

The Changing Role of Quality & Safety Following the Proposed Changes with Within the EASA Part 145 Quality & Safety System NPA 2019-05 (C)

Introduction

Steve Bentley CEO of Sofema Aviation Services www.sassofia.com & Sofema Online www.sofemaonline.com takes a look at what the forthcoming EASA changes to Part 145 will look like and what they could mean for Quality, Safety & Management Personnel.

Name Change QM/ QAM to CM

In keeping with “Management System” understanding from Regulation 965/2012, the previous role title of Quality Manager or Quality Assurance Manager is essentially dropped with the focus again on Compliance Management. So again we will see either Compliance Manager or Quality Manager responsible for Compliance.

Quality Assurance Manager Responsibilities related to the proposed amendment to EASA Part 145 Regulation NPA 2019-05 (C)

Before NPA 2019-05 (C)

(c) The accountable manager under point (a) shall appoint a person with the responsibility for monitoring the quality system, including the associated feedback system as required by point 145.A.65(c) (145.A.65 Safety and quality policy, maintenance procedures and quality system)

(c) The organisation shall establish a quality system that includes the following:

1. Independent audits in order to monitor compliance with required aircraft/aircraft component standards and adequacy of the procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft/aircraft components.

In the smallest organisations the independent audit part of the quality system may be contracted to another organisation approved under this Part or a person with appropriate technical knowledge and proven satisfactory audit experience; and

2. A quality feedback reporting system to the person or group of persons specified in point 145.A.30(b) and ultimately to the accountable manager that ensures proper and timely corrective action is taken in response to reports resulting from the independent audits established to meet point (1)

Authors Note – Here we had a classic misunderstanding with terminology!

Why? Essentially because when we speak about Quality System, we are talking about the totality of the process means Quality Control & Quality Assurance – However the Quality Control elements were not so visible in the way they needed to be!

The appointed person shall have direct access to the accountable manager to ensure that the accountable manager is kept properly informed on quality and compliance matters.

After NPA 2019-05 (C)

(c) The accountable manager under point (a) shall nominate a person or group of persons with the responsibility for managing the compliance monitoring function the quality system, including the associated feedback system as part of the management system

Authors Note – Here we are now talking about the “CM” person or persons who are responsible for only managing the “compliance monitoring function” (So where is QC in this story?) – See the forthcoming paragraph for the answer! ***

Role Identification related to Quality Control Responsibilities

It is their role to ensure that compliance is proactively managed and that any early warning signs of non-compliance are documented and acted upon.

***GM1 145.A.30(b) Personnel requirements

RESPONSIBILITY FOR ENSURING COMPLIANCE For day-to-day functions, the responsibility for ensuring that all maintenance activities are performed in accordance with the applicable requirements and procedures lies with the person(s) nominated in accordance with point 145.A.30(b). (This is the Base Maintenance Manager (BMM) Line Maintenance Manager (LMM) and Workshop Maintenance Manager (WMM)

These nominated persons should demonstrate a complete understanding of the applicable requirements and ensure that the organisation’s processes and standards accurately reflect the applicable requirements.

Authors Note – So consider how the physical “actual” demonstration of “applicable requirements plus organisational standards” is delivered?

In reality, this can be evidenced by a very low level of findings during compliance audits

The Role of the Compliance Manager Requires the Following (AMC1 145.A.30(c);(ca))

b) The compliance monitoring function should ensure that:

(1) the activities of the organisation are monitored for compliance with the applicable requirements and any additional requirements as established by the organisation, and that these activities are carried out properly under the supervision of the nominated persons referred to in points 145.A.30(b) to (ca).

Authors Note – Note the dual obligations related to first compliance and second effective supervision of the relevant business area manager

(2) any maintenance contracted to another maintenance organisation is monitored for compliance with the contract;

(3) an audit plan is properly implemented, maintained, and continually reviewed and improved; and

(4) corrections and corrective actions are requested as necessary.

Multiple Compliance Managers

If more than one person is designated for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point (i.e. the 'compliance monitoring manager').

Regarding SMS

(ca) The accountable manager shall nominate a person or group of persons with the responsibility for managing the development, administration, and maintenance of effective safety management processes as part of the management system.

Authors Note – Here we are now talking about “key SMS activities” but not all elements of the SMS – Responsibility for the SMS is not the same as Managing the Development (Discuss!) Ultimately the Business Area owner has a responsibility as part of the Management System Roles and Responsibilities

One way to look at this is to consider the SMS Practitioners as “service providers” to the Management Team – Do you agree?

Safety Manager Obligations

AMC1 145.A.30(c);(ca) Personnel requirements

(a) Safety manager

(2) The functions of the safety manager should be to:

(i) Facilitate hazard identification, risk assessment and management;

(ii) Monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan, unless action follow-up is addressed by the compliance monitoring function;

Authors Note – Consider the correlation between the QMS & SMS activities – it is important that within the EASA Part 145 Environment there is a close co-operation between the Compliance Driven & Safety Driven Activities

(iii) Provide periodic reports on safety performance to the safety review board;

(iv) Ensure the maintenance of safety management documentation;

(v) Ensure that there is safety training available and that it meets acceptable standards;

(vi) provide advice on safety matters; and

(vii) ensure the initiation and follow-up of internal occurrence investigations.

Can the Role of Quality & Safety be Combined?

If the functions related to compliance monitoring or safety management are combined with other duties, the organisation should ensure that this does not result in any conflicts of interest.

Authors Note – Where do you see potential conflicts of interest – consider the issues which will be present and how to resolve.

If the same person is designated to manage both the compliance monitoring function and safety management-related processes and tasks, the accountable manager, with regard to his or her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation, and the nature and complexity of its activities.

Multiple Safety Manager – Focal

If more than one person is designated for the safety management function, the accountable manager should identify the person who acts as the unique focal point (i.e. the 'safety manager').

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