

# VERT:CON<sup>®</sup>

**Atlanta 2026** | POWERED BY VAI

## **SMS WORKSHOP RESOURCE PACKET**



*8:00 - 9:30 AM Monday, March 9, 2026*



Hosted by the VAI Safety Industry Advisory Council

## **About the SMS Workshop**

This SMS resource packet was developed as a supplement for participants attending the Safety Management System (SMS) Workshop at VERTICON 2026 in Atlanta, Georgia, USA. It is provided to also deliver the same resource information to those unable to attend.

Our goal is to provide a comprehensive overview of information and resources to help users implement an SMS or enhance existing ones.

Thank you for your commitment to elevating safety in your daily operations and throughout the vertical aviation industry.

*The VAI Safety Industry Advisory Council*



## SMS Workshop Stations, Tables, and Partner Providers

The Safety Management System (SMS) Workshop is designed to give you the opportunity to engage with industry experts and explore key elements of SMS. Nine SMS stations and six VAI safety partner provider tables are available for you to visit, ask questions, and receive guidance. A full list and location diagram of stations and partners is provided below and on the next page. We encourage you to visit as many tables as possible to expand your knowledge of SMS.

Table 1: SMS Workshop Stations

Station	SMS Element
1	Safety Policy & Leadership
2	Safety Documentation & Guidance
3	Emergency Response Plan
4	Safety Risk Management
5	Safety Assurance
6	Safety Promotion
7	Safety Culture/Just Culture
8	FAA/EASA Engagement
9	SMS Resources & Technologies

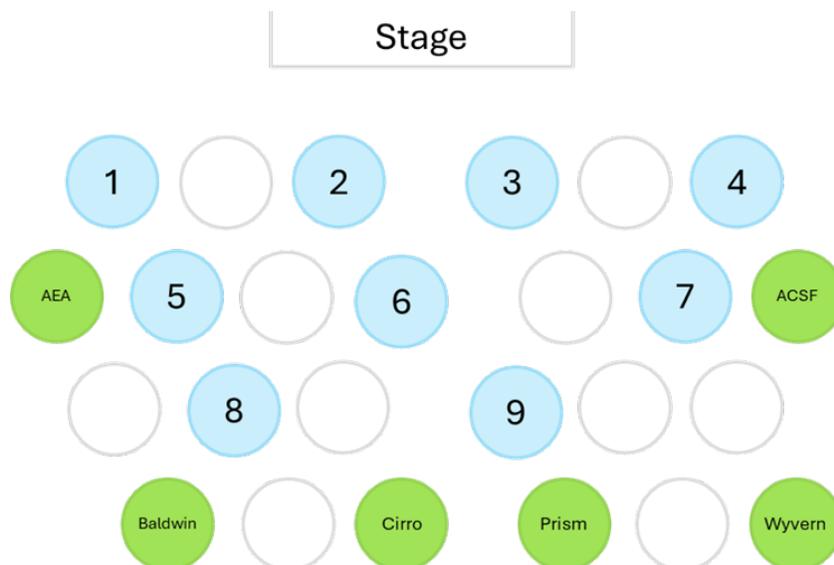


Figure 1: SMS Workshop Table Layout

Table 2: SMS Workshop Partner Providers

VAI SMS Partners and Providers	
	Air Charter Safety Foundation (ACSF)
	Aircraft Electronics Association (AEA)
	Baldwin Safety & Compliance
	CIRRO by Airsuite
	PRISM SMS
	WYVERN Ltd.

## VAI SMS Workshop Resource Hub

The resources in this packet support operators working to implement, mature, or sustain an effective Safety Management System (SMS). They reflect the guidance shared during the VERTICON SMS Workshop, where members of the VAI Safety Industry Advisory Council (IAC) and other industry experts provided practical tips to help you jumpstart or refine your SMS.

To access the VAI webpage containing the materials referenced in this packet, scan the QR code on this page.



Figure 2: SMS Workshop Resource Hub URL: [verticalavi.org/safety/sms/workshop](https://verticalavi.org/safety/sms/workshop)

## SMS Definitions

**International Civil Aviation Organization (ICAO):** Safety Management System means a systematic approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures.

**Federal Aviation Administration (FAA):** Safety Management System means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of safety risk controls. It includes systematic procedures, practices, and policies for the management of safety risk.

## SMS Compliance Deadline

For U.S. Operators, any person authorized to conduct operations under Part 135 or that holds a Letter of Authorization issued under § 91.147 before May 28, 2024, must:

- (1) Develop and implement an SMS that meets the requirements of this part no later than May 28, 2027.
- (2) Submit to the FAA a declaration of compliance with this part in a form and manner acceptable to the Administrator no later than May 28, 2027.

## SMS Frameworks

The following tables are representative samples of SMS frameworks as defined by the International Civil Aviation Organization (ICAO) and the US Federal Aviation Administration (FAA).

