

COMPLIANCE MATRIX: EU Regulation (No) 965/2012 Aircraft Operators		
Ref	Regulatory Requirement	Compliance Statement (SMS Reference)
ANNEX III - ORGANISATION REQUIREMENTS FOR AIR OPERATIONS [PART-ORO]		
SUBPART GEN - General Requirements		
Section 1 General		
ORO.GEN.105 Competent Authority		
	For the purpose of this Annex, the competent authority exercising oversight over operators subject to a certification obligation shall be for operators having their principal place of business in a Member State, the authority designated by that Member State.	<i>The SMS manual should identify the competent authority that provides oversight activity.</i>
ORO.GEN.110 Operator responsibilities		
ORO.GEN.130 Changes related to an AOC holder		
(a)	Any change affecting:	Changes to Management System Safety Objectives 6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities.
(1)	the scope of the certificate or the operations specifications of an operator; or	
(2)	any of the elements of the operator's management system as required in ORO.GEN.200(a)(1) and (a)(2), shall require prior approval by the competent authority.	- Refer to Quality Management Processes Document Management / Notification of Management System Changes to Regulatory Authority Documents that require notification of changes to the Regulatory Authority are agreed and listed. This includes changes to the scope of the certificate or the terms of approval. 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.
(b)	For any changes requiring prior approval in accordance with Regulation (EC) No 216/2008 and its Implementing Rules, the operator shall apply for and obtain an approval issued by the competent authority. The application shall be submitted before any such change takes place, in order to enable the competent authority to determine continued compliance with Regulation (EC) No 216/2008 and its Implementing Rules and to amend, if necessary, the operator certificate and related terms of approval attached to it. The operator shall provide the competent authority with any relevant documentation. The change shall only be implemented upon receipt of formal approval by the competent authority in accordance with ARO.GEN.330. The operator shall operate under the conditions prescribed by the competent authority during such changes, as applicable.	Changes to Operation 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. 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. 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 occurs 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.
(c)	All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure approved by the competent authority in accordance with ARO.GEN.310(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 The process for assessing impact of change provides the details for the batch notification of changes to the Regulatory Authority that do not require prior approval.
ORO.GEN.135 Continued validity of an AOC		
ORO.GEN.140 Access		
ORO.GEN.150 Findings		
ORO.GEN.155 Immediate reaction to a safety problem		
	The operator shall implement:	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
(a)	any safety measures mandated by the competent authority in accordance with ARO.GEN.135(c); and	
(b)	any relevant mandatory safety information issued by the Agency, including airworthiness directives.	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.
ORO.GEN.160 Occurrence reporting		
(a)	The operator shall report to the competent authority, and to any other organisation required to be informed by the State of the operator, any accident, serious incident and occurrence as defined in Regulation (EU) No 996/2010 of the European Parliament and of the Council (13) 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

