

PART CAMO SMS & HF Training Considerations for Organisations Who Demonstrate Partial Compliance

Sofema Aviation Services (SAS) www.sassofia.com and Sofema Online (SOL) www.sofemaonline.com offer Classroom, Webinar & Online Training I.A.W the requirements of GM2 CAMO.A.305(g) Personnel requirements training syllabus for initial safety training.

This document considers the situation related to organisations who are able to demonstrate partial compliance with the regulatory obligation and how they may demonstrate compliance.

Commented Steve Bentley CEO of Sofema “Understanding both the importance of the required training and the number of CAMO delegates who will need to demonstrate compliance with EASA Part CAMO Regulatory Requirements. Sofema has developed a training course which carefully covers in detail every element of the required syllabus - The course is 3 days in the classroom (It has to be to cover the subject matter!) It is also available with a voice over (not slide reading rather complementary to the content of the slide) – This course has been audited multiple times and found to meet the training objective of GM2 CAMO.A.305(g).”

3 Possible Scenarios are now Considered

- (1) The CAMO Team has received Previously HF Training but not SMS
- (2) The CAMO Team has received Previously SMS Training but not HF
- (3) The CAMO Team has received both HF & SMS Training but not in compliance with GM2 CAMO.A.305(g)

Option (1) SAS & SOL offer an SMS Bridging Course which covers all the SMS elements in GM2 CAMO.A.305(g) – However important note – The organisation should verify with the relevant Competent Authority (CA) that they will accept this solution

Option (2) SAS & SOL offer a HF Initial Course I.A.W the requirements of 140.A.30 personnel requirements and this course may be utilised again with the concurrence of the (CA)

Option (3) The organisation should be in a position to demonstrate to the CA that the training program meets full compliance with EASA Part – CAMO GM2 CAMO.A.305(g) – This can be done in a variety of ways including for example using XL to support a GAP Analysis

**Considerations Related to GM1 CAMO.A.305(g) Personnel requirements
Safety training (including human factors)**

(a) The scope of the safety training and the related training programme will differ significantly depending on the size and complexity of the organisation. Safety training should reflect the evolving management system, and the changing roles of the personnel who make it work.

(b) In recognition of this, training should be provided to management and staff at least:

- (1) During the initial implementation of safety management processes;
- (2) For all new staff or personnel recently allocated to any safety management related task;
- (3) On a regular basis to refresh their knowledge and to understand changes to the management system;
- (4) when changes in personnel affect safety management roles, and related accountabilities, responsibilities, and authorities; and

NOTE: In the context of safety management, the term 'authority' is used in relation to the level of management in the organisation that is necessary to make decisions related to risk tolerability.

(5) when performing dedicated safety functions in domains such as safety risk management, compliance monitoring, internal investigations.

(c) Safety training is subject to the record-keeping requirements in point CAMO.A.220(c).

GM2 CAMO.A.305(g) Personnel requirements

TRAINING SYLLABUS FOR INITIAL SAFETY TRAINING

The training syllabus below identifies the topics and subtopics that should be addressed during the safety training.

The CAMO may combine, divide, or change the order of any of the subjects in the syllabus to suit its own needs, as long as all the subjects are covered to a level of detail that is appropriate for the organisation and its personnel, including the varying level of seniority of that personnel.

Authors Note 1 – The above GM provides support for a solution which is “bespoke” for the organisation – however the challenge to be addressed reflects the need to demonstrate the above highlighted are

Authors Note 2 – Because of the challenge of demonstrating all elements of the required program – we carefully followed the GM guidelines as it is often easier for our clients to demonstrate “fresh” compliance rather than providing Gap Analysis detail assessment and developing in house bridging courses

EASA identifies the following option – but note in terms of audit oversight it creates a “Compliance Challenge” – note this is all it is a challenge as it is more than possible for the organisation to develop a dedicated bringing course

- Some of the topics may be covered in separate training courses (e.g. health and safety, management, supervisory skills, etc.) in which case duplication of the training is not necessary.
- Where possible, practical illustrations and examples should be used, especially accident and incident reports.
- Topics should be related to existing legislation, where relevant. Topics should be related to existing guidance/advisory material, where relevant (e.g. ICAO HF Digests and Training Manual).
- Topics should be related to continuing airworthiness management and maintenance engineering where possible; too much unrelated theory should be avoided.