*Table 3: International Civil Aviation Organization (ICAO) SMS Framework*

Safety Policy & Objectives		Safety Risk Management		Safety Assurance		Safety Promotion	
1.1	Management Commitment	2.1	Hazard Identification	3.1	Safety Performance Monitoring & Measurement	4.1	Training & Education
1.2	Safety Accountability & Responsibilities	2.2	Safety Risk Assessment & Mitigation	3.2	The Management of Change	4.2	Safety Communication
1.3	Appointment of Key Safety Personnel			3.3	Continuous Improvement of the SMS		
1.4	Coordination of Emergency Response Planning						
1.5	SMS Documentation						

*Table 4: Title 14 of the Code of Federal Regulations Part 5 – SMS Framework (Effective as of May 2024)*

Safety Policy	Safety Risk Management	Safety Assurance	Safety Promotion	SMS Documentation & Recordkeeping
Subpart B	Subpart C	Subpart D	Subpart E	Subpart F
§ 5.21 Safety policy.	§ 5.51 Applicability.	§ 5.71 Safety performance monitoring and measurement.	§ 5.91 Competencies and training.	§ 5.95 SMS documentation.
§ 5.23 Safety accountability and authority.	§ 5.53 System analysis and hazard identification.	§ 5.73 Safety performance assessment.	§ 5.93 Safety communication	§ 5.97 SMS records
§ 5.25 Designation and responsibilities of required safety management personnel.	§ 5.55 Safety risk assessment and control.	§ 5.75 Continuous improvement		
§ 5.27 Coordination of emergency response planning.	§ 5.57 Notification of hazards to interfacing persons			

**Note: Given that the US SMS declaration of compliance deadline is just over one year away, most of the information contained in the next nine sections is primarily based on US Title 14, Part 5 SMS requirements. International compliance requirements may differ slightly.**

## Station #1: Safety Policy & Leadership

### Title 14 of the Code of Federal Regulations Part 5 – § 5.21 Safety Policy Requirements:

- (a) Any person required to have an SMS under Part 5 must have a safety policy that includes at least the following:
- (1) The person's safety objectives.
  - (2) The person's commitment to fulfill the safety objectives.
  - (3) A clear statement about the provision of the necessary resources for the implementation of the SMS.
  - (4) A safety reporting policy that defines requirements for employee reporting of safety hazards or issues.
  - (5) A policy that defines unacceptable behavior and conditions for disciplinary action.
  - (6) An emergency response plan that provides for the safe transition from normal to emergency operations in accordance with the requirements of § 5.27.
  - (7) A code of ethics that is applicable to all employees, including management personnel and officers, which clarifies that safety is the organization's highest priority.
- (b) The safety policy must be signed by the accountable executive described in § 5.25.
- (c) The safety policy must be documented and communicated throughout the person's organization.
- (d) The safety policy must be regularly reviewed by the accountable executive to ensure it remains relevant and appropriate to the person.

*Note: For U.S. organizations with a single pilot who is the sole individual performing all necessary functions, the following Part 5 regulatory sections for safety policy are excepted from the implementation requirements: § 5.21(a)(4), 5.21(a)(5), 5.21(c), 5.23(a)(2), 5.23(a)(3), 5.23(b), 5.25(b)(3), 5.25(c).*

## Example Safety Policy

### [Organization Name] Safety Management System (SMS) Safety Policy & Code of Ethics Statement

#### Purpose

[Organization Name] is committed to achieving the highest standards of safety in all operations. We recognize that safety is fundamental to our success and to the well-being of our personnel, customers, and stakeholders. This policy establishes the framework for our Safety Management System (SMS) in accordance with ICAO Annex 19, EASA Part-ORO, and FAA Part 5 requirements, ensuring proactive hazard identification, risk mitigation, and continuous safety improvement.

#### Safety Commitment

[Organization Name]'s management and employees are committed to:

- Ensuring safety is the top priority in all operational and organizational decisions.
- Providing the necessary resources, authority, and support to implement and maintain an effective SMS.
- Promoting a positive safety culture that encourages the reporting of hazards, incidents, and safety concerns without fear of reprisal (Just Culture).
- Monitoring, measuring, and continuously improving safety performance.

## Safety Objectives

Table 5: Example List of Safety Objectives

Objective	SMART Target	KPI / Measurement	Timeline	Owner
Reduce Loss of Control In-Flight (LOC-I) Events	Decrease LOC-I incidents by 20% vs. baseline	Number of LOC-I incidents reported in flight ops database	31 Dec 2026	Chief Pilot / Safety Manager
Improve Runway Safety Performance	Reduce runway excursions/incursions by 15%	Runway safety reports and incident logs	30 Jun 2026	Ops Manager / Safety Manager
Mitigate CFIT Risks	Achieve 95% compliance with TAWS/EGPWS and CFIT procedures	Training completion records, simulator checks, audit reports	31 Dec 2026	Chief Pilot / Training Manager
Enhance Turbulence & Weather Reporting	Increase participation in real-time turbulence reporting by 30%	Flight crew reports submitted to turbulence reporting system	30 Sep 2026	Flight Ops Manager / Safety Manager
Strengthening GNSS/Navigation Integrity	Reduce unmitigated GNSS interference reports by 25%	Internal occurrence database, GNSS anomaly reports	31 Dec 2026	Flight Ops / Technical Manager
Promote Safety Reporting Culture	Increase voluntary safety reporting by 10%	Number of hazard/near-miss reports in SMS database	30 Jun 2026	Safety Manager / HR

## Roles and Responsibilities

- **Accountable Executive:** Ultimately responsible for safety performance and the provision of resources for SMS implementation.
- **Safety Manager:** Oversees SMS processes, manages safety reporting, risk assessment, and continuous improvement initiatives.
- **All Personnel:** Required to follow safety procedures, report hazards or incidents, and participate in safety programs.

## Implementation and Continuous Improvement

Our SMS integrates proactive and reactive safety management:

- Safety data will be collected, analyzed, and used to drive improvements.
- Regular audits, inspections, and management reviews will ensure the SMS remains effective and compliant with ICAO, EASA, and FAA regulations.
- Training programs will maintain personnel competence and awareness of safety responsibilities.

## Policy Review

This policy will be reviewed at least annually, or whenever significant operational or regulatory changes occur, to ensure continued relevance and effectiveness.

