risk Assessments Process 4-2: Hazards associated with the scope of the change to the service are identified and documented. - Assess Safety Impact of Change Process - Conduct Safety Risk Assessments Process Hazards associated with the service are identified proactively using a safety risk assessment process at the service level. Hazards, or the impact on existing hazards, introduced as a result of change are also identified following the same process.
(ii)	A process that ensures analysis, assessment and control of the safety risks associated with identified hazards.	**Safety Objectives** 1-4: Safety controls are in-place to mitigate all hazards associated with the service and the residual risk is accepted by management. - Conduct Safety Risk Assessment Process 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management. - Assess Safety Impact of Change Process - Conduct Safety Risk Assessment Process Hazards associated with the service are analysed to determine their safety risk level. The impact of change on the Safety Risk Level is also reviewed following the same process.
(iii)	A process to ensure that its contribution to the risk of aircraft accidents is minimised as far as is reasonably practicable.	
(3)	**Safety assurance**	
(i)	Safety performance monitoring and measurement means to verify the safety performance of the organisation and validate the effectiveness of the safety risk controls.	**Safety Objectives** 2-4: Safety performance monitoring data is collated, reviewed and analysed with respect safety performance indicators and targets to identify trends in performance. - Analyse Safety Performance Process. The organisations safety performance is verified by analysing trends in performance and, where possible, comparing safety performance indicators to predetermined targets.
(ii)	A process to identify changes which may affect the level of safety risk associated with its service and to identify and manage the safety risks that may arise from those changes.	**Safety Objectives** All Safety Objectives defined under SMS Core Objective 4 4-1: All planned changes are identified, described and assessed for its safety impact to the service. 4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management. 4-4: Planned and unplanned activities (maintenance, installation, commissioning, transition and decommissioning) are managed to ensure no adverse impact on delivery of services. 4-5: Safety cases for changes are developed, where appropriate, to demonstrate to all stakeholders that the change introduced will be acceptably safe in-service. - Assess Safety Impact of Changes Process - Conduct Safety Risk Assessments Process - Develop Safety Case for Changes Process SMS Core Objective 4 provides a structured approach to assess and manage the safety impact of change dependent on the significance of the change.
(iii)	A process to monitor and assess the effectiveness of the SMS to enable the continuous improvement of the overall performance of the SMS.	**Safety Objectives** 5-4: The effectiveness of safety management system activities are independently reviewed, and near and long-term actions are planned and implemented. - Conduct Audits and Reviews Process SMS effectiveness is reviewed as part of the business wide process management system and is done as part of the integrated audit activities. Sharing and exchange of lessons learned on SMS implementation is conducted with external organisations within the industry and also in other related industries.
(4)	**Safety promotion**	

COMPLIANCE MATRIX: EU Regulation (No) 2017/373 ATM/ANS		
Ref	**Regulatory Requirement**	**Compliance Statement (SMS Reference)**
(i)	Training programme that ensures that the personnel are trained and competent to perform their SMS duties.	**Safety Objectives** 5-2: Safety staff, and contractors, are competent (qualified, trained and continuously monitored) to perform their responsibilities. - Assess Competency of Safety Personnel **Role and Groups** Managing the competence of employees and contractors in the organisation is based on a Role based approach. A Competency Framework has been created to support employees along with a learing and development catalogue.
(ii)	Safety communication that ensures that the personnel are aware of the SMS implementation.	**Safety Objectives** 6-1: The SMS documentation is published in a format that ensures staff can access SMS information relevant to their position. - The SMS is Role based that allows employees to access information directly connected to their position in the organisation and their responsibilities. 5-5: The safety management system is actively promoted to internal and external stakeholders (where appropriate and approved). - Communicate Safety Information
ATS.OR.205 Safety assessment and assurance of changes to the functional system		
(a)	For any change notified in accordance with point ATM/ANS.OR.A.045(a)(1), the air traffic services provider shall:	**Safety Objectives** 1-3: Hazards, and associated consequences, for the scope of delivered services are identified and documented. 1-4: Safety controls are in-place to mitigate all hazards associated with the service and the residual risk is accepted by management. - Conduct Safety Risk Assessments Process 4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the residual risk is accepted by management. - Assess Safety Impact of Change Process - Conduct Safety Risk Assessments Process The activities within the Conduct Safety Risk Assessment Process are: 1. Define scope and context of service or change 2. Identify hazards and consequences 3. Determine safety criteria. 4. Analyse safety risk. 5. Evaluate residual safety risk. 6. Consider acceptance of residual safety risk. 7. Agree safety requirements with external stakeholders. 8. Verify implementation and effectiveness of controls. 9. Specify safety performance indicators and targets for the service. 10. Review performance of introduced change.