Here is the required Syllabus in full

1 General/Introduction to safety management and HF

1.1 Need to address safety management and HF

1.2 Statistics

1.3 Incidents

1a. Safety risk management

1a.1. Hazard identification

1a.2. Safety risk assessment

1a.3. Risk mitigation and management

1a.4. Effectiveness of safety risk management

2 Safety Culture/Organisational factors

2.1 Justness/Trust

2.2 Commitment to safety

2.3 Adaptability

2.4 Awareness

2.5 Behaviour

2.6 Information

3 Human error

3.1 Error models and theories

3.2 Types of errors in continuing airworthiness management and maintenance tasks

3.3 Violations

3.4 Implications of errors

3.5 Avoiding and managing errors

3.6 Human reliability

4 Human performance & limitations

4.1 Vision

4.2 Hearing

4.3 Information-processing

4.4 Attention and perception

4.5 Situational awareness

4.6 Memory

4.7 Claustrophobia and physical access

4.8 Motivation

4.9 Fitness/Health

4.10 Stress

4.11 Workload management

4.12 Fatigue

4.13 Alcohol, medication, drugs

4.14 Physical work

4.15 Repetitive tasks/complacency

5 Environment

5.1 Peer pressure

5.2 Stressors

5.3 Time pressure and deadlines

5.4 Workload

5.5 Shift work

5.6 Noise and fumes

5.7 Illumination

5.8 Climate and temperature

5.9 Motion and vibration

5.10 Complex systems

5.11 Other hazards in the workplace

5.12 Lack of manpower

5.13 Distractions and interruptions

6 Procedures, information, tools and practices

6.1 Visual inspection

6.2 Work logging and recording

6.3 Procedure — practice/mismatch/norms

6.4 Technical documentation — access and quality

7 Communication

7.1 Shift/Task handover

- 7.2 Dissemination of information
- 7.3 Cultural differences
- 8 Teamwork
 - 8.1 Responsibility
 - 8.2 Management, supervision and leadership
 - 8.3 Decision-making
- 9 Professionalism and integrity
 - 9.1 Keeping up to date; currency
 - 9.2 Avoiding error-provoking behaviour
 - 9.3 Assertiveness
- 10 Organisation's safety programme
 - 10.1 Safety policy and objectives, just culture principles
 - 10.2 Reporting errors and hazards, internal safety reporting scheme
 - 10.3 Investigation process
 - 10.4 Action to address problems
 - 10.5 Feedback and safety promotion

Final Comments

- To provide a "Cost Effective" online solution Sofema Online reduced the basic price for the online fully compliant combined SMS & HF course to 125 Euro / Delegate (Before Applicable Discount)

Please see here - <https://sofemaonline.com/lms/courses/264-easa-part-camo-safety-sms-amp-human-factor-hf-training-initial-with-vo/preview>

Note – As a Compliance or Safety Manager if you would like a "guest access" to audit this course please contact team@sassofia.com with your request

- Please also compare this "combined" course with our 145 HF Initial Training Course which is 112.50 Euros which means the equivalent cost of the SMS component within the combined course is 12.50 Euro / Delegate (Before Applicable Discount)

Ultimately the decision as to which training solution should be employed is made by the manager responsible for Competence and should be :-

- Acceptable to the Compliance Manager
- Able to support any audits performed by the Competent Authority

Next Steps

Please see Sofema Online www.sofemaonline.com and Sofema Aviation Services www.sassofia.com or email team@sassofia.com