Approved By: **//Signed//**

[Name]

Accountable Executive

[Date]

## Station #2: Safety Documentation & Recordkeeping Guidance

Concise examples of documentation and records that support the four pillars of a Safety Management System (SMS). Written for operators conducting rotorcraft external-load (Part 133), agricultural aircraft (Part 137), and commuter/on-demand (Part 135) operations. Tailor to your OpSpecs/LOAs, aircraft types, and operational control model. Key recordkeeping anchors (selected):

- 14 CFR 5.95: Maintain SMS documentation (safety policy; SMS processes/procedures).
- 14 CFR 5.97: Retain SRM outputs while controls remain relevant; retain SA outputs 5 years; retain SMS training records while employed; retain SMS communications 24 months.
- 14 CFR 5.9: Part 5 SMS applicability and compliance timelines for Part 135 certificate holders.
- Operational records to integrate into document/records control: Part 135.63 (pilot records, load manifests), Part 137.71 (job/dispensing records), Part 133 (certificate availability and Rotorcraft-Load Combination Flight Manual control).

Compliance note: Coordinate formats and retention with your FAA POI/PAI and company policy (including PRD requirements).

### 1. Safety Policy

Documents leadership commitment, defines accountability, and establishes controlled processes for how safety work is done and documented.

*Table 6: Example List of Safety Policy Records / Artifacts*

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Controlled SMS Manual / Safety Policy Statement (revision log)	Controlled doc describing SMS scope, policy, objectives, roles, and interfaces.	Cross-references OpSpecs/LOAs, Part 133 RLCFM, Part 137 procedures, and Part 135 GOM/ops control.	Meets Part 5.95 expectations and prevents outdated procedures from driving high-risk ops.
Accountability and Authority Records (AE acceptance, committee charter)	Evidence of who is accountable, who can accept risk, and how decisions escalate.	Clarifies approvals for high-risk external loads, chemical/material changes, and Part 135 operational control decisions.	Supports consistent risk acceptance and defensible decisions during FAA oversight and internal reviews.
Document and Records Control Procedure + Master Index	How docs/records are created, approved, distributed, revised, archived, and protected.	Integrates required records (135.63, 137.71) and controls Part 133 certificate/RLCFM availability.	Reliable records are SMS evidence. Good control supports Part 5.97 retention and organizational learning.

### 2. Safety Risk Management (SRM)

Documented process to identify hazards, assess risk, define controls, and formally accept residual risk for specific operations and changes.

*Table 7: Example List of Safety Risk Management Records / Artifacts*

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Hazard Register / Risk Control Register	Log of hazards, assessed risk, controls, owners, and links to supporting evidence.	Includes Part 133 load/hook hazards, Part 137 drift/chemical hazards, Part 135 weather/IFR/pax hazards.	Part 5.97: retain SRM outputs while controls remain relevant; supports consistent, repeatable SRM.
Mission / Job Safety Analysis (JSA) and Pre-Flight Risk Assessment	Point-of-work forms capturing hazards, mitigations, and go/no-go decisions.	Tailor to external-load plans, ag mix/load and wind limits, and Part 135 legs (alternates, duty/rest, terrain/night).	Shows controls were applied where risk is highest; enables trending and targeted mitigations.

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Management of Change (MOC) Package (screening + SRM + approvals)	Pre-implementation evaluation for changes (aircraft, routes, bases, equipment, vendors, procedures).	Triggers: new load class/mission type, new chemical/material, new Part 135 schedule/customer profile or dispatch tool.	Preserves rationale for controls and sets up later verification under Safety Assurance.

### 3. Safety Assurance

Evidence that controls are working, using audits, surveillance, data trending, and corrective actions to maintain and improve performance.

Table 8: Example List of Safety Assurance Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Audit / Surveillance Program Records (plan, checklists, findings)	Internal evaluations verifying compliance and effectiveness (what, who, when, results).	Targeted checks for Part 133 rigging/briefings, Part 137 chemical handling/job logs, Part 135 records integration (pilot/training/load manifest).	Part 5.97: retain SA outputs at least 5 years; audits detect drift before it becomes an accident.
Safety Performance Monitoring (SPM) Logs / Dashboards	Records of SPIs, trends, analysis, and decisions (rates, exceedances, repeat hazards).	Example metrics: load events per hour, spray deviations per job, unstable approaches per 100 legs, maintenance write-up trends.	Turns records into actionable safety intelligence and demonstrates SMS effectiveness.
Corrective Action Plan (CAP) Tracker + Effectiveness Reviews	Closed-loop record linking events to root cause, actions, evidence, verification, closure.	CAPs often update procedures, training, and operational control across 133/137/135.	Proves hazards are addressed sustainably, supports inspections, and prevents recurrence.

### 4. Safety Promotion

Ensures personnel are competent, informed, and engaged through training, communication, and lessons-learned sharing.

Table 9: Example List of Safety Promotion Records / Artifacts

Example record / artifact	Definition	133 / 137 / 135 linkage	Why it matters (Part 5)
Training Matrix + Individual Training Records (SMS and ops-specific)	Role-based training requirements plus individual completion/currency records.	Integrate Part 133 external-load procedures, Part 137 knowledge/skills, and Part 135 training/checks and duty compliance.	Part 5.97(c): retain SMS training records while employed; supports standardization and defensibility.
Safety Communications Archive (bulletins, alerts, read-and-sign logs)	Retained communications plus distribution/receipt evidence (slides, memos, acknowledgments).	Seasonal campaigns (ag peak), external-load alerts, and Part 135 passenger/IFR risk reminders.	Part 5.97(d): retain communications at least 24 months; proves workforce was informed of hazards/controls.
Debrief / Lessons-Learned Records (post-mission, periodic reviews)	Structured capture of what changed, what was risky, and improvement actions.	Use for complex lifts, repeated spray jobs, and Part 135 customer/route patterns; link to hazard register and CAPs.	Accelerates learning and closes the loop from events to improved procedures and training.