(1)	ensure that a safety assessment is carried out covering the scope of the change, which is:	**Refer to above.** Activity 1 - The process of define the scope and context of the change includes all actors within the system and specifically targets the operational interfaces between actors. Actors include human, machine, organisational, environmental.
(i)	the equipment, procedural and human elements being changed;	
(ii)	interfaces and interactions between the elements being changed and the remainder of the functional system;	
(iii)	interfaces and interactions between the elements being changed and the context in which it is intended to operate;	
(iv)	the life cycle of the change from definition to operations including transition into service;	**Refer to above.** The Conduct Safety Risk Assessment Process covers the steady state operations i.e. the safety risk of the service or the service once a change has been implemented. **Safety Objectives** 4-4: Planned and unplanned activities (maintenance, installation, commissioning, transition and decommissioning) are managed to ensure no adverse impact on delivery of services. - Conduct Safety Assessment of Lifecycle Activity Process. The safety assessment of lifecycle activities relating to the implementation of changes including transition to service is assessed by a specific process. This process seeks to minimise any adverse impact on the delivery of the steady state service at the time the lifecycle activity is being conducted. E.g. The installation of the technical equipment to support the change should not impact the live operational service.
(v)	planned degraded modes of operation of the functional system; and	**Refer to above.** The Conduct Safety Risk Assessment Process covers normal, abnormal and fall-back operations.
(2)	provide assurance, with sufficient confidence, via a complete, documented and valid argument that the safety criteria identified via the application of point ATS.OR.210 are valid, will be satisfied and will remain satisfied.	**Refer to above.** Activity 3 - The Conduct Safety Risk Assessment Process involves declaration of Safety Criteria. The declares a risk level against this criteria.
(b)	An air traffic services provider shall ensure that the safety assessment referred to in point (a) comprises:	**Refer to above.** The Conduct Safety Risk Assessment Process covers these activities.
(1)	the identification of hazards;	
(2)	the determination and justification of the safety criteria applicable to the change in accordance with point ATS.OR.210;	
(3)	the risk analysis of the effects related to the change;	
(4)	the risk evaluation and, if required, risk mitigation for the change such that it can meet the applicable safety criteria;	
(5)	the verification that:	
(i)	the assessment corresponds to the scope of the change as defined in point (a)(1);	

Ref	Regulatory Requirement	Compliance Statement (SMS Reference)
(ii)	the change meets the safety criteria;	
(6)	the specification of the monitoring criteria necessary to demonstrate that the service delivered by the changed functional system will continue to meet the safety criteria.	
ATS.OR.210 Safety criteria		
(a)	An air traffic services provider shall determine the safety acceptability of a change to a functional system, based on the analysis of the risks posed by the introduction of the change, differentiated on basis of types of operations and stakeholder classes, as appropriate.	**Safety Objectives** 1-3: Hazards, and associated consequences, for the scope of delivered services are identified and documented. 1-4: Safety controls are in-place to mitigate all hazards associated with the service and the residual risk is accepted by management. - Conduct Safety Risk Assessments Process 4-2: Hazards associated with the scope of the change to the service are identified and documented. 4-3: Safety controls are in-place, and are effective, to mitigate all hazards associated with the change to the service and the
(b)	The safety acceptability of a change shall be assessed by using specific and verifiable safety criteria, where each criterion is expressed in terms of an explicit, quantitative level of safety risk or another measure that relates to safety risk.	residual risk is accepted by management. - Assess Safety Impact of Change Process - Conduct Safety Risk Assessments Process
(c)	An air traffic services provider shall ensure that the safety criteria:	The Conduct Safety Risk Assessment Process determines safety criteria (Activity 3) and the acceptability of the change is determined using this criteria (and the organisations Safety Risk Classification scheme).
(1)	are justified for the specific change, taking into account the type of change;	The rules of determining the Safety Criteria including justifying it for the specific change is explained in the Activity 3 description.
(2)	when fulfilled, predict that the functional system after the change will be as safe as it was before the change or the air traffic services provider shall provide an argument justifying that:	This includes the method for managing any temporary or permanent reduction in safety by context of future improvement in safety or other beneficial consequences. The Safety Risk Classification scheme defines unacceptable risk categories to be considered by the Safety Risk Owner as part of the approval of the change.
(i)	any temporary reduction in safety will be offset by future improvement in safety; or	
(ii)	any permanent reduction in safety has other beneficial consequences;	
(3)	when taken collectively, ensure that the change does not create an unacceptable risk to the safety of the service;	
(4)	support the improvement of safety whenever reasonably practicable.	
ATS.OR.315 Fatigue		
In accordance with point ATS.OR.200, an air traffic control service provider shall:		
(a)	develop and maintain a policy for the management of air traffic controllers' fatigue;	No compliance provided.
(b)	provide air traffic controllers with information programmes on the prevention of fatigue, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to Regulation (EU) 2015/340.	No compliance provided.+A95:C116A87:C116C91A1:C116