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	(b) Without prejudice to point (a) the operator shall report to the competent authority and to the organisation responsible for the design of the aircraft any incident, malfunction, technical defect, exceeding of technical limitations or occurrence that would highlight inaccurate, incomplete or ambiguous information contained in the operational suitability data established in accordance with Regulation (EU) No 748/2012 or other irregular circumstance that has or may have endangered the safe operation of the aircraft and that has not resulted in an accident or serious incident.	<ul style="list-style-type: none"> - Investigate Safety Events Process - Investigate Special Events Process <p>The processes for investigation safety events ensures appropriate follow-up with regulatory authority including improvement actions.</p>
	(c) Without prejudice to Regulation (EU) No 996/2010 and Regulation (EU) No 376/2014, the reports referred in points (a) and (b) shall be made in a form and manner established by the competent authority and shall contain all pertinent information about the conditions known to the operator.	
	(d) Reports shall be made as soon as practicable, but in any case within 72 hours of the operator identifying the condition to which the report relates, unless exceptional circumstances prevent this.	
	(e) Where relevant, the operator 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.	
SECTION 2 - Management		
ORO.GEN.200 Management system		
	(a) The operator shall establish, 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 the operator, including a direct safety accountability of the accountable manager;	<p>Organisational Safety Arrangements</p> <p>Accountable Executive is designated and accountabilities defined.</p> <p>Safety Accountability Chain is defined for organisation.</p> <p>Accountabilities for other Managers in accountability chain are defined and accountabilities allocated.</p>
2	a description of the overall philosophies and principles of the operator with regard to safety, referred to as the safety policy;	<p>Safety Policy</p> <p>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.</p> <p>Just Culture Policy</p> <p>The Safety Policy is supported by a Just Culture Policy which provides clear view on activities that are unacceptable within the organisation.</p>
3	the identification of aviation safety hazards entailed by the activities of the operator, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;	<p>Safety Objectives</p> <p>1-3: Hazards, and associated consequences, for the scope of delivered services are identified and documented.</p> <ul style="list-style-type: none"> - Conduct Safety Risk Assessments Process <p>4-2: Hazards associated with the scope of the change to the service are identified and documented.</p> <ul style="list-style-type: none"> - Assess Safety Impact of Change Process - Conduct Safety Risk Assessments Process <p>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.</p> <p>Note: The Reporting of Events from employees is NOT considered a hazard identification activity although it does contribute to the understanding of contributing factors in addition to our understanding of historical performance.</p> <p>Safety Objectives</p> <p>1-4: Safety controls are in-place to mitigate all hazards associated with the service and the residual risk is accepted by management.</p> <ul style="list-style-type: none"> - Conduct Safety Risk Assessment Process <p>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.</p> <ul style="list-style-type: none"> - Assess Safety Impact of Change Process - Conduct Safety Risk Assessment Process <p>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.</p> <p>Safety Objectives</p> <p>3-1: Safety improvement actions are identified to manage adverse trends in safety performance.</p> <ul style="list-style-type: none"> - Identify Safety Improvement Actions Process
4	maintaining personnel trained and competent to perform their tasks;	<p>Safety Objectives</p> <p>5-2: Safety staff, and contractors, are competent (qualified, trained and continuously monitored) to perform their responsibilities.</p> <ul style="list-style-type: none"> - Assess Competency of Safety Personnel <p>Role and Groups - Management of Employee Competence in SMS</p> <p>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 learning and development catalogue.</p>

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5	documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;	<p>Safety Objectives</p> <p>1-1: Procedures describe how services are provided in normal, abnormal and fall-back scenarios.</p> <p>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.</p> <p>6-1: SMS documentation is published in a format that ensures employees can access SMS information relevant to their position and duties.</p> <p>5-1: Safety accountabilities and responsibilities for employees (and contractors) are allocated, appropriately discharged and maintained.</p> <p>- Allocate Safety Accountability to Managers Process</p> <p>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.</p> <p>6-2: SMS documents are defined, systematically reviewed, updated and archived and, where appropriate, communicated to authorities.</p> <p>- Refer to Quality Management Processes</p> <p>The organisations Quality Management Processes comply with ISO9001 and are used to amend all documentation within the organisation.</p>
6	a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and	The organisations auditing processes, managed by the Quality Management department, are in place to assess compliance to requirements.
7	any additional requirements that are prescribed in the relevant Subparts of this Annex or other applicable Annexes.	<i>To be defined by the organisation.</i>
(b)	The management system shall correspond to the size of the operator and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.	<i>The justification of the scope and content of the SMS should be made by the organisation.</i>
ORO.GEN.205 Contracted activities		
ORO.GEN.210 Personnel requirements		
(a)	The operator shall appoint an accountable manager, who has the authority for 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.	<p>Organisational Safety Arrangements</p> <p>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"</p>
(b)	A person or group of persons shall be nominated by the operator, with the responsibility of ensuring that the operator remains in compliance with the applicable requirements. Such person(s) shall be ultimately responsible to the accountable manager.	<i>The organisations has a Quality Management department to assess compliance to requirements.</i>
(c)	The operator shall have sufficient qualified personnel for the planned tasks and activities to be performed in accordance with the applicable requirements.	<p>Refer to HR Processes for information on this topic. With reference to safety then the following information applies.</p> <p>Safety Objectives</p> <p>5-2: Safety staff, and contractors, are competent (qualified, trained and continuously monitored) to perform their responsibilities.</p> <p>- Assess Competency of Safety Personnel</p>
(d)	The operator shall maintain appropriate experience, qualification and training records to show compliance with point (c).	<p>Role and Groups</p> <p>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 learning and development catalogue.</p>
(e)	The operator shall ensure that all personnel are aware of the rules and procedures relevant to the exercise of their duties.	
ORO.GEN.215 Facility requirements		
ORO.GEN.220 Record-keeping		