# Station #3: Emergency Response Plan

## What is an Emergency Response Plan?

An Emergency Response Plan (ERP) is a written guide that tells people what to do when something serious goes wrong. In aviation, emergencies are stressful, fast-moving, and often confusing. An ERP removes guesswork by setting out:

- What actions to take
- Who to contact
- What information to collect
- What should and should not be said

An ERP is written before an emergency happens, so people do not have to think under pressure.

## Why is an ERP important?

Emergencies rarely happen when the “right” people are available. Often, the first person involved is:

- Inexperienced
- Working alone
- Not a manager
- Not trained to make big decisions

## An ERP gives that person:

- A clear starting point
- Confidence to act
- A structure to follow

If someone can open a document and calmly work through it step by step, the ERP is doing its job.

## What does a good ERP look like?

### A good ERP is:

- **Simple:** written with short sentences and clear actions
- **Practical:** written for real people who need some help. It is not written in legalese or for a regulator to tick a box.
- **Accessible:** It must be easy to find during an emergency. You should be able to put your hand on it immediately.
- **Scalable:** It is appropriate for the size of the organization

### The Format is flexible; it can be:

- Printed posters or flip charts
- Digital documents
- Apps or intranet access

If it is hard to read or hard to find, it will not be used!

## What should be in an ERP?

Start by listing emergencies that could realistically affect your operation, based on:

- Aircraft, type of operation and activities
- Location and facilities
- Available resources
- Number of staff
- Operating hours

Each ERP should reflect your organization, even though many emergency types are common across aviation. Common aviation emergencies include:

- Aircraft accident or serious incident
- Overdue or missing aircraft
- Medical emergency
- Fire (aircraft or building)
- Fuel spill or hazardous materials
- Severe weather or natural disaster
- Security threat
- Media or public enquiries

## How do you create an ERP?

The easiest way to start is to work backwards.

### Imagine:

- An emergency has just happened.
- The least experienced person in your organisation is the one dealing with it.

### Ask yourself:

- What do they need in front of them to get through the next 30 minutes?

### The Solution:

- That document is your ERP.
- It does not need to be perfect.
- It needs to be clear, usable, and realistic.

## Key Point

An ERP does not stop emergencies. It helps people respond calmly, consistently, and safely when one happens.

*Note: For U.S. aviation organizations with a single pilot who is the sole individual performing all necessary functions, the following Part 5 regulatory sections for coordination of emergency response planning are exempted from the implementation requirements: § 5.27(a), 5.27(a).*

## Station #4: Safety Risk Management

Managing safety is about controlling the risk from hazards, which means trying to prevent bad things from happening, or if something does go wrong, trying to minimize the consequences of the hazard event. Every SYSTEM has hazards and some level of risk associated with it. What do we do about it?

The SMS component “Safety Risk Management” (SRM) plays a key part within an SMS through proactive methods. Robust risk management is a strong indicator of safer operations.

### Key Definitions:

- Hazard - a condition or an object that could foreseeably cause or contribute to an incident or aircraft accident, as defined in 49 CFR 830.2.
- Consequence – the effect or result of a particular action or situation, often one that is bad or not convenient.
- Risk – the predicted likelihood (probability) AND severity of the consequences or outcomes of a hazard.
- Mitigation or Control – a means to reduce or eliminate the effects of hazards (also a barrier).
- Threats – events or errors that occur beyond the influence of the personnel, increase operational complexity, and which must be managed to maintain the margins of safety.
- Error – an action or inaction by personnel that leads to deviations from organizational or the operational person’s intentions or expectations.
- Violation – a deliberate act of willful misconduct or omission resulting in a deviation from established regulations, procedures, norms or practices.

### Integral elements to SRM:

- Understand the environment/system in which you operate or perform a task.
- Know the processes/procedures you use to complete the operation or task. “What do you do to get it done?” (a step-by-step flowchart can be useful for this)
- Identify the hazards that may or have been encountered during the operation or task.
- Understand the potential impact/consequence of an identified hazard through a process of analysis and assessment.
- Determine risk acceptability of the hazard occurring.
- If the risk is deemed unacceptable, implement appropriate mitigations/controls to eliminate the risk or reduce it to an acceptable level.

There are certain conditions in which the SRM process is required to be applied:

[14 CFR Part 5 §5.51 – Applicability]

- Implementation of new systems.
- Revision of existing systems.
- Development of operational procedures.
- Identification of hazards or ineffective risk controls through the safety assurance processes.

In conducting the system analysis, the following information must be considered:

- (1) Function and purpose of the system.
- (2) The system's operating environment.

- (3) An outline of the system's processes and procedures.
- (4) The personnel, equipment, and facilities necessary for operation of the system.
- (5) The interfaces of the system.

When a hazard has been identified, an organization must analyze and assess the risk associated with it by looking at the severity and likelihood. The purpose is to facilitate the determination of a risk level and assign a value to it, thereby providing the organization a better understanding of the hazard's potential impact and acceptability. A risk matrix is an effective tool that provides aviation organizations with a way to integrate the effect of severity of the outcome and the probability of occurrence. Aviation organizations are then able to assess risks, compare potential effectiveness of proposed risk controls, and prioritize risks where multiple risks are present. This enables you to assess risks using quantitative or qualitative estimates.

