Checklist Compliance Monitoring System audit

Operator [1]	**Date**	**Inspector (Name/signature)** [2]	**Ref.**
Purpose:			
Audit team composition:		**Auditees names:**	

[2] By signing this checklist, I hereby confirm that, at the time of performing this activity, I did not have any conflict of interest to declare regarding the above-mentioned operator [1].

No	**Ref Non-compliance**	**Non-compliances**	**Level (1/2)**

List of remarks	
Ref remarks	Remarks

Additional notes/comments:

NA = Not Applicable; C = Compliant; NC = Not Compliant; R = Remark; N/R = Not Reviewed
P = Present; S = Suitable; O = Operating; E = Effective

<table>
<tr><th>Reference</th><th>Inspection topics</th><th colspan="4">Specific requirements/expectations</th><th>PSOE</th><th>Eval.</th><th>Description</th></tr>
<tr><td colspan="9">Responsibilities and accountability for ensuring compliance</td></tr>
<tr><td rowspan="3">ORO.GEN.210(b)</td><td rowspan="3"><u>Responsibilities and accountability for ensuring compliance:</u>

(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.</td><td>Present</td><td>Suitable</td><td>Operational</td><td colspan="4">Effective</td></tr>
<tr><td>Applicable requirements are clearly identified and properly transcribed into organisation manuals and procedures.

Responsibilities and accountabilities for compliance are defined for all staff involved in safety activities.</td><td>The contracts with (or requirements cascaded to) the external organisation(s), having a significant contribution to safety, also addresses the need for ensuring compliance to Safety requirements; responsibilities and accountability are defined.</td><td>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.</td><td colspan="4">Enhancements to processes and procedures are suggested from the workforce and management.

Individuals are proactively identifying and reporting potential non-compliances.</td></tr>
<tr><td colspan="4">• Review how senior management ensures the organisation remains in compliance.
• Review that job descriptions include responsibilities for compliance.
• Check that the contracts with the external organisation(S), having a significant contribution to safety, properly address the needs for ‘compliance’.
• Evidence that senior management act on internal and external audit results. Check that, when deficiencies are detected and linked to significant risks to control, the root causes are identified and feed the Hazard Identification and Risk Assessment (HIRA) process.
• Review how independence of the internal audit function is achieved.</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td></td></tr>
<tr><td rowspan="3">ORO.GEN.200(a)(6)</td><td rowspan="3"><u>Responsibilities and accountabilities for compliance monitoring:</u>

the AM should designate a CMM. The role of the CMM is to ensure that the activities of the operator are monitored for compliance with the applicable regulatory requirements, and any additional requirements as established by the operator, and that these activities are carried out properly under the supervision of the relevant head of functional area.</td><td>Present</td><td>Suitable</td><td>Operational</td><td colspan="4">Effective</td></tr>
<tr><td>It has been documented that there is a person or group of persons with the responsibilities for compliance monitoring including the person acting as CMM with direct access to the AM.

The AM’s accountability and responsibilities for compliance monitoring is documented.</td><td>Independence of the compliance monitoring audit function is achieved.</td><td>The CMM has implemented and is maintaining a compliance monitoring programme.

The accountable manager is ensuring that there are sufficient compliance monitoring resources and independence of the audit function is being maintained.</td><td colspan="4">The organisation has established a method to assess the efficiency and effectiveness of the compliance monitoring activities with feedback to the AM.

The AM and senior management actively seek feedback on the status of compliance monitoring activities.</td></tr>
<tr><td colspan="4">• How does the compliance monitoring manager interact with:
  ▪ senior management;
  ▪ line managers;
  ▪ the safety management staff
• Evidence that senior management take action on compliance monitoring results.
• Check that the number of staff involved in compliance monitoring is appropriate.
• Check for evidence of direct reporting lines to the accountable manager.</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td></td></tr>
</table>

<table>
<tr><th>Reference</th><th>Inspection topics</th><th colspan="4">Specific requirements/expectations</th><th>PSOE</th><th>Eval.</th><th>Description</th></tr>
<tr><td></td><td></td><td colspan="4">• Review how independence of the audit function is achieved (including for internal and external auditors).</td><td></td><td></td><td></td></tr>
<tr><td colspan="9">Compliance monitoring programme</td></tr>
<tr><td rowspan="3">ORO.GEN.200(a)(6)
ORO.GEN.205</td><td rowspan="3"><u>Operator’s compliance monitoring programme:</u>

The CMM should be responsible for ensuring that the compliance monitoring programme (CMP) is properly implemented, maintained and continually reviewed and improved.

