

What does EASA expect from a 145 Compliance System?

Introduction

This document outlines the necessary compliance requirements for the Compliance System within an EASA Part 145 approved maintenance organization. The Compliance System is integral to ensuring that maintenance activities are conducted in accordance with approved procedures, and this document ensures alignment with the current EASA Part 145 regulations in particular Part 145.A.200.

Quality System Monitoring

General Requirements

Quality System Monitoring:

The quality system must monitor maintenance activities to ensure compliance with approved procedures. This monitoring ensures that all maintenance activities are performed according to the established standards and that any deviations are promptly identified and corrected.

Quality system procedures should be included within the approved procedures and be subject to audits to verify their effectiveness and adherence.

Independent Audits:

Audits must be independent, meaning they are carried out by personnel not responsible for the functions, procedures, or products being audited. This ensures objectivity and impartiality in the audit process.

Options for auditing include:

- Using competent personnel from different departments within the organization, ensuring they are not responsible for the quality functions being audited.
- Contracting audits to another organization or a qualified person with no involvement in the audited activities.
- Having the quality system monitored and certified against internationally recognized quality standards by a certification organization. This can provide an external validation of the quality system's effectiveness.

The method of auditing the quality system must be described in the Maintenance Organization Exposition (MOE) and approved by the competent authority, ensuring transparency and regulatory compliance.

Personnel Requirements

Quality Audit Staff:

- Must be capable of monitoring compliance with Part-145 and identifying noncompliance effectively. They should have a comprehensive understanding of the regulatory requirements and be able to assess whether the organization's procedures meet these standards.
- Should request remedial action from the accountable manager and nominated persons as necessary, ensuring that any identified issues are addressed promptly and effectively.

Competence Assessment:

- Quality Assurance Professionals must possess knowledge and skills in various areas, including applicable standards, auditing techniques, human factors, relevant regulations, safety risks, professional integrity, and maintenance procedures. This ensures that they can perform their duties effectively and contribute to the organization's compliance and safety objectives.

Safety and Quality Policy

Establishment of Policy:

The organization must establish a safety and quality policy to be included in the exposition under 145.A.70. This policy should articulate the organization's commitment to safety and quality, setting the tone for all maintenance activities.

Procedures must be agreed upon with the competent authority, taking into account human factors to ensure good maintenance practices and compliance with requirements. These procedures should be designed to minimize human error and enhance overall safety.

Maintenance Procedures:

- Ensure a clear work order or contract is agreed upon for maintenance activities. This provides clarity on the scope of work and expectations, reducing the likelihood of misunderstandings or omissions.
- Procedures must cover all aspects of maintenance, including specialized services and the standards the organization intends to work to. This comprehensive approach ensures that all maintenance activities are performed to the same high standard.

Quality System Elements

Independent Audits:

- Objective routine sample checks of all maintenance aspects to ensure compliance with required standards. These audits should cover both procedural compliance and product quality.
- Audits should include random checks during maintenance activities, including night shifts where applicable. This ensures that compliance is maintained at all times and in all conditions.

Quality Feedback System:

- Ensure findings from audits are investigated and corrected in a timely manner. This continuous improvement process helps maintain compliance and improve overall quality.
- Reports from audits must be sent to relevant departments for rectification. This ensures that those responsible for the issues are aware of them and can take corrective action.
- Regular meetings between the accountable manager and staff to review progress on corrective actions. These meetings provide an opportunity to discuss any ongoing issues and ensure that corrective actions are implemented effectively.

Audit Documentation and Retention:

- All records related to audits and the quality feedback system should be retained for at least two years or longer if required for regulatory compliance. This documentation provides a historical record of compliance and can be used to identify trends and areas for improvement.

Guidance on Quality System Procedures

Quality Audit of Organization Procedures:

- Describe how internal procedures are audited, including the methodology and compliance with Part 145.A.200. This ensures that the organization's procedures are regularly reviewed and updated as necessary.
- Define independence of quality compliance monitoring staff, access to the accountable manager, and audit procedures. This helps ensure that audits are objective and that any issues identified are addressed at the highest level.

Quality Audit of Aircraft and/or Components:

- Procedures for product audits, including sampling and investigation audits, should be defined. These audits ensure that individual products meet the required standards and that any issues are promptly identified and addressed.
- Small organizations may subcontract audits to another organization or a qualified person with appropriate knowledge and experience. This provides an

option for organizations that may not have the resources to perform these audits internally.

Corrective Action Procedure:

- Procedures for follow-up on corrective actions, including planning, notification, and management of due dates. This ensures that all identified issues are addressed promptly and effectively.
- Regular meetings to review the progress of corrective actions and update the audit planning as necessary. This continuous review process helps ensure that corrective actions are implemented effectively and that the organization remains compliant.

Company Audit Policy

Compliance with Part-M Requirements:

- Ensure audits take into account applicable Part-M requirements and appendices. This ensures that the organization's procedures are compliant with all relevant regulations.
- The MOE should address detailed procedures, responsibilities, and compliance measures for Part 145. This comprehensive approach helps ensure that all aspects of the organization's operations are covered.

Audit Planning and Execution:

- Detailed plans for scheduled and random audits, including during night shifts. This ensures that compliance is maintained at all times and in all conditions.
- Validation and internal approval of the audit program and changes to the program. This helps ensure that the audit program remains relevant and effective.

Management and Follow-Up:

- Procedures for managing findings, including classification, due dates, and corrective actions. This helps ensure that all identified issues are addressed promptly and effectively.
- The follow-up of corrective actions cannot be subcontracted. This ensures that the organization retains control over the implementation of corrective actions and can ensure that they are completed effectively.

Conclusion

This document ensures that the Quality System within a Part 145 organization is compliant with current EASA regulations, including procedures for monitoring, independent audits, personnel requirements, safety and quality policy, and corrective actions. Adherence to these guidelines ensures that maintenance practices are in

accordance with approved procedures and regulatory standards. By following these guidelines, the organization can ensure that it provides a high level of safety and quality in its maintenance activities.