Risk Probability	Risk Severity				
	Catastrophic (A)	Hazardous (B)	Major (C)	Minor (D)	Negligible (E)
Frequent (5)	5A	5B	5C	5D	5E
Occasional (4)	4A	4B	4C	4D	4E
Remote (3)	3A	3B	3C	3D	3E
Improbable (2)	2A	2B	2C	2D	2E
Extremely Improbable (1)	1A	1B	1C	1D	1E

Figure 3: Example Risk Matrix

Our strategic objective is to manage the safety risks to a level As Low As Reasonably Practicable (ALARP) or Acceptable Level of Safety (ALoS)

- A point at which a risk is reduced so low that further risk reduction measures are not required.
- Any further risk reduction is either impractical or is grossly outweighed by the costs.
- Simply a balancing of risk reduction feasibility and the cost of achieving it.

**Risk mitigation/control methods are often grouped into the following categories:**

- Elimination
- Substitution
- Engineering Controls
- Administrative Controls
- Personal Protective Equipment

**Risk mitigation/control considerations:**

- Residual Safety Risks – The degree of safety risk that remains after the implementation of the initial mitigation and which may necessitate additional risk control measures.
- Unintended Consequences (Substitute Risk) – The introduction of new or different risks associated with the implementation of any mitigation alternative.
  - Unexpected drawback – unexpected detriments that occur in addition to the desired effect of the solution.
  - Perverse results – the intended solution makes the problem worse.
  - Unexpected benefits – a positive, yet unexpected or unpredictable outcome from an action.

## Station #5: Safety Assurance

**Safety Assurance (SA)** – Evaluates the continued effectiveness of implemented risk control strategies; supports the identification of new hazards.

- Systematically provide confidence that organizational outputs meet or exceed safety requirements
- Provides insight for methods/opportunities for improving safety and minimizing risk

### Key Elements:

- Safety performance monitoring and measurement.
  - Acquire data with respect to your operations, products, and services.
- Safety performance assessment.
  - Determining effectiveness of risk management and achieving safety objectives.
- Continuous improvement.
  - Correct/fix safety performance deficiencies.

### Safety Objectives (linked to Safety Policy)

- Method for measuring performance
- Reflective of company's type of operation
- Updated on a regular basis
- Realistic

Why monitor your operational processes and environment by reviewing data collected?

- Identify new hazards
- Measure the effectiveness of safety risk controls
- Ensure compliance with regulatory requirements applicable to the SMS
- Assess impacts on aviation safety (linked to SRM system analysis)
- Ensure the safety assurance function is based upon a comprehensive plan
- Seek out vulnerabilities

### Data Collection methods

- SPIs (Specific Performance Indicators - Indicators of risk/ Examples: MEL, Hazard reports, Hot Starts)
- SPTs (Specific Performance Targets support organization safety objectives)
- Auditing and evaluations of operational processes and systems
- Employee reporting system
- Personal interviews
- Accident/Incident reports
- Monthly Safety Meetings and Quarterly Safety Council Meetings
- "Toolbox Talks" or "Tailgate" Meetings

### Internal Audit Program

- Monthly or quarterly tasks by company departments - reviewed by Safety Director
- Establish an Internal Audit Program (IAP) to assess the full scope of processes

- IAP focuses on policies, processes and procedures that provide risk controls to confirm their effectiveness

### **Safety Performance Assessment (SPA)**

The SPA process is where these decisions are made about safety performance. The SPA process should consider who makes the decisions regarding whether the company's safety performance is effective and whether the company is meeting its safety objectives and expectations that are identified in the safety policy.

- Decisions are typically made by personnel with assigned responsibility and authority (i.e. Process Owners/managers, Safety Review Committee or working group).
- The conclusions of the SPAs are reported to the Accountable Executive, who possesses ultimate authority to act on such conclusions, as necessary.
- SPAs should be accomplished at a frequency to permit a change in processes or procedures to better align the organization to meet the safety objectives.

### **Continuous Improvement**

Safety assurance processes support improvements to the SMS through continual verification and follow-up actions.

- Continuous improvement is a characteristic of a "learning culture" that enables proactive risk management through process assessment and improvement.
- This process is designed to ensure that you are correcting sub-standard safety performance identified during the safety performance assessment.

### **Corrective and Preventative Action (CAPA) Plans**

- The identification of planned actions that must be taken in response to the finding.
- An implementation schedule, including a timeframe for putting corrective actions in place.
- The assignment of the individual(s) who have the responsibility for implementing each of the corrective steps (should reside with the operational departments cited in the finding).

### **The Management of Change (MOC)**

Organizations, regardless of the size, are involved in continual change. Change may affect the effectiveness of existing safety risk controls. In addition, new hazards, and related safety risks may be inadvertently introduced into an operation when change occurs. Before implementing changes, a change management process (which includes a risk assessment) should be used to proactively identify the adverse effects to processes, procedures, products and services.

### **Summary**

- Evaluates the continued effectiveness of risk controls
- Supports the identification of new hazards
- Ensures compliance with FAA SMS standards
- Provides insight for improving safety and minimizing risk
- SA will continue to evaluate and improve service

**Note:** For U.S. aviation organizations with a single pilot who is the sole individual performing all necessary functions, the following Part 5 regulatory sections for safety assurance are excepted from the implementation requirements: § 5.71(a)(7).

## Station #6: Safety Promotion

Safety promotion encourages a positive safety culture and helps achieve safety objectives through the combination of technical competence that is continually enhanced through training and education, effective communication, and information-sharing.