The CMP should reflect:
(A) schedule of the monitoring programme;
(B) audit procedures including an audit plan that is implemented, maintained, and continually reviewed and improved;
(C) reporting procedures;
(D) follow-up and corrective action procedures; and
(E) recording system.</td><td>Present</td><td>Suitable</td><td>Operational</td><td colspan="4">Effective</td></tr>
<tr><td>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.</td><td>The compliance monitoring audit programme covers all applicable regulations and includes details of the schedule of audits.

The compliance monitoring programme adequately covers the external organisations supporting the delivery of services, having a significant contribution to the safety.</td><td>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</td><td colspan="4">The organisation regularly reviews its compliance monitoring programme and procedures to identify the need for changes and to ensure they remain effective.

The effectiveness of the SMS processes is reviewed on a regular basis.</td></tr>
<tr><td colspan="4">• Verify the presence of a procedure to establish the audit programme. This procedure should include:
○ regulatory compliance
○ regulatory changes identification
○ operator’s scope of operations extension
○ audit scope
○ contracted activities (incl. ground handling, training,
○ re-planning of audits
• Assess the contents of the programme to verify that the scope is complete (all applicable requirements, including AMCs) and covers at least the following areas:
(1) operational procedures;
(2) flight safety procedures;
(3) operational control and supervision;
(4) aircraft performance;
(5) all weather operations;
(6) communications and navigational equipment and practices;
(7) mass, balance and aircraft loading;
(8) instruments and safety equipment;
(9) ground operations;
(10) flight and duty time limitations, rest requirements, and scheduling;
(11) aircraft maintenance/operations interface;
(12) use of the MEL;
(13) flight crew;
(14) cabin crew;
(15) dangerous goods;</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td></td></tr>
</table>

Reference	Inspection topics	Specific requirements/expectations	PSOE	Eval.	Description
		(16) security. • Check that as a minimum, the operator planned to monitor compliance with the following (where appropriate): ○ privileges of the operator; ○ manuals, logs, and records; ○ training standards; ○ management system procedures and manuals; ○ activities of the organisation carried out under the supervision of the nominated persons in accordance with ORO.GEN.210(b); ○ <u>any outsourced activities</u> in accordance with ORO.GEN.205, (e.g. ground handling organisations providing ramp, passenger, baggage, cabin, W&B, ground support equipment, fuel services,…). • Check that the compliance monitoring activities include verification of implementation and not only documentation review. • Review how risk and performance is used to determine the depth and frequency of monitoring activities. • Review how independence is achieved. • Assess what triggers a change in the programme. • Review whether there are any potential conflicts of interest.			

Compliance monitoring outcomes (findings, CAP,…)

Reference	Inspection topics	Present	Suitable	Operational	Effective
ORO.GEN.200(a)(6)	Compliance monitoring outcomes e.g. audit results including finding correction and corrective action and actions follow-up.	The operator 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.	Responsibilities and timelines for determining, accepting, and following-up the corrective/preventive action are defined. Responsibilities and timelines for determining, accepting, and following-up the corrective/preventive action are defined. Compliance monitoring includes contracted activities. The tools for the follow-up of corrective and preventive actions are adapted to the compliance monitoring outcomes and appropriately liaise with the SMS tools, when necessary.	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, as well as its effectiveness. The operator investigates the systemic causes and contributing factors of findings, which further liaise with the hazard identification and risk assessment (HIRA) as well as the safety objectives. 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.

