Compliance Auditing EASA ATM-ANS

Sofema Aviation Services (SAS) www.sassofia.com considers the performance of a ATM-ANS Compliance Audit at the overview level – Conducting a Compliance Audit for ANS EASA ATM-ANS Management System, the audit purpose is to verify that all the requirements of Regulation (EU) 2017/373 are met.

Introduction - AMC1 ATM/ANS.OR.B.005(c) Management system ED Decision 2017/001/R

Compliance Monitoring — General for Complex Service Providers

Compliance monitoring

- A service provider should specify the basic structure of the compliance monitoring function applicable to the activities conducted.

- The compliance monitoring function should be structured according to the size of the service provider and the complexity of the activities to be monitored, including those which have been subcontracted.

- A service provider should monitor compliance with the procedures they have designed to ensure that services are provided with the required safety levels and quality, as applicable.

- In doing so, they should as a minimum, and where appropriate, monitor:

o manuals, logs, and records;

o training standards; and

o management system procedures.

Compliance Organisational set-up

- A person should be responsible for compliance monitoring to ensure that the service provider continues to meet the requirements of this Part and other applicable Parts.

- The accountable manager should ensure that sufficient resources are allocated for compliance monitoring.

- Personnel involved in the compliance monitoring should have access to all parts of service provider and, as necessary, any contracted organisation.

Note 1 - In the case the person responsible for compliance monitoring acts also as safety manager, 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 service provider and the nature and complexity of its activities.

Note 2 - The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not directly involved in the activity being audited.

- Compliance monitoring documentation

- Relevant documentation should include relevant part(s) of the service provider's management system documentation.

Note 3 - In addition, relevant documentation should also include:

- terminology;

- specified activity standards;

- a description of the service provider;

- allocation of duties and responsibilities;

- procedures to ensure compliance;

- the compliance monitoring programme, reflecting:

o the schedule of the monitoring programme;

o audit procedures;

o reporting procedures;

o follow-up and corrective action procedures; and

o the record-keeping system;

o the training syllabus

o document control.

Training

- Correct and thorough training is essential to optimise compliance in every service provider.

- In order to achieve significant outcomes of such training, the service provider should ensure that all personnel understand the objectives as laid down in the service provider's management system documentation.

- 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 recording.

- Time should be provided to train all personnel involved in compliance management and for briefing the remainder of the personnel.

Note 4 The allocation of time and resources should be governed by the volume and complexity of the activities concerned.

The following is a typical structured approach to delivering a compliance audit.

Preparation

- Review & Understand the Regulation (EU) 2017/373 and its requirements.

- Review Documentation by examining the service provider's documented management system and key processes.

- Develop an Audit Plan which outlines the scope, objectives, criteria.

- Consider the schedule to ensure the effective delivery of the audit.

Conducting the Audit

- Evaluate the Management System to verify the management system is implemented and maintained as per the regulation.

- Consider Responsibilities and Accountabilities - ensure that lines of responsibility and accountability are clearly defined throughout the organization.

- Review the service provider's policies related to safety, quality, and security of its services fully documented & compliance verified.

- Check the means to verify the performance of the service provider's organization against performance indicators and targets.

- Review Change Management Process to evaluate the process and verify the process to identify and accommodate changes within the organization and its context is acceptable.

- Assess Training and Competence to ensure that personnel are trained and competent to perform their duties safely and efficiently.

- Evaluate Communication Means and Processes to Assess and validate the formal means for communication within the organization.

- Check Documentation of Key Processes to ensure that all management system key processes are documented, including a process for making personnel aware of their responsibilities.

- Evaluate the compliance management control function established to monitor compliance with applicable requirements and the adequacy of the procedures.

- Assess Functional System Behaviour by verifying the process by which the service provider monitors the behavior of its functional system and addresses underperformance.

- Ensure that the management system is proportionate to the size and complexity of the service provider.

- Review Interfaces with Relevant Service Providers to assess how the service provider establishes formal interfaces with relevant service providers and aviation undertakings.

Reporting

- Prepare Audit Report: Compile a comprehensive audit report detailing the findings, recommendations, and any agreed-upon corrective actions.

- Document Findings (Corrective Action Report - CAR) - Clearly and accurately document any non-compliances, observations, and areas of improvement – Provide the CAR to the responsible business owner/nominated person

- Present the findings to the accountable manager and discuss necessary corrective actions.

Follow-Up Activities

- Monitor Corrective Actions - Ensure that the service provider implements effective corrective actions where necessary.

- Verify Implementation: Conduct follow-up audits or reviews to verify the implementation and effectiveness of the corrective actions.

- Maintain Audit Records: Keep records of the audit process, findings, and corrective actions for future reference.

Continuous Improvement

- Review Audit Process: Evaluate the effectiveness of the audit process and make improvements where necessary.

- Update Audit Criteria: Regularly review and update audit criteria based on changes in regulations, industry best practices, and lessons learned from previous audits.

Next Steps

Sofema Aviation Services (www.sassofia.com) offers the following course – please see the following link https://sassofia.com/course/easa-quality-assurance-auditing-introduction-for-air-navigation-services-ans-3-days/ or email team@sassofia.com