Effective safety management cannot be achieved solely by mandate or strict adherence to policies and procedures. Safety promotion affects both individual and organizational behavior, and supplements the organization's policies, procedures and processes, providing a value system that supports safety efforts.

### Key Elements:

- Competencies and training
- Safety communication

Aviation organizations are required to provide initial safety training for employees so they can perform their SMS-related duties.

- Training should be specific to employee roles and responsibilities regarding their duties associated with the sustainment of the SMS.
- It is the responsibility of all aviation organizations to determine their training needs based on operational requirements.
- This training is to ensure the individuals attain and maintain the competencies necessary to perform their duties relevant to the operation and performance of the SMS.

Competency is an observable, measurable set of skills, knowledge, abilities, behaviors, and other characteristics that individuals exhibit as they successfully perform work functions.

- Competencies are typically required at different levels of proficiency depending on the work roles or occupational function.
- Aviation organizations should establish competencies for all employees commensurate with their duties relevant to the operation and performance of the SMS.

Operators must develop and maintain means for communicating safety information that, at a minimum:

- Ensures that employees are aware of the SMS policies, processes, and tools that are relevant to their responsibilities.
- Conveys hazard information relevant to the employee's responsibilities.
- Explains why safety actions have been taken.
- Explains why safety procedures are introduced or changed.
- Informs employees on SMS performance.

Effective communication involves adjusting the content and way the information is delivered to match the employee's role in the organization.

- Helping to raise safety awareness among employees.
- Open communication creates effective relationships and builds trust.

- Trust is fundamental because employees are not going to reveal what's really on their minds or what's really going on. (connected with safety culture)

The Accountable Executive must ensure that communication mechanisms are available and are effectively utilized. Examples include newsletters, bulletins, notices, websites and/or emails.

Safety Promotion is the human system that powers Risk Management. Key themes include

## SAFETY PROMOTION IN PRACTICE

:

- Training the right people on the right risks
- Communicate hazards before they become accidents
- Share lessons learned continuously
- Close the loop with feedback
- Measure participation and timeliness

Below are some useful safety training, communication and lessons learned resources to use in your safety promotion process:

### Regulatory Foundations and Manuals

- [ICAO Doc 9859](#) (Safety Management Manual)
  - Global standard for SMS principles
- [AC 120-92D](#) - SMS for Aviation Service Providers
  - Primary roadmap for US SMS implementation.
- [UK CAA CAP 795 & 1059](#)
  - SMS guidance for any size organization
- [FAA-H-8083-21B](#) - Helicopter Flying Handbook
  - Essential reference for rotorcraft airmanship

- [Safety Management Implementation](#) (ICAO)
- [European Safety Promotion Network Rotorcraft](#) (ESPN-R)
- [Safety Training and Promotion](#) (UK CAA)
- [SkyWise Alerts](#) (UK CAA)
  - Instant safety news and regulatory alert system
- [FAAS Team Online Course Catalog](#) (FAA Safety)
  - The repository for FAA-approved eLearning.
- [FAA Lessons Learned Library](#)
  - Ready-to-use accident safety briefings
- [FAA From the Flight Deck Videos](#)
  - Visual guides to airports and complex geometry
- [Safety Management System](#) (FAA)
- [NTSB Safety Alerts](#) (including Helicopters)
  - Short, operationally focused safety actions
- [NASA ASRS – CALLBACK Newsletter](#)
  - De-identified narratives for safety meetings
- [Flight Safety Foundation](#) (FSF) Briefing Notes
  - Training material (e.g., ALAR, CFIT, TEM)

### Reporting and Just Culture Tools

- [NASA ASRS Electronic Report](#) Submission
  - Forms for [pilots](#) (B), [maintenance](#) (D), [UAS](#) (U)
- [Just Culture Toolbox](#) (ATM Partners for Just Culture)
  - An aid for fostering open reporting
- [Safety Culture White Paper](#) (AESA)
  - Parameters for Safety Culture Framework

### Training and Outreach Media

- [US Helicopter Safety Team USHST H-SE Podcasts](#)
  - Safety Culture, Managing Risk, Spatial D, etc.

**Note:** For US aviation organizations with a single pilot who is the sole individual performing all necessary functions, the following Part 5 regulatory sections for safety promotion are excepted from the implementation requirements: § 5.93, 5.97(d).

## Station #7: Safety Culture / Just Culture

Safety Culture is defined as a set of beliefs, values, customs, and behaviors that members of a group use to relate to their world and each other regarding safety.

Cultures are the product of the values and actions of the organization's leadership as well as the results of organizational learning. Cultures are not really "created" or "implemented;" they emerge over time and because of experience.

Organizations cannot simply purchase a software program, produce a set of posters filled with buzzwords, require their people to attend an hour of slide presentations, and instantly install an effective SMS. As with the development of any skill, it takes time, practice and repetition, the appropriate attitude, a cohesive approach, and constant coaching from involved mentors.

### Safety Culture Elements

Informed Culture	Those who manage and operate the system have current knowledge about the human, technical organizational, and environmental factors that determine the safety of the system as a whole.
Reporting Culture	An organizational climate in which people are prepared to report safety lapses and potential safety hazards.
Just Culture	An atmosphere of trust in which people are encouraged (even rewarded) for providing essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behavior.
Learning Culture	An organization must possess the willingness and the competence to draw the right conclusions from its safety information system and the will to address problems identified through the reporting culture, and possibly implement major reforms.
Flexibility Culture	A culture in which an organization is able to reconfigure themselves in the face of high tempo operations or certain kinds of hazards - often shifting from the conventional hierarchical mode to a flatter mode.