<table>
<tr><th>Reference</th><th>Inspection topics</th><th colspan="3">Specific requirements/expectations</th><th>PSOE</th><th>Eval.</th><th colspan="2">Description</th></tr>
<tr><td rowspan="2"></td><td rowspan="2"></td><td></td><td>The methods used for causal analysis are appropriate to the size of the organisation and the complexity of its aviation products and services.</td><td colspan="4"></td><td>There is regular communication between compliance monitoring staff and staff involved in other SMS activities.</td></tr>
<tr><td colspan="3">• Review the methods used for root cause analysis
• Is the method used consistently?
• Review any repeat findings or where actions have not been implemented or overdue.
• Check for timely implementation of actions.
• Awareness of senior management of the status of significant findings and related CA/PAs.
  ○ Check that the feedback system to the AM is implemented (e.g. emails and/or meeting minutes).
  ○ In case of overdue internal findings, check that the AM is informed and take appropriate actions.
• Appropriate personnel participate in the determination of causes and contributing factors.
• Look for consistency between internal audit results and external audit results.
• Check how the identification of the systemic causes and contributing factors of findings liaise with the hazard identification and risk assessment (HIRA), including the safety objectives and its associated safety performance measurement & monitoring, when appropriate.
• Check what type of information should be reported to the AM (or Safety Review Board or any safety committees, as appropriate) to support the HIRA and the establishment of safety objectives.
  ○ Check that CMF procedures include:
  ○ reporting procedures
  ○ follow-up and corrective action procedures
  ○ Check that those procedures are correctly implemented, in particular:
    ▪ Time to send the audit/inspection report to the auditees
    ▪ Follow-up of the findings by the NP and the CMM (deadline…)
    ▪ Closure of the findings by the CMM (evidences, on time)

<u>Note:</u> The operator retains the ultimate responsibility for the effectiveness of the CMF, in particular for the effective implementation and follow-up of all corrective actions (e.g. in case of the use of external auditors).</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td colspan="2"></td></tr>
<tr><td colspan="9">Training</td></tr>
<tr><td rowspan="2">ORO.GEN.200(a)(6)</td><td rowspan="2">CMF training</td><th>Present</th><th>Suitable</th><th colspan="4">Operational</th><th>Effective</th></tr>
<tr><td>The training programmes for the compliance monitoring manager (CMM), internal/external auditors, personnel involved in compliance management and the remainder of the personnel has been defined.</td><td>The training programmes ensure an adequate level of competence relevant to the involvement in compliance management.</td><td colspan="4">The CMM underwent the qualification and training programme before being appointed.

All training programmes were implemented.</td><td>The qualificatiosn of the compliance monitoring manager and of the staff managing the CMF is adequate. Their understanding of their function is adequate</td></tr>
</table>

<table>
<tr><th>Reference</th><th>Inspection topics</th><th>Specific requirements/expectations</th><th>PSOE</th><th>Eval.</th><th>Description</th></tr>
<tr><td></td><td></td><td>• Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover:
• the requirements of compliance monitoring,
• manuals and procedures related to the task,
• audit techniques,
• reporting and record keeping.
• Check that the auditors are trained and that the training includes at least:
○ Auditing techniques,
○ Regulation knowledge (e.g. EASA OPS),
○ procedures related to the task,
○ reporting and record keeping
• Check that all personnel involved in compliance management has been trained.
• Check that a briefing on compliance management for the reminder of the personnel is foreseen in the operator’s procedures.
• Check that any external auditor received the adequate training.
• In addition, check in case of use of external auditor(s):
○ the presence of a written agreement,
○ the task repartition definition; and
○ that the operator remains responsible for the follow-up of corrective actions.</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td></td></tr>
<tr><td colspan="6">Record keeping</td></tr>
<tr><td rowspan="3">ORO.GEN.220
ORO.MLR.115</td><td rowspan="3"><u>Record keeping system:</u>

(a) The operator shall establish a system of record-keeping that allows adequate storage and reliable traceability of all activities developed, covering in particular all the elements indicated in ORO.GEN.200.

Records of the activities referred to in ORO.GEN.200; shall be stored for at least 5 years</td><td>Present</td><td colspan="2">Suitable</td><td>Operational / Effective</td></tr>
<tr><td>The operator defined a system for record keeping</td><td colspan="2">The system allows for an adequate storage and reliable traceability.</td><td>The operator is using the established system for record keeping. / The record keeping system established is working properly.</td></tr>
<tr><td>• Check that the format of the records are be specified in the operator’s procedures.
• Check that records are stored in a manner that ensures protection from damage, alteration and theft.</td><td>☐ P
☐ S
☐ O
☐ E</td><td>☐ N/A
☐ C
☐ NC
☐ R
☐ N/R</td><td></td></tr>
</table>