Figure 4: Safety Culture Elements (adapted from James Reason)

For an organization to be aligned and achieve a positive level of safety culture (and SMS success), there is a mutual obligation among all members of the system to be accountable for their choices. By fostering an environment in which people can speak up to address system vulnerabilities or individual errors, that accountability can truly yield a proactive outcome for the organization's ability to properly manage risk.

### Just Culture

- It is a culture in which employees are not punished for actions, omissions or decisions taken by them which are commensurate with their experience and training, but where gross negligence, willful violations and destructive acts are not tolerated.
- It is a shared responsibility by the organization leadership and the employees.
- The organization is accountable for:
  - The "system" they have designed
  - Responding to the behaviors of their employees in a fair and just manner

- The employee is accountable for:
  - Quality of their choices
  - Reporting both their errors and system vulnerabilities
  - Do no harm
  - Duty to follow procedures

### JUST CULTURE REQUIRES STRUCTURE

- Clear reporting channels
- Protection boundaries defined in policy
- Rapid acknowledgment (48–72 hours)
- Visible corrective action
- Leadership modeling non-punitive response

### Safety Culture Success

Areas in which all levels of the organization must help to effectively manage their culture are:

- The influences that the organization can have on an individual(s)
- At-risk behaviors/decisions
- Due diligence
- Personal courage

**“Without trust, reporting stops. Without reporting, learning stops.”**

### Reporting & Just Culture resources

- [EU Regulation 376/2014](#) – Occurrence Reporting (EASA)
  - Legal foundation for EU reporting & just culture protections.
- [EUROCONTROL Just Culture Resources](#)
  - Policy guidance and boundaries for non-punitive reporting.
- [FAAAC 00-46F – Aviation Safety Reporting Program](#)
  - Explains U.S. voluntary reporting protections.
- [14 CFR § 91.25 – ASRP Protection](#) (National Archives – Electronic CFR)
  - Regulatory protection of reports (with limited exceptions).
- [NASAASRS Electronic Report Submission](#)
  - Direct reporting portal for crews

### Leadership & Safety Culture Tools

- [FAA M-SCAIT Toolkit](#) (Maintenance safety, culture assessment, and improvement tools)
  - FAA Compliance Program (Compliance Philosophy: Regulatory framework emphasizing correction and learning over punishment — foundational to just culture leadership.)
- [NTSB Party Guidance](#) (Investigation Participation)
  - Helps operators convert investigations into learning.
- [NTSB CAROL Database](#) (Aviation Investigation Search)
  - Searchable accident/recommendation database for internal safety dissemination.

## Station #8: EASA / FAA / Other CAA Engagement

Aviation organizations that have implemented an SMS may also have a regulatory requirement for SMS compliance depending on their type of operation and/or the country in which they operate in.

Once compliance has been declared to the regulatory agency, aviation organizations should expect verification through the agency’s defined surveillance process. It is recommended that aviation organizations be proactive with their inspectors and certificate management team to demonstrate proactiveness and transparency.

For US aviation organizations, the [FAA document 8900.1, Volume 17](#) provides guidance to inspectors for planning, observing, and evaluating an operator’s SMS. Aviation organizations should review this document to better understand what is expected and how their inspectors will perform surveillance using the Safety Assurance System (SAS). The job aids typically utilized by inspectors are Data Control Tools (DCTs) that can be found in the FAA’s Dynamic Regulatory System (DRS) under the SAS selection.

To access the full DCTs, go to: [https://drs.faa.gov/browse/SAS\\_AXH\\_DCT/doctypeDetails](https://drs.faa.gov/browse/SAS_AXH_DCT/doctypeDetails)

For US operators required to submit a Declaration of Compliance to the FAA no later than May 28, 2027, there are several requirements that must be included to be considered acceptable under [14 CFR § 5.9\(a\)\(2\)](#):

- The name of the aviation organization and its certificate number (if applicable),
- The physical address of the aviation organization,
- A statement that the aviation organization has developed and implemented an SMS that meets the requirements of 14 CFR part 5, and
- A signature from the accountable executive or another senior member of management.

Types of correspondence with the FAA:

*Table 10: List of Types of Correspondence with the FAA*

Type of Record	File Name	Example
For correspondence sent from the FAA	[YYYYMMDD] [FAA] [Name or Designator] [Brief Description/Subject]	20230326 FAA AEHG GOM Ltr Accept
For correspondence sent to the FAA	[YYYYMMDD] [Name or Designator] [Brief Description/Subject]	20230326 FAA AEHG GOM DCT Response
Manuals	[Designator] [Manual Name or Abbreviation] [Revision Level]	AEHG GMM Manual Rev12
Certificates	[YYYYMMDD] [Designator] [Certificate]	20231206 AEHG Certificate
Operations Specifications (OpSpecs) / Letters of Authorization (LOA)	[YYYYMMDD] [OpSpec / LOA]	AEHG A001
Memorandums	[YYYYMMDD] [Issuing Office] [Receiving Office] [Brief Description/Subject]	20230326 S019 AFS200 Memo Deviation 119 Personnel
Other Media	[YYYYMMDD] [FAA Office] [Designator] [Brief Description/Subject]	20230326 S019 AEHG Low Flying

## Example SMS Declaration of Compliance document for the FAA

### FAA Safety Management System

#### Declaration of Compliance for [Name of Aviation Organization]

[Name of Aviation Organization] has prepared this declaration of compliance document in accordance with 14 CFR §5.9(a)(2) to demonstrate the organizations' compliance with 14 CFR Part 5 Safety Management System (SMS) regulation.

[Name of Aviation Organization] recognizes that SMS is vital to the continued success of the organization. Therefore, the company has developed and implemented a fully functioning SMS that meets the requirements of Part 5.

Signed,

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[Name of Person], Accountable Executive [or another senior member of management]

[Name of Aviation Organization] Certificate Number: \_\_\_\_\_ [if applicable, for Part 135 certificate holders]

[Name of Aviation Organization] Operator Designator Code: \_\_\_\_\_ [if applicable, for Part 91.147 LOA holders]

[Name of Aviation Organization] Physical Address: \_\_\_\_\_

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#### Notes for consideration when drafting the declaration of compliance document:

- *The Certificate Number applies to Part 135 certificate holders.*
- *The Operator Designator Code applies to Part 91.147 LOA holders.*
- *Text in brackets is not to be included in your final version that is submitted – information only.*
- *This template was drafted IAW: AC 120-92D, section 3.2.5.3; FAA Notice 8900.737 (Eff. 5/28/25); guidance from AFS-940, Safety Management Branch.*
- *The Aviation Organization must submit a declaration of compliance to their FAA Flight Standards District Offices (FSDO) or certificate management office (CMO); i.e. principal inspector (PI)/aviation safety inspector (ASI).*
- *This document may be signed by another senior member of management instead of the Accountable Executive, i.e., Part 119.69 personnel*
- *A "Compliance Statement" is different from this declaration document and is necessary only for new Part 135 applicants (i.e., the statement includes the matrix/list of all applicable sections contained in Part 5. See AC 120-92D, Appendix D).*

## Station #9: SMS Resources & Technologies

Numerous SMS resources are available to help organizations and individuals. We encourage you to collaborate with other operators to share best practices and lessons learned.

The resource list below is a subset of a more comprehensive list available throughout this document and also located in the [VAI SMS Workshop Resource Hub](#).

### 1. International Standards & Guidance

- ICAO International Policy
  - [ICAO Annex 19](#) — more information and a downloadable Executive Summary
  - [Safety Management Manual \(SMM\) — Doc 9859](#)  
More information on how to obtain guidance material on safety management principles and concepts, State Safety Program, and SMS
- [European Aviation Safety Agency \(EASA\) Safety Management](#)
- [Transport Canada Civil Aviation \(TCCA\) SMS](#)
- [Civil Aviation Safety Authority \(CASA\) of Australia SMS](#)
- [Civil Aviation Authority of New Zealand \(CAA NZ\) SMS](#)
- [National Civil Aviation Agency \(ANAC\) of Brazil State Safety Program \(SSP\)](#)

### 2. United States Policy and Guidance

- [United States State Safety Program \(SSP\) Document \(PDF\)](#)
- [FAA Order 8000.369 \(as amended\), Safety Management System](#)
- [FAA Order 8040.4, Safety Risk Management Policy](#)
- [FAA Order 8040.6, Unmanned Aircraft Systems Safety Risk Management Policy](#)
- [FAA Order VS 8000.370, Aviation Safety \(AVS\) Safety Policy](#)
- [FAA Order VS 8000.367, AVS Safety Management System \(AVSSMS\) Requirements](#)
- [SRM Guidance Involving External Stakeholders](#)
- Air Operators / MROs / Flight Training (Oversight by FAA Flight Standards)
  - [AC 120-92 — Safety Management Systems for Aviation Service Providers](#)
- [SMS for Airports and Airport Projects](#)
- [Air Traffic Organization \(ATO\) Safety and Technical Training](#)
- [Commercial Space Transportation SMS Manual](#)
- [Aircraft Certification Service \(AIR\)](#)
  - [Advisory Circular \(AC\) 21-58, Safety Management Systems for Part 21 Type and Production Certificate Holders](#)
  - [Order 8120.24, Implementation Plan Approval, Verification, and Evaluation of Safety Management Systems for Design and Production Approval Holders](#)

- Regulatory Requirements
  - [14 CFR part 5, Safety Management Systems](#)
- Additional Links
  - [FAA Data Sharing; Aviation Safety Information Analysis & Sharing \(ASIAS\)](#)
  - [NASA's Aviation Safety Reporting System \(ASRS\)](#)
  - [Common Issues in SMS Review and Validation](#) (PDF)

### 3. Industry Resources

- [Vertical Aviation International](#) (VAI)
  - [Safety Resources – all](#)
  - [Aviation Safety Action Program](#)
  - [Spotlight on Safety](#)
  - [Safety Management System](#)
  - [Flight Data Monitoring](#)
  - [Fatigue Risk Management](#)
  - [Health Usage Monitoring System](#)
- [US Helicopter Safety Team](#) (USHST)
  - [Peer Pilot Program](#)
  - [Helicopter Safety Enhancements](#)
  - [Training Resources](#)
- [Vertical Aviation Safety Team](#) (VAST)
  - [Safety Resources](#) – Keyword SMS
- [FAA Safety Team](#) (FAASTeam)
  - The Rotorcraft Collective [YouTube playlist](#)
- [SKYbrary](#)
  - [Safety Management](#)
  - [Safety Management International Collaboration Group \(SM ICG\) Industry Products](#)
  - [SMS Evaluation Tool](#)
  - [SMS for Small Organizations](#)
- [European Safety Promotion Network Rotorcraft](#) (ESPN-R)
- [International Air Transport Association](#) (IATA)

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Chris Young

**“It’s not about having an  
SMS, it’s what you do  
with SMS.”**

**~ Robert Sumwalt**

